

Whitfield County Phase II MS4 Storm Water Management Program June 2, 2023

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STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION

Storm Water Management Program (SWMP)

General NPDES Permit No. GAG610000 for Small Municipal Separate Storm Sewer Systems (MS4)

1. General Information

- A. Name of small MS4: Whitfield County
- B. Name of responsible official: Robert J. Sivick

Title: County Administrator

Mailing Address: 201 S. Hamilton St City: Dalton State: GA Zip Code: 30720

Telephone Number: 706.275.7500

Email Address: rsivick@whitfieldcountyga.com

C. Designated stormwater management program contact:

Name: Kent Benson Title: County Engineer

Mailing Address: 301 W Crawford St City: Dalton State: GA Zip Code: 30720

Telephone Number: 706.275.7552

Email Address: kbenson@whitfieldcountyga.com

2. Sharing Responsibility

A. Has another entity agreed to implement a control measure on your behalf? Yes__X__ No_____(If no, skip to Part 3)

Keep Dalton Whitfield Beautiful, Inc. is supported by the Dalton-Whitfield Regional Solid Waste Management Authority (DWRSWMA). The DWRSWMA is run by a board comprised of City of Dalton and Whitfield County officials.

Control Measure or BMP: Public Involvement/Participation MCM

- 1. Name of entity: <u>Dalton-Whitfield Regional Solid Waste</u>
 Management Authority
- 2. Control measure or component of control measure to be implemented by entity on your behalf:

<u>Public Involvement/Participation BMP#2 – Household Hazardous</u> Waste Disposal (See Appendix 1 for MOU)

Control Measure or BMP: Public Involvement/Participation MCM

- 1. Name of entity: <u>Keep Dalton-Whitfield Beautiful, Inc.</u>
- Control measure or component of control measure to be implemented by entity on your behalf: <u>Public Involvement/Participation BMP #3 – Adopt-A-Mile (See</u> Appendix 2 for MOU)

Minimum Control Measures (4.2)

- 4.2.1 Public Education and Outreach
- 4.2.2 Public Involvement/Participation
- 4.2.3 Illicit Discharge Detection and Elimination
- 4.2.4 Construction Site Stormwater Runoff Control
- 4.2.5 Post-Construction Stormwater Management in New Development and Redevelopment
- 4.2.6 Pollution Prevention/Good Housekeeping

Certification Statement (6.10)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: Robert	J. Sivick	Date:	61	2	123	

Signature: ______ Title: County Administrator

Storm Water Management Program

4.2.1 Public Education and Outreach on Storm Water Impacts

40 CFR Part 122.34(b)(1) 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 storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

See Table 4.2.1(a) of the Permit

BMP #1 - Educational Library - Permit Table 4.2.1(a) (1.a.)

- 1. Target audience: General Public / Citizen of Whitfield County
- 2. Description of BMP: The county has a program to circulate educational materials to the population base over the five-year period of this permit. The program will utilize materials currently assembled by the county staff and new materials published by the State of Georgia Department of Community Affairs, the Georgia's Water Resources Toolkit for Local Governments, Clean Water Campaign and other water resources protection organizations / campaigns. These brochures / pamphlets will address topics such as the impacts of stormwater discharges on water bodies; the steps that the public can take to reduce pollutants in stormwater runoff; lawn and garden activities; water conservation; proper disposal of household wastes; sources of water quality violations; hazards of illegal discharge and dumping; etc. The educational materials will be bilingual where available to ensure that the Hispanic population in the community is accommodated. One brochure will be chosen each year by county staff, and will be made available to the public at government buildings including the public library and the county Administration Building.
- 3. Measurable goal(s):
 - a. Select one brochure each year, and list in the annual report
- 4. Documentation to be submitted with each Annual Report:
 - a. A copy of the brochure
 - b. Number of brochures picked up by the public
- 5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): Feb 2005
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
- 6. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater coordinator)
- 7. Rationale for choosing BMP and setting measurable goal(s): The county has a centralized location for all City and county Building permits that receives a large volume of property owners, contractors, etc. daily, such that this BMP will highly visible to citizens. Placing the information at the library adds another level of availability to the citizens of Whitfield County. Also, the amount of readily available information from the agencies listed above in the BMP description should make this BMP very cost effective to implement.
- 8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The county will track

the number of materials distributed and compare it to the prior year's distribution count.			

BMP #2 - County Website - Permit Table 4.2.1(a) (1.a.)

- 1. Target audience: General Public / Citizens of Whitfield County
- 2. Description of BMP: The county maintains a website for publicizing stormwater information for the public and county employees. The stormwater webpage consists of a main page and four subpages. One subpage entitled, "What Can I do?" has been dedicated solely to what citizens can do to reduce pollution and prevent stormwater problems. Informational tips on reducing pollutants in stormwater are listed on this subpage to provide citizens an overview of common things they can do to reduce pollution in runoff. A second page focuses on explaining land disturbance and what is required if the land disturbance is regulated by Whitfield County. The general public and development community can learn about stormwater management plans and permit requirements on a third page dedicated to Stormwater Management Plans. On the stormwater learning center webpage citizens can find electronic publications with detailed information on why stormwater needs managed and further links to websites with dedicated information and tips related to stormwater. Links from the main Whitfield County Government website to the stormwater website are located under the Departments -> Engineer and Development -> Stormwater/Erosion Control. The URL for the Whitfield County stormwater website is: http://www.whitfieldcountyga.com/eng/stormwater.htm
- 3. Measurable goal(s):
 - a. Semi-Annual update to webpage
 - b. Report statistics/analytics on number of visitors to the webpage annually
- 4. Documentation to be submitted with each annual report:
 - a. Screen shot of webpage with updates
 - b. Copy of analytics report showing webpage use statistics
- 5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): Nov 2004
 - c. Frequency of actions (if applicable):
 - i) Update webpage semiannually
 - ii) Report statistics- annually
 - d. Month/Year of each action (if applicable): ongoing
- 6. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator) and IT Department
 - 7. Rationale for choosing BMP and setting measurable goal(s): It is believed that a large portion of county citizens have access to the internet. Also key words, "Whitfield County, GA" and "Stormwater" can be searched with an internet search engine and the stormwater site can be found 24 hours a day. Many of the citizens have different work hours and the website provides

- information to people who work at night. The webpage statistics allows for the number of visitors to be counted.
- 8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The webpage usage statistics can be compared to the prior year's results.

BMP #3 - Watershed & Tributary Signage - Permit Table 4.2.1(a) (1.a.)

- 1. Target audience: General Public / Citizens of Whitfield County
- 2. Description of BMP: The county has worked to identify significant watershed boundaries and tributaries that exist along major roads within the county. The Public Works Department sign shop has created, installed and maintains fourteen signs throughout the county. The signs serve to educate the public and county employees about significant drainage features (rivers, creeks, streams, lakes, etc.) as well as major watershed boundaries. With locations along roads, the signs are very visible to the traveling public which increases the general public's awareness about water features. The county plans to develop an online watershed map illustrating each sign location and allowing the user to read more information about the individual watersheds.
- 3. Measurable goal(s):
 - a. Inspect 100% of watershed signs annually
 - b. Repair and maintain 100% of watershed signs annually
 - c. Track number of visitors to watershed map website annually.

- a. Interim milestone dates (if applicable):
 - i) Develop watershed map and information December 2018
- b. Implementation date (if applicable):
 - i) Go live with watershed map on website June 2019
- c. Frequency of actions (if applicable): annually
- d. Month/Year of each action (if applicable): ongoing
- 5. Documentation to be submitted with each annual report:
 - a. Watershed sign map
 - b. Sign inspection report
 - c. Copy of analytics report of watershed map webpage use statistics.
- 6. Rationale for choosing BMP and setting measurable goal(s): The county has an extensive road network as well as numerous watersheds. The combination of these two factors should enable the county to implement a BMP that will have the greatest impact on the traveling citizens of the county from a public awareness perspective. The addition of the online watershed map will add another avenue for citizens to not only learn watershed locations but also learn specific information about the identified watersheds.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Without inspection and maintenance watershed signs will become damaged or missing, which would decrease the public awareness. Therefore, by inspecting and maintaining the existing signs the traveling public's awareness of watershed boundaries will continue. Tracking the number of visits to the online watershed map better defines

the actual number of citizens taking locations.	note of the watershed and	d the watershed sign
M/hitfield County SMMD	42	luna 2, 2022

BMP #4 - Educational Advertisement - Permit Table 4.2.1(a) (1.a.)

- 1. Target audience: General Public
- 2. Description of BMP: The County Engineer will educate the public on the importance of stormwater management, pollution prevention and water resources by creating short advertisements to run on social media. County Public Relations staff will help to create content for an informational advisement related to stormwater pollution topics. Such topics include: erosion and sedimentation control, pollution prevention, water quality, watersheds, and water resources.
- 3. Measurable goal(s):
 - a. Create one new advertisement and post periodically on an annual basis.
 - b. Track number of views / visits.
- 4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Create / decide on advertisement during the first quarter of permit year Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
- 5. Documentation to be submitted with each annual report: : A copy of the advertisement and number of views / visits.
- 6. Rationale for choosing BMP and setting measurable goal(s): Today more and more people are present on social media. By posting an advertisement with stormwater pollution prevention and educational information on a social media platform, the City can reach a wider audience.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Comparing the number of and number of views / visits each year will determine the amount of the outreach of the BMP.

June 2, 2023

4.2.2 Public Involvement/Participation

40 CFR Part 122.34(b)(2) 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.

See Table 4.2.2 (a) of the Permit

BMP #1 - Stakeholder Group - Permit Table 4.2.2(a)(1.a.)

- Target audience/stakeholder group: Community Stakeholders of Whitfield County, Varnell & Tunnel Hill
- 2. Description of BMP: Whitfield County has established a group of stakeholders who have an interest or stake in stormwater for various reasons. The advisory group at a minimum is comprised of representatives from the following organizations or groups: industry, City of Tunnel Hill, City of Varnell, Whitfield County, residential/commercial contractors, local civil engineer, local architect, Conasauga River Alliance, Whitfield Environmental Health and the Dalton Whitfield Solid Waste Authority. Discussions occur to provide members of the group updates to stormwater regulations and to discuss any topics of concern.

The Stakeholder Advisory Group will continue to convene on an annual basis to review the progress of the stormwater program, opportunities for coordination between local governments for stormwater related programs, and other related watershed issues. The meetings are a good venue to provide feedback on problems local government is experiencing and possible solutions. Also if changes are proposed to the stormwater ordinance the group will be the initial sounding board to provide input and feedback before the changes are presented to the Board of Commissioners. If issues arise that require attention by the committee it can be convened on a more frequent basis.

- 3. Measurable goal(s):
 - a. Hold one stakeholder meeting annually.
 - b. Track number of attendees.
 - c. Track the actions taken as a result of the stakeholder meetings
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - i) Send notifications of meeting via email and/or telephone annually.
 - ii) Hold meeting annually.
 - d. Month/Year of each action (if applicable): ongoing
- 5. Documentation to be submitted with annual report:
 - a. A copy of the agenda, sign in sheet, meeting minutes and/or presentation.
- 6. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 7. Rationale for choosing BMP and setting measurable goal(s): Input and buy-in are critical in implementing a successful SWMP. Being able to discuss and gather feedback from different individuals with varied interests will allow the stormwater program to meet water quality goals and concerns. An agenda, meeting minutes and record of attendees will be taken at each stakeholder meeting. The number

- of meetings and number of attendees will be tracked along with the number of actions taken by the group.
- 8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If people are attending the meetings then discussion is taking place regarding stormwater. The more participation the better the community is involved in providing guidance for the stormwater program. The public is usually honest about how they feel government is working or not working.

BMP #2 - Household Hazardous Waste - Permit Table 4.2.2(a)(1.a.)

- 1. Target audience/stakeholder group: General Public / Citizens of Whitfield County
- 2. Description of BMP: The Dalton-Whitfield Regional Solid Waste Management Authority owns and operates a permanent household hazardous Waste (HHW) collection and storage facility. Residents of Whitfield County are able to responsibly manage their HHW on a monthly basis without incurring any expense. The facility is open the third Saturday of every month. Residents are limited to 200 pounds of HHW per visit. No commercial or business generated hazardous waste is accepted. The facility has been in continuous operation since June 1999. DWRSWMA promotes this program on its website on a continuous basis and advertises it in local newspapers at least once a year.
- 3. Measurable goal(s): Annually
 - a. Track the number of residents delivering HHW.
 - b. Track the quantity of HHW collected.
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): Third Saturday of every month.
- 5. Documentation to be submitted with annual report:
 - a. A copy of the advertisement advertising the locations for collection
 - b. A copy of the chain of custody showing proper disposal of the collected material
 - c. Number of residents participating.
- 6. Person (position) responsible for overall management and implementation of the BMP: Executive Director DWRSWMA.
- 7. Rationale for choosing BMP and setting measurable goal(s): Household Hazardous Waste (HHW) can be a significant source of stormwater pollution. By offering this management option it removes and reduces the potential pollution to local waterways. It also reinforces the public education aspect, increases awareness of the problem and ideally prevents this source of pollution from finding its way onto the ground and into local waterways.
- 8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The DWRSWMA will track the public's participation and quantities of materials collected and compare it to prior event activity.

BMP #3 - Adopt - A- Mile Program - Permit Table 4.2.2(a)(1.a.)

- 1. Target audience/stakeholder group: General Public / Citizens of Whitfield County
- 2. Description of BMP: Keep Dalton Whitfield Beautiful, Inc. (KDWB), with the support of the Dalton-Whitfield Regional Solid Waste Management Authority, currently administers an Adopt-A-Mile (AAM). The program encourages volunteer groups to "adopt" a one mile section of roadway within the community and pick-up litter along the roadway four times per year. KDWB provides roadside signage acknowledging the volunteer's efforts, in addition to supplying safety vests, gloves, tools, and trash bags. If the volunteer groups sort the recyclables from the litter collected, the recyclables are managed separately by the DWRSWMA.
- 3. Measurable goal(s):
 - a. KDWB will promote the program continuously on its website continuously.
 - b. Track the number of participating volunteers and volunteer groups.
 - c. Track the number of clean up events.
 - d. Report the number of volunteers participating.
 - e. Track the number of miles of roadway adopted.
 - f. Track the amount of waste and recyclables collected either by the number of bags or the weight.

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): N/A
- c. Frequency of actions (if applicable): Remind volunteer groups quarterly.
- d. Month/Year of each action (if applicable): ongoing
- 5. Person (position) responsible for overall management and implementation of the BMP: Executive Director Keep Dalton Whitfield Beautiful, Inc.
- 6. Documentation to be submitted with the annual report:
 - a. Copy of the advertisements/screenshot of the webpage.
 - b. Number of clean up events
 - c. Number of volunteers participating
 - d. Number of miles of roadways adopted
 - e. Number of bags of waste and recyclables collected or bills of lading showing the weight of the waste recyclables.
- 7. Rationale for choosing BMP and setting measurable goal(s): Litter can be a significant source of stormwater pollution. By offering this volunteer based program it removes and reduces the potential pollution to local waterways. It also reinforces the public education aspect, increases awareness of the problem and

ideally prevents this source of pollution from finding its way onto the ground and into local waterways.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: KDWB will track the public's participation and quantities of materials collected and compare it to prior event activity.

BMP #4 - Conasauga Watershed Cleanup - Permit Table 4.2.2(a)(1.a.)

- 1. Target audience/stakeholder group: General Public / Citizens of Whitfield County
- 2. Description of BMP: The County contributes to organizing the Conasauga River Watershed Cleanup annually. The group of organizers represent many different agencies and private organizations. The annual watershed event is advertised in the local newspaper, flyers and in the County newsletter. Volunteers of all ages are encouraged to participate in picking up litter at sites within the watershed in and along tributary streams and Conasauga River. Cleanup sites are typically on public land such as roadway bridge crossings, County owned properties and local parks. The Whitfield County Public Works Department provides equipment, trucks and personnel to pick up and haul litter/debris collected at the sites. The County recycles what it can of the litter collected and disposes the rest of it at the Dalton Whitfield Solid Waste Authority landfill.
- 3. Measurable goal(s):
 - a. Annually hold one cleanup event.
 - b. Track tons of trash/debris collected.
 - c. Track the number of pickup sites or areas.
 - d. Track the number of participating volunteers.
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): a least one annually
 - d. Month/Year of each action (if applicable): ongoing
- 5. Documentation to be submitted with annual report:
 - a. Summary of weight of trash/debris collected at the pickup event.
 - b. Summary of number of volunteers who participated in event.
 - c. A copy of advertisements.
- 6. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 7. Rationale for choosing BMP and setting measurable goal(s): This BMP enlists citizens to learn firsthand the amount of litter and debris which enters the watershed from stormwater in the Conasauga River Watershed in Whitfield County.
- 8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The tons of trash / litter collected will be a direct indicator of the amount of pollution removed from waterways which may have been deposited by stormwater. The number of

participants will be a direct gauge of participation by citizens in reducing pollution in local waterways.

4.2.3 Illicit Discharge Detection and Elimination

40 CFR Part 122.34(b)(3) Requirement: The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges into your small MS4. You must:

- A) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls;
- B) Effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions;
- C)Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to your system; and
- D)Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

See Table 4.2.3 (a) of the Permit

BMP #1 – Illicit Discharge and Illegal Connection Ordinance - Permit Table 4.2.3(a)(1.a.)

- 1. Description of BMP: Legal Authority is established with Whitfield County Code of Ordinances, Chapter 7.5 Environment, Article VI. Illicit Discharge and Illegal Connection Control (Appendix C1) which prohibits illicit discharges and illegal connections to protect the public health, safety, environment, and general welfare through the regulation of non-stormwater discharges to the county separate storm sewer system (MS4) to the maximum extent practicable, as required by state and federal law
- 2. Measurable goal(s):
 - a. Annually evaluate, and if necessary, modify the existing IDDE Ordinance.
- 3. Documentation to be submitted with each annual report: Submit copy of adopted ordinance, if revised during the reporting period.
- 4. Schedule:
 - a. Implementation date (if applicable): 6/12/2006
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): With the ordinance in place, the county is able to enforce illicit discharges and illegal connections and remove pollution from stormwater.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Tracking the enforcement of the Illicit Discharge and Illegal Connection Ordinance will allow the County to determine if or when any changes need made to the ordinance in order to remove or prevent illicit discharges.

BMP #2 - Outfall Map and Inventory- Permit Table 4.2.3(a)(2.a.)

1. Description of BMP: The county has an existing Outfall Map and Outfall Inventory (Appendix C-2) which lists outfall Id number and receiving waters. The county will update outfalls from existing inventory and map to insure the listed outfalls meet the definition of outfall. The Outfall Map and Inventory is located in Appendix C-2. Any updates to the Outfall Map and Inventory will be included in the Annual Report.

2. Measurable goal(s):

- a. Map and inventory all existing outfalls and their receiving streams; and as discovered, existing ones not previously mapped or inventoried.
- b. Map and inventory all new outfalls and their receiving streams located in the MS4's urbanized area.
- c. Determine number of outfalls added during the reporting period and the total number of new outfalls and their receiving waters
- 3. Documentation to be submitted with each annual report:
 - a. Updated inventory and map.
 - b. A list of any outfalls removed or relocated
 - c. Number of outfalls added during the reporting period and the total number of new outfalls in the MS4's urbanized area.

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): N/A
- c. Frequency of actions (if applicable): annually
- d. Month/Year of each action (if applicable): ongoing
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): Maintaining a valid inventory of outfalls is the first step in performing outfall inspections for IDDE.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The outfall map will be used to conduct the outfall inspections. The outfall inspections identify possible pollutant sources thereby reducing pollution when these are removed.

BMP #3 IDDE Plan - Permit Table 4.2.3(a)(3.a.)

Description of BMP: The Whitfield County IDDE Plan (Appendix C3) purpose is
to find and remove illicit discharges and illegal dumping. The IDDE Plan will be
followed to inspect outfalls for dry weather flows, source trace all dry weather
flows found and utilize the enforcement procedures specified in the Enforcement
Response Plan (ERP, Appendix G) to remove identified illicit discharges and
connections.

2. Measurable goal(s):

- a. Implement the IDDE Plan and revise IDDE Plan when needed.
- b. Conduct dry weather screening inspections on 100% of the total outfalls within a 5 year permit period (minimum of 5% of outfalls in urbanized area screened per year)
- c. All suspected illicit discharges will be source traced and investigated according to the IDDE Plan.
- d. All suspected illicit discharges which are found to be illicit discharges will be eliminated using enforcement actions if necessary, according to the IDDE Plan and ERP.
- 3. Documentation to be submitted with each annual report:
 - a. A copy of the revised or current IDDE Plan, when necessary
 - b. The number of completed outfalls inspections
 - c. A copy of the completed outfalls inspection reports
 - d. A copy of any documentation of illicit discharge source tracing, compliance and enforcement activities.

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): N/A
- c. Frequency of actions (if applicable):
- d. Month/Year of each action (if applicable): ongoing
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- Rationale for choosing BMP and setting measurable goal(s): Non-Stormwater discharges will be discovered and each outfall will be screened once every permit period. BMP is also a required Phase II BMP.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: This BMP consists of locating and removing sources of illicit discharges into Whitfield County's MS4 which reduces pollution.

BMP #4 - Education - Permit Table 4.2.3(a)(4.a.)

- 1. Description of BMP: The county maintains a website for publicizing stormwater information for the public and county employees. The stormwater webpage consists of a main page and four subpages. One subpage entitled, "What Can I do?" has been dedicated solely to what citizens can do to reduce pollution and prevent stormwater problems. Informational tips on reducing pollutants in stormwater are listed on this subpage to provide citizens an overview of common things they can do to reduce pollution in runoff. On the stormwater learning center webpage citizens can find electronic publications with detailed information on why stormwater needs managed and further links to websites with dedicated information and tips related to stormwater. Links from the main Whitfield County Government website to the stormwater website are located under the Departments -> Development -> Stormwater. The URL for the Whitfield County stormwater website is: http://www.whitfieldcountyga.com/eng/stormwater.htm
- 2. Measurable goal(s):
 - a. Semi-Annual update to webpage
 - b. Report statistics/analytics on number of visitors to the webpage annually
- 3. Documentation to be submitted with each annual report:
 - a. Screen shot of webpage with updates
 - b. Report statistics/analytics on number of visitors to the webpage annually
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): Nov 2004
 - c. Frequency of actions (if applicable):
 - i) Update webpage semiannually
 - ii) Report statistics- annually
 - d. Month/Year of each action (if applicable): ongoing
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator) and IT Department
- 6. Rationale for choosing BMP and setting measurable goal(s): It is believed that a large portion of county citizens have access to the internet. Also key words, "Whitfield County, GA" and "Stormwater" can be searched with an internet search engine and the stormwater site can be found 24 hours a day. Many of the citizens have different work hours and the website provides information to people who work at night. The webpage statistics allows for the number of visitors to be counted.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The webpage usage statistics can be compared to the prior year's results.

BMP #5 – IDDE Complaint Response – Permit Table 4.2.3(a)(5.a.)

1. Description of BMP: The County has a complaint phone number 706-281-1768 to facilitate receipt of stormwater complaints. All types of complaints (IDDE complaints/water quality, Construction Site Runoff complaints/ ES& PC, and drainage complaints) are entered in a single Complaint Database with the type of complaint categorized for each complaint received. IDDE complaints are categorized as Water Quality complaints under Complaint Type. Refer to the Complaint Response Plan (Appendix C-5) for specific procedures.

2. Measurable goal(s):

- a. All IDDE complaints entered and tracked in the Complaint Database (contains IDDE complaints/water quality, Construction Site Runoff complaints/ES& PC, and drainage complaints) along with their investigations including complaint date, complaint type and complaint status following the Complaint Response Plan (Appendix C-5).
- b. Complaint investigations initiated within two business days.
- c. Appropriate action taken for 100% of complaints received.
- 3. Documentation to be submitted with each annual report:
 - a. A copy of any revised procedures (Complaint Response Plan, Appendix C-5)
 - b. A copy of the complaints received and their resolution.
 - c. A copy of any compliance and enforcement activities.

- a. Interim milestone dates (if applicable):
- b. Implementation date (if applicable):
- c. Frequency of actions (if applicable): Annually
- d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): Having a standard procedure for receiving, investigating and tracking the status of illicit discharge complaints will insure the complaints are handled properly to eliminate future discharges. The BMP is also requirement of Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: After the Complaint Response procedures are implemented, if the Complaint Response Procedure yields successful elimination of illicit discharges it is an effective BMP.

Construction Site Storm Water Runoff Control

40 CFR Part 122.34(b)(4) Requirement: The permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Storm water 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 program must include:

- 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 impacts to water quality;
- 4.2.4.4 Procedures for site plan review which 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.

See Table 4.2.4 (a) of the Permit

BMP #1 -Soil Erosion, Sedimentation and Pollution Control Ordinance - Permit Table 4.2.4(a)(1.a.)

- 1. Description of BMP: Legal Authority is established with Whitfield County Code of Ordinances, Chapter 5 Buildings; Construction and Related Activities, Article IV. Soil Erosion, Sedimentation and Pollution Control (Appendix D-1) which governs land disturbance activity greater than 1 acre and less than 1 acre but a part of a common development. The ES&PC Ordinance also ensures construction site operators control waste on construction sites.
- 2. Measurable goal(s):
 - a. Maintain an ordinance to control soil erosion during land disturbing activities and construction waste.
 - b. Annually evaluate Soil Erosion, Sedimentation and Pollution Control ordinance and, if necessary modify the existing ordinance.
- 3. Documentation to be submitted with each annual report: Submit copy of ordinance adopted ordinance if revised during the reporting period.
- 4. Schedule:
 - a. Implementation date (if applicable): 2023
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): With the ordinance in place, the county is able to enforce land disturbance activities remove pollution from stormwater.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Tracking the enforcement of the Soil Erosion, Sedimentation and Pollution Control Ordinance will allow the county to determine if or when any changes need made to the ordinance in order to minimize pollution from construction site runoff.

BMP #2 - Construction Site (ES & PC) Plan Review - Permit Table 4.2.4(a)(2.a.)

1. Description of BMP: Whitfield County is a certified Local Issuing Authority, and subject to the Georgia Erosion and Sediment Control Act (GESA) of 1975, as amended in 2015. Accordingly, all projects are required to comply with the local Erosion, Sedimentation and Pollution Control (ES&PC) 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 unincorporated county limits. Projects less than 1 acre but part of a common development are subject to a plan as well. The Whitfield County has a Memorandum of Agreement (Appendix D-2.1) with Limestone Valley Soil & Water Conservation District. Plan review procedures are in accordance with Georgia Soil and Water Conservation Commission requirements. The procedures in the Whitfield County Erosion, Sedimentation and Pollution Control Plan Review Standard Operating Procedure (Appendix D-2) are followed to insure the plan meets the minimum requirements.

2. Measurable goal(s):

- a. Track number of ES&PC plans received
- b. Track number of ES&PC plans approved
- c. Track number of ES&PC plans denied
- d. Review all site plans for compliance with ES&PC Plan Review SOP (Appendix D2), ES&PC Ordinance (Appendix D-1), and Stormwater Local Design Manual (LDM) (Appendix E-1.1).
- 3. Documentation to be submitted with each annual report: List of all received, reviewed, approved and denied site plans during the reporting period.
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): The county is performing this effort as part of its responsibility as an Issuing Authority under the State's Erosion and Sedimentation Act. ES & PC plans are the first step to insure construction site runoff is controlled to limit stormwater pollution during construction projects.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Sites over 1 acre of disturbance will have an approved Erosion, Sedimentation and Pollution Control Plan with structural designed BMPs designed to reduce sediment from being

discharged into the MS4. The nudisapproved will be tracked to co	umber of plans submitte impared to previous yea	d, approved, and rs.
Whitfield County SWMP	31	June 2, 2023

BMP #3- Construction Site (ES & PC) Inspection Program - Permit Table 4.2.4(a)(3.a)

1. Description of BMP: Whitfield County currently inspects active construction projects within the unincorporated county. Site inspection procedures are in accordance with GSWCC requirements. All permitted construction sites are inspected according to the Erosion, Sedimentation and Pollution Inspections & Enforcement Standard Operating Procedure (Appendix D-3), ES&PC Ordinance (Appendix D-1), and Stormwater Local Design Manual (LDM) (Appendix E1.1). The County will ensure that structural and non-structural BMPs at construction sites are properly designed and maintained and construction site waste is properly handled.

2. Measurable goal(s):

- a. Inspect 100% of active construction sites following installation of initial BMPs, during active construction and after final stabilization.
- 3. Documentation to be submitted with each annual report: A list of active construction sites and any inspections conducted during the reporting period.

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): 2018
- c. Frequency of actions (if applicable):
- d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): Construction site activities have the potential to pollute stormwater since sediment is the number one pollutant. The BMP is also requirement of this Permit and a part of the county's responsibility as a certified Local Issuing Authority.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: An ES&PC plan that is implemented will reduce sediment from entering the MS4 and ultimately reducing stormwater pollution. Site inspections will insure the ES&PC plans are being implemented.

BMP #4 - Construction Site (ES & PC) Enforcement Procedures - Permit Table 4.2.(a)4.a.

- Description of BMP: Whitfield County will follow the Erosion, Sedimentation and Pollution Inspections & Enforcement Standard Operating Procedures (Appendix D-3) and ERP (Appendix G) to enforce the Erosion and Sedimentation Control Ordinance for all violations found during site inspections. Example enforcement documents can be found in Appendix D-4.
- 2. Measurable goal(s):
 - a. Track the number and type compliance and enforcement activities
 - b. Implement compliance and enforcement activities when appropriate.
- 3. Documentation to be submitted with each annual report:
 - a. Copy of any compliance and enforcement activities executed from the inspections.
 - b. The number, type and status of each enforcement activity conducted during the reporting period.
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2023
 - c. Frequency of actions (if applicable):annually
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): With consequences for non-compliance, the site operators will have an incentive to comply. The BMP is also requirement of this Permit and a part of the county's responsibility as a certified Local Issuing Authority.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The number of enforcement actions will be tracked and compared to the previous year's actions.

BMP #5 -Construction Site (ES &PC) Complaint Response - Permit Table 4.2.3(a)(5.a.)

1. Description of BMP: The county has complaint phone number 706-281-1768 for stormwater complaints. The Stormwater Complaint Database contains all stormwater complaints with each complaint categorized by complaint type (Drainage, ES&PC and Water Quality (IDDE)). Currently all construction site runoff complaints are logged in the Stormwater Complaint Database under complaint type ES&PC. The Complaint Response SOP (Appendix C-5) will be followed for all construction stormwater complaints.

2. Measurable goal(s):

- a. Complaint investigations will be initiated within 72 hours, during the normal work week.
- b. county will take appropriate action for 100% of construction site runoff complaints.
- c. Track complaints and their investigations in a database (including complaint date, complaint type and complaint status)
- 3. Documentation to be submitted with each annual report:
 - a. Copy of any revised procedures
 - b. Copy of the database containing complaints received and their resolution database (including complaint date, complaint type and complaint status)
 - c. Copy of any compliance and enforcement activities related to the complaints.

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): 2023
- c. Frequency of actions (if applicable): annually
- d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): Having a standard procedure for receiving, investigating and tracking the status of complaints will insure the complaints are handled properly to reduced pollution from construction sites. The citizen complaint program will provide a way for residents of Whitfield county to be an "auxiliary" inspection force ensuring that water quality violations are being investigated. This BMP will also be held to engage citizens in local water resources protection thereby educating them about the causes and effects of water pollution. The BMP is also requirement of Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: After the Complaint Response procedures are implemented; the Complaint Response Procedure will be followed to insure each complaint is handled properly. The number of

complaints received can be removed based on valid con	compared to the num nplaints will determine	ber of pollutant sources if this is an effective BI	MP.
Whitfield County SWMP	35	June 2, 2023	

BMP #6 - Certifications - Permit Table 4.2.3(a)(6.a.)

- 1. Description of BMP: GESA requires that all local government staff involved in construction activities subject to the Construction General Permits are trained and certified in accordance with the rules adopted by GWSCC. All inspectors will have a current Level 1B certification and all site plan reviewers will have a current Level II certification. Recertification is required every three years to keep the certifications current for both Level 1B and Level II. Whitfield County GSWCC Certification List can found in Appendix C-6.
- 2. Measurable goal(s):
 - a. Ensure that all county personnel that are involved in construction and inspection are appropriately certified by GSWCC.
- 3. Documentation to be submitted with each annual report: Number and type of current certifications held by county Staff.
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- Rationale for choosing BMP and setting measurable goal(s): Stormwater training
 is required to ensure inspectors and plan reviewers stay up to date with the rules
 and regulations they are required to enforce. The BMP is also a requirement of
 this Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Without the proper training, inspectors will not know what to look for at construction sites in order to prevent pollution from stormwater from those sites. Stormwater knowledge will prevent inspectors from unknowingly allowing violations to occur. Plan review education will ensure that the plan reviewers have a working knowledge of the requirements for ES & PC plans.

Post-Construction Storm Water Management in New Development and Redevelopment

40 CFR Part 122.34(b)(5) 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.

See Table 4.2.5 (a) of the Permit

BMP #1 - Legal Authority - Permit Table 4.2.5(a)(1.a.)

- 1. Description of BMP: Legal Authority is established with is established with Whitfield County Code of Ordinances, Chapter 14 Site Design, Article VI. Stormwater Management (Appendix E-1) which governs storm water runoff into the MS4 from new development and redevelopment projects. The ordinance will be reviewed annually and revised when necessary. The ordinance follows and adopts the current Georgia Stormwater Management Manual (GSMM). The Whitfield Dalton Stormwater Local Design Manual (LDM) (Appendix E-1.1) supplements the Post Construction Ordinance with additional design standards following the GSMM.
- 2. Measurable goal(s):
 - a. Implement and enforce the ordinance to address post construction runoff from new and redevelopment projects.
 - b. Review the ordinance annually and revised when necessary
- 3. Documentation to be submitted with each annual report: Submit any revisions of the ordinance to EPD for inclusion in the SWMP.
- 4. Schedule: Implementation date (if applicable): December 1, 2006
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): With the ordinance in place, the county is able to establish a program to address runoff from new and redevelopment projects. This sets the requirements for development in order to minimize the effects of impervious surfaces.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Tracking enforcement of the Stormwater Management Ordinance will allow the county to determine if or when any changes need made to the ordinance in order to minimize pollution from new and redevelopment.

BMP #2 - Inventory - Permit Table 4.2.5(a)(2)

1. Description of BMP: The county's post construction BMP inventory consists of the following two categories: (1) "County Structures" - inventory of publicallyowned post construction stormwater management BMPs (detention ponds, retention ponds, water quality structures and infiltration devices) (2) "Publicly Owned by Others" – inventory of post construction stormwater management BMPs (detention ponds, retention ponds, and water quality structures) owned by other public entities (not covered by an MS4 permit that County has the legal authority to inspect, with construction completed after December 6, 2012); and (3) "Privately Owned" – privately-owned post-construction stormwater management BMPs (detention ponds, retention ponds, and water quality structures) designed after December 1, 2006 (effective date of the county's Stormwater Management Ordinance) with a legally recorded stormwater facility maintenance agreement. The Post Construction BMP Inventory and Map (Appendix E-2) consists of the following structures: detention ponds, retention ponds, underground detention, and water quality structures. The post construction inventory will be updated as new structures are designed and constructed. The Owner data field is categorized as either County, Publicly owned by others or private for the three categories.

2.

- 3. Measurable goal(s):
 - a. Maintain an inventory of publically-owned detention ponds, retention ponds and water quality structures.
 - b. Maintain an inventory of privately-owned detention ponds, retention ponds and water quality structures designed after December 1, 2006 with a legally recorded stormwater facility maintenance agreement.
 - Update inventory as new structures are completed or existing structures are identified.
 - d. Inventory includes the number and type of structure.
- 4. Documentation to be submitted with each annual report: Inventory of structures
- 5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually update inventory
 - d. Month/Year of each action (if applicable):
- 6. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 7. Rationale for choosing BMP and setting measurable goal(s): The county must maintain an inventory in order for the BMPs to be tracked for maintenance. The county has been requiring post construction structural BMPs since the ordinance went into effect in 2006. The BMP is also requirement of Permit.

8.	How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The inventory is critical in tracking the number of structural BMPs and how well the BMPs reduce pollution in stormwater and mitigate runoff.		

BMP #3 – Inspection Program – Permit Table 4.2.5(a)3.

- Description of BMP: The county will inspect the publicly owned and privately owned post construction stormwater management structures (detention ponds, retention ponds and water quality structures), included on the inventory in BMP #2. During a five year period, 100% of the inventory will be inspected. Inspections will be conducted according to the standards in the MS4 Maintenance Procedures (Appendix F-2) and Georgia Stormwater Management Manual (GSMM) using the BMP Inspection Checklists (Appendix E-3) and BMP inspection letter template (Appendix E-3.)
- 2. Measurable goal(s): Inspect 100% of post construction BMP inventory in a five-year permit period but not less than 5% during any given year.
- 3. Documentation to be submitted with each annual report:
 - a. Copy of inspection reports/checklists
 - b. Copy of all compliance or enforcement activities, resulting from the inspections, conducted during the year
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): The county sees the importance of regular BMP maintenance and believes inspection will help keep BMPs functioning properly. Properly functioning BMPs will lead to cleaner discharge to the MS4. The county staff can handle inspection of the BMPs over the life of the permit period by having the flexibility in the number of inspections conducted each year. 100 % of the structures will be completed by the end of the five year period. The BMP is also requirement of Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The number of BMPs inspected and maintained will be tracked. Each maintained BMP reduces pollution.

BMP #4 - Maintenance Program - Permit Table 4.2.5(a)4.

1. Description of BMP: The Post Construction Structure (BMP) Maintenance Program will follow the MS4 Maintenance Procedures (Appendix F-2). The categories of BMPs (County Structures, Privately-owned by others, and Privately-owned) defined in BMP #2 – Post-Construction Structure (BMP) Inventory above will be maintained according to the Maintenance Procedures (Appendix F-2) and the GSMM. All maintenance performed on any county structures will be documented (4.b). For privately-owned structures and publicly owned by others structures (which the county has legal authority to inspect) with construction completed after December 6, 2012, the county will either require maintenance agreements or conduct maintenance. Copies of the agreements will be retained per the Permit (4.b.1). A summary list of the maintenance agreements (Appendix E-4) will be maintained. Since December 1, 2006, the effective date of the county stormwater ordinance, the county has required maintenance agreements. The county will continue to regulate and enforce the maintenance agreements in existence since the effective date of the ordinance.

2. Measurable goal(s):

- a. County will operate and maintain the county structures according to the maintenance schedules outlined in the Maintenance Procedures (Appendix F-2) and the GSMM.
- b. County will insure publicly-owned by others and privately-owned structures, for which the county does not have maintenance responsibility, are maintained according to the maintenance schedules outlined in the Maintenance Procedures and the GSMM.
- c. County will obtain maintenance agreements (which outline the owner's and county's responsibilities) for publicly-owned by others structures and privatelyowned structures with construction completed after December 6, 2012.
- 3. Documentation to be submitted with each annual report:
 - a. For County structures, a list of post construction structures maintained or repaired and the type of maintenance performed, including documentation of maintenance activities performed during the reporting period.
 - b. For publicly-owned by others and privately-owned structures where owner conducts maintenance under a maintenance agreement, a summary list of the maintenance agreements and total number of maintenance agreements.
 - c. A copy of any revised MS4 Maintenance Procedures.

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): Upon approval of SWMP.
- c. Frequency of actions (if applicable):
- d. Month/Year of each action (if applicable):

- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator) along with Whitfield County Public Works
- Rationale for choosing BMP and setting measurable goal(s): Proper maintenance of the BMPs is necessary for the BMPs to function as designed. Following a regular schedule will insure the maintenance occurs in a timely manner.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: By insuring that the structural BMPs are properly maintained, we are also ensuring that structures are adequately removing pollutants from Stormwater which they were designed and built to accomplish. The county will be able to track the number of times maintenance is required and type of maintenance to compare with prior years maintenance.

BMP #5 - GI/LID Program Permit Table 4.2.5(a)5

- 1. Description of BMP: GI/LID program (Appendix E-5) will be evaluated to determine if revisions are necessary. The program shall include:
 - background information on the MS4 (e.g. geology, hydrology);
 - 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 County's jurisdiction;
 - procedures for the inspection and maintenance of the GI/LID structures, including publicly-owned/County structures, owned by other entities, and privately owned non-residential (e.g. who inspects, who maintains, inspection and maintenance schedule, method of documentation of inspection and maintenance activities).
- 2. Measurable goal(s): Review GI/LID Program annually and revise when necessary.
- 3. Documentation to be submitted with each annual report: Submit a copy of the revised program, if revised during the reporting period.
- 4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable): ongoing
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): This BMP is required by the permit and the measureable goal provides time to develop the program.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: By providing a framework to for development using GI/LID BMPs, any GI/LID practices installed will reduce runoff leaving sites and therefore reduce pollutants leaving the sites.

BMP #6 – GI/LID Structures Inventory Permit Table 4.2.5(a)6.

1. Description of BMP: The county's GI/LID inventory contains water quality related structures constructed and built since December 6, 2012 in unincorporated Whitfield County. The GI/LID Inventory (Appendix E-6) consists of the following GI/LID water quality related structures: bioswales/vegetated swales, bioretention, pervious pavement, infiltration trenches, green roofs and any other structure deemed appropriate by the Stormwater Coordinator. The inventory contains county owned, publicly owned by other entities and privately owned non-residential structures. The total number of each type structure will be tracked during the plan review process. Structures will be added to the inventory when as-built inspections are performed for post-construction BMPs. The GI/LID Structures locations will be shown on a GI/LID Structure Map and the inventory table will include ID number, structure type, and as-built date.

2. Measurable goal(s):

- a. Maintain an inventory of publicly owned / County owned, publicly owned by other entities and privately owned non-residential GI/LID water quality structures listed above constructed after December 6, 2012.
- b. Update inventory annually.
- 3. Documentation to be submitted with each annual report: An updated inventory including those structures added during the reporting period.
- 4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): This BMP will enable the county to specifically track GI/LID BMPs which in turn tracks how much owners/designers are moving towards implementing treatment by using vegetation and soil to treat rainwater. The BMP is also requirement of Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: An increase in the number of installed GI/LID structures should lead to an increase in the overall amount of stormwater infiltrated, evapotranspired or reused thereby removing that stormwater volume leaving sites. Less runoff should equal less polluted runoff.

BMP #7 - GI/LID Inspection Program Permit Table 4.2.5(a)7

- 1. Description of BMP: The permit requires the county to conduct or ensure inspections are conducted on 100% of the GI/LID structures included in BMP 5 above within a 5-year period. The inspections will be completed in accordance with the schedule submitted in the GI/LID program (Appendix E-5.)
- 2. Measurable goal(s):
 - a. Inspect 100% GI/LID structure inventory in a five-year permit period, but no less than five (5%) annually.
- 3. Documentation to be submitted with each annual report:
 - a. Copies of inspection reports.
 - b. Track total number and percentage of total County owned GI/LID structures inspected during report period.
 - c. Track total number and percentage of publicly-owned by others and private non-residential GI/LID structures inspected during report period.
 - d. Copy of all compliance or enforcement activities, resulting from the inspections, conducted during the year.

- a. Interim milestone dates (if applicable):
- b. Implementation date (if applicable):
- c. Frequency of actions (if applicable): ongoing
- d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): This BMP is required by the permit and the measureable goals insure that GI/LID structures are being inspected and maintained by tracking each.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Inspection of structures will determine how well the structures are reducing pollution to stormwater and how well the GI/LID structures are being maintained.

BMP #8 – GI/LID Maintenance Program Permit Table 4.2.5(a)8

1. Description of BMP: The permit requires the county to conduct maintenance of county owned GI/LID structures as needed. The county will implement the maintenance procedures, in accordance with the GI/LID Program (Appendix E-5) for all publicly owned structures owned by other entities and privately owned non-residential GI/LID structures, to ensure maintenance is performed as needed. A summary list of maintenance agreements for GI/LID structures publicly owned by other entities and privately owned non-residential will be maintained. (Appendix E-8.)

2. Measurable goal(s):

- a. County will operate and maintain the county / publicly-owned GI/LID structures according to GI/LID Program.
- b. County will insure GI/LID structures publicly owned by other entities and privately owned non-residential, for which the county does not have maintenance responsibility, are maintained according to the GI/LID Program.
- 3. Documentation to be submitted with each annual report:
 - a. Track total number and percentage of total County owned GI/LID structures maintained during report period.
 - b. Documentation of maintenance performed on County owned GI/LID structures during reporting period.
 - c. Summary list of the maintenance agreements and total number of maintenance agreements for structures publicly owned by other entities and structures privately owned non-residential GI/LID.

- a. Interim milestone dates (if applicable):
- b. Implementation date (if applicable):
- c. Frequency of actions (if applicable): ongoing
- d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): This BMP is required by the permit and the measureable goals insure that GI/LID structures are being inspected and maintained by tracking each.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: By insuring that the GI/LID BMPs are properly maintained, the County will ensure that structures are adequately remving pollutants from stormwater which they were designed and built to accomplish. The County will be able to track the number of times maintenance is required and type of maintenance to compare with prior years maintenance.

Pollution Prevention/Good Housekeeping for Municipal Operations

40 CFR Part 122.34(b)(6) 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 storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.

See Table 4.2.6 (a) of the Permit

BMP #1 – MS4 Control Structure Inventory and Map – Permit Table 4.2.6(a)(1a)

1. Description of BMP: The county will maintain an inventory and map catch basins, detention ponds, ditches and storm drain pipes located within the urbanized area. Mapping and inventorying will be conducted according to the MS4 Maintenance Procedures (Appendix F1). The county will update the inventory and map (Appendix F2) as new structures are completed or existing structures are identified. All detention/retention ponds inventoried will follow the Post Construction MCM BMP#2.

2. Measurable goal(s):

- a. Update Storm Sewer Map and inventory as required within urbanized areas each year
- b. Track number of catch basins, detention ponds, ditches and storm drain pipes by type added each year within urbanized area
- c. Track total number of structures within urbanized area
- 3. Documentation to be submitted with each annual report:
 - a. Updated Storm Sewer Map and Inventory with total number of each type of structure added to the inventory and the revised total number of each type of structure.
 - b. Copy of any revised MS4 Maintenance Procedures

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): N/A
- c. Frequency of actions (if applicable):
- d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- Rationale for choosing BMP and setting measurable goal(s): A map and inventory is the critical link to tracking inspection and maintenance of the storm sewer system.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The map and inventory do not directly reduce pollution to stormwater but it allows maintenance and inspection to be tracked in a feasible manner from which the effectiveness can be compared.

BMP #2 - MS4 Inspection Program - Permit Table 4.2.6(a)(2a)

1. Description of BMP: To ensure long-term functionality of this infrastructure, MS4 inspection program must be implemented. The county will inspect catch basins, detention ponds, ditches and storm drain pipes. Inspections will include examinations for both structural and water quality concerns. Inspections will be conducted according to the MS4 Maintenance Procedures (Appendix F-2) and the GSMM. Refer to Post Construction MCM BMP#3 for the detention/retention pond information.

2. Measurable goal(s):

- a. Inspect structures (catch basins, detention ponds, ditches, and storm drain pipes) each year such that 100% of inventory is inspected within the five-year period, but not less than five (5%) per year.
- 3. Documentation to be submitted with each annual report:
 - a. The number (both the number and percentage of the total of each type of structure) of MS4 structural control inspections
 - b. Any documentation of compliance and enforcement activities related to the inspections during the reporting period.

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): N/A
- c. Frequency of actions (if applicable):
- d. Month/Year of each action (if applicable):
 - i) Jan Dec 2023 Inspect MS4 Control Structures
 - ii) Jan Dec 2024 Inspect MS4 Control Structures
 - iii) Jan Dec 2025 Inspect MS4 Control Structures
 - iv) Jan Dec 2026 Inspect MS4 Control Structures
 - v) Jan Dec 2027 Inspect MS4 Control Structures
- 5. Person (position) responsible for overall management and implementation of the BMP: Public Works Director
- 6. Rationale for choosing BMP and setting measurable goal(s): This BMP will allow the county to ensure long term maintenance of the county's MS4 as well as identifying potential water quality problems and future CIP projects. Inspection of structures in the permitted area will be broken down to achieve 100% at the end of the 5-year period.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The system inspection determines the state of the system and what structures or areas need attention. The first step to reducing pollution is having a good assessment through

inspection of the system to determine what needs to be improved to reduce pollution to stormwater.			

BMP #3 – MS4 Maintenance Program – Permit Table 4.2.6(a)(3a)

- 1. Description of BMP: From the Inspection Program, proactive maintenance and system cleaning will be performed on an as needed basis to ensure functional operation of the drainage system during future storm events. The county will maintain the MS4 control structures (catch basins, ditches, detention/retention ponds, and storm drain lines included on MS4 Control Structure Inventory and Map (Appendix F-1) according to the maintenance schedules outlined in the Whitfield County MS4 Maintenance procedures (Appendix F-2) and GSMM. Refer to Post Construction MCM BMP#4 for any detention/retention pond maintenance.
- 2. Measurable goal(s):
 - a. Track number of each type of structure maintained in urbanized area
 - b. Maintain the structural controls according to the maintenance schedules outlined in the MS4 Maintenance procedures (Appendix F-2) and the GSMM.
- 3. Documentation to be submitted with each annual report: Number of each type of structure maintained during the reporting period.
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Public Works Director
- 6. Rationale for choosing BMP and setting measurable goal(s): Maintenance of the storm drain system is required to keep the system functioning. After the structures are assessed for maintenance, maintenance can be prioritized and significant system repairs or replacements planned.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Maintenance should always be reducing pollution through properly removing sediment, fixing erosion and removing debris from clogged pipes and structures. The number of structures maintained during the reporting period will allow for the MS4 to track whether the system performance and whether it is reducing pollution to stormwater.

BMP #4 -Litter Pickup- Permit Table 4.2.6(a)(4b)

- 1. Description of BMP: Whitfield County Public Works utilizes community service laborers when available and county employees to pick-up litter along county owned roadways in the county. The county does not own or operate street sweepers. Pickups are operated each weekend, as community service laborers are available. Community service pickups cover varying lengths of roadways per weekend. All litter collected is disposed of at the Dalton-Whitfield Solid Waste Authority. The total number of streets/road miles in the urbanized area of Whitfield County (does not include City of Dalton or private roads) is approximately 300 miles. The litter cleanup activities will be performed in accordance with the Whitfield County MS4 Maintenance Procedures (Appendix F-1) and MS4 Waste Disposal SOP (Appendix F-6). Example of Roadside Trash Pickup Report is located in Appendix F-4.
- 2. Measurable goal(s):
 - a. Clean 100% of county owned roads and parking lots at least once during the 5-year period.
 - b. Track the number of road miles covered per month by Public Works
 - c. Track the number of tons of litter/debris picked up per month by Public Works
- 3. Documentation to be submitted with each annual report: Copy of Summary Roadside Trash Pickup Report of litter picked up each month
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Public Works Director
- 6. Rationale for choosing BMP and setting measurable goal(s): Picking up roadside trash and debris will prevent it from entering the MS4. Utilizing prison labor and community service workers allows Whitfield County to operate a larger program than county resources would allow. The BMP is also requirement of the Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Removing litter from roads and right of way removes pollutants from the MS4 therefore reducing stormwater pollution. The total number of pounds of litter removed can be tracked in order to measure the effectiveness of the BMP.

BMP #5 - Employee Pollution Prevention Training - Permit Table 4.2.6(a)5a.

- 1. Description of BMP: The county has an existing training program that provides annual stormwater training for employees that come in contact with materials such as motor oil, solvents, pesticides, etc. along with guidelines for proper handling, storage, application, and disposal of materials. The training will be updated to teach staff about other potential sources of stormwater pollution and ways to prevent and reduce pollution from municipal activities. Resources including the EPA Menu of BMPS: Municipal Employee Training and Education, "Preventing Stormwater Pollution: What We Can Do" video (North Central Texas Council of Governments) and various other training presentations or videos will be utilized to implement the training program. The training program will be tailored to the activities the individual departments perform on a daily basis. The Building and Grounds Department, Public Works Department and the Recreation Department (maintenance only) personnel will participate in the training annually.
- 2. Measurable goal(s):
 - a. Train 100% of Building and Grounds, Public Works and the Recreation (maintenance) personnel annually.
- 3. Documentation to be submitted with each annual report: Copy of training sign in sheet and copy of training presentation
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): Training will help educate employees to recognize potential pollution sources and reduce pollution to stormwater in their daily activities. The BMP is also requirement of the Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The annual training and education will make employees aware of potential water quality impacts which will lead to steps toward reducing stormwater pollution. The number of trained employees can be tracked to determine if training is effective at reducing pollution to stormwater.

BMP #6 - Waste Disposal - Permit Table 4.2.6(a)(6.a.)

- 1. Description of BMP: The county Public Works Department will implement procedures for proper disposal of waste removed from the MS4 during maintenance operations and roadside litter cleanup. A standard operating procedure for waste disposal has been developed for the Public Works Department and the Sherriff's Department (Appendix F-6)
- 2. Measurable goal(s):
 - a. 100% of waste removed from the MS4 is disposed of to the Dalton-Whitfield Solid Waste Authority
 - b. Track amount of waste and/or recycling.
- 3. Documentation to be submitted with each annual report: Summary sheet of waste disposed
- 4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Public Works Director
- 6. Rationale for choosing BMP and setting measurable goal(s): Proper disposal of waste removed during maintenance of MS4 insures waste is truly removed and does not end up back in the MS4. The BMP is also requirement of Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The total amount of waste properly removed will be a reduction in waste in stormwater.

BMP #7 - New Flood Management Projects - Permit Table 4.2.6(a)(7.a.)

- 1. Description of BMP: Capital improvement projects and new flood management projects (located within the urbanized area) will be assessed, during the design phase, for water quality impacts. The county has a design review procedure/checklist (Appendix F-7) and Water Quality Improvement Worksheet-proposed (Appendix F-7) for use by county staff regarding the feasibility of incorporating water quality enhancements into the design of future flood management projects.
- 2. Measurable goal(s):
 - a. Assess 100% of future BMPs/capital improvement projects annually for water quality impacts
 - b. Track number of projects reviewed, during the design phase, for water quality impacts noting plans with pollutant reduction.
- 3. Documentation to be submitted with each annual report: List of the BMPs/Capital improvement site plans reviewed.
- 4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
- 5. Person (position) responsible for overall management and implementation of the BMP: Kent Benson (County Engineer)
- 6. Rationale for choosing BMP and setting measurable goal(s): This BMP will allow the county to assess opportunities to incorporate water quality considerations into any capital improvement project design work. The BMP is also requirement of Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: All capital improvement projects that incorporate water quality BMPs will reduce the impact of the capital improvement project thereby reducing pollution.

BMP #8 - Existing Flood Management Projects - Permit Table 4.2.6(a)(8.a.)

1. Description of BMP: Existing publicly owned flood management facilities (located within the urbanized area) designed prior to the 2016 GSMM, will be assessed with regards to water quality issues. The County has a checklist (Appendix F-8) to analyze existing municipal flood management control BMPs (including detention and retention ponds) to ascertain if there is a potential to retrofit the existing BMP to address water quality. Once improvements have been identified and shown to be feasible, water quality retrofits may be budgeted, planned and implemented. If an assessment was previously performed using the 2016 GSMM, documentation of the previous assessment will be provided.

2. Measurable goal(s):

- a. Review existing flood management structures for potential retrofitting each year (if the County has less than 5 structures then assess 100% within 5-year period, if more than 5 structures then assess 100% within 5-year period but minimum of one annually.)
- b. Track existing publicly owned flood management structures, date of assessment, assessment results and status of any retrofitting activities for the 5-year permit period.
- 3. Documentation to be submitted with each annual report:
 - a. Summary list of existing publicly owned flood management structures, date of assessment, and results of assessment and status of any retrofitting activities.
 - b. Checklist for an existing flood management BMP reviewed

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): N/A
- c. Frequency of actions (if applicable): annually
- d. Month/Year of each action (if applicable): ongoing
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): Considerations for water quality should be included when feasible. The county owns very few flood management projects which do not include a water quality component but this analysis could help prioritize existing infrastructure for upgrades in the future. This BMP is a requirement of the Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If an existing flood management BMP can be improved to help water quality, pollution will be reduced.

BMP #9 – Municipal Facilities Inventory and Inspection – Permit Table 4.2.6(a)(9.a.)

- 1. Description of BMP: The County has number of municipal facilities that have the potential to cause pollution. An inventory of these facilities is provided in Appendix F-9. Inspections of the facilities will be conducted on the inventoried facilities using the Municipal Facilities Inspection Checklist (Appendix F-9).
- 2. Measurable goal(s):
 - a. Annually update inventory of all municipal facilities with potential to cause pollution
 - b. Inspect 100% of facilities on inventory within 5-year period but no less than 5% of facilities annually.
 - c. Number of facilities on inventory inspected during report period
- 3. Documentation to be submitted with each annual report:
 - a. Copy of inventory of all municipal facilities with potential to cause pollution
 - b. Copy of inspections conducted during reporting period
 - c. Copy of any compliance or enforcement activities, resulting from the inspections
- 4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
- 5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
- 6. Rationale for choosing BMP and setting measurable goal(s): Municipal facilities must be inspected to insure good housekeeping measures are in place and being followed. The BMP is also requirement of the Permit.
- 7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: All good housekeeping practices that are being followed will reduce pollution. Any identified practices corrected will reduce pollution as well.

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