

## INTRODUCTION

The purpose of the City of Grovetown (City), Georgia's Stormwater Management Program (SWMP) is to implement and enforce a program designed to reduce the discharge of pollutants from the Municipal Separate Storm Sewer System (MS4) to the maximum extent practicable in order to protect water quality and to satisfy the appropriate water quality requirements of the State Act and Rules (Chapter 391-3-6-.16). The activities shown herein contain the standard operating procedures, schedules, inspection forms, and other documents needed to support the implementation of the requirements of the State of Georgia Environmental Protection Division of the Department of Natural Resources (EPD) authorization to discharge under the General National Pollutant Discharge Elimination System (NPDES) Stormwater Permit No. GAG610000 (Permit). The SWMP includes:

- Minimum Control Measures:
  1. Public Education and Outreach on Stormwater Impacts
  2. Public Involvement/Participation
  3. Illicit Discharge Detection and Elimination (IDDE)
  4. Construction Site Stormwater Runoff Control
  5. Post-Construction Stormwater Management in New Development and Redevelopment
  6. Pollution Prevention/Good Housekeeping for Municipal Operations
- Enforcement Response Plan (ERP)
- Impaired Waters
- Sharing Responsibility
- SWMP Modifications

Each Minimum Control Measure (MCM) contains multiple Best Management Practices (BMPs) serving as the City's compliance strategy to meet the requirements of the Permit. Development of the SWMP is in close consultation with the Permit. The City believes the SWMP will serve as a valuable means to address the requirements of the Permit and to control water pollution in the City's streams.

## MCM 4.2.1 PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS

**Permit Requirement:** The permittee must implement a Public Education Program to distribute educational materials to the community and/or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

#### **4.2.1.1 BMP 1 Municipal Website**

##### **Description:**

The City's Public Education Program includes maintaining a municipal website for disseminating information to the general public. The website is available at <https://www.cityofgrovetown.com>. The Public Works Department's page includes a stormwater management page at <https://www.cityofgrovetown.com/192/Stormwater-Management> with information about Stormwater Management. Additionally the City website contains a recycling page at <https://www.cityofgrovetown.com/228/Recycling> with information on pollution prevention and preservation of natural resources.

##### **Measureable Goal:**

The City will update the stormwater and recycling webpages as needed during the reporting period. Additionally, each year the number of visits to the City's website will be tracked.

##### **Method of Documentation of Activities:**

The City will provide a screenshot of the stormwater and recycling webpages. The number of visits to the website will also be reported with each annual report

##### **Implementation Schedule:**

- Date of implementation: July 2018
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Director of Leisure and Recreation

#### **4.2.1.2 BMP 2 Utility Bill Insert**

##### **Description:**

The City operates municipally owned water, sewer, and stormwater utilities serving the citizens of Grovetown. Customers are billed monthly for these services through the issuance of a single bill. The City provides educational materials addressing stormwater issues to the public in the form of a Utility Bill Insert that is mailed to 100% of water, sewer, and stormwater customers once each year. The insert includes information on the impacts of stormwater discharges, steps the public can take to reduce pollutants in runoff, hazards associated with the improper disposal of wastes, and water conservation, etc.

##### **Measureable Goal:**

The City will distribute the utility bill containing stormwater educational material to 100% of the City's water, sewer, and stormwater customers each year.

##### **Method of Documentation of Activities:**

The City will provide a copy of the utility bill insert with each annual report and report the month the stormwater insert was sent with the utility bill. Additionally, the number of customers that receive a utility bill insert will be provided with each annual report.

##### **Implementation Schedule:**

- Date of implementation: 2018
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Utility Billing Supervisor

### **4.2.1.3 BMP 3 Educational Brochures at Public Places**

**Description:**

The City's Public Education Program includes educational brochures at City Hall and Liberty Park containing information on the impacts of stormwater on water quality.

**Measureable Goal:**

The City will stock educational brochures at City Hall and Liberty Park at the beginning of the reporting period. On a monthly basis, the number of brochures collected will be noted using a tracking spreadsheet. This spreadsheet will note the beginning number of brochures and number collected each month.

**Method of Documentation of Activities:**

The City will provide the educational brochure tracking log and a copy of each educational brochure in each annual report.

**Implementation Schedule:**

- Date of implementation: 2018
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Human Resources Safety & Wellness Director

#### **4.2.1.4 BMP 4 Stormwater Education Town Hall**

**Description:**

The City will hold a town hall for communication with the public. Planning and development will provide stormwater education information to the public during the town hall, with the specific target audience of weekend warriors and contractors.

**Measureable Goal:**

The City will host a town hall containing information on stormwater management practices.

**Method of Documentation of Activities:**

The City will provide the sign in sheet from the town hall in each annual report.

**Implementation Schedule:**

- Date of implementation: June 2, 2018
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

## MCM 4.2.2 PUBLIC INVOLVEMENT/PARTICIPATION

**Permit Requirement:** The permittee must develop and implement a Public Involvement/Participation Program. The permittee must, at a minimum, comply with State and local public notice requirements when implementing a public involvement / participation program. The program should address the need for the public to be included in developing, implementing, and/or reviewing the stormwater management program. The program must make efforts to reach out and engage all economic and ethnic groups.

If the permittee has a website, the SWMP, as well as any updates, must be posted on the website.

#### **4.2.2.1 BMP 1 Bulk Waste and Yard Debris Collection**

##### **Implementation Description:**

The City provides free bulk waste and yard debris recycling to 100% of the citizens. This service allows residents to place certain bulk items and yard debris. This service is provided at certain times of the year. The City advertises this service and provides the pickup schedule on the Garbage Collection section of the City website. The website is available at <https://www.cityofgrovetown.com/206/Garbage-Collection>.

##### **Measureable Goal:**

Annually track the amount of bulk waste and yard debris collected. Continue to advertise service on City website.

##### **Method of Documentation of Activities:**

The City will provide a screenshot of the collection service on the website in each annual report. The amount of material collected annually will also be provided with each annual report.

##### **Implementation Schedule:**

- Date of implementation: within 30 days of EPD approval
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annually

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Director of Leisure and Recreation



#### **4.2.2.2 BMP 2 Pet Waste Station**

##### **Implementation Description:**

The City maintains a dog park at Goodale Park with Dog Waste Stations consisting of signage, dog waste bags, and a waste receptacle.

##### **Measureable Goal:**

The City will supply the dog waste stations with dog waste bags and empty the waste receptacles on a monthly basis.

##### **Method of Documentation of Activities:**

The City will provide a tracking log of waste bags distributed to the dog waste station during the reporting period in each annual report.

##### **Implementation Schedule:**

- Date of implementation: August 12, 2017
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Director of Leisure and Recreation

### **4.2.2.3 BMP 3 Mayor's City Cleanup Day**

**Implementation Description:**

The Mayor's City Cleanup Day is an opportunity for volunteers to engage in cleanup activities throughout the City. The City will supply protective gloves and trash bags for all participants.

**Measureable Goal:**

The City will host the Mayor's City Cleanup Day during the reporting period.

**Method of Documentation of Activities:**

The City will provide a copy of the volunteer sign-in sheet each annual report.

**Implementation Schedule:**

- Date of implementation: May 27, 2017
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Mayor

#### **4.2.2.4 BMP 4 Citizen Request Tracker**

##### **Implementation Description:**

The City provides a Citizen Request Tracker on its website (<http://ga-grovetown.civicplus.com/RequestTracker.aspx>) for anyone to contact the stormwater management program with complaints or concerns regarding MS4 infrastructure issues, water quality concerns, and erosion and sediment control violations. The City will maintain a log of all notifications received including the following information:

- Date of notification
- Address/location of concern
- Contact information
- Details of notification (MS4, water quality, IDDE, E&S, etc.)
- Resolution (e.g. work order generated, field investigation, conversation, etc.)

##### **Measureable Goal:**

Once a complaint is received, the City will investigate within 3 business days. Additionally, the City will maintain a log of notifications received through the Citizen Request Tracker page of the website.

##### **Method of Documentation of Activities:**

The City will provide a copy of the log with each annual report.

##### **Implementation Schedule:**

- Date of implementation: 2018
- Month/Year of each action: on-going
- Interim milestone dates: n/a
- Frequency of the action: as needed

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Director of Leisure and Recreation

## MCM 4.2.3 ILLCIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

**Permit Requirement:** The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges (as defined in 40 CFR Part 122.26(b)(2)) into its MS4. The permittee must:

- 4.2.3.1 Develop, if not already completed, a storm sewer map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls;
- 4.2.3.2 Prohibit through ordinance, or other regulatory mechanisms, non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions;
- 4.2.3.3 Develop and implement a plan to detect and address non-storm water discharges including illegal dumping to the MS4;
- 4.2.3.4 Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper disposal of wastes; and
- 4.2.3.5 Address the following categories of non-stormwater discharges or flows only if they are identified as significant contributors of pollutants to the MS4:
  - water line flushing
  - landscape irrigation
  - diverted stream flows;
  - rising ground waters
  - uncontaminated ground water infiltration (as defined in 40 CF Part 35.2005(20));
  - uncontaminated pumped ground water;
  - discharges from potable water sources;
  - foundation drains;
  - air conditioning condensation;
  - irrigation water;
  - springs;
  - water from crawl space pumps;
  - footing drains;
  - lawn watering;
  - individual residential car washing;
  - flows from riparian habitats and wetlands;
  - swimming pool discharges;
  - street wash water; and
  - flows from firefighting activities.

#### **4.2.3.1 BMP 1 Legal Authority**

**Description:**

The City maintains an illicit discharge prohibition ordinance within the City of Grovetown's Code of Ordinances that meets the requirements of the Permit.

**Measureable Goal:**

The City will evaluate, and if necessary, modify the existing ordinance during the reporting period.

**Method of Documentation of Activities:**

If the ordinance is revised during the reporting period, a copy of the adopted ordinance will be submitted with the annual report.

**Implementation Schedule:**

- Date of implementation: October 14, 2013
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

#### **4.2.3.2 BMP 2 Outfall Map and Inventory**

**Description:**

The City maintains an updated map and inventory showing the location of all outfalls from the MS4 and the names and locations of all waters of the State that receive discharges from those outfalls. Each year, the City will update the map to reflect the addition of outfalls from new infrastructure projects or developments. Additionally, the City will remove outfalls that have been reclassified or removed. The outfall map and inventory are included in Addendum C.

**Measureable Goal:**

The City will maintain an updated map and inventory showing the location of all outfalls from the MS4 and the names and locations of all waters of the State that receive discharges from those outfalls.

**Method of Documentation of Activities:**

The outfall map and inventory will be submitted with each annual report. The number of outfalls added during the reporting period and the total number of outfalls will be provided in each annual report.

**Implementation Schedule:**

- Date of implementation: December 2013
- Month/Year of each action: annual
- Interim milestone dates: n/a
- Frequency of the action: continuous

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Public Works Director

### **4.2.3.3 BMP 3 IDDE Plan**

#### **Description:**

The City's IDDE Plan consists of inspecting outfalls to ensure illegal dumping is not occurring, sampling any dry weather flow to determine if upstream facilities are discharging non-stormwater flows to the drainage system, and eliminating all identified illicit discharges.

The City is divided into five sectors and conducts annual dry weather screening such that 100% of the total outfalls are inspected within the 5-year permit term. The outfall sector map and screening schedule are included in Addendum C. If an outfall is added to the City during the reporting period, the outfall will be screened that year if it is located in the sector to be screened in that year, or if the outfall is located in a previously screened sector.

If a dry weather flow indicates a potential for an illicit discharge, the City implements investigative and follow-up procedures including the performance of field tests, sampling, source tracing, and removal. If the source of an illicit discharge is identified as deriving from an adjacent MS4, the City will notify that MS4.

The City ensures all identified illicit discharges are eliminated. If necessary, the City implements enforcement procedures described in the Enforcement Response Plan (ERP) in Part 4.3 of the Permit.

#### **Measureable Goal:**

The City will annually dry weather screen approximately 20% of the outfalls from the MS4, such that 100% of the total outfalls are screened within the 5-year permit term. The City will annually investigate 100% of suspected illicit discharges and ensure all identified illicit discharges are eliminated.

#### **Method of Documentation of Activities:**

The City will provide:

- the number of outfall inspections conducted,
- information on any illicit discharge detection activities performed, and
- information on any eliminated discharges or enforcement actions taken to eliminate illicit discharges

during the reporting period in each annual report.

#### **Implementation Schedule:**

- Date of implementation: December 2013
- Month/Year of each action: annual
- Interim milestone dates: n/a
- Frequency of the action: continuous

**Office or Position(s) Responsible for BMP Implementation/Coordination:**  
Public Works Director



#### **4.2.3.4 BMP 4 Education**

##### **Description:**

The City will conduct an educational activity explaining the hazards of illicit discharges and the improper disposal of waste as it relates to the potential for water quality impacts. The City operates municipally owned water, sewer, and stormwater utilities serving the citizens of Grovetown. The diverse customer base includes residential, commercial, retail, institutional, and industrial users.

##### **Measureable Goal:**

The City will implement a program to educate the public, businesses, and government employees about the hazards of illicit discharges. The City will distribute a utility bill insert containing stormwater educational material to 100% of the City's water, sewer, and stormwater customers each year. The City will devote a section of the utility bill insert to illicit discharges.

##### **Method of Documentation of Activities:**

The City will provide a copy of the utility bill insert with each annual report and report the month the stormwater insert was sent with the utility bill.

##### **Implementation Schedule:**

- Date of implementation: 2018
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Utility Billing Supervisor

#### **4.2.3.5 BMP 5 Complaint Response**

##### **Description:**

The City provides a Citizen Request Tracker on its website (<http://ga-grovetown.civicplus.com/RequestTracker.aspx>) for anyone to contact the stormwater management program with complaints or concerns regarding illicit discharges. The City will maintain a log of all notifications received including the following information:

- Date of notification
- Address/location of concern
- Contact information
- Details of notification (MS4, water quality, IDDE, E&S, etc.)
- Resolution (e.g. work order generated, field investigation, conversation, etc.)

##### **Measureable Goal:**

Once a complaint is received, the City will investigate within 3 business days. Additionally, the City will maintain a log of notifications received through the Citizen Request Tracker page of the website.

##### **Method of Documentation of Activities:**

The City will provide a copy of any documentation of compliance and enforcement activities on each illicit discharge related complaint received and/or investigated during the reporting period in each annual report.

##### **Implementation Schedule:**

- Date of implementation: 2013
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: continuous

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Public Works Director

## MCM 4.2.4 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

**Permit Requirement:** The permittee must develop, implement and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Stormwater discharges from construction activity disturbing less than one acre must be included in the permittee's program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The permittee must develop and implement a construction site stormwater runoff control program that contains the following elements:

- 4.2.4.1 An ordinance or other regulatory mechanism to require erosion and sediment (E&S) controls, as well as sanctions to ensure compliance, to the extent allowable, under State or local law;
- 4.2.4.2 Requirements for construction site operators to implement E&S control best management practices;
- 4.2.4.3 Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse water quality impacts;
- 4.2.4.4 Procedures for site plan review that incorporate consideration of potential water quality impacts;
- 4.2.4.5 Procedures for receipt and consideration of information submitted by the public; and
- 4.2.4.6 Procedures for site inspection and enforcement of control measures

#### **4.2.4.1 BMP 1 Legal Authority**

**Description:**

The City maintains a Soil Erosion, Sedimentation and Pollution Control ordinance within the City of Grovetown City's Code of Ordinances that requires construction site operators to control waste at the construction site, such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste.

**Measureable Goal:**

The City will evaluate, and if necessary, modify the existing Soil Erosion, Sedimentation and Pollution Control ordinance for compliance with the Permit during the reporting period.

**Method of Documentation of Activities:**

If the Soil Erosion, Sedimentation and Pollution Control ordinance is revised during the reporting period, a copy of the adopted ordinance will be submitted with the annual report.

**Implementation Schedule:**

- Date of implementation: September 9, 2013
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

#### **4.2.4.2 BMP 2 Site Plan Review Procedures**

##### **Description:**

The City is certified as a Local Issuing Authority, and remains in compliance with the Georgia Erosion and Sediment Control Act (GESA) of 1975 as amended in 2003. Accordingly, all developers are required to comply with the local Soil Erosion, Sedimentation and Pollution Control ordinance and obtain a land disturbance permit prior to the start of any land disturbing activities that will disturb one (1.0) or more acres of land within the city limits.

The City does not currently have a Memorandum of Agreement with Georgia Soil and Water Conservation Commission (GSWCC) such that in house reviews are performed; the City sends all Erosion, Sedimentation and Pollution Control (ES&PC) plans submitted for Land Disturbance Permits (LDP) to Natural Resource Conservation Service (NRCS) for review. The City ensures 100% of all plans are reviewed and approved by NRCS prior to issuance of a LDP.

##### **Measureable Goal:**

The City will implement site plan review procedures in accordance with the GSWCC requirements.

##### **Method of Documentation of Activities:**

The City will provide a list of the site plans received and the number of site plans reviewed, approved, or denied during the reporting period in each annual report.

##### **Implementation Schedule:**

- Date of implementation: n/a
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

#### **4.2.4.3 BMP 3 Inspection Program**

**Description:**

The City inspects all active construction projects within the city limits that maintain Land Disturbance Permits. Sites are inspected for compliance with their ES&PC plan.

**Measureable Goal:**

The City will implement construction site inspection procedures in accordance with the GSWCC requirements. These inspections ensure that structural and non-structural BMPs at construction sites are properly designed and maintained, and that construction site waste is properly controlled.

**Method of Documentation of Activities:**

The City will provide a list of active construction sites and any inspections conducted during the reporting period in each annual report.

**Implementation Schedule:**

- Date of implementation: n/a
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: continuous

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Building Official / Inspector

#### **4.2.4.3 BMP 4 Enforcement Procedures**

**Description:**

If upon inspection a construction site is found to be in non-compliance with the Soil Erosion, Sedimentation and Pollution Control ordinance, the LDP holder will be notified. The City implements enforcement procedures described in the ERP in Part 4.3 of the Permit and ensures all identified E&S violations are eliminated.

**Measureable Goal:**

The City will implement enforcement procedures for E&S violations documented at construction sites as described in the ERP in Part 4.3 of the Permit.

**Method of Documentation of Activities:**

The City will provide documentation of any enforcement actions taken during the reporting period in each annual report, including the number and type (e.g. Notice of Violation, Stop Work Order) and status (e.g. pending, resolved).

**Implementation Schedule:**

- Date of implementation: n/a
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: continuous

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Building Official / Inspector

#### **4.2.4.5 BMP 5 Complaint Response**

**Description:**

The City will implement procedures for receiving, investigating, responding, and tracking the E&S complaints.

**Measureable Goal:**

The City implements a program to receive, investigate, respond, and track E&S complaints (including complaint date, type of complaint, complaint status). City staff will investigate 100% of all water quality violation calls received. Additionally, staff will take appropriate action for 100% of complaints that require it.

**Method of Documentation of Activities:**

The City will provide information (e.g. complaint date, type of complaint, complaint status) on E&S complaints received and/or investigated during the reporting period in each annual report.

**Implementation Schedule:**

- Date of implementation: n/a
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: continuous

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Building Official / Inspector



#### **4.2.4.6 BMP 6 Certification**

**Description:**

GESA, as amended, requires all construction site operators and all local government staff involved with E&S inspections or ES&PC plan review receive training from the GWSCC on proper E&S control.

**Measureable Goal:**

The City ensures any MS4 staff involved in construction activities subject to the Construction General Permits (CGPs) are trained and certified in accordance with the rules adopted by the GSWCC.

**Method of Documentation of Activities:**

The City will provide copies of current GSWCC cards with each annual report.

**Implementation Schedule:**

- Date of implementation: n/a
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: continuous

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

## MCM 4.2.5 POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

**Permit Requirement:** The permittee must develop, implement and enforce a program to address stormwater runoff into the MS4 from new development and redevelopment projects, including projects less than one acre if they are part of a larger common plan of development or sale, as described in Parts 4.2.5.1 and 4.2.5.2. The program must ensure that controls are in place that will prevent or minimize water quality impacts. At a minimum, the Post-Construction Stormwater Management in New Development and Redevelopment Program must contain the following requirements:

- Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;
- Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State and local law; and
- Ensure adequate long-term operation and maintenance of the BMPs.

**Response:**

4.2.5.1 Stormwater Design Manual

The City will implement the appropriate parts of the latest version of the Georgia Stormwater Management Manual (GSMM) to the maximum extent practicable.

At a minimum, the City will apply the standards for new development and redevelopment to any site that meets one or more of the following criteria:

- New development that creates or adds 5,000 square feet or greater of new impervious surface area, or that involves land disturbing activity of one acre of land or greater.
- Redevelopment that creates, adds or replaces 5,000 square feet or greater of impervious surface area, or that involves land disturbing activity of one acre or more, including projects less than one acre if they are part of a larger common plan of development or sale.

For sites meeting the above criteria, the City will ensure that the minimum performance standards are applied during the site plan preparation and/or review process. The performance standards must be implemented to the maximum extent practicable.

The performance standards to be implemented are as follows:

Stormwater Runoff Quality/Reduction:

Stormwater runoff shall be adequately treated prior to discharge.

1. From December 6, 2017 until December 6, 2020, the City will address stormwater runoff using either Option (a) or Option (b) below:
  - a) The stormwater management system shall be designed to retain the first 1.0 inch of rainfall on the site, to the maximum extent practicable. The determination by the MS4 that it is infeasible to apply the stormwater runoff quality/reduction standard, on part or all of a project, will be documented with the site plan review documents. If the first 1.0 inch of rainfall can be retained onsite using runoff reduction methods, then additional water quality is not required. If the 1.0 inch cannot be retained onsite, the remaining runoff from a 1.2 inch rainfall event must be treated to remove at least 80% of the calculated average annual post-development total suspended solids (TSS) load or equivalent as defined in the GSMM.
  - b) The stormwater management system shall be designed to remove 80% of the average annual post-development TSS load or equivalent as defined in the GSMM. Compliance with this performance standard is presumed to be met if the stormwater management system is sized to capture and treat the water quality treatment volume, which is defined as the runoff volume resulting from the first 1.2 inches of rainfall from a site.

No later than December 6, 2020, the City will use approach 1(a) above to achieve compliance with this performance standard. The City will encourage all site plan reviewers, construction site inspectors, and other personnel whose duties involve post-construction stormwater runoff to receive training in the new GSMM and the runoff quality/reduction standard during that implementation phase.

Stream Channel/Aquatic Resource Protection:

Stream channel and/or aquatic resource protection shall be provided by using the following approaches: 1) 24-hour extended detention storage of the 1-year, 24-hour return frequency storm event; 2) erosion prevention measures such as energy dissipation and velocity control; and 3) preservation of the applicable stream buffer.

Overbank Flood Protection:

Downstream overbank flood protection shall be provided by controlling the post-development peak discharge rate to the predevelopment rate for the 25-year, 24-hour storm event.

Extreme Flood Protection:

Extreme flood protection shall be provided by controlling the 100-year, 24-hour storm event such that flooding is not exacerbated.

Trout Stream Protection:

For receiving waters with a trout stream designation, which contain outfalls from the City of Grovetown's MS4, the City will address the protection of the trout waters from impacts from the MS4 outfalls due to elevated temperature.

#### 4.2.5.2 Linear Transportation Projects

The City will apply the performance standards in Part 4.2.5.1 during the design of all construction projects. However, the performance standards may be infeasible to apply, all or in part, for linear transportation projects being constructed by the City, local governments, or authorities. The City may develop a feasibility program which sets reasonable criteria for determining when implementing the performance standards in linear projects is infeasible. The City may develop this feasibility program and submit it to EPD for review. Upon submittal to EPD, the City, local governments, and authorities may begin implementation of this feasibility program for linear transportation projects only.

#### 4.2.5.3 Green Infrastructure/Low Impact Development (GI/LID)

The City will continue to review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration. At a minimum, the City will assess those regulations governing road design and parking requirements. During the review, the City will consider the inclusion of incentives for use of GI/LID practices into the regulatory documents.

#### **4.2.5.1 BMP 1 Legal Authority**

**Description:**

The City maintains a stormwater maintenance, post construction, and long term maintenance of detention ponds ordinance within the City of Grovetown's Code of Ordinances that meets the requirements of the Permit.

**Measureable Goal:**

The City will evaluate, and if necessary, modify the existing ordinance during the reporting period.

**Method of Documentation of Activities:**

If the ordinance is revised during the reporting period, a copy of the adopted ordinance will be submitted with the annual report.

**Implementation Schedule:**

- Date of implementation: July 16, 2007
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

#### **4.2.5.2 BMP 2 Inventory**

**Description:**

The City maintains an inventory of all publicly-owned post-construction stormwater management structures (e.g. detention / retention ponds, water quality vaults) and those privately-owned structures designed after the December 9, 2008 deadline for adoption of the GSMM. The inventory includes information on the number and type of structures, and ownership (i.e. publicly-owned, privately-owned).

**Measureable Goal:**

The City will maintain an inventory of post-construction stormwater management structures and update the inventory as new structures are completed or existing structures are identified.

**Method of Documentation of Activities:**

The City will provide the updated inventory of post-construction stormwater management structures, including those structures added during the reporting period in each annual report.

**Implementation Schedule:**

- Date of implementation: December 2013
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Public Works Director

### **4.2.5.3 BMP 3 Inspection Program**

#### **Description:**

The City conducts inspections of all post-construction stormwater management structures included on the inventory required in 4.2.5.2 BMP #2, so that 100% of the structures are inspected within the 5-year permit term.

#### **Measureable Goal:**

The City will conduct annual inspections on approximately 20% of the post-construction stormwater management structures included on the inventory in 4.2.5.2 BMP #2, such that 100% of the structures are inspected during the 5-year permit term.

#### **Method of Documentation of Activities:**

The City will provide documentation of the post-construction stormwater management structure inspections conducted during the reporting period in each annual report.

#### **Implementation Schedule:**

- Date of implementation: n/a
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

#### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Public Works Director

#### **4.2.5.4 BMP 4 Maintenance Program**

**Description:**

The City implements a long-term operation and maintenance program for post-construction stormwater management structures included on the inventory in 4.2.5.2 BMP #2.

**Measureable Goal:**

The City will maintain all City-owned structures to the maximum extent practicable. Publicly-owned structures owned by other entities (e.g. Columbia County Board of Education), and privately-owned structures with construction completed after December 6, 2012 are maintained to the maximum extent practicable by:

- the City; or
- the owner/developer of the site in accordance with a maintenance agreement

**Method of Documentation of Activities:**

The City will provide a list of City-owned post-construction stormwater management structures maintained and the type of maintenance performed, including work orders of any maintenance activities performed during the reporting period.

The City will include a copy of all maintenance agreements recorded that reporting period.

A copy of maintenance letters sent to private pond owners will be provided with each annual report.

**Implementation Schedule:**

- Date of implementation: October 2013
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Water, Wastewater & Stormwater Operations Manager



#### **4.2.5.5 BMP 5 GI/LID Structure Inventory**

**Description:**

The City maintains an inventory of water quality-related GI/LID structures located within the city limits constructed after December 6, 2012, including the total number of each type of structure (e.g. bioswales, pervious pavement, rain gardens, cisterns, and green roofs). The inventory includes City-owned, publicly-owned by other entities, and non-residential privately-owned GI/LID structures.

**Measureable Goal:**

The City will maintain an inventory of water quality-related GI/LID structures located within the city limits constructed after December 6, 2012. The City will track new water quality-related GI/LID structures through the plan review process to ensure the structures are added to the inventory.

**Method of Documentation of Activities:**

The City will provide the updated inventory of water quality-related GI/LID structures located within the city limits constructed after December 6, 2012, including those structures added during the reporting period, in each annual report.

**Implementation Schedule:**

- Date of implementation: December 2014
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

#### **4.2.5.6 BMP 6 GI/LID Program**

##### **Description:**

The City will develop a program describing the GI/LID practices (e.g. better site planning techniques, better site design techniques) to be implemented by the City. The program shall include:

- the procedures for evaluating the feasibility and site applicability of different GI/LID techniques and practices to be considered;
- the GI/LID structures allowed to be constructed within the City's jurisdiction;
- procedures for the inspection and maintenance of the GI/LID structures, including City-owned, publicly-owned by other entities, and non-residential privately-owned GI/LID structures (e.g. who inspects, who maintains, inspection and maintenance schedule, method of documentation of inspection and maintenance activities).

##### **Measureable Goal:**

The City will submit the GI/LID program to EPD by February 15, 2020. The GI/LID program will be included in the SWMP and will be implemented by the City.

##### **Method of Documentation of Activities:**

The City will submit the GI/LID program to EPD by February 15, 2020. Thereafter, if the GI/LID program is revised during the reporting period, the revised GI/LID program will be submitted to EPD for review with the annual report.

##### **Implementation Schedule:**

- Date of implementation: December 2019
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

#### **4.2.5.7 BMP 7 GI/LID Inspection and Maintenance Program**

##### **Description:**

Beginning in 2020, the City will conduct inspections and/or ensure inspections are conducted on 100% of the GI/LID structures included in the inventory created in 4.2.5.5 BMP 5, within the 5-year permit term. The inspections will be completed in accordance with the schedule submitted in 4.2.5.6 BMP 6.

Beginning in 2020, the City will ensure maintenance is conducted as need on all GI/LID structures within the city limits.

##### **Measureable Goal:**

Beginning in 2020, the City conducts annual inspections on approximately 33% of the post-construction stormwater management structures included on the inventory in 4.2.5.2 BMP #2, such that 100% of the structures are inspected during the 5-year permit term.

Beginning in 2020, the City will conduct maintenance on the City-owned GI/LID structures, as needed.

Beginning in 2020, the City will implement the maintenance procedures in accordance with the GI/LID program submitted in 4.2.5.6 BMP 6 to ensure publically-owned by other entities and non-residential privately-owned GI/LID structures are maintained as needed.

##### **Method of Documentation of Activities:**

The City will provide documentation of the GI/LID structure inspections conducted during the reporting period in each annual report.

The City will provide the number of and percentage of the total City-owned GI/LID structures maintained during the reporting period in each annual report.

The City will provide documentation of publically-owned by other entities and non-residential privately-owned GI/LID structures maintained in each annual report.

##### **Implementation Schedule:**

- Date of implementation: 2020
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annually thereafter

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Public Works Director

**MCM 4.2.6**  
**POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR**  
**MUNICIPAL OPERATIONS**

**Permit Requirement:** The permittee must develop and implement an operation and maintenance program that includes a training component with the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Using training materials available from the USEPA and other organizations as guidance, the permittee must, as a part of this program, include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

#### **4.2.6.1 BMP 1 MS4 Control Structure Inventory and Map**

**Description:**

The City will continue to maintain an inventory and map of the MS4 control structures including:

- Catch basins,
- Ditches (miles or linear feet),
- Detention/retention ponds, and
- Storm drain lines (miles or linear feet)

**Measureable Goal:**

The City will annually update the inventory and map of the MS4 control structures owned and/or maintained by the City within the city limits.

**Method of Documentation of Activities:**

The City will provide the updated MS4 control structure map and inventory, the number of MS4 control structures added during the reporting period, and the total number of MS4 control structures in each annual report.

**Implementation Schedule:**

- Date of implementation: December 2013
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Public Works Director

#### **4.2.6.2 BMP 2 MS4 Inspection Program**

##### **Description:**

The City has been divided into five sectors and will be inspected such that each area will be inspected once and 100% of the regulated area of the City will be inspected over the course of the permit. A copy of the City's MS4 inspector sector map has been included in the attachments. Generally, the MS4 will be inspected for evidence of sedimentation, debris, or structural damage. Each year, the inspection results will be recorded in a GIS database. The database will be exported every year and provided with each annual report.

##### **Measureable Goal:**

The City will inspect the MS4 one sector per year such that the entire City will be inspected over the course of the permit.

##### **Method of Documentation of Activities:**

The City will provide the number and percentage of MS4 control structures inspected during the reporting period in each annual report.

##### **Implementation Schedule:**

- Date of implementation: September 2015
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

##### **Office or Position(s) Responsible for BMP Implementation/Coordination:**

Public Works Director

#### **4.2.6.3 BMP 3 MS4 Maintenance Program**

**Description:**

The City conducts maintenance on the MS4 control structures as needed. Maintenance is performed based on the results of the MS4 inspection program.

**Measureable Goal:**

The City will conduct maintenance on the MS4 control structures annually as needed.

**Method of Documentation of Activities:**

The City will provide the number of each type of MS4 control structure maintained during the reporting period in each annual report. Additionally, work orders of maintenance activities undertaken during the reporting period will be provided with each annual report.

**Implementation Schedule:**

- Date of implementation: September 2015
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: continuous

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Water, Wastewater & Stormwater Operations Manager

#### **4.2.6.4 BMP 4 Street and Parking Lot Cleaning**

**Description:**

The City conducts street and parking lot cleaning in an effort to remove litter and debris from City roadways before entering the MS4. Public Works staff pick up litter along City streets and Leisure and Recreation staff pick up litter in City Parks, including the parking lots. Additionally, Public Works staff operate a leaf machine that removes curbside vegetative debris.

**Measureable Goal:**

The City will utilize Public Works crews to remove litter and vegetative debris from City streets and along the right-of-way. A minimum of 1 mile of City streets will be cleaned on a weekly basis. These weekly results will be summarized for each month. The City will utilize Leisure and Recreation staff to remove litter from City Parks.

**Method of Documentation of Activities:**

The City will document the dates of cleaning, amounts of litter collected and the tons of debris picked up on a weekly basis. Monthly logs summarizing the weekly results will be provided in each annual report.

**Implementation Schedule:**

- Date of implementation: January 2013
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: continuous

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Street and Sanitation Supervisor



#### **4.2.6.5 BMP 5 Employee Training**

**Description:**

The City conducts annual training for the Public Works Department employees to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. The training includes such topics as good housekeeping at municipal facilities, illicit discharge detection, construction site inspections, and green infrastructure.

**Measureable Goal:**

The City will conduct annual training for the Public Works Department employees on stormwater related pollution prevention topics. All attendees will sign a sign-in sheet.

**Method of Documentation of Activities:**

The City will provide documentation of the educational activities conducted during the reporting period in each annual report. Additionally, a sign-in sheet for the training event will be provided.

**Implementation Schedule:**

- Date of implementation: 2018
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Street and Sanitation Supervisor

#### **4.2.6.6 BMP 6 Waste Disposal**

**Description:**

The City will implement a program to identify the amount of waste collected and disposed of during each reporting period. Additionally, the City will identify how each waste stream is disposed of. Generally, the waste stream will be broken into the following categories:

- Trash & Litter
- Debris from the MS4

**Measureable Goal:**

100% of waste removed from the MS4 will be disposed of properly in a permitted local landfill or transfer station.

**Method of Documentation of Activities:**

The City will provide logs of waste disposal activities performed during the reporting period in each annual report.

**Implementation Schedule:**

- Date of implementation: 2018
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: continuous

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Street and Sanitation Supervisor

#### **4.2.6.7 BMP 7 New Flood Management Projects**

**Description:**

The City is certified as a Local Issuing Authority, and remains in compliance with the Georgia Erosion and Sediment Control Act (GESA) of 1975 as amended in 2003. Accordingly, the City requires all new flood management projects, which includes new City facilities, comply with the stormwater maintenance, post construction, and long term maintenance of detention ponds ordinance within the City of Grovetown's Code of Ordinances. The City ensures proposed flood management projects (e.g. detention and retention ponds) are assessed for water quality impacts during the design phase. Addendum F contains the Proposed Flood Management Project Design Checklist.

**Measureable Goal:**

The City will assess proposed flood management projects for water quality impacts during the design phase.

**Method of Documentation of Activities:**

The City will provide the number of plans reviewed where flood management projects were assessed for water quality impacts during the reporting period in each annual report.

**Implementation Schedule:**

- Date of implementation: n/a
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: as needed

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

#### **4.2.6.8 BMP 8 Existing Flood Management Projects**

**Description:**

The City conducts an assessment of existing City-owned flood management projects (e.g. detention and retention ponds) for potential retrofitting to address water quality impacts; the City conducts any retrofitting activities resulting from the assessment. Addendum F contains the Existing Facility Water Quality Improvement Worksheet.

**Measureable Goal:**

The City will annually assess at least one City-owned flood management project for water quality impacts.

**Method of Documentation of Activities:**

The City will provide a copy of the completed flow chart and checklist for one existing flood management project per reporting period.

**Implementation Schedule:**

- Date of implementation: 2018
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Planning and Development Director

#### **4.2.6.9 BMP 9 Municipal Facilities**

**Description:**

The City maintains an inventory of municipal facilities with the potential to cause pollution. The City conducts annual inspections of the municipal facilities on this inventory, so that 100% of the structures are inspected within the 5-year permit term.

**Measureable Goal:**

The City will maintain an updated inventory of municipal facilities with the potential to cause pollution. The City will conduct annual inspections of the municipal facilities on this inventory, such that 100% of the structures are inspected within the 5-year permit term.

**Method of Documentation of Activities:**

The City will submit an updated inventory of municipal facilities with the potential to cause pollution with each annual report. The City will provide documentation of the inspections of these facilities conducted during the reporting period with each annual report.

**Implementation Schedule:**

- Date of implementation: 2018
- Month/Year of each action: n/a
- Interim milestone dates: n/a
- Frequency of the action: annual

**Office or Position(s) Responsible for BMP Implementation/Coordination:**

Public Works Director

## 4.3 ENFORCEMENT RESPONSE PLAN (ERP)

**Permit Requirement:** The permittee must develop and implement an ERP that describes the action to be taken for violations associated with the permittee's ordinances and other legal authorities. The ERP will detail the permittee's responses to any noted stormwater violations, including escalating enforcement responses to address repeat and continuing violations. The plan must detail:

- Names of ordinances providing the legal authority to undertake enforcement, including citation of specific ordinance sections;
- Types of enforcement mechanisms available for each area (e.g. IDDE, Construction, Post-Construction). The ERP must list the enforcement actions the permittee has the authority to use, including such actions as:
  - verbal warnings;
  - written notice of violations;
  - citations (with fines);
  - stop work orders;
  - withholding plan approval or other authorizations; and
  - any other available enforcement mechanisms.
- Description of when each enforcement mechanism will be employed, including the path of escalation;
- Time frames for each step, including investigation of noncompliance, sequence and use of enforcement mechanisms, corrective action by responsible party, re-inspection of site, etc.
- Description of the methods to be used to track, either manually or electronically, instances of noncompliance, including such items as:
  - name of owner/operator of facility and/or the location or address;
  - type of site (e.g. IDDE, construction);
  - description of non-compliance;
  - description of enforcement action(s) used;
  - time frames for each step (e.g. investigation, corrective action, re-inspection);
  - documentation of inspection and enforcement actions taken;
  - documentation of referral to other departments or agencies; and
  - date of violation resolution.

**Response:**

Addendum G contains the City's ERP. The City will annually review and revise the ERP as needed. If revised during the reporting period, the City will submit the revised ERP to EPD for review.

## 4.4 IMPAIRED WATERS

**Permit Requirement:** The permittee must identify any impaired waters located within its permitted area, using the latest approved 305(b)/303(d) List of Waters (<https://epd.georgia.gov/georgia-305b303d-list-documents>), which contain MS4 outfalls or are within one (1) linear mile downstream of MS4 outfalls. Also, the pollutant(s) of concern must be identified. For those impaired waters, the permittee shall propose a Monitoring and Implementation Plan (Plan) addressing each pollutant of concern. The permittee must annually check whether an impaired water within its permitted area has been added to the latest 305(b)/303(d) list. Newly listed waters must be addressed in the Plan and the SWMP must be revised accordingly. The permittee must report on all monitoring activities in subsequent annual reports. If a TMDL containing a wasteload allocation specific to one or more of the permittee's outfalls is approved, then the wasteload allocation must be incorporated into the SWMP. All previous and newly approved TMDLs within the permitted areas must be included in either the proposed Plan or a revision to the existing Plan

The Plan shall include:

- Sample location, whether samples are collected instream (i.e. upstream and downstream), from outfalls during wet weather events, or a combination of both locations. Biological samples must be collected instream. If the permittee chooses to conduct outfall sampling and there are multiple outfalls located on an impaired stream, then the permittee may choose representative outfalls for sampling in place of sampling all outfalls;
- Sample type, frequency, and any seasonal considerations;
- Implementation schedule to start monitoring for each pollutant of concern;
- Map showing the location of the impaired waters, the monitoring location, and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of these waters, or a schedule for confirming the location of these outfalls; and
- Description of proposed BMPs to be used to control and reduce the pollutant(s) of concern and a schedule for implementation of these BMPs.

Each Annual Report shall include:

- Any monitoring data collected during the reporting period;
- An assessment of the data trends over time for each pollutant of concern. The assessment shall initially include a characterization of baseline conditions. The data assessment must include a written evaluation of whether water quality is improving, declining, fluctuating, or remaining constant. The permittee can choose the method to provide the assessment (e.g. line graphs, narrative). If monitoring identifies that an upstream MS4 is the source of the pollutant of concern, then the permittee must notify the immediately adjacent MS4.
- An assessment to determine the effectiveness of the BMPs employed and what, if any, additional adaptive BMP measures may be necessary to return the waters to compliance with State water quality standards. If BMP revisions and/or additional BMPs are necessary, then the revised Plan must be submitted to EPD for review.

For those waters where the permittee is conducting monitoring, the data must be made available to other MS4 permittees upon request. In the event that monitoring is performed in accordance with an EPD-approved Sampling Quality and Assurance Plan, and a water is removed from the 303(d) list of impaired waters, then monitoring conducted under the Plan may cease. Monitoring for the purpose of de-listing an impaired water will benefit the permittee through reduced expenses associated with long-term testing.

The permittee must submit a modified Plan for any newly listed waters with the subsequent annual report. Following review and comment on the Plan by EPD, the permittee will incorporate necessary revisions into the Plan. Once approved, the Plan will become an addendum to the SWMP.

**Response:**

The latest approved 305(b)/303(d) List of Waters (2014) does not contain any impaired waters located within the city limits of Grovetown.

The City will annually review the latest approved 305(b)/303(d) List of Waters to identify any impaired waters located within its permitted area, which contain MS4 outfalls or are within one (1) linear mile downstream of MS4 outfalls. If newly listed impaired waters within the city limits are identified, the City will propose a Monitoring and Implementation Plan (Plan) addressing each pollutant of concern and submit the Plan with the subsequent annual report for review and comment by EPD.



#### 4.5 SHARING RESPONSIBILITY

The City does not share responsibility for implementation of any part of this SWMP with another entity; the City does not perform tasks for another entity; no other entity is performing tasks on behalf of the City.

#### 4.6 STORMWATER MANAGEMENT PROGRAM MODIFICATIONS

The City will submit written notification of any SWMP modifications to the EPD for review and approval.