Phase I Large MS4

City of Duluth
Stormwater Management Program

November 25, 2024

NPDES Permit No. GAS000112
Permit Effective: June 11, 2024
Permit Expiration: June 10, 2029

Please note that this template does not provide an exhaustive listing of what the NPDES Permit requires to be included in the Stormwater Management Program (SWMP). The permittee must carefully review each part of the Permit and ensure all items are included.

STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Stormwater Management Program (SWMP)

1. General Information

A. Name of MS4: **City of Duluth, Georgia**

B. NPDES Permit Number: **GAS000112**

C. Mailing Address (if providing a post office box, also provide a street address):
City of Duluth
3167 Main Street
Duluth, GA 30096

D. Name of responsible official: **Greg Whitlock**
Title: **Mayor of City of Duluth**
Mailing Address: **3167 Main Street**
City: **Duluth** State: **GA** Zip Code: **30096**
Telephone Number: **770-476-3434**
Email Address: **gwhitlock@duluthga.net**

E. Designated stormwater management program contact:
Name: **Alyssa Gilhooly**
Title: **Stormwater Program Administrator**
Mailing Address: **3167 Main Street**
City: **Duluth** State: **GA** Zip Code: **30096**
Telephone Number: **770-497-5311**
Email Address: **agilhooly@duluthga.net**

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F. Provide the river basin(s) to which your MS4 discharges: **Upper Chattahoochee River Basin, Upper Ocmulgee River Basin**

G. Provide the latitude and longitude of the MS4 center (e.g. City Hall, County offices, MS4 mailing address) using Global Positioning System (GPS) –WG 84:
Latitude: **N 34°00'07"** Longitude: **W 84°08'49"**

2. Sharing Responsibility

A. Has another entity agreed to implement a SWMP Component on your behalf?
Yes X No_____(If no, skip to Part 3)

SWMP Component:

1. Name of entity: **Gwinnett County**

2. SWMP component to be implemented by entity on your behalf:
Gwinnett County provides some services required by the City of Duluth SWMP. These services are described in the Gwinnett County 2020 Service Delivery Strategy (SDS), which is included in Appendix 1. These services include Spill Response (identified in the SDS as Chemical/Biological Hazard Disposal) and Sanitary Sewer Infiltration Controls. The City of Duluth does not own or operate the sanitary sewer system within its jurisdiction. Gwinnett County owns and operates this system and performs all activities related to the detection and elimination of seepage and spillage from the sanitary sewer. Gwinnett County Fire and Emergency Services has a Haz Mat Team that coordinates hazardous material recognition, scene safety, material removal and decontamination operations.

B. Attach an additional page if necessary to list additional shared responsibilities. **It is mandatory that you submit a copy of a written agreement between your MS4 and the other entity demonstrating written acceptance of responsibility.**

3. Certification Statement

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 gather and evaluate 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: Greg Whitlock Date: 11-25-24

Signature: [signature] Title: Mayor

Structural and Source Control Measures
Table 3.3.1 of the Permit

1. MS4 Structure Inventory and Map

1. Description of SWMP Component: **The City of Duluth Municipal Separate Storm Sewer System (MS4) includes those structures, pipes, ditches and other conveyances, and facilities used for collecting, conveying, storing and/or treating stormwater runoff that are owned and operated by the City of Duluth.**

The City of Duluth has adopted an Extent of Service (EOS) Policy to define the various components of the MS4. The City of Duluth owns and operates the stormwater management systems and facilities within the city's public road rights-of-way, and owns or has rights established by written agreements to operate, maintain, improve and access stormwater system components as described in Section 15-6(b) of the Duluth Municipal Code Chapter 15. The Duluth Municipal Code Chapter 15 – Utilities is included in Appendix 2a.

Using the guidelines of the existing EOS Policy, City of Duluth staff have created a series of maps depicting the locations of MS4 structures (catch basins), pipes, detention ponds and ditches. In addition, an inventory of the MS4 structural components is maintained in list form. The City updates the maps and inventory at least once per year, but often more frequently, through the review of construction and as-built drawings, plats and/or field inspection reports. The current MS4 inventory and maps are included in Appendix 2b.

2. Measurable goal(s): **The City of Duluth will update the MS4 inventory and maps of MS4 structures (catch basins), pipes, ditches and detention ponds (including underground detention facilities, if any) at least annually. The City will document the number of structures, pipes, ditches and ponds that are added or removed from the inventory each year.**

3. Documentation to be submitted with each Annual Report: **The following items will be submitted with each annual report:**

- **a. Updated maps and inventory of MS4 structures (catch basins), pipes, ditches and detention ponds,**
- **b. Number of MS4 structural components that were added or removed during the previous year, and**
- **c. Updated total number of MS4 structural components.**

2. MS4 Inspection and Maintenance Program

1. Description of SWMP Component (Ensure the text describes both the inspection and maintenance of the MS4 structures): **City of Duluth staff (or a consultant) will inspect 100% of the MS4 structures (catch basins), pipes, ditches and detention ponds within the five-year permit term. The city has been split geographically into five "zones". A map of these zones is included in Appendix 2b. Staff will inspect all the MS4 infrastructure in one zone each year so that all zones have been inspected by the end of the five-year permit term. Inspections will include a visual evaluation of each component to assess its condition and need for maintenance. Digital inspection reports for structures, pipes, ditches and detention ponds will be completed using a GIS application or electronic form. Inspection forms can be found in Appendix 2c. The City will conduct maintenance on the MS4 structural components as needed based on findings during the inspections, reports from the public and available budget.**

2. Measurable goal(s): **Conduct visual inspections of MS4 inventory according to geographical zone, such that one zone is inspected each year, and all zones are inspected by the end of the five-year permit term. Conduct maintenance on MS4 infrastructure as needed and as resources allow.**

3. Documentation to be submitted with each Annual Report: **The following items will be submitted with each annual report:**

    a. **Number of MS4 structures (catch basins), pipes, ditches and detention ponds inspected during the reporting period, and the cumulative percentage of the total MS4 inventory that has been inspected during the permit term,**
    b. **Inspection reports for each MS4 structure, ditch, pond or pipe, or if completing the inspections electronically, a summary table of completed inspections with inspection date, asset ID number, and general findings from the inspection, and**
    c. **A table showing maintenance completed during the reporting period, including number of structures maintained, number of pipes or total linear feet of pipe maintained, number of ditches or total linear feet of ditches maintained, and number of detention ponds maintained.**

3. Planning Procedures

1. Description of SWMP Component: **FORWARDuluth is the City of Duluth's 2045 Comprehensive Plan that describes the city's aspirations and goals for the future while articulating a corresponding set of policies and recommendations to guide decisions regarding land use, development and capital improvements. This plan can be found in Appendix 3. The Comprehensive Plan is required by Georgia state planning rules to be updated every five years. The Comprehensive Plan discusses objectives and policies that impact the city's stormwater program. These are summarized in Appendix 3.**

2. Measurable goal(s): **Review and update the stormwater portion of the Comprehensive Plan as needed, and at least every five years.**

3. Documentation to be submitted with each Annual Report: **A written description of any changes to the stormwater portion of the Comprehensive Plan during the reporting period.**

4. Street Maintenance

1. Description of SWMP Component: **The City of Duluth conducts annual street sweeping on nearly every street within the city limits (approximately 276 curb miles). A list of these streets and their curb mileage is found in Appendix 4. Citywide street sweeping generally occurs at the end of calendar year when there is heavy leaf litter on the ground. Additionally, areas of Downtown Duluth are swept after select large public events, concerts and festivals. A map of the areas that are swept after events is found in Appendix 4.**

2. Measurable goal(s): **Conduct citywide street sweeping once per year and sweeping after select events in Downtown Duluth.**

3. Documentation to be submitted with each Annual Report: **For citywide annual sweeping, invoice(s) from the street sweeping contractor showing the number of miles swept and the date(s) of service, and a Location Summary Report listing the streets that were swept, will be provided. For event sweeping, an invoice will be provided along with date of service.**

5. Flood Management Projects

1. Description of SWMP Component (Ensure the text describes procedures for both proposed and existing flood management projects): **For proposed post-construction flood management projects (e.g., new detention ponds), water quality impacts are assessed during the design phase in accordance with the City of Duluth Unified Development Code (UDC) Article 10, Division IV. Please refer to the Post-Construction section of this SWMP for additional details. Briefly, the UDC requires developers to submit a stormwater site plan for new development and redevelopment that creates, adds or replaces 5,000 square feet or more of new impervious surface area, or involves land disturbing activity of one acre of land or greater. Stormwater site plans are reviewed by a Georgia-registered Professional Engineer and must be approved by the City's Department of Community Development and Engineering before a land disturbing permit (LDA) is issued. The site plan must address stormwater runoff quality/reduction.**

   All flood management projects owned and maintained by the City of Duluth that were designed prior to the 2016 Georgia Stormwater Management Manual (GSMM) have been previously assessed for the feasibility of retrofitting activities to address water quality impacts. No additional assessments of existing flood management projects are required.

2. Measurable goal(s): **Ensure that all new development and redevelopment projects that require post-construction flood management practices are assessed for water quality impacts, and track the number of plans reviewed for water quality measures. Conduct retrofitting activities on city-owned flood management practices as resources allow.**

3. Documentation to be submitted with each Annual Report: **For proposed flood management projects, a summary table showing the number of stormwater site plans evaluated for water quality impacts within the reporting period will be included. In the first annual report submitted after permit issuance, the completed assessments of existing flood management projects owned by the City of Duluth will be provided. Each subsequent annual report will include a summary table of the existing flood management projects owned by the city, details from the previously completed retrofit feasibility assessments, and the status of any retrofitting activities on city-owned flood management structures.**

6. Municipal Facilities Excluding Any Facilities Addressed in Section 3.3.3

1. Description of SWMP Component (Ensure the text addresses both the inventory and the inspection of the facilities): **The inventory of municipal facilities with the potential to cause pollution is provided in Appendix 5. Stormwater staff inspect these facilities to identify activities and/or materials that could cause or contribute to the discharge of pollutants from the MS4. At least one municipal facility will be inspected each year, so that all facilities have been inspected within the five-year permit term. The inspection will consist of a site visit to identify actual or potential pollutant sources, and an inspection form will be completed during the visit. The inspection form is found in Appendix 5. Any concerns about pollutant source containment or control practices will be discussed with the Department Director or an appointee during the inspection or as soon as possible thereafter. Educational materials will be distributed as appropriate. If any municipal facility fails the routine inspection, corrective actions and a timeline for those actions will be discussed with the Department Director, and the facility will be reinspected within 30 business days.**

2. Measurable goal(s): **Update the inventory of municipal facilities with the potential to cause pollution each year. Inspect at least one municipal facility from this inventory each year, so that 100% of these facilities are inspected during the five-year permit term. If a municipal facility fails a routine inspection, a reinspection should occur within 30 business days to confirm that corrective actions have been taken.**

3. Documentation to be submitted with each Annual Report: **The updated inventory of municipal facilities with the potential to cause pollution will be provided. In addition, completed inspection report(s), documentation of any corrective actions taken to address noncompliance, and completed re-inspection reports will be included.**

7. Pesticide, Fertilizer, and Herbicide Application

1. Description of SWMP Component (Ensure the text addresses both commercial applicators and municipal use): **Commercial Applicators and Distributors: The City of Duluth relies on the Georgia Department of Agriculture (GDA) to address requirements for Pesticide Applicator and Training Certification. All companies and operators providing pest control services in the State of Georgia are regulated by GDA according to federal and state laws. GDA performs compliance inspections to monitor compliance in pesticide use, record keeping, pesticide storage and disposal, etc. The Occupational Tax Officer at the City of Duluth requests proof of license for any profession that requires it during the new business application process and for occupational tax renewals.**

   Municipal Use: The City of Duluth utilizes state-certified contractors for most pesticide, herbicide and fertilizer applications. Some municipal staff members in the Parks & Recreation Department and the Public Works Department apply general use fertilizers, pesticides and/or herbicides (on city property or within city public right-of-way (ROW). Private or Commercial Pesticide Applicator Licenses through the GDA are not required for these types of activities. Staff that apply general use fertilizers, pesticides and/or herbicides are encouraged to complete the Georgia Competent Applicator of Pesticides Program (GCAPP). Other educational resources, including relevant sections of the Georgia Pest Management Handbook, are available to these staff. These resources are provided in Appendix 6. Records of training and certifications are maintained by each Department with staff that apply fertilizers, pesticides and/or herbicides.

2. Measurable goal(s): **Continue to verify during the business licensing process that pesticide applicators operating in the City of Duluth hold the appropriate professional license. Verify that vendors contracted by the City of Duluth to perform fertilizer, pesticide and/or herbicide application are appropriately licensed. Make educational materials available to municipal staff involved in fertilizer, pesticide and/or herbicide application, and track any training or certifications obtained by municipal staff.**

3. Documentation to be submitted with each Annual Report: **A list of new businesses established in the City of Duluth during the reporting period that require a pesticide license will be provided. Licensing information for vendors contracted by the City to perform fertilizer, pesticide and/or herbicide application will also be provided. Completed training courses or certifications by municipal staff will also be summarized.**

Illicit Discharge Detection and Elimination Program (IDDE)
Table 3.3.2 of the Permit

1. Legal Authority

1. Description of SWMP Component: **Article 10, Division V of the current City of Duluth Unified Development Code (UDC) provides legal authority to carry out all inspection, surveillance, monitoring and enforcement procedures to prevent non-stormwater discharges, and prohibit illicit discharges and illegal connections, to the storm sewer system. UDC Article 10, Division V is provided in Appendix 7a.**

2. Measurable goal(s): **Evaluate and modify UDC Article 10, Division V as needed to comply with the NPDES Phase I MS4 Permit, MNGWPD Water Resources Plan, and other local, state or federal regulations.**

3. Documentation to be submitted with each Annual Report: **If revisions to Article 10, Division V of the UDC are made during a reporting period, a copy of the revised Ordinance will be submitted with the annual report.**

2. Outfall Inventory and Map

1. Description of SWMP Component: **The City of Duluth maintains an inventory and map of the outfalls from the MS4, and updates this inventory at least annually to add or remove outfalls. The inventory also includes the names and locations of waters of the State that receive discharges from these outfalls. The City of Duluth defines an outfall as the most downstream point (i.e., final discharge point) of the MS4 where it discharges to receiving waters of the State. The current inventory and map are found in Appendix 7b.**

2. Measurable goal(s): **Update the inventory and map of outfalls from the MS4 at least annually.**

3. Documentation to be submitted with each Annual Report: **An updated map and inventory of outfalls from the MS4 will be submitted with each Annual Report. The number of outfalls added and/or removed during the previous year will be noted, as well as the updated total number of outfalls from the MS4.**

3. IDDE Plan

1. Description of SWMP Component (Ensure the text discusses the outfall inspections, any stream walks activities, illicit discharge tracing, and illicit discharge elimination): **The City of Duluth conducts dry weather screening (DWS) activities in accordance with the current MS4 Outfall Dry Weather Screening Plan, found in Appendix 7c. Dry weather screening is conducted on all MS4 outfalls in one inspection zone per year so that 100% of the MS4 outfalls are screened for dry weather flow within the five-year permit term. Stream walks are not conducted in conjunction with DWS. Sampling and/or source tracing is completed for dry weather flows to identify where the illicit discharge originates and what it contains. Details on source tracing are found in the MS4 Outfall Dry Weather Screening Plan. The City of Duluth follows the enforcement procedures identified in UDC Article 10, Division V to eliminate confirmed illicit discharges where a source has been identified. These enforcement procedures are also found in the Enforcement Response Plan (ERP) included as Appendix 15 of this SWMP.**

2. Measurable goal(s): **Conduct dry weather screening of all MS4 outfalls in one zone per year, so that all MS4 outfalls are screened within the five-year permit term; Investigate and perform source tracing on all suspected illicit discharges; Take action to eliminate identified sources of illicit discharge using enforcement procedures described in the ERP.**

3. Documentation to be submitted with each Annual Report: **The following items will be provided with each Annual Report:**
    a. **Number and percentage of outfall inspections conducted during the reporting period,**
    b. **Dry weather screening inspection forms,**
    c. **Lab reports from potential illicit discharges discovered during dry weather screening,**
    d. **Source tracing reports to identify potential illicit discharges discovered during dry weather screening, and**
    e. **A summary table describing actions taken to eliminate all identified sources of illicit discharges, including any enforcement actions taken during the reporting period. In the event that a source cannot be identified, documentation will be provided to describe the source tracing efforts and findings.**

4. Spill Response Procedures

1. Description of SWMP Component: **Spill Response Procedures are performed by Gwinnett County in accordance with the Gwinnett County Service Delivery Strategy (SDS) found in Appendix 1. Gwinnett County Fire and Emergency Services has a Haz Mat Team that coordinates hazardous material recognition, scene safety, material removal and decontamination operations. Gwinnett County maintains and operates the sanitary sewer system in the City of Duluth, and confirmed or suspected sewage spills are immediately reported to Gwinnett County Department of Water Resources.**

2. Measurable goal(s): **Report any known spills or sewage leaks within the City of Duluth to Gwinnett County immediately upon discovery. Obtain documentation on any spill occurrences and cleanup performed within the city limits from Gwinnett County Fire and Emergency Services or Gwinnett County Department of Water Resources. Download the Sewage Spills Report maintained by the Georgia EPD each month to determine if there were any sewage spills reported within the city limits within the last 30 days.**

3. Documentation to be submitted with each Annual Report: **A summary table of spill occurrences within the city limits during the reporting period, including the date of spill, location, material that was spilled and quantity (if available), will be provided.**

5. Public Reporting Procedures

1. Description of SWMP Component: **The City of Duluth has established procedures for facilitating public reporting of illicit discharges and responding to reports of illicit discharge. Members of the public can report suspected or observed illicit discharge by calling the Stormwater Division (770-497-5311), emailing a dedicated Stormwater email address (sw@duluthga.net), or through an online reporting system (www.duluthga.net/report). The Stormwater section of the City of Duluth webpage (www.duluthga.net/stormwater) provides general information on illicit discharges, how to detect them and how to report them. The Stormwater Division formally notifies the public of the various ways to report an illicit discharge at least once each year. This is achieved with an article in Duluth Life Magazine, website posting or addition to the Weekly ENewsletter that is published by the Public Information & Marketing Department. One other way this might be achieved is through the distribution of magnets that have the reporting website on them. These magnets might be distributed at a public event or meeting.**

   Reports of illicit discharge are received by the Stormwater Department and investigated by a member of the Stormwater Division, Code Compliance Division, or other appropriate staff. All complaints are recorded, investigated, and if necessary, enforcement measures are taken to eliminate the illicit discharge in accordance with the ERP found in Appendix 15.

2. Measurable goal(s): **Maintain multiple methods (phone, email and website) for reporting illicit discharges; formally promote and publicize one or more of these methods at least once per reporting period; document all reports of illicit discharge that come through these channels and maintain records on inspection, response and enforcement procedures**.

3. Documentation to be submitted with each Annual Report: **A copy of the website posting, article or Weekly ENewsletter used to promote the methods for public reporting of illicit discharge will be provided. If magnets were used to fulfill this requirement, a description of the event(s) that they were distributed at and the approximate number of magnets distributed will be provided. A summary table documenting the reports of illicit discharge that were made through these various channels, or discovered by City staff, including details of the inspection, response and enforcement procedures and current status (in progress or closed) will also be submitted.**

6. Proper Management and Disposal of Used Oil and Toxic Materials

1. Description of SWMP Component: **The City of Duluth facilitates the proper management and disposal of used oil and other toxic materials. Each year, the city holds a Community Cleanup Day that permits residents to properly dispose of items such as paint, vehicle parts and fluids, household cleaners and other hazardous wastes for free. If the annual Community Cleanup Day is cancelled due to inclement weather or is discontinued for any reason, the city will promote other hazardous waste collection events available to Gwinnett County residents on the website and in the Weekly ENewsletter. In addition, there are resources about reducing household hazardous waste on the City of Duluth website. There is also a link to a recycling resource maintained by Gwinnett Clean & Beautiful (www.gwinnettcb.org/recycling) where residents learn about how and where to recycle a variety of materials.**

2. Measurable goal(s): **Perform at least one activity each year to facilitate the proper management and disposal of used oil and other toxic materials.**

3. Documentation to be submitted with each Annual Report: **Documentation from the City's annual Community Cleanup Day, including the date and time of the event and promotional materials, will be provided. If the City does not hold a Community Cleanup Day, copies of the website postings and ENewsletter distributed to promote another local waste collection event will be submitted. Copies of or links to any educational materials or resources added to the website during the reporting period will also be provided.**

7. Sanitary Sewer Infiltration Controls

1. Description of SWMP Component: **The City of Duluth does not own, operate or maintain the sanitary sewer system within its jurisdiction. Sanitary Sewer Infiltration Control procedures are completed by the Gwinnett County Department of Water Resources (DWR). If City staff are made aware of or discover a sanitary sewer leak, that information is immediately provided to the Gwinnett County DWR. Staff will also download the Sewage Spills Report generated by Georgia EPD each month. If a sewage spill within the city limits appears on this list, staff will reach out to Gwinnett County DWR for details regarding the spill and clean-up.**

2. Measurable goal(s): **Download EPD Sewage Spills report once per month. Document any sewage spills that occurred within the city limits. Contact Gwinnett DWR for information as appropriate.**

3. Documentation to be submitted with each Annual Report: **A summary table of any known sewage spills that occurred within the city limits during the reporting period will be provided.**

Industrial Facility Stormwater Discharge Control
Table 3.3.3 of the Permit

1. Industrial Facility Inventory

1. Description of SWMP Component: **The City of Duluth maintains an inventory of facilities with coverage under the EPD Industrial Stormwater General Permit (IGP) that are located within the city limits. This includes facilities with both Notice of Intent (NOI) coverage and No Exposure Exclusion (NEE) coverage. The inventory is updated at least annually using information that is publicly available in the Georgia EPD Online System (GEOS). The current inventory is available in Appendix 8a.**

2. Measurable goal(s): **Update the inventory of industrial facilities with coverage under the current IGP annually.**

3. Documentation to be submitted with each Annual Report: **The updated inventory of industrial facilities will be provided with each annual report.**

2. Inspection Program

1. Description of SWMP Component: **The City of Duluth inspects industrial facilities with NOI and NEE coverage under the current IGP. At least one industrial facility is inspected each reporting year, and all facilities that appear on the inventory are inspected within the five-year permit term. The current inventory, which includes only five facilities, is provided in Appendix 8a. The inspection form is found in Appendix 8b. The city maintains records of the inspection findings, problems identified, and any actions taken to correct those problems. If an inspection reveals that a facility is contributing a substantial pollutant load to the MS4, the city will notify the site owners or operators and request that they provide monitoring results for the pollutant of concern, if they are already monitoring for the pollutant under their Stormwater Pollution Prevention Plan (SWPPP). The city may elect to perform its own monitoring and source tracing and will follow procedures to identify and eliminate illicit discharges. The city will also notify EPD of its concerns and request assistance as needed.**

2. Measurable goal(s): **Conduct one or more industrial inspections each year, so that each facility on the inventory is inspected at least once during the five-year permit term. For any facility that is determined to be a significant contributor of stormwater pollution to the MS4, request monitoring results and/or follow procedures for identifying and eliminating illicit discharges.**

3. Documentation to be submitted with each Annual Report: **The following items will be provided with each annual report:**
    a. **Number and percentage of industrial facilities inspected during the reporting period,**
    b. **Inspection reports from each inspection,**
    c. **Documentation of any actions to correct problems related to stormwater pollution that were discovered during the inspection, and**
    d. **Monitoring results (if any) provided by the industrial facility or collected by the city.**

4. Enforcement Procedures

1. Description of SWMP Component: **If an illicit discharge to the MS4 is discovered during a routine inspection of an industrial site, City staff will follow the enforcement procedures described in Article 10, Division V of the UDC, which are also described in the Enforcement Response Plan (Appendix 15). If there is no evidence of an illicit discharge, but conditions or practices on the site indicate that an illicit discharge is likely to occur, the inspector will discuss their concerns with the owner or operator. A copy of the inspection report will also be provided to the facility.**

2. Measurable goal(s): **Implement enforcement procedures when illicit discharges to the MS4 are discovered from an industrial site. Document enforcement actions, including Notices of Violation, citations, corrective actions, and/or re-inspections.**

3. Documentation to be submitted with each Annual Report: **A summary table of all enforcement actions on industrial sites, including the current status of the case, will be provided. Copies of any Notices of Violation issued to the facility will be provided, along with reinspection report(s) to confirm that the violation has been corrected.**

5. Educational Activities

1. Description of SWMP Component: **At the conclusion of the inspection, the inspector will discuss his or her observations of the site with the operator, and will provide at least one educational brochure or information sheet related to stormwater pollution prevention to the operator.**

2. Measurable goal(s): **Provide at least one educational brochure or fact sheet to the facility operator or manager at the conclusion of the inspection.**

3. Documentation to be submitted with each Annual Report: **Copy of the brochure(s) or fact sheet(s) provided to the facility at the inspection.**

Construction Site Management
Table 3.3.4 of the Permit

1. Legal Authority

1. Description of SWMP Component: **Article 10, Division I of the current City of Duluth UDC provides the City with the authority to: issue Land Disturbing Activity (LDA) permits; require best management practices (BMPs) to prevent and minimize erosion and sedimentation (E&S); require erosion, sedimentation and pollution control plan submission and review prior to construction; conduct inspections and enforcement, including stop work orders, bond forfeiture and monetary penalties; and require education and certification for persons involved in land development, design, review permitting, construction, monitoring, inspection and other land disturbing activities. UDC Article 10, Division I is found in Appendix 9a. This ordinance is revised as necessary for compliance with the NPDES Phase I Large MS4 Permit and other regulations. UDC Article 8 also discusses land development requirements such as buffers and setbacks. The City of Duluth is a local issuing authority (LIA) for LDA permits. The Memorandum of Agreement (MOA) between the Gwinnett Soil and Water Conservation District and the City of Duluth that authorizes the city to review and approve E&S control plans is also included in Appendix 9a.**

2. Measurable goal(s): **Re-evaluate and modify the existing E&S ordinance when necessary for compliance with the NPDES Phase I Large MS4 permit and other regulations.**

3. Documentation to be submitted with each Annual Report: **If changes were made to the E&S ordinance during the reporting period, a copy of the revised and adopted ordinance will be provided.**

2. Site Plan Review Procedures

1. Description of SWMP Component: **All site plans for non-exempt land disturbing activities are reviewed in accordance with the procedures and requirements outlined in Article 10, Division I of the UDC, and must be approved prior to issuance of the permit. Site plans are reviewed using the most current Erosion, Sedimentation & Pollution Control Plan Checklist made available each year by the Georgia Soil and Water Conservation Commission. Site plans are also reviewed using a checklist developed by the Department of Community Development and Engineering to confirm that the plans follow all requirements of the UDC. Both review checklists are available in Appendix 9b. Plan reviews and LDA permits are tracked electronically using a software called iWorQ.**

2. Measurable goal(s): **Review all Erosion, Sedimentation and Pollution Control Plans according to established procedures and requirements. Track the number of plans reviewed, plans approved, and plans denied or sent back for revision. Track the number of LDA permits issued.**

3. Documentation to be submitted with each Annual Report: **A summary table listing the number of Erosion, Sedimentation and Pollution Control Plans that were reviewed, approved and denied during the reporting period will be provided. The table will also indicate the number of LDA permits that were issued during the reporting period.**

3. Inspection Program

1. Description of SWMP Component: **The City of Duluth implements the construction site inspection program by routinely inspecting land disturbing activities to ensure that structural and non-structural BMPs are properly designed and maintained as specified in the Construction General Permit (CGP), as required by UDC Article 10, Division I and in accordance with the approved ES&PC Plan. Each active construction site is inspected by a City of Duluth staff member, or a consultant on behalf of the city, up to once per month but no less than once per reporting period, until the site is stabilized and all land disturbing activities are complete. The form that is completed during each inspection can be found in Appendix 9c. Completed inspection forms are shared with the LDA permittee electronically. Inspections are tracked electronically using a software called iWorQ.**

2. Measurable goal(s): **Inspect all active construction sites with LDA permits up to once per month but no less than once per reporting period, until land disturbing activities are complete and the site is stabilized. 100% of active construction sites must be inspected at least once during the reporting period. Maintain records of all inspection activities conducted during the reporting period.**

3. Documentation to be submitted with each Annual Report: **Completed inspection forms from each ES&PC inspection, and a summary table showing the number of active sites, number of inspections, and the date of each inspection, will be provided in each annual report.**

4. Enforcement Procedures

1. Description of SWMP Component: **If, through inspection, it is deemed that a construction site has failed to comply with the approved ES&PC plan, permit conditions, or with the provisions of UDC Article 10, Division I, enforcement measures will be taken following the procedures outlined in the ERP (Appendix 15). If a site is deemed out of compliance, the inspection report will set forth the measures necessary to achieve compliance and the timeline within which such measures shall be completed. This will serve as the written Notice of Violation and will be sent to the LDA permittee electronically. Follow-up inspections will be conducted to confirm that appropriate corrective actions have been taken within the specified time frame. Following the third and each subsequent violation of the ES&PC requirements, a Stop Work Order (SWO) will be issued, requiring all land disturbing activities to stop until corrective action is taken. An immediate Stop Work Order is issued without prior warnings if: the violation presents an imminent threat to public health or waters of the state, land disturbing activities are conducted without obtaining the necessary permit, or the LDA permittee has failed to maintain a stream buffer. Additionally, if significant amounts of sediment have been or are being discharged into state waters and best management practices have not been properly designed, installed and/or maintained, a SWO is issued immediately without prior written warnings.**

2. Measurable goal(s): **Follow the established enforcement procedures for ES&PC violations at active construction sites. Record all enforcement activity.**

3. Documentation to be submitted with each Annual Report: **All enforcement activities for ES&PC violations during the reporting period will be summarized in a table and submitted with the annual report. Written Notices of Violation and Stop Work Orders will be provided, as well as documentation of any penalties assessed for noncompliance.**

5. Certification

1. Description of SWMP Component: **All entities involved in construction activities subject to the CGP are required to comply with the certification requirements of the Georgia Erosion and Sedimentation Act (GESA) and the rules adopted by the Georgia Soil and Water Conservation Commission (GSWCC). The City of Duluth requires all construction site operators to provide evidence in their LDA permit application that they have obtained the appropriate certification. Evidence of site personnel certification must also be produced during an inspection upon request. The city also requires municipal staff involved in construction activities subject to the CGPs to be trained and certified in accordance with the rules adopted by GSWCC.**

2. Measurable goal(s): **Ensure that all City of Duluth staff involved in construction activities subject to the CGPs receive the proper training and obtain the certifications required by GESA and GSWCC.**

3. Documentation to be submitted with each Annual Report: **The number and type of current certifications held by City of Duluth staff will be provided in each annual report.**

Highly Visible Pollutant Sources (HVPS)
Table 3.3.5 of the Permit

1. HVPS Facility Inventory

1. Description of SWMP Component: **The City of Duluth maintains an inventory of Highly Visible Pollutant Source (HVPS) businesses that operate within the city limits. The following types of facilities or businesses are HVPS: gas stations, automobile repair shops, commercial car washes, home improvement stores, veterinarian offices (for potential to carry a fecal loading to streams), pet kennels/boarding facilities (for potential to carry a fecal loading to streams), and garden nurseries. The most current HVPS inventory is provided in Appendix 10a. The list is developed and updated using Occupational Tax Certificate (OTC) information provided by the City Clerks office. The inventory is updated at least once each reporting period.**

2. Measurable goal(s): **Review and update the inventory of HVPS facilities annually.**

3. Documentation to be submitted with each Annual Report: **An updated inventory of HVPS facilities will be provided with the annual report.**

2. Inspection Program

1. Description of SWMP Component: **City of Duluth staff conduct routine inspections of HVPS facilities to identify potential pollution sources and/or practices that could contribute to stormwater pollution. Approximately 20% of the facilities in the HVPS inventory are inspected each year, so that 100% of HVPS facilities are inspected within the five-year permit term. At a minimum, at least 5% of the inventoried facilities are inspected each year. HVPS inspections involve an assessment of the site to evaluate the condition and presence of stormwater pollutants and includes a visual observation of areas including but not limited to outdoor storage areas, fueling areas, and outdoor work areas. Photos and notes are taken during the inspection using a standard inspection form, provided in Appendix 10b. The form can be filled out digitally onsite using ArcGIS Survey123 on a city-issued mobile device, or after the inspection at a desktop computer. If the owner or manager of the business is available at the time of the inspection, the inspector may discuss their observations with him or her prior to leaving the site. Completed HVPS inspection reports and educational materials are mailed to the facilities at which the inspector observed conditions or practices that could contribute to stormwater pollution. Any HVPS facility that fails a routine inspection will be reinspected by the end of the following reporting period.**

2. Measurable goal(s): **Inspect approximately 20% of the total HVPS facilities each year so that 100% of the facilities are inspected within the five-year permit term. Reinspect HVPS facilities that fail a routine inspection by the end of the following reporting period.**

3. Documentation to be submitted with each Annual Report: **The total number of HVPS facilities, along with the number and percentage of facilities that were inspected during the reporting period, will be provided. Completed inspection forms from each HVPS inspection will be provided. Reinspection reports, if any, will also be included.**

3. Enforcement Procedures

1. Description of SWMP Component: **If an illicit discharge to the MS4 is discovered during a routine inspection of a HVPS facility, City staff will follow the enforcement procedures described in Article 10, Division V of the UDC, which are also described in the Enforcement Response Plan (Appendix 15). If there is no evidence of an illicit discharge, but conditions or practices on the site indicate that an illicit discharge is likely to occur, the inspector may discuss their concerns with the facility owner or manager if they are available at the time of the inspection. A copy of the inspection report will also be provided to the facility, along with educational materials about best management practices and stormwater pollution prevention.**

2. Measurable goal(s): **Implement enforcement procedures when illicit discharges to the MS4 are discovered from a HVPS facility. Document enforcement actions, including Notices of Violation, citations, corrective actions, and/or re-inspections.**

3. Documentation to be submitted with each Annual Report: **A summary table of all enforcement actions on HVPS sites, including the status of each case, will be provided. Copies of any Notices of Violation issued to the facility will be provided, along with reinspection report(s) to confirm that the violation has been corrected.**

4. Educational Activities

1. Description of SWMP Component: **The inspector provides each HVPS facility with a general information sheet during the inspection. The information sheet explains the purpose of the inspection and lists common best management practices to prevent stormwater pollution from HVPS sites. The information sheet is provided in Appendix 10c. Industry-specific resources may also be distributed during the inspection, if available. In addition, the Stormwater Division maintains a "Resources & Related Websites" webpage with brochures and other information on preventing stormwater pollution from HVPS facilities. The weblink for this webpage is: https://duluthga.net/services/planning development/stormwater/educational brochures resources .php.**

2. Measurable goal(s): **Provide the owner, manager, or employee of each HVPS facility with at least one educational brochure or handout. Maintain up-to-date resources on stormwater pollution prevention for HVPS facilities on the webpage.**

3. Documentation to be submitted with each Annual Report: **Copies of the handouts and resources that were distributed during the HVPS inspections will be provided, as well as any related resources that were added to the webpage during the reporting period.**

Public Education
Table 3.3.9 of the Permit

NOTE: If the population of your municipality is less than 10,000, then you must implement two public education activities. If the population of your municipality exceeds 10,000, then you must implement four public education activities.

1. Public Education Program - Educational Activity #1

1. Description of SWMP Component: **The City of Duluth Stormwater Division maintains several webpages on the City of Duluth website. This group of webpages can be easily accessed from the main City of Duluth website, or directly using the following link: www.duluthga.net/stormwater. A variety of educational resources are available on these webpages including information about stormwater pollution, illicit discharge, water conservation, septic systems and floodplain management. Webpage topics and educational resources are routinely updated, changed and revised based on the needs of the community. Upcoming events, like street sweeping and local hazardous waste collection days, are also promoted on the webpage. Contact information for the Stormwater Division is listed on the webpage, as well as a link to report illicit discharges or issues with stormwater drainage in the city. Updates and/or posts to the webpage are made at least annually.**

2. Measurable goal(s): **Maintain the group of webpages related to stormwater and update one or more of the webpages at least annually.**

3. Documentation to be submitted with each Annual Report: **A summary of changes to the webpages during the reporting period will be provided, as well as screenshots of the webpage content.**

2. Public Education Program - Educational Activity #2

1. Description of SWMP Component: **The City of Duluth publishes a quarterly magazine called "Duluth Life" that is sent to all residents in the city limits. The magazine discusses a variety of local issues and topics, promotes upcoming events, and celebrates the achievements of the city, staff and residents. The Stormwater Division will submit an article to be included in at least one issue of the Duluth Life magazine each reporting period. Potential topics include but are not limited to stormwater pollution prevention, pet waste, septic system maintenance, illicit discharge, hazardous waste disposal, street sweeping, green infrastructure and residential pesticide, fertilizer and herbicide application.**

2. Measurable goal(s): **Publish at least one article related to stormwater in the Duluth Life magazine each year.**

3. Documentation to be submitted with each Annual Report: **A copy of the article(s) that were published in Duluth Life magazine during the reporting period will be provided.**

3. Public Education Program - Educational Activity #3

1. Description of SWMP Component: **The Stormwater Division will host a booth at one community event each year. Staff will distribute stormwater outreach materials and/or promotional items during the event. Possible events to host a booth at include: Annual Community Clean-Up Day, Fridays-N-Duluth, Duluth Farmers & Artisan Market, Howl on the Green, or an event organized through the Duluth Neighborhood Outreach Work (N.O.W.) program.**

2. Measurable goal(s): **Host a booth at one community event each year.**

3. Documentation to be submitted with each Annual Report: **Details about the booth, including the date and name of the community event and the approximate number of attendees at the event, will be provided. Photos of the booth will also be included in the annual report. Copies of the outreach materials and/or a description of the promotional items that were distributed at the event will be provided.**

4. Public Education Program - Educational Activity #4

1. Description of SWMP Component: **The city will make brochures related to stormwater pollution prevention available in public places. Brochures will be placed in the lobby of City Hall, at the entrance to the Department of Community Development & Engineering on the second floor of City Hall, and at the Public Works facility. Examples of the brochures are included in Appendix 11. Most of these brochures are provided by the Metropolitan North Georgia Water Planning District (MNGWPD), but the city may create its own brochure or fact sheet for the purposes of this educational activity. A known number of brochures will be placed in each location at the beginning of the reporting period and checked every two months to determine how many brochures have been taken. Brochures will be replenished as needed or rotated out to display a new brochure. The city will document the name of the brochure and how many of each are taken during the reporting period.**

2. Measurable goal(s): **Display one or more brochures related to stormwater pollution prevention at two public locations within City Hall and at the Public Works facility. Document the number of brochures displayed at the beginning of each reporting period and record the number of brochures that have been taken by checking each location every two months. Replenish brochures as needed.**

3. Documentation to be submitted with each Annual Report: **Copies of all brochures that were displayed, and the number of each brochure that was taken from each location during the reporting period, will be provided.**

Public Involvement
Table 3.3.10 of the Permit

NOTE: If the population of your municipality is less than 10,000, then you must implement two public involvement activities. If the population of your municipality exceeds 10,000, then you must implement four public involvement activities.

1. Public Involvement Program- Activity #1

1. Description of SWMP Component: **The City of Duluth hosts an annual Community Clean-Up Day through the Duluth Neighborhood Outreach Work (N.O.W.) program. The event is usually held in June. On this day, residents can bring items such as household chemicals, pesticides/herbicides/fertilizers, appliances, yard waste, motor oil and leftover paint to the Public Works facility for proper disposal.**

2. Measurable goal(s): **Hold one Community Clean-Up Day each reporting period.**

3. Documentation to be submitted with each Annual Report: **Promotional materials (e.g., social media posts, posts to the webpage, newsletters) to announce the event will be provided. The estimated number of participants and the approximate quantity (e.g., number of dumpsters filled, pounds of waste collected, gallons of paint collected) of materials collected during the Community Clean-Up Day will be provided.**

2. Public Involvement Program - Activity #2

1. Description of SWMP Component: **The Stormwater Division has a direct phone number and email address that the public can use to report illicit discharges or damaged infrastructure, discuss concerns about stormwater drainage or flooding, or ask questions about their stormwater utility fee. The email address is sw@duluthga.net, and the phone number is 770-497-5311. In addition, the City of Duluth uses an online reporting portal that citizens can access from their mobile devices or home computers. The portal can be accessed at www.duluthga.net/report. Staff are in the process of creating a separate online reporting system that is more specific to the commonly reported stormwater issues. The new reporting system will be hosted on the ArcGIS platform and allow staff to more quickly understand the location of a complaint relative to the MS4 structural controls. More information on this reporting system will be provided to EPD in a future annual report.**

2. Measurable goal(s): **Maintain a database of complaints received via various methods (phone, email, citizen reporting portal).**

3. Documentation to be submitted with each Annual Report: **A summary of complaints received through the various reporting methods during the reporting period will be provided. The summary will include the date, location and nature of the complaint, as well as any follow-up actions.**

3. Public Involvement Program - Activity #3

1. Description of SWMP Component: **The City of Duluth has installed several pet waste stations throughout the downtown area, at city parks and on walking trails maintained by the city. A map of the pet waste stations is provided in Appendix 12. The pet waste stations are regularly emptied, and waste bags are replenished as needed. Many of the pet waste stations in Downtown Duluth have signs on them with various facts about pet waste and the importance of cleaning up after your pets. The signs also have a QR code that directs the public to a city webpage with additional information about pet waste and some of the pet friendly areas and activities around the city. The website is: https://duluthga.net/community/pet_waste_pledge.php.**

2. Measurable goal(s): **Continue to provide and maintain pet waste stations for public use.**

3. Documentation to be submitted with each Annual Report: **A photo of any new pet waste stations installed during the reporting period will be provided. An updated map of the pet waste stations will also be included.**

4. Public Involvement Program - Activity #4

1. Description of SWMP Component: **The City of Duluth will organize a storm drain marking OR storm drain painting project each reporting period. Storm drain marking involves attaching an aluminum disk with the message "No Dumping – Drains to River" or "Only Rain in the Drain", to the tops of storm drains. Alternatively, a stencil with a similar message and paint may be used. The city will work with Homeowners Associations (HOAs), service groups, students or other organizations to mark the storm drains in a general area (neighborhood, street, park, etc.). The city will provide all materials, including storm drain markers and adhesive, gloves, safety vests and maps of the storm drains. Alternatively, the Stormwater Division will partner with the Duluth Public Arts Commission (DPAC) to have one or more storm drains painted by an artist. The artist's design must be related to stormwater pollution and the protection of water resources. The art will be permanently installed on the storm drain.**

2. Measurable goal(s): **Host one storm drain marking event OR have at least one storm drain painted by an artist each year.**

3. Documentation to be submitted with each Annual Report: **If the city hosted a storm drain marking event, the number of catch basins marked, a map of the catch basins, and the number of volunteers involved in the project will be provided. Photos will also be included. If a storm drain is painted by an artist, the city will provide the documents that were used to solicit designs (e.g., RFP), as well as the location and photos of the painted storm drain.**

Post-Construction
Part 3.3.11 of the Permit

1. **Ordinance Review (Part 3.3.11(a)(1) of the Permit):**

   A. Provide the date of the adoption of the Post-Construction ordinance: **City of Duluth UDC Article 10, Division IV - Post-Development Stormwater Management was adopted on June 8, 2015, and most recently amended on October 12, 2020.**

   B. Provide the date of the adoption of the Georgia Stormwater Management Manual or an equivalent or more stringent local design manual: **City of Duluth UDC Article 10, Division IV was amended to include the adoption of the latest edition of the Georgia Stormwater Management Manual or Gwinnett County's approved equivalent stormwater management design manual on October 12, 2020.**

   C. Ensure a copy of the Post-Construction ordinance is attached to the SWMP. **City of Duluth UDC Article 10, Division IV is provided in Appendix 13.**

2. **Linear Transportation Projects (Part 3.3.11(a)(3) of the Permit):**

   A. The linear transportation feasibility program is voluntary. Have you developed or are you planning to develop a linear transportation feasibility program?
   Yes X No _____

   B. If yes, is the linear transportation feasibility program attached to the SWMP?
   Yes X No ____
   To determine if the implementation of post-construction stormwater management standards for linear transportation projects constructed by the City of Duluth is infeasible, the city follows the criteria published in Chapter 10 of the GDOT *Drainage Design for Highways*. This document is included in Appendix 13 of the SWMP.

   C. If you plan to develop a linear transportation feasibility program, provide the schedule for submitting the program: _____
   _____

Green Infrastructure/Low Impact Development (GI/LID)
Table 3.3.11(b)(2) of the Permit

1. Legal Authority

1. Description of SWMP Component (the text must describe the method used to conduct the review of the building codes, ordinances, and other regulations): **City staff are currently reviewing and updating the Unified Development Code (UDC), which is a single regulatory document that guides development within the City of Duluth. During this review, staff will determine if any current building codes, ordinances or other regulations prohibit or impede the use of GI/LID practices. The UDC will be updated as necessary to remove or revise language that prohibits or impedes the use of GI/LID. Staff will also consider opportunities to include incentives for use of GI/LID practices. It is anticipated that the updated UDC will be adopted by mid-2025.**

2. Measurable goal(s): **Review the current UDC to determine if there are any regulations that prohibit or impede the use of GI/LID practices, and evaluate opportunities to incentivize the use of GI/LID practices. Update the UDC as necessary.**

3. Documentation to be submitted with each Annual Report: **Proposed or adopted revisions to any GI/LID regulations in the UDC will be submitted with the annual report, along with a schedule for completion of the revisions. Once the revisions are adopted and it has been determined that no regulations impede or prohibit the use of GI/LID, further evaluation of the codes will not be necessary unless there are changes to local, state or federal requirements.**

Note: A copy of the worksheet used to conduct the code and ordinance evaluation (Center for Watershed Protection's Code and Ordinance Worksheet, EPA's Scorecard) must be included as an attachment to the SWMP. The worksheet can be from a previous permit period. **Two worksheets are included in Appendix 14a. One of these worksheets will be used to complete the code and ordinance evaluation.**

2. GI/LID Program

1. Description of SWMP Component: **The GI/LID Program was approved by Georgia EPD on March 15, 2018. It includes procedures for evaluating the feasibility and site applicability of different GI/LID techniques and practices, and the various structures and practices to be considered. The GI/LID Program is found in Appendix 14b.**

2. Measurable goal(s): **Implement the GI/LID Program. Review and revise the GI/LID Program as necessary.**

3. Documentation to be submitted with each Annual Report: **If the GI/LID Program is revised during the reporting period, the revised Program will be submitted with the annual report.**

3. GI/LID Structure Inventory

1. Description of SWMP Component: **The City of Duluth maintains an inventory of water quality-related GI/LID structures within the city limits and tracks the addition of new GI/LID structures through the plan review process. The inventory includes GI/LID structures that are owned by the City of Duluth and owned by other public entities that are not covered by an NPDES MS4 permit. It also includes privately-owned non-residential GI/LID structures. The current inventory is available in Appendix 14c.**

2. Measurable goal(s): **Track new water quality-related GI/LID structures through the plan review process. Execute maintenance agreements for all new GI/LID structures that are not owned by the City of Duluth. Update the GI/LID structure inventory and map at least once per reporting period.**

3. Documentation to be submitted with each Annual Report: **The updated inventory and map of GI/LID structures will be provided with each annual report. The inventory will indicate the ownership and type of GI/LID structure. The total number of GI/LID structures in the city will be included each year.**

4. Inspection and Maintenance Program

1. Description of SWMP Component (Ensure the text describes both the inspection and maintenance of the GI/LID structures): **City staff will inspect each GI/LID structure on the inventory within the five-year permit term. Approximately 20% of the total GI/LID structures will be inspected each year. Inspection forms are found in Appendix 14d. Maintenance on the city-owned GI/LID structures will be conducted as needed and as resources allow. The city keeps records of the maintenance agreements that are executed for GI/LID structures not owned by the City of Duluth. If a routine inspection of a GI/LID structure suggests that maintenance is not being performed in accordance with the recorded agreement, the city will inform the property owner of the deficiencies and may choose to pursue formal enforcement actions where appropriate.**

2. Measurable goal(s): **Inspect approximately 20% of the inventoried GI/LID structures each year, so that 100% of the GI/LID structures are inspected within the five-year permit term. Retain copies of the maintenance agreements that are executed for new GI/LID structures after the effective date of the permit and maintain a current summary list of these agreements. Ensure maintenance is conducted on all GI/LID structures as needed and/or as described in the maintenance agreement.**

3. Documentation to be submitted with each Annual Report: **Completed GI/LID inspection reports will be provided. The number of GI/LID structures inspected and percentage of the total GI/LID structures inspected each reporting period will be documented in each annual report. Maintenance records for city-owned GI/LID structures, if any, will be provided. An updated summary list of existing maintenance agreements for GI/LID structures will be submitted with the annual report. This summary list will also include any actions taken during the reporting period to ensure that maintenance is conducted on GI/LID structures that are not owned by the city.**

Appendix 15

Enforcement Response Plan (ERP)
Part 3.3.6 of the Permit

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program.

   A. Provide the date the ERP was approved by EPD: **May 22, 2015**

   B. If the ERP has not yet been approved, provide the date submitted to EPD: _____

2. A copy of the ERP must be attached to this Appendix. **A copy of the ERP is found on the following pages. The ERP is also available digitally in Appendix 15.**

NOTE: Ensure the Appendix has a number or letter designation (e.g. Appendix #1, Appendix A). Attach a copy of the ERP to this appendix cover page.

Appendix 16

Impaired Waters
Part 3.3.7 of the Permit

1. Population at the time of permit issuance: **32,350**

2. The Impaired Waters Plan must, at a minimum, include:
   - A list of impaired waters and the pollutant(s) of concern, including the date of the 303(d) list used;
   - A 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 the waters and within the same watershed;
   - The sample location (instream or at the outfalls);
   - Information on the sample type, frequency, and any seasonal considerations;
   - Schedule for starting monitoring for any newly identified pollutants
   - BMPs that will be implemented to address each pollutant of concern; and
   - A schedule for implementing the BMPs;
   - The information to be included in each annual report, including the monitoring data, an assessment of data trends, and an assessment of the effectiveness of the BMPs.

3. If the population exceeds 10,000, and a water is impaired for bacteria, then the MS4 must also address the following in the Impaired Waters Plan:
   - Sampling frequency for bacteria
   - A description of the development of a Sampling Quality and Assurance Plan if the data is below water quality standards for two years.

NOTE: Upon completion, the Impaired Waters Plan will be attached to this page as an Appendix to the SWMP. Ensure the Appendix has a number or letter designation (e.g. Appendix #2, Appendix B). **The draft Impaired Waters Plans are found on the following pages. Please note that for Bromolow Creek, the current IWP that was submitted with the 2024 Annual Report will be replaced with a revised IWP effective January 1, 2025. Both IWPs for Bromolow Creek are included.**

The draft Impaired Waters Plans are also available digitally in Appendix 16.

Appendix 17

Municipal Employee Training
Part 3.3.8 of the Permit

1. Description of the Employee Training Program: **The Stormwater Division will organize one stormwater-related training for municipal employees each year. This training is available to all city employees, including staff at City Hall, Public Works, Parks and Recreation, and Municipal Court. The training is held in-person or virtually using Microsoft Teams and is generally one hour long. The general stormwater training course may cover topics including, but not limited to, illicit discharge detection and elimination, good housekeeping practices at municipal facilities, stormwater control structures, HVPS inspections, green infrastructure and low-impact development, pesticide/herbicide/fertilizer use, and stormwater infrastructure maintenance and repair projects. When necessary, individual employees or groups of employees will receive more specialized training. Specialized training may be offered by the city, a regulatory agency, a private organization or another municipality.**

2. Measurable goal(s): **Organize and host a general stormwater training course that is available to all municipal employees once per year.**

3. Documentation to be submitted with each Annual Report: **Attendance sign-in sheet from the general training course as well as the materials presented at the training will be provided. If any MS4 employees receive specialized training, the name of the employee, date of training and type of training will be included.**

NOTE: Ensure the Appendix has a number or letter designation (e.g. Appendix #3, Appendix C).