Stormwater Management Program (SWMP)

National Pollutant Discharge & Elimination System (NPDES)

Phase II Municipal Separate Storm Sewer System (MS4)

City of Winder

Prepared by: GMC Goodwyn Mills Cawood

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APPENDICES:

PLAN REVIEW AND REVISION

The City of Winder has written this Stormwater Management Program (SWMP) after being designated as a Phase II Municipal Separate Storm Sewer System (MS4) in a letter from EPD dated October 10, 2025. In accordance with the National Pollutant Discharge Elimination System (NPDES) Phase II Municipal Separate Storm Sewer System (MS4) Permit #GAG610000, the City of Winder will begin implementing aspects of the SWMP over the coming years. This progress will be reported to EPD in accordance with the permit and the SWMP will be regularly reviewed to determine if the City of Winder needs to replace ineffective or infeasible Best Management Practices (BMPs), improve stormwater control measures, and to ensure the City is in compliance with the permit. Plan revisions and submittals to EPD will be documented in the log below beginning with the initial SWMP submittal in March 2025 and thereafter.

DATE OF PLAN REVISION	DESCRIPTION OF PLAN REVISIONS	STATUS
March 2026	SWMP drafted and submitted to EPD as directed in EPD letter dated October 10, 2025.	EPD reviewed and submitted comments & requests for some minimal revisions in a letter dated 6/8/26.
July 20, 2026	SWMP revised & re-submitted per EPD's 6/8/26 letter (email submittal only, no attachments)	EPD approved 7/22/26

Responsible Party and Plan Certification

Responsible Official:

Jimmy Terrell

Mayor

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Winder, Ga 30680

Phone: (770) 867-3106

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Designated Stormwater Management Program Contacts:

Horace Gee

Utilities Operations Director

138 Sweetwater Trail

Winder, Ga 30680

Phone: (770) 867-7978

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Sharing Responsibility

The City of Winder does not share responsibility with any other entity for implementation of the Best Management Practices outlined in this Plan.

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 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: Jimmy Terrell Date: July 17, 2026

Signature:  Title: Mayor

ACRONYMS

The following acronyms may be used in the City's SWMP, NPDES Phase II MS4 permit, and/or other SWMP supporting documentation.

BMPs	Best Management Practices
CWA	Clean Water Act
E&S	Erosion & Sedimentation
EPD	Georgia Environmental Protection Division
ERP	Enforcement Response Plan
E&S	Erosion and Sedimentation
ESPC	Erosion, Sedimentation & Pollution Control
GESA	Georgia Erosion & Sedimentation Act
GIS	Geographic Information System
GI/LID	Green Infrastructure / Low Impact Development
GSMM	Georgia Stormwater Management Manual
GSWCC	Georgia Soil & Water Conservation Commission
IDDE	Illicit Discharge Detection & Elimination
IWP	Impaired Waters Plan
LDA	Land Disturbing Activity
LIA	Local Issuing Authority
MCM	Minimum Control Measure
MNGWPD	Metropolitan North Georgia Water Planning District
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NOV	Notice of Violation
NPDES	National Pollutant Discharge & Elimination System
NRCS	Natural Resource Conservation Service
POC	Pollution of Concern
ROW	Right of Way
SIC	Standard Industrial Classification
SWMP	Stormwater Management Program
TSS	Total Suspended Solids
USEPA	United States Environmental Protection Agency

DEFINITIONS

The following definitions were established by the NPDES Phase II MS4 permit, signed on December 6, 2022, and are hereby included in the City of Winder's SWMP.

Annual Report - the document submitted by the permittee on an annual basis summarizing the SWMP activities conducted during the previous reporting period.

Best Management Practice (BMP) - both structural devices to store or treat stormwater runoff and non-structural programs or practices which are designed to prevent or reduce the pollution of the waters of the State of Georgia.

Construction Activity - the disturbance of soils associated with clearing, grading, excavating, filling of land, or other similar activities which may result in soil erosion.

Construction General Permits (CGPs) - the Georgia NPDES Permit for Stormwater Discharges Associated with Construction Activity Nos. GAR100001, GAR100002, and GAR100003, which identify the Manual for Erosion and Sediment Control in Georgia (Green Book) and stream buffer requirements.

Control Measure - any BMP or other method used to prevent or reduce the discharge of pollutants to the waters of the State of Georgia.

Clean Water Act (CWA) - the Federal Clean Water Act (formerly known as the Federal Water Pollution Control Act or the Federal Water Pollution Control Act Amendments of 1972), as amended.

Director - the Director of the Environmental Protection Division of the Department of Natural Resources, State of Georgia.

Discharge - the discharge of a pollutant.

Discharge-related Activities - includes activities which cause, contribute to, or result in stormwater point source pollutant discharge; and measures to control stormwater discharges, including the siting, construction and operation of BMPs to control, reduce or prevent stormwater pollution.

EPA or USEPA - the United States Environmental Protection Agency.

EPD - the Environmental Protection Division of the Department of Natural Resources, State of Georgia.

Existing Permittee - a Phase II municipal separate storm sewer system designated by EPD for coverage under this permit prior to the issuance date of this permit.

Green Infrastructure/Low Impact Development (GI/LID) – management approaches, such as better site design or conservation design, or systems and practices that use or mimic natural processes to reduce runoff and pollutant loading, that result in infiltration, evapotranspiration, or the harvesting and use of stormwater, or any of the stormwater best management practices described in the Georgia Stormwater Management Manual, Volume 2, or an equivalent local design manual.

Illicit Connection - any man-made conveyance connecting a non-stormwater discharge directly to a municipal separate storm sewer system.

Illicit Discharge - any direct or indirect non-stormwater discharge to a municipal separate storm sewer system, including, but not limited to, sewage, process wastewater, and washwater. The discharge may be continuous or intermittent in occurrence.

Linear Transportation Projects – construction projects on traveled ways including but not limited to roads, sidewalks, multi-use paths and trails, and airport runways and taxiways.

Maximum Extent Practicable (MEP) - the controls necessary for the reduction of pollutants discharged from a municipal separate storm sewer system. These controls may consist of a combination of BMPs, control techniques, system design and engineering methods, and such other provisions for the reduction of pollutants discharged from an MS4 as described in the SWMP.

Municipal Separate Storm Sewer System (MS4) - a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels or storm drains, owned or operated by a municipality or other public body, designed or used for collecting or conveying stormwater runoff and is not a combined sewer or part of a Publicly Owned Treatment Works.

National Pollutant Discharge Elimination System (NPDES) - the program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits and imposing and enforcing pretreatment requirements under Sections 307, 402, 318, and 405 of the Clean Water Act.

New Development - land disturbing activities, structural development (construction, installation or expansion of a building or other structure), and/or creation of impervious surfaces on a previously undeveloped site.

New Permittee - a Phase II MS4 designated by EPD for coverage under this permit based on the 2020 or subsequent decennial U.S. Census, or based on other State designation criteria.

Notice of Intent (NOI) - the mechanism used to register for coverage under this general permit.

Outfall - the most downstream point (i.e. final discharge point) on an MS4 where it discharges to receiving waters of the State.

Owner or Operator - the owner or operator of any MS4 or any activity subject to regulation under the NPDES program.

Permitted Area - the area of a City or County that is covered by this General NPDES Stormwater Permit. For a City, it refers to the entire City limits; for a County, it refers only to that part of the County contained within an "Urbanized Area" as defined by the latest Decennial Census by the Bureau of the Census.

Point Source - any discernible, confined and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged into the waters of the State of Georgia. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

Pollutant - dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials (except those regulated under the Atomic Energy Act of 1954, as amended), heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal and agricultural waste discharged into water.

POTW - Publicly Owned Treatment Works.

Redevelopment - the structural development (construction, installation or expansion of a building or other structure), creation or addition of impervious surfaces, replacement of impervious surface not part of routine maintenance, and land disturbing activities associated with structural or impervious development. Redevelopment does not include such activities as exterior remodeling.

Small MS4 (defined in 40 CFR Part 122.26(b)(16)) - all separate storm sewers that are owned or operated by the United States, the State of Georgia, city, town, borough, county, parish, district, association, or other public body (either created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity or a designated and approved management agency under Section 208 of the CWA that discharges to the waters of the State of Georgia but is not defined as a "large" or "medium" MS4. This term includes systems similar to municipal MS4s, such as systems at military bases, large hospitals, universities, prison complexes, and highways and other thoroughfares. This definition does not include separate storm sewers in very discrete areas, such as individual buildings.

State Act - the Georgia Water Quality Control Act, as amended.

State Rules (Rules) - the Georgia Rules and Regulations for Water Quality Control.

Stormwater - stormwater runoff, snow melt runoff, and surface runoff and drainage.

Stormwater Management Program (SWMP) - the comprehensive program required to be developed and implemented under the terms and conditions of this permit, containing the procedures, schedules, forms and other documents needed to manage the quality of stormwater discharged from a MS4 to the maximum extent practicable in order to protect water quality.

Waters of the State - any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, wetlands, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the State which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation.

INTRODUCTION

In 1987, amendments to the Clean Water Act (CWA) established a legal framework and requirements for the United States Environmental Protection Agency (USEPA) to develop a comprehensive, phased program for regulating municipal and industrial stormwater discharges under the National Pollutant Discharge Elimination System (NPDES) permit program. In response, the USEPA instituted Phase I of the NPDES Stormwater Program in November 1990. The Phase I program required medium to large communities with populations of at least 100,000 people and with municipal separate storm sewer systems (MS4s) to develop programs to address the quality of their stormwater discharges. These amendments to the CWA also placed stormwater management requirements on many industries based upon standard industrial classification codes, including stormwater permitting requirements on construction activities that disturbed five or more acres of land.

The NPDES Phase II Stormwater regulations were established in December 1999. The Phase II stormwater requirements affect smaller communities with Municipal Separate Storm Sewer Systems (MS4s) serving populations of less than 100,000 people, as well as construction activities that disturb one or more acres of land. Only those small MS4s located in "urbanized areas", as defined by the U.S. Bureau of the Census, are currently required to apply for a stormwater NPDES permit and develop a Stormwater Management Program (SWMP). The designated Stormwater Phase II permitting authority in the State of Georgia is the Environmental Protection Division (EPD) of the Georgia Department of Natural Resources.

The City of Winder was designated by the Georgia EPD as an MS4 that must seek coverage under the NPDES Phase II regulations in a letter dated October 10, 2025, and as required, has prepared and submitted a Notice of Intent (NOI) and a SWMP for coverage under the current 2022-2027 NPDES Phase II Permit. A copy of the City's current permit and NOI is included in Appendix A.

The City of Winder has been designated as a permittee with a population less than 10,000 by the Georgia EPD and therefore must meet certain minimum program requirements required by the City's Phase II MS4 Permit. This SWMP has been revised to meet permit requirements and addresses program elements and associated BMPs related to the following:

- Public Education and Outreach
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Runoff Control
- Post-Construction Stormwater Management in New Development and Redevelopment (including a Green Infrastructure/Low Impact Development Program)
- Pollution Prevention/Good Housekeeping for Municipal Operations
- Enforcement Response Plan
- Impaired Waters Plan (IWP)

Because the City of Winder is located within the Metropolitan North Georgia Water Planning District (MNGWPD), the City is also subject to the various requirements of the District.

DRAINAGE SYSTEM - LEGAL SUMMARY

The drainage system within the City of Winder consists of natural and/or man-made structures, within the political boundaries of the City which channel or convey stormwater from its point of collection to a point of discharge. The City, owns or has legal access to certain segments of this system which (1) are located within public streets and street rights-of-way owned or controlled by the City; (2) are subject to written easements, rights-of-entry, rights-of-access, rights-of-use, or other legal provisions for adequate access for operation, maintenance, and/or improvement of such systems and facilities; or (3) are located on public lands owned by the City or to which the City has been granted adequate access by the public owner for operation, maintenance, and/or improvement of such systems and facilities. Operation and maintenance of stormwater systems and facilities which are located on private property for which there has been no public dedication of such systems and facilities for operation, maintenance, and/or improvement of the systems and facilities by the City, or public property not owned or controlled by the City of Winder, shall be and remain the legal responsibility of the property owner, except as that responsibility may be otherwise affected by the laws of the United States of America, the State of Georgia, and this Permit.

As defined for purposes of this Permit, the MS4 owned and operated by the City of Winder may entail a more expansive system than that of the drainage system alone in order to recognize the City's evolving role as a regulator under a comprehensive management program designed to reduce pollutants flowing into our Federal and State waters to the maximum extent practicable, through public awareness and education, local permitting, inspection, and enforcement.

A. PUBLIC EDUCATION AND OUTREACH

Regulatory Requirement, 40 CFR Part 122.34(b)(1): You must implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.1(b) of the NPDES Phase II MS4 permit.

A.1. A.1 STORMWATER EDUCATION OUTREACH ACTIVITY #1

A.1.1. Target Audience:

General public.

A.1.2. Description of BMP:

The City of Winder has developed a comprehensive, multi-faceted public stormwater education program to educate the general public on the importance of preventing stormwater pollution. The City has developed and maintains a stormwater webpage that contains information on stormwater management and educational material. The webpage can be access at: https://www.cityofwinder.com/government/utilities/environmental-protection/public-outreach/stormwater. The webpage includes information regarding stormwater pollution, useful tips for homeowners, business owners, and developers, and provides additional resources as well as an email address, stormwater@cityofwinder.com, to report stormwater-related concerns.

The City will continue to maintain their stormwater webpage and review the webpage each reporting period. Stormwater-related materials and resources will be updated as necessary. The City will report the number of "hits" to determine how many individuals visit the site during each reporting period.

Webpage updates may include, but are not limited to, adding/revising information and graphics regarding topics such as:

- Providing information about citizen involvement opportunities with the City's Stormwater Management Program and important events (like trash clean-ups, etc.);
- Nonpoint source pollution and its impact on waterways and wildlife;
- Tips to prevent stormwater pollution & illicit discharges and properly manage wastes, such as pet wastes and fats, oils & greases (FOG);
- Methods for identifying and reporting illicit discharges;
- Education about how stormwater is discharged directly into waterways without chemical/biological treatment;
- GI/LID practices and techniques;
- Proper storage and application practices for pesticides, fertilizers, and herbicides; and
- Good housekeeping and stormwater pollution prevention practices for commercial establishments

A.1.3. Measurable Goal(s):

a. Maintain the stormwater webpage and review content each reporting period and update as needed.

b. Report the number of stormwater webpage hit during each reporting period.

A.1.4. Documentation For Annual Report:

The following documentation for the selected public education outreach event will be provided:

a. Screenshot of stormwater webpage before and after updates and date of updates; OR

b. Statement indicating stormwater webpage was reviewed, when the review was conducted, and no updates were necessary

c. Number of stormwater webpage hits during reporting period

A.1.5. Schedule:

a. Each reporting period, 2026 – 2027

A.1.6. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

A.1.7. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides information to the general public on stormwater management related issues. Furthermore, because this information is updated annually, the City can keep the public up to date on new and developing issues related to stormwater management and water resources issues.

A.1.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The effectiveness of this BMP will be measured by tracking public access to and engagement with the City's stormwater webpage. The City will review website analytics to determine the number of visits and other data useful to assessing the effectiveness of the webpage and educational materials posted. Maintaining a dedicated webpage provides residents access to information on stormwater-related topics included pollution prevention, illicit discharge identification and reporting, opportunities for public involvement, and more. If website engagement is low, the City can modify material to make it more engaging or better suited to its citizens or use other means to promote their webpage.

A.2. STORMWATER EDUCATION OUTREACH ACTIVITY #2

A.2.1. Target Audience:

General public.

A.2.2. Description of BMP:

The City of Winder has developed a comprehensive, multi-faceted public stormwater education program to educate the general public on the importance of preventing stormwater pollution. The City of Winder will distribute stormwater educational material at City Hall and/or a minimum of one (1) City event.

Educational topics covered may include:

- Proper stormwater maintenance practices that Home Owners Associations (HOAs) and citizen can practice to help keep our waters clean (proper management of yard debris, detention/retention pond maintenance, proper storage and application practices for pesticides, fertilizers, and herbicides, etc.; Promoting the use of the City's Stormwater webpage and advertising the link to the City's Stormwater Webpage;
- Providing information about citizen involvement opportunities with the City's Stormwater Management Program and important events (like trash clean-ups, etc.);
- Nonpoint source pollution and its impact on waterways and wildlife;
- Tips to prevent stormwater pollution & illicit discharges and properly manage wastes, such as pet wastes and FOG;
- Methods for identifying and reporting illicit discharges;
- Education about how stormwater is discharged directly into waterways without chemical/biological treatment;
- GI/LID practices and techniques;
- Good housekeeping and stormwater pollution prevention practices for commercial establishments

The City will conduct at least one dedicated public stormwater educational outreach activity from the list below in Section A.2.3 each reporting period to educate the public about stormwater topics and maintain documentation of the event. This may include information about the educational topics listed above and/or other relevant stormwater topics selected by the City. The City may opt to rotate public education activities to reach intended target audiences and/or provide specific types of stormwater-related education based on areas of concern identified by citizen complaints and/or common illicit discharges.

A.2.3. Measurable Goal(s):

a. Provide educational brochures or fliers at City Hall, available to the public.

b. Set up a booth and/or distribute educational brochures or fliers during the Jugg Tavern Festival, Bark in the Park, or similar event

A.2.4. Documentation For Annual Report:

a. Copy of educational brochure or flier and number taken from City Hall during the reporting period; OR

b. Copy of educational materials distributed during event, photo of booth, date event was held, and estimated number of citizens in attendance.

A.2.5. Schedule:

a. Each reporting period, 2026 – 2027

A.2.6. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

A.2.7. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides information to the public on stormwater management related issues in a format that they are more likely to view, i.e. the City website. Furthermore, because this information will be updated periodically, the City can keep the general public up-to-date on new and developing issues related to stormwater management.

A.2.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

As this educational material is continuously distributed within the community, the general public will become better educated on stormwater management issues and reduce their impacts on local waterways.

A.3. STORMWATER EDUCATION OUTREACH ACTIVITY #3

A.3.1. Target Audience:

General public.

A.3.2. Description of BMP:

The City of Winder has developed a comprehensive, multi-faceted public stormwater education program to educate the general public on the importance of preventing stormwater pollution. Educational activities may include one of the following: including stormwater educational information in package to new utility account holders; including stormwater educational flier with utility bill; and coordinating educational outreach events with Home Owners Associates (HOAs), schools, and/or government officials.

Educational topics covered may include:

- Proper stormwater maintenance practices that Home Owners Associations (HOAs) and citizen can practice to help keep our waters clean (proper management of yard debris, detention/retention pond maintenance, proper storage and application practices for pesticides, fertilizers, and herbicides, etc.; Promoting the use of the City's Stormwater webpage and advertising the link to the City's Stormwater Webpage;
- Providing information about citizen involvement opportunities with the City's Stormwater Management Program and important events (like trash clean-ups, etc.);
- Nonpoint source pollution and its impact on waterways and wildlife;
- Tips to prevent stormwater pollution & illicit discharges and properly manage wastes, such as pet wastes and FOG;
- Methods for identifying and reporting illicit discharges;
- Education about how stormwater is discharged directly into waterways without chemical/biological treatment;
- GI/LID practices and techniques;
- Good housekeeping and stormwater pollution prevention practices for commercial establishments

The City will conduct at least one dedicated public stormwater educational outreach activity from the list below in Section A.2.3 each reporting period to educate the public about stormwater topics and maintain documentation of the event. This may include information about the educational topics listed above and/or other relevant stormwater topics selected by the City. The City may opt to rotate public education activities to reach intended target audiences and/or provide specific types of stormwater-related education based on areas of concern identified by citizen complaints and/or common illicit discharges.

A.3.3. Measurable Goal(s):

a. Include educational material in package given to new utility account holders; OR
b. Include educational flier with utility bill; OR

c. Coordinate at least one educational outreach class with a Homeowner's Associations (HOA), local school, and/or local government officials; OR

A.3.4. Documentation For Annual Report:

a. Copy of educational material and number of new utility account holders during each reporting period; OR

b. Copy of educational flier included with utility bill, date utility bill was sent, and number of citizens who received a utility bill containing the educational flier; OR

c. Copy of educational material or presentation, sign in sheet, and date presentation was held.

A.3.5. Schedule:

a. Each reporting period, 2026 – 2027

A.3.6. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

A.3.7. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides information to the public on stormwater management related issues in a format that they are more likely to view, i.e. the City website. Furthermore, because this information will be updated periodically, the City can keep the general public up-to-date on new and developing issues related to stormwater management.

A.3.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

As this educational material is continuously distributed within the community, the general public will become better educated on stormwater management issues and reduce their impacts on local waterways.

A.4. STORMWATER EDUCATION OUTREACH ACTIVITY # 4

A.4.1. Target Audience:

General public.

A.4.2. Description of BMP:

The City of Winder has developed a comprehensive, multi-faceted public stormwater education program to educate the general public on the importance of preventing stormwater pollution. Educational activities may include one of the following: a Podcast episode hosted by the City Administrator discussing stormwater educational topics; or a social media post containing stormwater educational material.

Educational topics covered may include:

- Proper stormwater maintenance practices that Home Owners Associations (HOAs) and citizen can practice to help keep our waters clean (proper management of yard debris, detention/retention pond maintenance, proper storage and application practices for pesticides, fertilizers, and herbicides, etc.; Promoting the use of the City's Stormwater webpage and advertising the link to the City's Stormwater Webpage;
- Providing information about citizen involvement opportunities with the City's Stormwater Management Program and important events (like trash clean-ups, etc.);
- Nonpoint source pollution and its impact on waterways and wildlife;
- Tips to prevent stormwater pollution & illicit discharges and properly manage wastes, such as pet wastes and FOG;
- Methods for identifying and reporting illicit discharges;
- Education about how stormwater is discharged directly into waterways without chemical/biological treatment;
- GI/LID practices and techniques;
- Good housekeeping and stormwater pollution prevention practices for commercial establishments

The City will conduct at least one dedicated public stormwater educational outreach activity from the list below in Section A.2.3 each reporting period to educate the public about stormwater topics and maintain documentation of the event. This may include information about the educational topics listed above and/or other relevant stormwater topics selected by the City. The City may opt to rotate public education activities to reach intended target audiences and/or provide specific types of stormwater-related education based on areas of concern identified by citizen complaints and/or common illicit discharges.

A.4.3. Measurable Goal(s):

a. City Administrator will create a podcast episode discussing stormwater educational materials and make the podcast publicly available; OR

b. A minimum of one (1) social media post including stormwater educational material.

A.4.4. Documentation For Annual Report:

a. Link to podcast episode, date of podcast, and number of listeners/viewers; OR

b. Screenshot of social media post containing stormwater educational material, date of social media post, and number of views.

A.4.5. Schedule:

a. Each reporting period, 2026 - 2027

A.4.6. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

A.4.7. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides information to the public on stormwater management related issues in a format that they are more likely to view, i.e. the City website and social media account(s). Furthermore, because this information will be updated periodically, the City can keep the general public up-to-date on new and developing issues related to stormwater management.

A.4.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

As this educational material is continuously distributed within the community, the general public will become better educated on stormwater management issues and reduce their impacts on local waterways.

PUBLIC INVOLVEMENT / PARTICIPATION

40 CFR Part 122.34(b)(2) Requirement: You must, at a minimum, comply with State, Tribal, and local public notice requirements when implementing a public involvement/participation program.

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.2(b) of the NPDES Phase II MS4 permit.

B.1. CITIZEN COMPLAINT HOTLINE / WEBPAGE

B.1.1. Target Audience:

General public.

B.1.2. Description of BMP:

The City has established procedures for receiving, investigating, and tracking stormwater-related complaints. Complaints can be made by calling the Customer Center at (770) 867-3106 or by emailing stormwater@cityofwinder.com which is listed on the City's stormwater webpage, or city.hall@cityofwinder.com, which is listed under the "Comments, Suggestions, Report an Issue" tab of the City website. The City will encourage citizens to look for and report illicit discharges and illegal dumping, as well as other stormwater issues, via this phone number and emails and the City's stormwater webpage. The City will advertise the phone number and stormwater webpage on the utility bill or through other educational efforts. All citizen complaints will be documented by City staff and then directed to the appropriate department for follow-up within five (5) business days. All complaints received, the City's response, records of any investigation activities performed, and enforcement actions undertaken will be recorded and reported with each Annual Report.

B.1.3. Measurable Goals:

a. Advertise the opportunity for citizens to report illicit discharges each year via the utility bill and/or other educational materials
b. Record illicit discharge complaints in the Stormwater Complaint Database
c. Investigate 100% of all water quality complaints within five (5) business days
d. Take appropriate action for 100% of complaints requiring action

B.1.4. Documentation For Annual Report:

a. Summary of the stormwater-related complaints received (e.g., complaint date, type of complaint, date of investigation, complaint status) during each reporting period
b. Copies of any materials promoting the Citizen Hotline/website during each reporting period

B.1.5. Schedule:

a. Ongoing, 2026 – 2027

B.1.6. Person (Position) Responsible for Overall BMP management and Implementation:

Utilities Director

B.1.7. Rationale for choosing BMP and setting measurable goal(s):

To promote opportunities for the general public to get involved and report stormwater pollution incidents to the City for proper follow up, inspection and enforcement should help to reduce the frequency and significance of stormwater pollution incidents within the community.

B.1.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The ability of residents to report complaints will increase the City's knowledge of these incidents. Investigation of the incidents should result in a larger number of these issues getting resolved by the City and therefore less pollutants being discharged into local streams and creeks.

B.2. LIMB AND LEAF PICKUP

B.2.1. Target Audience:

General public.

B.2.2. Description of BMP:

The City will remove yard waste a minimum of once per month, a service included in their trash service fee. Generally, yard debris will be transported to a facility that produces mulch or taken to a landfill.

B.2.3. Measurable Goal(s):

a. Collect yard waste at least once per month

B.2.4. Documentation For Annual Report:

a. Record cubic yards of yard waste collected during each collection event during each reporting period

B.2.5. *Schedule:*

a. Ongoing, 2026 – 2027

B.2.6. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

B.2.7. Rationale for choosing BMP and setting measurable goal(s):

Urban streams are often an unnoticed natural resource feature that only seems to garner the public's attention when flooding occurs or when a significant pollution event occurs. The intent is that people's participation in the proper disposal of their yard waste will result in improved stream health as well as stream functionality. The general public may not understand that yard waste is a pollutant, so offering this service prevents inadvertent pollution and offers citizens an easy alternative to yard waste removal. Once people interact more with these natural resource features, people will better understand how their behavior impacts local streams and creeks.

B.2.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will be able to keep records of the amount of yard waste removed. This is a direct measurement of the effectiveness of this BMP in removing yard waste and pollution from the streams and creeks.

B.3. PET WASTE STATIONS

B.3.1. Target Audience:

General public.

B.3.2. Description of BMP:

The City will maintain waste stations in parks and public areas frequented by pet owners and provide pet waste bags and encourage pet owners to clean up after their pets.

B.3.3. Measurable Goal(s):

a. Empty pet waste stations; and

b. Refill pet waste bags.

B.3.4. Documentation For Annual Report:

a. Track number of bags replaced on a monthly basis during each reporting period

B.3.5. *Schedule:*

a. Ongoing, 2026 – 2027

B.3.6. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

B.3.7. Rationale for choosing BMP and setting measurable goal(s):

The installation and maintenance of pet waste stations in public parks and spaces allows for the reduction of bacteria and other pollutants from pet waste from entering the MS4. Pet waste is a source of bacteria, nutrients, and organic matter that can be transported to local streams, ponds, and other surface waters by way of stormwater runoff if not properly disposed of. By providing convenient access to pet waste bags and waste bins in public areas frequented by pet owners, the City can encourage proper disposal of pet waste.

The general public may not understand that pet waste is a pollutant, so offering this service prevents inadvertent pollution and offers citizens an easy alternative. This makes it easier for citizens to directly participate in pollution prevention by reducing the likelihood that pet waste will be left on the ground.

B.3.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will be able to keep records of the amount of pet waste bags used by tracking the number of bags they place in pet waste stations each month. This is a direct measurement of the effectiveness of this BMP in encouraging pet owners to properly discard of pet waste, effectively reducing the amount of pollutants entering the MS4.

B.4. CITIZEN OUTREACH

B.4.1. Target Audience:

General public.

B.4.2. Description of BMP:

The City will work to directly involve citizens in preventing stormwater pollution in their community, encouraging stakeholders to take an active role in pollution prevention. The City will conduct a minimum of one (1) citizen outreach efforts from the list in B.4.3. during each reporting period.

B.4.3. Measurable Goal(s):

a. Boy Scout volunteers clean up the park after City events; OR

a. The Annual Report and Stormwater Management Plan will be posted on the City's stormwater webpage with a link soliciting comments; OR

b. The City will conduct a tree planting event, providing trees to citizens for an Earth Day celebration or similar.

B.4.4. Documentation For Annual Report:

a. Volunteer sign in sheet, date of event, and weight ticket indicating amount of waste collected during each collection event; OR

b. Screenshots of website showing most recent Annual Report and current Stormwater Management Plan with link comment, table of citizen comments summary and date received; OR

c. Copy of advertisement of tree giveaway/planting event, number of trees planted/distributed, and date event was held

B.4.5. *Schedule:*

a. Each reporting period, 2026 – 2027

B.4.6. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

B.4.7. Rationale for choosing BMP and setting measurable goal(s):

This BMP provides the City with multiple options for facilitating meaningful citizen involvement in the stormwater management program. Public participation is a key component of the program and is instrumental in increasing community awareness of stormwater impacts while encouraging residents to take an active role in preventing stormwater pollution and protecting local waterways.

The activities in this BMP – including volunteer clean up events, opportunities for public review and comment on the SWMP and Annual Reports, and community tree planting/giveaway events- each provide a practical means for engaging residents in the stormwater management program. These activities promote stewardship by encouraging public involvement and educating the public on stormwater pollution while providing them an opportunity to get directly involved in reducing pollution and improving water quality locally.

Providing multiple implementation options allows the City flexibility to select an activity that best aligns with the interests and needs of their citizens while also considering available resources all while meeting the intent of the MS4 permit to encourage citizen involvement in stormwater management efforts.

B.4.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The effectiveness of this BMP will be evaluated by documenting citizen participation. The City will track metrics such as the number of participants, number of comments received, or the number of trees distributed/planted during each reporting period. For volunteer cleanup events, the City will track the quantity of waste/litter removed and number of volunteers involved. This is a direct measurement of the effectiveness of this BMP in engaging the public in various means of stormwater management.

ILLICIT DISCHARGE DETECTION AND ELIMINATION

40 CFR Part 122.34(b)(3) Requirement: You 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-stormwater discharges into your storm sewer system and implement appropriate enforcement procedures and actions;

C) Develop and implement a plan to detect and address non-stormwater 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.

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.3(b) of the NPDES Phase II MS4 permit.

C.1. LEGAL AUTHORITY

C.1.1. Description of BMP:

The City adopted an ordinance very similar to the Metropolitan North Georgia Water Planning District (MNGWPD)'s model Illicit Discharge and Illegal Connection Ordinance on June 29, 2009. This existing ordinance prohibits non-stormwater discharges into the storm sewer system and establishes appropriate enforcement procedures. The City added an additional provision to the MNGWPD model ordinance prohibiting the storage, handling, deposit, or application of pollutants where rainfall or runoff could carry them into the MS4 and requires BMPs to prevent pollution. The City will review the Ordinance each reporting period, and revise it as needed to ensure illicit discharges are prohibited and submit a copy of the Ordinance, if revised, to the Georgia EPD with the Annual Report. A copy of the Ordinance is included in Appendix C.

C.1.2. Measurable Goal(s):

a. Enforce 100% of violations of the Illicit Discharge ordinance
b. Annually evaluate the Illicit Discharge and Illegal Connection Ordinance to determine if revisions are required

C.1.3. Documentation For Annual Report:

a. If revised during the reporting period, provide updated ordinance
b. Documentation of the ordinance review

C.1.4. Schedule:

a. Prohibit illicit discharges: Ongoing
b. Review ordinance for needed updates: Each reporting period, 2026 – 2027

C.1.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

C.1.6. *R*ationale for choosing BMP and setting measurable goal(s):

An Illicit Discharge Ordinance is necessary to provide the City with the authority to prevent illicit discharges.

C.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will maintain the records of the number and types of illicit discharges identified and eliminated through enforcement of this ordinance.

C.2. MS4 OUTFALL MAP AND INVENTORY

C.2.1. Description of BMP

The NPDES Phase II MS4 permit defines an "MS4 Outfall" to be *"the most downstream point (i.e. final discharge point) on an MS4 where it discharges to waters of the State."* The City of Winder is developing a GIS-based inventory and a map showing the location of outfalls from the MS4 and the names and location of all Waters of the State that receive discharges from those outfalls. A map and inventory of the MS4 outfalls will be provided within four (4) years from the date of designation with the next annual report. Following submittal of the initial inventory and map, each year, the City will update the MS4 outfall map and inventory to reflect the addition of outfalls from new infrastructure projects or developments, and the removal of outfalls that have been reclassified or removed.

C.2.2. Measurable Goal(s):

a. Create initial MS 4 outfall map and inventory

b. Each reporting period, maintain and update an outfall inventory database and map showing the location of all outfalls from the MS4 and the names and location of all Waters of the State that receive discharges from those outfalls

C.2.3. Documentation For Annual Report:

a. Completed MS4 outfall map and inventory

b. Updated MS4 outfall inventory and map each reporting period

c. Number of outfalls added/removed during the reporting period

d. Total number of outfalls

C.2.4. Schedule:

a. Completed MS4 outfall map and inventory, develop within four years from the date of designation and submit no later than with the 2029 Annual Report (Feb 2030)

b. Each reporting period after initial submittal

C.2.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

C.2.6. Rationale for choosing BMP and setting measurable goal(s):

The City needs an accurate inventory of its MS4 outfalls to implement dry weather screening activities and its IDDE program. Ensuring that outfalls screened are actual MS4 outfalls will make the most efficient use of City resources.

C.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will maintain the records of the following: (1) the number of illicit discharges identified; (2) the types of illicit discharges identified; (3) the actions taken by the City when an illicit discharge is identified; and (4) the ultimate outcome that resulted from the illicit discharge including whether or not the illicit discharge was eliminated.

C.3. ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PLAN

C.3.1. Description of BMP

The City of Winder will establish an IDDE Plan to inspect MS4 outfalls to determine if upstream facilities/connections are discharging non-stormwater flows to the drainage system and to eliminate those illicit discharges. Per the permit, a copy of the IDDE Plan will be submitted to EPD for review and approval within one year from the date of designation, submitted with the annual report.

Once the IDDE Plan is established, the City will perform inspections and/or dry weather screening of the MS4 outfalls within its inventory and investigate any potential illicit discharges in accordance with the procedures outlined in the IDDE Plan. Suspect or obvious illicit discharges will require follow-up actions and activities, which will be specified in the IDDE Plan to determine the specific source(s) of contamination. The City will outline enforcement actions and procedures should the City positively identify any illicit discharges which will be written to align with both the Illicit Discharge Ordinance, attached in Appendix C, and the Enforcement Response Plan (ERP), which will also be submitted to EPD for review and approval within one year of designation of an MS4 with the annual report.

Following establishment of the IDDE Plan, during each reporting period, the City will screen at least 5% of the total number of stormwater outfalls listed on the City's most current inventory of MS4 outfalls, and 100% of the inventory will be screened over a five-year permit period.

C.3.2. Measurable Goal(s):

a. Develop an IDDE Plan and submit to EPD for review and approval
b. Dry weather screen 100% of all MS4 outfalls over a five-year period with at least 5% of listed stormwater outfalls screened each reporting period
c. Investigate and perform source tracing for 100% of all suspected illicit discharges
d. Enforce the Illicit Discharge Ordinance, IDDE Plan, and ERP for 100% of positively identified illicit discharges

C.3.3. Documentation For Annual Report:

a. IDDE Plan including field screening, source tracing, and discharge elimination procedures and example forms and enforcement letters
b. Number, percentage of MS4 outfalls inspected and date of inspections during the reporting period
c. Documentation of inspections and dry weather screening, such as a table of individual inspection reports with a record for each outfalls inspected, the date of the inspection, and the findings of that inspection, or a copy of the completed dry weather screening forms (Outfall Reconnaissance Inventory Form) for all MS4 Outfalls screened within the reporting period
d. Records of any source tracing or enforcement activities conducted as a result of dry weather screening activities and associated dates each reporting period

C.3.4. Schedule:

a. Submit IDDE Plan within one year of the date of designation with that year's annual report. The City was designated an MS4 on October 10, 2025. The City will submit their IDDE Plan for EPD review and approval with the 2026 Annual Report (Feb 2027).

b. IDDE Plan Implementation: conduct DWS while mapping outfall locations; upon completion of mapping, conduct DWS inspections on 100% of outfalls within a 5-year period. DWS a minimum of 5% of the outfalls annually.

c. Following submittal of IDDE Plan: Enforce the IDDE ordinance, as necessary

C.3.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

C.3.6. Rationale for choosing BMP and setting measurable goal(s):

Dry weather screening data is useful in identifying potential illicit discharges and the possible sources of those illicit discharges. Appropriate corrective and enforcement actions will be undertaken if an illicit discharge is detected through the dry weather screening activities.

C.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will maintain records of the number and types of illicit discharges identified, investigated and eliminated through implementation of this BMP. If the IDDE Program is being implemented in accordance with the MS4 permit then the City should be taking the necessary steps to identify and remove illicit discharges within the City's MS4.

C.4. ILLICIT DISCHARGE EDUCATION

C.4.1. Description of BMP

The City will continue to develop an illicit discharge education program to inform the public, government employees, businesses and industrial facilities of the hazards associated with illegal discharges/illegal dumping and how to prevent them in the household and/or workplace. The City will continue to implement an illicit discharge educational program by including education information on illicit discharges on the City's stormwater webpage. Educational information on the webpage will encourage the general public to report suspected illicit discharges, illegal dumping and/or stormwater pollution. The website will include a contact phone number and a complaint form that can be completed and submitted to the City. When feasible, the City will also include information about the importance of illicit discharge prevention and how to report illicit discharges in its other public outreach activities.

C.4.2. Measurable Goal(s):

a. Each reporting period, include illicit discharge education information, including information about how to report illicit discharges, on the City's Stormwater Webpage; OR

b. Ensure that at least one other public education or involvement outreach activity each reporting period addresses illicit discharge prevention and reporting procedures

C.4.3. Documentation For Annual Report:

a. Screenshot of webpage and number of webpage hits; OR

b. Documentation of educational event / handouts that addressed illicit discharge prevention and reporting procedures

C.4.4. Schedule:

a. Each Reporting Period, 2026 – 2027

C.4.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

C.4.6. Rationale for choosing BMP and setting measurable goal(s):

A program that raises public awareness regarding the negative impacts associated stormwater pollution as well as illicit discharges and illegal dumping into local streams should encourage the correct behavior from the general public and thereby reduce the frequency of these type incidents.

C.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

By educating the public about illicit discharges and encouraging them to report any illicit discharges, the City will be better able to remove and reduce the number of illicit discharges to the MS4.

C.5. COMPLAINT RESPONSE

C.5.1. Description of BMP

Illicit discharge and illegal dumping complaints can be made by calling the Customer Center at (770) 867-3106 or by emailing stormwater@cityofwinder.com, which is listed on the City's stormwater webpage, or city.hall@cityofwinder.com, which is listed under the "Comments, Suggestions, Report an Issue" tab of the City website. The City will encourage citizens to look for and report illicit discharges and illegal dumping via this phone number and the City's stormwater webpage. The City will advertise the hotline and stormwater webpage on the utility bill or through other educational efforts. All illicit discharge and illegal dumping complaints will be documented by City staff and then directed to the appropriate department for follow-up within five (5) business days. All complaints received, the City's response, records of any investigation activities performed, and enforcement actions undertaken will be recorded in the City's Stormwater Complaint Database. The City will formalize this process into a Complaint Response Procedures document and submit to EPD for review no later than one (1) year from the date of designation as an MS4 with the Annual Report.

C.5.2. Measurable Goal(s):

a. Establish formal procedures for receiving, investigating, and tracking the status of illicit discharge complaints and submit to EPD for review and approval
b. Investigate illicit discharge and illegal dumping complaints within five (5) business days
c. Record illicit discharge and illegal dumping complaints in the Stormwater Complaint Database

C.5.3. Documentation For Annual Report

a. Complaint Response Procedures document
b. Summary of the illicit discharge complaints received (e.g., complaint date, type of complaint, date of investigation, complaint status) during the reporting period

C.5.4. Schedule:

a. Submit Complaint Response Procedures, February 15, 2027
b. Ongoing throughout the year, 2026 – 2027

C.5.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

C.5.6. Rationale for choosing BMP and setting measurable goal(s):

The ability of the general public to report stormwater pollution incidents to the City for proper follow up, inspection and enforcement should help to reduce the frequency and significance of stormwater pollution incidents within the community.

C.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The ability of residents to report complaints will increase the City's knowledge of these incidents. Investigation of the incidents should result in a larger number of these issues getting resolved by the City and therefore less pollutants being discharged into local streams and creeks.

CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

40 CFR Part 122.34(b)(4) Requirement: You must develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. Your program must include:

A) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance;

B) Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;

C) 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;

D) Procedures for site plan review which incorporate consideration of potential water quality impacts;

E) Procedures for receipt and consideration of information submitted by the public; and

F) Procedures for site inspection and enforcement of control measures.

See Table 4.2.4(b) of the NPDES Phase II MS4 permit

D.1. LEGAL AUTHORITY

D.1.1. Description of BMP

The City of Winder is a Local Issuing Authority (LIA) for land disturbing activity (LDA) Permits as defined by the Georgia Erosion and Sedimentation Act (GESA). Winder does not have a memorandum of agreement (MOA) and has Erosion, Sedimentation, and Pollution Control (ES&PC) Plans reviewed and approved by the Georgia Soil and Water Conservation Commission (GSWCC) prior to issuing LDA Permits. The City of Winder is responsible for regulating, permitting, and enforcing GESA requirements for land disturbing activities once GSWCC has approved an ES&PC Plan.

The City adopted an Erosion and Sedimentation (E&S) Control Ordinance on June 8, 2010, to provide the City with the authority necessary to enforce applicable provisions of the GESA. A copy of the ordinance is provided in Appendix D. The City's E&S Ordinance includes an escalating series of enforcement mechanisms available to City staff. The City will review its E&S Ordinance annually and update as necessary to comply with GESA.

The City has also adopted a Litter Ordinance that was last updated on January 8, 2013, that makes it unlawful for any person to dump, deposit, throw or leave any litter on any public or private within the City of Winder or waters within the city limits. The ordinance defines litter as, "all sand gravel, slag, brickbats, rubbish, waste material, tin cans, refuse, garbage, paper, trash, debris or discarded materials of every kind and description.". This is sufficient to prohibit construction site operators

from discarding waste on construction sites. A copy of the Litter Ordinance is included in Appendix D.

D.1.2. Measurable Goal(s):

a. Review the E&S ordinance each reporting period to determine if the City wishes to make any updates related to GESA standards

b. Submit a copy of the ordinance(s), if revised as detailed above, to the Georgia EPD with the subsequent Annual Report

D.1.3. Documentation For Annual Report:

a. Copy of ordinance, if revised during the reporting period

D.1.4. Schedule:

a. Ordinance review: Each Reporting Period, 2026 – 2027

D.1.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

D.1.6. *Rationale for choosing BMP and setting measurable goal(s):*

This ordinance is required to enable City staff to enforce the Erosion and Sedimentation Control Ordinance as needed to comply the NPDES Phase II MS4 Permit and GESA.

D.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will maintain the records of the number and types of E&S violations investigated and the number of sediment discharges eliminated through implementation of the ordinance.

D.2. SITE PLAN REVIEW PROCEDURES

D.2.1. Description of BMP

All qualifying developments are required to comply with the Soil Erosion and Sedimentation Control (E&S) Ordinance and obtain an LDA Permit prior to the start of any land disturbing activities that will result in a disturbance of one or more acres of land within the City limits. Phase developments that disturb a total of one (1) acre or more are also required to obtain an LDA Permit.

The City's E&S Ordinance requires submittal of an approved Erosion, Sedimentation, and Pollution Control (ES&PC) Plan prior to issuance of an LDA Permit. ES&PC Plans received by the City of Winder are forwarded to the Georgia Soil and Water Conservation Commission (GSWCC) who review the plans for compliance with the requirements of GESA and the Georgia Erosion and Sedimentation Control Manual. The ES&PC Plan must be approved by the GSWCC before the City of Winder can issue an LDA Permit.

D.2.2. Measurable Goal(s):

a. Provide 100% of ES&PC Plans to GSWCC for their review and approval
b. Issue LDA permits only after ES&PC Plan is approved by GSWCC
c. Maintain a Site Plan Review database that summarizes the site plans received, number plans reviewed, approved, or denied, and the number of LDA Permits issued during the reporting period

D.2.3. Documentation For Annual Report:

a. List of site plans reviewed, approved, or denied during the reporting period
b. Number of LDA Permits issued during the reporting period

D.2.4. Schedule:

a. Ongoing throughout the year, 2026 – 2027

D.2.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

D.2.6. Rationale for choosing BMP and setting measurable goal(s):

The intent of this BMP is to ensure that an LDA Permit applicant properly prepares and secures approval of an ES&PC Plan from GSWCC prior to issuance of an LDA Permit. This helps to prevent the introduction of pollutants into the MS4 from unmitigated construction site runoff.

D.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will maintain records of the number of LDA Permits issued, number of site plans received, and number of plans approved or denied. This ensures site plans have the minimum required BMPs as required by GESA, which are intended to reduce pollution from construction site runoff.

D.3. INSPECTION PROGRAM

D.3.1. Description of BMP

The City of Winder Engineering Department is responsible for the inspection program which oversees compliance of construction sites with the provisions of the City's E&S Ordinance. The inspections include checking all BMPs required by the GSWCC-approved ES&PC Plan and City-issued LDA Permit. Authority for right of entry and inspection is granted under the City's E&S Ordinance, which also includes a series of escalating enforcement actions to compel compliance. The City inspects active construction sites in accordance with the following procedures:

- City staff will conduct site inspections of all sites that have an LDA Permit after land disturbing activities commence to verify compliance with all applicable E&S requirements
- Once a site is under construction, it will be inspected by the City regularly until final stabilization is achieved, with at least one (1) inspection occurring during the reporting period
- Inspections during the construction process will be prioritized as follows:
    - Proximity to waterways
    - Following a significant rain event
    - Evidence of poor housekeeping
    - History of poor compliance
    - Evidence of absent or malfunctioning controls
- A final site inspection will be conducted at all LDA Permit sites after land disturbing activities have ceased to ensure that the site has been adequately stabilized and all excess materials have been removed
- Documentation of the E&S inspection will be completed during each inspection, ensuring all inspections are uniform and to provide both the City and Permittee with a formal record of inspection

D.3.2. Measurable Goal(s):

a. Inspect 100% of all active construction sites with an LDA Permit at least once during each permit period

b. Complete and maintain a log of E&S inspections which includes the site name, address, date of inspection, violations identified, and any enforcement action or fines

c. Maintain copies of all E&S inspections

D.3.3. Documentation For Annual Report:

a. Log of E&S inspections containing the site name, address, date of inspection(s), violations, and enforcement actions, if any

D.3.4. Schedule:

a. Ongoing throughout the year, 2026 – 2027

D.3.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

D.3.6. Rationale for choosing BMP and setting measurable goal(s):

E&S inspections and enforcement of the ordinance will prevent excessive erosion and sedimentation from construction activities.

D.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

This BMP ensures that developers implement approved ES&PC Plans to prevent sediment from leaving construction sites. State law mandates that discharges from land development sites cannot increase the TSS in the receiving stream by more than 25 NTUs so implementation of the approved ES&PC Plan combined with ongoing inspections by EPD and the City should achieve that water quality goal. The City will keep records of the number and observations of the E&S inspections conducted through implementation of this BMP.

D.4. ENFORCEMENT PROCEDURES

D.4.1. Description of BMP

The City will develop an Enforcement Response Plan (ERP) and submit to EPD for review and approval with the 2026 Annual Report, per the permit. Upon approval, the City will begin enforcement of the ERP.

In the interim, if a site is found to be in violation of the City's E&S Ordinance during an inspection, the City will, at its discretion, issue a verbal warning, written notice of violation, or stop work order. Depending on the nature and number of violations issued, the City may require bond forfeiture or impose monetary penalties in accordance with the E&S Ordinance.

D.4.2. Measurable Goal(s):

a. Develop an ERP

b. Implement enforcement actions for 100% of identified violations in accordance with the E&S Ordinance

c. Keep a log of all violations and enforcement actions taken during the reporting period, including the number and type (e.g. Verbal Warning, Notice of Violation, Stop Work Order), status (e.g. pending, resolved), and amount of any assessed penalties

D.4.3. Documentation For Annual Report

a. Copy of ERP

b. Documentation of any enforcement actions taken during the reporting period including the number, type, status, and amount of assessed penalties

D.4.4. Schedule:

a. Develop ERP within one year of designation, submit with 2026 Annual Report (February 2027)

b. Ongoing throughout the year, 2026 – 2027

D.4.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

D.4.6. Rationale for choosing BMP and setting measurable goal(s):

Effective enforcement of the City's E&S Ordinance is necessary to ensure that the City properly regulates land disturbance activities that occur within the jurisdiction.

D.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain records of the number and nature of enforcement actions taken by the City. Documentation regarding any enforcement actions undertaken will be submitted to EPD in the Annual Report each year.

D.5. COMPLAINT RESPONSE

D.5.1. Description of BMP

Construction stormwater complaints can be made by calling the Customer Center at (770) 867-3106 or by emailing stormwater@cityofwinder.com, which is listed on the City's stormwater webpage, or city.hall@cityofwinder.com, which is listed under the "Comments, Suggestions, Report an Issue" tab of the City website. All construction stormwater-related complaints will be documented by City staff and then directed to the appropriate department for follow-up within five (5) business days. All complaints received, the City's response, records of any investigation activities performed, and enforcement actions undertaken will be recorded in the City's Stormwater Complaint Database. The City will formalize this process into a Complaint Response Procedures document and submit to EPD for review no later than one (1) year from the date of designation as an MS4 with the Annual Report (February 15, 2027).

D.5.2. Measurable Goal(s):

a. Establish formal Complaint Response Procedures document
b. Investigate E&S complaints within five (5) business days or refer them to the EPD for investigation where appropriate
c. Record complaints in the database

D.5.3. Documentation For Annual Report:

a. Submit Complaint Response Procedures document to EPD for review and approval
b. Summary of the E&S complaints received (e.g., complaint date, type of complaint, investigation date, complaint status, enforcement action) during the reporting period

D.5.4. Schedule:

a. Develop Complaint Response Procedures within one year of designation, 2026 Annual Report (Feb 2027)
b. Ongoing throughout the year, 2026 – 2027

D.5.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

D.5.6. Rationale for choosing BMP and setting measurable goal(s):

E&S problems may be more easily identified and corrected by providing the public a way to report complaints.

D.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain records of the number and types of E&S complaints received and investigated through implementation of this BMP.

D.6. CERTIFICATION

D.6.1. Description of BMP

GESA requires all local government employees involved with plan review, site inspections, or E&S Ordinance enforcement, as well as construction site operators to undergo the applicable training seminars developed by the Georgia Soil and Water Conservation Commission (GSWCC). The City of Winder requires all applicable staff to receive this training as soon as possible after the start of their employment.

D.6.2. Measurable Goal(s):

a. Applicable City staff will receive E&S training and certification

D.6.3. Documentation For Annual Report:

a. Proof of certification for applicable City employees, including documentation of current certifications will be provided (e.g., printouts from the GSWCC website or copies of certification cards)

D.6.4. Schedule:

a. Certifications will be renewed as needed based on certification expiration dates

D.6.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

D.6.6. Rationale for choosing BMP and setting measurable goal(s):

By requiring certification for City employees and construction site operators, the City will ensure that ES&PC Plans are correctly designed and implemented on each active construction site.

D.6.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

This BMP ensures City staff involved in the review, inspection, and enforcement of the E&S Ordinance are properly trained and familiar the associated requirements and regulations. The City will require that all personnel involved in E&S activities maintain their certifications and seek re-certification in accordance with the requirements of the GSWCC.

POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT & REDEVELOPMENT

40 CFR Part 122.34(b)(5) Requirement: You must develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. You must:

A) Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;

B) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development or redevelopment projects; and

C) Ensure adequate long-term operation and maintenance of BMPs.

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.5(b) of the NPDES Phase II MS4 permit.

E.1. LEGAL AUTHORITY

E.1.1. Description of BMP

The City is in the process of reviewing and adopting a Post Construction Stormwater Management Ordinance which will establish legal authority to enforce a program to address stormwater runoff into the MS4 from new development and redevelopment projects through the adoption of post construction runoff standards. A copy of the model ordinance, which is currently being reviewed, is included in Appendix E and a copy of the final ordinance will be provided with the 2026 Annual Report following adoption and codification.

The proposed Post-Construction Stormwater Management Ordinance will require the use of post-construction stormwater management and site planning and design criteria to protect stormwater from negative impacts associated with land development, including the stormwater design criteria established in the Georgia Stormwater Management Manual (GSMM). The design criteria and performance standards included in the City's Ordinance will be consistent with the latest version of the GSMM and the requirements of Section 4.2.5.1 of the City's MS4 permit. The ordinance and design manual will apply to new development and redevelopment that creates or adds more than 5,000 square feet of impervious surface or that involves land disturbing activities of 1 acre or more, including projects less than 1 acre if they are part of a larger common plan of development or sale.

Once adopted, the City will apply their performance standards during the design of City-construction projects, with the possible exception of linear projects. If the City designs a linear construction project, for which it would be impossible to apply the performance standards, the City will develop a feasibility program which sets reasonable criteria for determining when implementing performance standards for linear projects is infeasible. This will be submitted to EPD and applied to future linear construction projects upon submittal.

Following adoption, the City will review its Post-Construction Stormwater Management Ordinance each reporting period and revise as needed to ensure appropriate post-construction stormwater controls are in place and submit a copy of the ordinance, if revised, to the Georgia EPD with the Annual Report.

E.1.2. Measurable Goal(s):

a. Review, adopt, and codify a Post-Construction Stormwater Management Ordinance for applicable development and redevelopment

b. Following adoption, each reporting period, evaluate the City's Post-Construction Ordinance to determine if revisions are required

c. Update the ordinance, if required

d. If and when needed, develop linear project feasibility program to apply to future linear projects

E.1.3. Documentation For Annual Report:

a. Draft Post-Construction Stormwater Management Ordinance and final ordinance once adopted

b. If revised during reporting period, updated copy of Post-Construction Stormwater Management Ordinance

c. If developed, linear project feasibility program

E.1.4. Schedule:

a. Adopt a Post-Construction Stormwater Management Ordinance: 2026 Annual Report (Feb 2027)

b. Once adopted, enforce the use of the Post-Construction Stormwater Management Ordinance during plan review: Ongoing, 2026 – 2027

c. Review of Post-Construction Ordinance: Each Reporting Period, 2026 – 2027

d. If and when needed, develop linear project feasibility program, and submit to EPD for approval

E.1.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

E.1.6. Rationale for choosing BMP and setting measurable goal(s):

By reviewing and updating the Post Construction Stormwater Management Ordinance, the City will ensure that future development addresses stormwater quality in accordance with the most recent version of the GSMM as well as the most updated approaches to GI/LID design.

E.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:

The City will maintain records for the number of stormwater management plans reviewed and approved in accordance with the ordinance and the GSMM. By requiring a "better site design" approach to stormwater management runoff control, the City will ensure that new development and re-development projects comply with applicable post construction stormwater management requirements related to stormwater quality. Furthermore, the ordinance and GSMM require that all stormwater management site plans be designed to reduce Total Suspended Solids (TSS) by 80%.

E.2. INVENTORY

E.2.1. Description of BMP

The City maintains an inventory of stormwater detention/retention ponds and underground detention structures. The inventory includes the number and type of structures, and ownership information (whether the structures are publicly- or privately-owned). The inventory identifies all ponds and underground detention structures owned and/or maintained by the City regardless of construction date. The inventory also lists privately-owned structures and public structures owned by an entity other than City that were designed within one year after the City was designated as an NPDES Phase II MS4 Permittee on October 10, 2025 (i.e., October 10, 2026). The City will continue to maintain and update this inventory each reporting period and include those updates in the Annual Report. As required by the Permit, the City will prepare an updated and "final" completed inventory and map within 3 years of designation, by or before October 10, 2028, to be submitted with the 2028 Annual Report in February 2029.

E.2.2. Measurable Goal(s):

a. Develop inventory of all publicly-owned post-construction stormwater management structures and those privately-owned structures and publicly-owned structures owned by other entities not covered by an MS4 permit that the permittee has legal authority to inspect designed *after* October 10, 2026.

b. Update inventory each reporting period as new development and redevelopment occur, and existing structures are identified (detention/retention ponds and underground detention)

E.2.3. Documentation For Annual Report:

a. Inventory of post construction stormwater management structures, including structures added during the reporting year

E.2.4. Schedule:

a. Submit Completed Inventory: No later than with the 2028 Annual Report (Feb 2029)

b. Updated Inventory: Each reporting period thereafter

E.2.5. Person (position) Responsible for Overall BMP Management and Implementation:

Utilities Director

E.2.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP provides the information necessary for the City to implement the Stormwater Facility Inspection activity under BMP E.3 as outlined in the MS4 Permit.

E.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:

Development of an inventory of stormwater facilities will enable the City staff to implement the required inspection and maintenance activities to ensure that the ponds are operating properly as it relates to water quality treatment.

E.3. INSPECTION PROGRAM

E.3.1. Description of BMP

The City will develop inspection procedures for stormwater management structures, including detention/retention ponds and underground detention structures (i.e., underground stormwater vaults), listed on the City's Inventory as described in BMP E.2. A copy of the Post-Construction Inspection and Maintenance Program will be provided with the 2028 Annual Report, per the permit.

City staff or their designated representatives will inspect 100% of inventoried structures within the 5-year permit period, and at least one inspection will be conducted each reporting period. If more than five (5) post-construction structures are listed on the inventory, the City will inspect at least 5% of the structures each reporting period.

For ponds and underground vaults, inspections will be documented using the Operation and Maintenance Inspection Report for Ponds or through a field collection application that is downloaded on City-owned smart phones and/or tablets and recorded within the City's GIS layer. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of the paper inspection form will be provided in Appendix E when completed.

E.3.2. Measurable Goal(s):

a. Inspect 100% of inventoried public and private structures every 5 years, with at least one structure inspected each reporting period. If there are more than five (5) structures on the inventory, 5% of the structures will be inspected each reporting period.

b. Develop a Post-Construction Stormwater Inspection and Maintenance Program and submit with 2028 Annual Report (February 2029).

E.3.3. Documentation For Annual Report:

a. Number and percentage of stormwater management structures (ponds and underground detention) inspected during the reporting period

b. Documentation of inspections conducted, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed inspection checklist for each structure inspected during the reporting period

c. Post-Construction Stormwater Inspection and Maintenance Program

E.3.4. Schedule:

a. Post-Construction Inspection and Maintenance Program: Complete no later than October 10, 2028 and submit with subsequent Annual Report (Feb 2029)

b. Ongoing inspections following submittal of Inspection and Maintenance Program

E.3.5. Person (position) Responsible for Overall BMP Management and Implementation:

Utilities Director

E.3.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP should result in the City being better able to ensure that stormwater facilities are operating properly as it relates to water quality management and flood control.

E.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City's current post construction stormwater management ordinance and the GSMM require that detention ponds be designed to remove 80% of TSS. Furthermore, routine inspections and performance of the required maintenance activities ensure that these detention ponds continue to function as intended and to meet water quality and flood control standards.

E.4. MAINTENANCE PROGRAM

E.4.1. Description of BMP:

In order to compel the maintenance of privately-owned detention ponds or other stormwater facilities, the City will adopt a Post-Construction Stormwater Management Ordinance which will require private owners to maintain their structural controls. The ordinance will require that an "Inspection and Maintenance Agreement" be developed for all new stormwater facilities designed in accordance with the ordinance. The City is granted authority through the ordinance to inspect private stormwater facilities to ensure that they are being maintained in accordance with the agreement.

The ordinance will provide detailed information about stormwater facility inspection and maintenance procedures the City will follow. When issues are identified from an inspection, the City will send a letter to the affected private or public/non-City property owners notifying them of the findings of the inspection along with a timeframe for completion of repairs. Where maintenance agreements exist, the City will enforce maintenance via its ordinance; otherwise, the City will complete the maintenance if the property owner does not act on the request and the City will seek to recover costs based on provisions in the ordinance. A list of all maintenance agreements will be maintained and submitted with each annual report. The Post-Construction Stormwater Management Ordinance will be included with the 2026 Annual Report, following its adoption and codification.

The City will perform maintenance activities on public stormwater facilities in accordance with applicable procedures utilizing information compiled through the stormwater structure inspections conducted by City staff.

E.4.2. Measurable Goal(s):

a. Ensure that 100% of private stormwater management structures (i.e. detention ponds and underground detention) constructed after the date the Post-Construction Stormwater Management Ordinance is adopted have an Inspection and Maintenance Agreement
b. Maintain copies of all maintenance agreements on file
c. Notify private owners of stormwater facility maintenance needs identified through inspections
d. Maintain 100% of City-owned or maintained stormwater management structures (ponds and underground detention) as needed and identified through inspections over a five-year period

E.4.3. Documentation for Annual Report:

a. Summary list of all maintenance agreements designed *after* adoption of Post-Construction Stormwater Management Ordinance
b. Work orders completed for publicly-owned detention/retention ponds and publicly-maintained detention/retention ponds that have been maintained during the reporting period
c. Documentation of communication with owners of public, non-City or privately-owned detention/retention ponds and underground detention (e.g., letters to owners)

E.4.4. Schedule:

a. Provide summary list of all maintenance agreements: 2028 Annual Report (Feb 2029)

b. Implement Post-Construction Stormwater Inspection and Maintenance Program, including inspection and maintenance of structures: 2028 Annual Report (Feb 2029)

E.4.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

E.4.6. Rationale for choosing BMP and setting measurable goal(s):

Requiring developers/property owners to sign an Inspection and Maintenance Agreement as well as develop and implement inspection and maintenance plans for their stormwater facilities (i.e. detention ponds) should improve the oversight and operational function of these facilities. The development and implementation of maintenance procedures for the City to follow with regard to publicly-maintained detention ponds will result in improved operations of these facilities.

E.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:

The City's existing ordinances require that detention ponds be designed to remove 80% of TSS and to provide flood control. Routine inspection and appropriate maintenance of both public and private detention ponds should ensure that they continue to function to meet applicable water quality and flood control goals. It is assumed that ongoing maintenance of the designated detention ponds should result in improved operation of these ponds thereby minimizing the discharge of pollutants to the City's MS4.

E.5. GREEN INFRASTRUCTURE / LOW IMPACT DEVELOPMENT (GI/LID) PROGRAM

E.5.1. Description of BMP

The City has been designated as a permittee with a population exceeding 10,000 by the Georgia EPD and is therefore required to develop a GI/LID Program that meets the requirements specified in Table 4.2.5(b).5 of the City's Phase II MS4 permit and is also required to complete the requirements of section 4.2.5.3 of the Phase II permit. The GI/LID program must be submitted within 3 years of designation (October 10, 2028). Per the permit, the City will develop a GI/LID program which includes procedures for the inspection and maintenance of GI/LID structures. A copy of the City's GI/LID plan will be submitted for review and approval with the 2028 Annual Report.

E.5.2. Measurable Goal(s):

a. Submit the GI/LID Program with the 2028 Annual Report

b. Review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices by October 10, 2028 and submit with subsequent annual report

E.5.3. Documentation For Annual Report:

a. Copy of GI/LID Program

b. Copy of GI/LID ordinance, building code, and regulation review

E.5.4. Schedule:

a. Develop GI/LID Program: 2028 Annual Report (Feb 2029)

b. Review ordinances, building codes, and regulations: 2028 Annual Report (Feb 2029)

E.5.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

E.5.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will allow the City to identify the location of GI/LID structures and to then perform inspections of the BMPs to ensure that they operate as designed in the future.

E.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:

Each type of GI/LID practice has an estimated pollutant removal efficiency. By encouraging the incorporation of these types of best practices into new and redevelopment projects, the City can estimate the amount of pollutants being removed by these best practices. Furthermore, an inventory is necessary for inspection and maintenance purposes because proper maintenance is essential to achieving the desired pollutant removal efficiency.

E.6. GI/LID STRUCTURE INVENTORY

E.6.1. Description of BMP

The City of Winder will maintain an inventory of GI/LID structures constructed after October 10, 2025 (date of the City's designation) that are located within the City limits. The GI/LID program, once developed, will detail procedures for maintaining and updating the City's GI/LID structure inventory. The inventory will include, at a minimum, the number, type, and general location of GI/LID structures such as bioswales, pervious pavements, rain gardens, cisterns, green roofs, and other structures deemed appropriate by the City that are owned by the City, other public entities, and privately-owned non-residential GI/LID structures. The inventory will be updated at least once each reporting period as new GI/LID structures are constructed or existing structures are identified and maintenance agreements will be obtained for newly-designed non-permittee owned structures.

E.6.2. Measurable Goal(s):

a. Develop a GI/LID structure inventory of any GI/LID structures constructed after October 10, 2025 containing, at a minimum, permittee-owned structures, publicly owned by other entities, and privately-owned non-residential structures

b. Each reporting period, update inventory as new GI/LID structures are constructed or existing structures are identified

c. Obtain maintenance agreements for newly-designed non-permittee owned structures added to the City's GI/LID inventory

E.6.3. Documentation For Annual Report:

a. GI/LID inventory containing all structures constructed after October 10, 2025

b. Updated inventory, including structures added during the reporting year (documentation requirements for maintenance agreements is discussed below in Section E.8)

E.6.4. Schedule:

a. Completed Inventory: 2026 Annual Report (Feb 2027)

b. Update Each Reporting Period, 2026 – 2027

E.6.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

E.6.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP allows the City to identify the location and maintenance needs of GI/LID structures.

E.6.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Each type of GI/LID practice has an estimated pollutant removal efficiency. By encouraging the incorporation of these types of practices in new development and redevelopment, the City can estimate the amount of pollutants being removed through these practices. Routine inspection and appropriate maintenance ensure that GI/LID practices continue to function to meet infiltration and water quality goals.

E.7. GI/LID STRUCTURE INSPECTION PROGRAM

E.7.1. Description of BMP

The City will develop and implement inspection procedures for GI/LID structures which will be detailed in GI/LID Plan which will be submitted to EPD for review and approval with the 2028 Annual Report, per the permit. Inspections will be documented and documentation will be provided with the City's subsequent Annual Report once the GI/LID Structure Inventory (BMP E.7) is completed.

E.7.2. Measurable Goal(s):

a. Inspect 100% of inventoried public and private structures every 5 years, with at least one structure inspected each reporting period. If there are more than five (5) structures on the inventory, 5% of the structures will be inspected each reporting period

b. Document inspections

E.7.3. Documentation For Annual Report:

a. Number, percentage, and date of GI/LID structures inspected during the reporting period

b. Documentation of inspections conducted, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed inspection checklist for each structure inspected during the reporting period

E.7.4. Schedule:

a. Inspections: Begin following completion of GI/LID Program and no later than 2029

E.7.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

E.7.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP allows the City to identify the location and maintenance needs of GI/LID structures.

E.7.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:

Each type of GI/LID practice has an estimated pollutant removal efficiency. By encouraging the incorporation of these types of practices in new development and redevelopment, the City can estimate the amount of pollutants being removed through these practices. Routine inspection and appropriate maintenance ensure that GI/LID practices continue to function to meet infiltration and water quality goals.

E.8. GI/LID STRUCTURE MAINTENANCE PROGRAM

E.8.1. Description of BMP

The City will develop a maintenance program, which will be included in the GI/LID Plan, once developed, to ensure that all GI/LID structures are maintained in accordance with their design, the City ordinance, and the recommendations of other available local resources. The City will begin implementing the maintenance program in the reporting period following the completion of the GI/LID Plan (January 1 – December 31, 2028). If maintenance is needed for City-owned GI/LID structures, the City will follow the procedures and maintain documentation as required by the GI/LID Plan. The City will ensure that private, non-residential GI/LID structures and publicly-owned structures owned by other entities are appropriately maintained as described in the GI/LID Plan and maintain appropriate documentation.

E.8.2. Measurable Goal(s):

a. Maintain 100% of City-owned GI/LID structures as needed

b. Ensure that 100% of all private, non-residential GI/LID structures and GI/LID structures owned by public entities other than the City are appropriately maintained

c. Notify private owners and public entities with Stormwater Facility Inspection and Maintenance Agreement of maintenance needs identified by inspections

E.8.3. Documentation For Annual Report:

a. The number of City-owned GI/LID structures maintained during the reporting period and documentation of maintenance activities

b. Updated summary list of Maintenance Agreements

c. Documentation of activities taken to ensure proper maintenance of publicly-owned GI/LID structures owned by other entities and privately-owned non-residential GI/LID structures

E.8.4. Schedule:

a. Each Reporting Period, beginning after submission of GI/LID Plan and no later than 2029

E.8.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

E.8.6. Rationale for choosing BMP and setting measurable goal(s):

GI/LID BMPs are a way to manage stormwater in a natural environment and increase onsite infiltration to reduce runoff. Maintaining GI/LID structures can help ensure their effectiveness at improving water quality and help the City to promote GI/LID practices.

E.8.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:

Routine inspection and required maintenance ensure that GI/LID BMPs continue to function to effectively treat stormwater runoff. If deficiencies are present, they can be addressed by the property owner.

POLLUTION PREVENTION/ GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

40 CFR Part 122.34(b)(6) Requirement: You must develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.6(b) of the NPDES Phase II MS4 permit.

F.1. MS4 STRUCTURE INVENTORY AND MAP

F.1.1. Description of BMP

The City's MS4 is made up of the structures and facilities that are used for collecting, conveying, storing and/or treating stormwater from the source drainage area to the point of final outlet. The City's NPDES Phase II Small MS4 Permit defines a MS4 as follows:

"Municipal Separate Storm Sewer System or an MS4 means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains, owned or operated by a municipality or other public body, designed or used for collecting or conveying storm water runoff and is not a combined sewer or part of a Publicly Owned Treatment Works."

The City's stormwater system is comprised of the following structures that are regulated by the City's MS4 Permit and that are owned and/or operated by the City:

- Catch Basins
- Storm Drain Lines
- Ditches
- Municipal Detention / Retention Ponds and Underground Detention

The City of Winder will develop a final inventory and map of the MS4 control structures within the City within 4 years of designation (October 10, 2029), a copy of which will be submitted to EPD no later than with the 2029 Annual Report. Catch basins, ditches, detention/retention ponds/underground detention, and storm drain lines will be included in this inventory. The City's inventory of MS4 control structures will be updated annually, as new structures are added or identified, and submitted to EPD with each subsequent Annual Report.

F.1.2. Measurable Goal(s):

a. Maintain and update a map of the City's MS4 control structures, including catch basins, ditches, City-owned detention/retention ponds/underground detention, and storm drain lines

b. Maintain and update a database inventory of the City's MS4 control structures, including catch basins, ditches, City-owned detention/retention ponds, and storm drain lines

c. Provide status of inventory preparation and mapping of MS4 structures in each Annual Report

F.1.3. Documentation For Annual Report:

a. Updated MS4 control structure inventory and map, at a minimum including catch basins, ditches, City-owned detention/retention ponds/underground detention, and storm drain lines

b. Number/length of structures added during the reporting period

c. Total number of catch basins and ponds and length of ditches/drain lines

F.1.4. Schedule:

a. Inventory and Map, complete no later than October 10, 2029 and submit with 2029 Annual Report (Feb 2030)

b. Update each reporting period thereafter

F.1.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

F.1.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP provides the information necessary for the City to implement the MS4 Inspection and Maintenance Program as required by the NPDES Phase II MS4 Permit.

F.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The MS4 must function properly in order to reduce the discharge of pollutants from the public drainage system to the Maximum Extent Practicable (MEP) as required by the NPDES Phase II MS4 Permit. Routine inspection and then performance of the required maintenance activities should ensure that the MS4 continues to function as designed in terms of reducing the discharge of pollutants.

F.2. MS4 INSPECTION PROGRAM

F.2.1. Description of BMP

The City will inspect 100% of the MS4 system structures included in the MS4 control structure inventory over the five-year period of the permit, and will inspect, at a minimum, 5% of structures each reporting period. Inspections of the MS4 structures will be documented either on paper inspection forms or through an electronic field GIS collection application.

The City will visually inspect MS4 structures and document the inspections in accordance with the following procedures:

- Inspections will generally include a visual condition assessment of the various system elements including catch basins, storm drain lines, ditches, and visible areas of detention/retention ponds and underground detention structures.
- Storm drain lines will be visually inspected where they outfall into a structure or open drainage way, unless access is restricted due to obstructions.
- Visible areas of underground detention structures, such as where stormwater enters or outfalls, will be visually inspected; underground components that are not visible without entry will not be inspected.
- Inspections will be documented using the forms included in Appendix D.

F.2.2. Measurable Goal(s):

a. Inspect 100% of the MS4 system components in the MS4 control structure inventory during the five-year permit period, inspecting a minimum of 5% of structures per year

F.2.3. Documentation For Annual Report:

a. MS4 Inspection Records (at a minimum, catch basins, ditches, City-owned detention/retention ponds, and storm drain lines)

b. Number/length and percentage of structures inspected during the reporting period

F.2.4. Schedule:

a. Initiate inspections starting in late 2027 under next permit

F.2.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

F.2.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP should enable the City to better maintain the MS4 and to ensure that it is functioning properly such that the discharge of pollutants is reduced to the MEP.

F.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The MS4 must function properly to reduce the discharge of pollutants from the system into downstream receiving water bodies. Routine inspections ensure that the required maintenance needs are promptly identified so appropriate MS4 maintenance activities can be undertaken. Furthermore, the inspection activities undertaken will identify the required maintenance needs of

the MS4 such that sediment and debris removal can be performed thereby reducing the potential for these pollutants to be discharged from the system.

F.3. MS4 MAINTENANCE PROGRAM

F.3.1. Description of BMP

Upon completion of an inspection, the City will determine if maintenance is needed based on inspection results and the City's maintenance criteria. The City will prioritize maintenance needs based on their potential impact to the functionality of the public MS4. Maintenance will be conducted in accordance with the procedures will be performed in general accordance with the following standards:

- The City will schedule appropriate maintenance as needed and in accordance with available City resources.
- The City will respond to all citizen complaints related to MS4 structures, and will perform maintenance as needed.
- Sediment will be removed before 50% of the capacity of the structure has been lost.
- Trash and debris will be removed from structures.
- Manmade and natural objects that are causing or could potentially cause a blockage to the system will be removed.
- Excess emergent vegetation will be removed.
- Bank side vegetation and vegetation in the maintenance right-of-way will be mowed or trimmed, but not removed to protect against erosion.
- Ditches that are not draining properly will be re-graded to match existing pipe invert grades, to the extent possible.
- Materials removed from the MS4 during maintenance will be properly disposed of by the City or a contractor hired by the City.
- Maintenance activities for MS4 structures are documented through the use of a Work Order database maintained by the City.

F.3.2. Measurable Goal(s):

a. Maintain 100% of MS4 structures based on the City's maintenance criteria, and as funding is available

F.3.3. Documentation For Annual Report:

a. Maintenance records for MS4 control structures (at a minimum, catch basins, ditches, City-owned detention/retention ponds, and storm drain lines)

b. Number/length and type of each structure maintained during the reporting period

F.3.4. Schedule:

a. Ongoing, as needed, 2026 – 2027

F.3.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

F.3.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will enable the City to identify MS4 structures in need of maintenance and to undertake the necessary actions to ensure the operational functionality of the MS4 on an ongoing basis. Proper operation and maintenance of the MS4 is essential to ensure that the discharge of pollutants from the MS4 is minimized.

F.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The MS4 must function properly to reduce the discharge of pollutants from the system into downstream receiving water bodies and to meet applicable compliance requirements of the NPDES Phase II MS4 Permit. Proper maintenance of MS4 structures ensures that the system functions properly to meet this water quality goal. Furthermore, the activities undertaken such as sediment and debris removal from the MS4 can be documented to demonstrate that these pollutants are not ultimately being discharged from the system.

F.4. STREET AND PARKING LOT CLEANING

F.4.1. Description of BMP

The City will either manually collect litter and debris in City-owned at least one (1) time during each reporting period or utilize their street sweeper to clean a minimum of ten (10) miles of City streets and road shoulders during each reporting period. City crews also remove litter and debris on an as-needed/customer complaint basis throughout the City if there is an illegal dumping issue. The City tracks the amount of litter and debris collected during manual cleanup events and tracks the number of miles cleaned with the street sweeper.

F.4.2. Measurable Goal(s):

a. Conduct a minimum of one (1) litter collection event during each reporting period; OR

b. Clean a minimum of ten (10) miles of City streets using the street sweeper

F.4.3. Documentation For Annual Report:

a. Documentation of litter collection event activities (amount of debris, trash and litter collected)

b. Summary of street sweeping activities and miles swept

F.4.4. Schedule:

a. Ongoing, 2026 – 2027

F.4.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

F.4.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will reduce the amount of leaves, litter, other debris and other potential pollutants from being discharged from City streets into the MS4.

F.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will keep records or make estimates of the amount of material collected, based on accepted estimation techniques, of the amount of leaves, debris and other materials removed through the activities described above.

F.5. EMPLOYEE TRAINING

F.5.1. Description of BMP

The City will conduct annual employee training for employees responsible for implementation of the SWMP. City employees will be trained during each reporting period on stormwater topics that are necessary for that employee to do their job. Training topics may be rotated throughout the 5-year permit period to ensure that City staff receive the training applicable to their job responsibilities and/or to cover topics relevant to issues the City may currently be experiencing. Training may be provided via in-person meetings, PowerPoint presentations and/or videos or, alternatively, the City may send employees offsite to an applicable training course.

Employee "categories" that may receive training include the following:

Employee Category	Primary Job Duties	Examples of Relevant Training Topics
Public Works Staff / Utilities Staff	Maintenance of stormwater infrastructure and streets/ROWs; green infrastructure maintenance; litter pick-up; investigating illicit discharges; pond maintenance	• BMPs for stormwater structure and street/ROW maintenance • Good housekeeping practices for municipal facilities • Proper waste management and disposal practices • How to identify and eliminate illicit discharges • Green infrastructure & pond maintenance practices
Planning and Zoning / Engineering Staff	Site plan review; permitting; construction site inspections and enforcement (limited as the City is not an LIA)	• Site plan review procedures • How to track additions of new structures for MS4/outfall/pond/green infrastructure inventories, etc. • Green infrastructure design and construction • Construction site inspections / requirements of the E&S ordinance
Code Enforcement Staff	Enforcement of local ordinances	• Training regarding use of the City's Enforcement Response Plan • Tracking of site investigations and complaint resolution
City Hall Administrative Staff / City Clerk	Logging stormwater-related questions and complaints into the City's Work Order system; public education and public involvement activity coordination; ordinance updates; webpage management	• Educational topics to include in Public Education/Public Involvement BMPs & stormwater webpage • Ways to encourage active public participation • Regulatory requirements for local ordinances

The City will facilitate a minimum of one (1) training session per year for City employees who are involved in implementation of the SWMP. Alternatively, City staff may attend an established offsite training program that address stormwater issues.

F.5.2. Measurable Goal(s):

a. Train employees during each reporting period

b. Document educational training events

F.5.3. Documentation For Annual Report:

a. Documentation of training activities, including a summary of training materials or training agenda

b. Name and number of training attendees and date of training

F.5.4. Schedule:

a. Each Reporting Period, 2026 – 2027

F.5.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

F.5.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will help prevent water quality impacts due to activities undertaken by employees during municipal operations.

F.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

Good housekeeping improvements at municipal facilities will indicate that the training program is effective.

F.6. WASTE DISPOSAL

F.6.1. Description of BMP

The City will properly dispose of wastes including litter, debris, sediment, and other pollutants removed from the drainage system during maintenance, litter pickup, or any other maintenance activity involving the MS4. Depending on the type of waste, waste may be disposed of at a landfill, wood mulching facility, or stockpiled for future use. Limbs collected during waste disposal activities will be either taken to the landfill or mulching facility. Sediment and debris will be either stockpiled for future use or disposed of at a landfill. Litter and other debris will be disposed of at a landfill. The City will obtain weight tickets for materials disposed of at the landfill or mulching facility and will provide a signed memo for any materials that are stockpiled for use on future projects.

F.6.2. Measurable Goal(s):

a. Properly dispose of 100% of waste removed from the MS4 in accordance with the City's MS4 Inspection, Operation, & Maintenance Procedures

b. Maintain waste disposal records

F.6.3. Documentation For Annual Report:

a. Documentation of waste disposal activities (e.g., weight tickets, number of bags collected, etc.)

F.6.4. Schedule:

a. Ongoing, 2026 – 2027

F.6.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

F.6.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP ensures waste resulting from MS4 maintenance activities are properly disposed and thereby prevented from re-entering MS4.

F.6.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will keep records, or make well-founded estimates, of the amount of waste and debris resulting from MS4 maintenance activities disposed of at the landfill.

F.7. NEW FLOOD MANAGEMENT PROJECTS

F.7.1. Description of BMP

The City will ensure that all new flood control projects are assessed for water quality impacts. For the purposes of this BMP, the City interprets "Flood Control Projects" to refer to stormwater management structures such as detention/retention ponds. Once adopted and codified, all new developments will be required to comply with the City's Post-Construction Stormwater Management Ordinance, which require that stormwater management controls address water quality as well as water quantity protection. A copy of the draft Post-Construction Stormwater Management Ordinance is included in Appendix E for review.

F.7.2. Measurable Goal(s):

a. Once adopted, ensure 100% of new flood management projects (i.e., detention and retention ponds) comply with the Post-Construction Stormwater Management Ordinance and GSMM

b. Document site plan reviews where flood management projects were assessed for water quality impacts

F.7.3. Documentation For Annual Report:

a. List of plans previewed where flood management projects were assessed for water quality impacts

b. Note the plans that resulted in improved pollutant reduction during the reporting period in each annual report

F.7.4. Schedule:

a. Ongoing, 2026 – 2027

F.7.5. Person (Position) Responsible for Overall Management and Implementation:

Utilities Director

F.7.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will improve the water quality treatment potential of flood control projects throughout the City.

F.7.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The GSMM provides pollutant removal efficiencies for all types of detention/retention facilities constructed or retrofitted in accordance with the GSMM standards. The City will provide information in the annual report on the number of new stormwater management structures constructed in accordance with GSMM standards.

F.8. EXISTING FLOOD MANAGEMENT PROJECTS

F.8.1. Description of BMP

The City developed Water Quality Assessment Procedures to ensure that existing City flood management projects (i.e., detention and retention ponds) are assessed for potential retrofitting to address water quality impacts. These procedures and the associated checklist are included in Appendix F.

The City will perform Water Quality Assessments for all City-owned detention and retention ponds during the 5-year permit period. If more than five flood management structures are listed on the inventory, the City will assess at least one of the flood management structures each reporting period. If an assessment was previously performed on an existing flood management structure using the most recent GSMM, prior to the effective date of this permit, then an additional assessment may not need to be performed and the City will document this determination. Assessments of flood management structures will be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and recorded within the City's GIS layer or using a paper checklist. The field collection application and paper inspection checklist contain the same questions.

Retrofitting activities will be conducted as specified in the Water Quality Assessment Procedures to be provided in Appendix F and as funding becomes available for their implementation.

F.8.2. Measurable Goal(s):

a. Perform Water Quality Assessment for 100% of City-owned detention and retention ponds within the 5-year permit period (unless a previous assessment was conducted using the most recent GSMM and the City has documentation, in which case the assessment may not need repeated). If more than 5 structures are listed on the inventory, at least one assessment will be performed each reporting period

b. Evaluate potential retrofitting, if applicable

F.8.3. Documentation For Annual Report:

a. Copy and/or summary of any water quality assessments and retrofitting activities, if performed, for existing flood control projects conducted during the reporting period

F.8.4. Schedule:

a. Each reporting period, 2026 – 2027

F.8.5. Person (position) responsible for overall management and implementation of the BMP:

Utilities Director

F.8.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will improve the water quality treatment potential of existing flood control projects undertaken and funded by the City.

F.8.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The GSMM provides water quality BMP design criteria and pollutant removal efficiencies for all types of flood control projects constructed or retrofitted in accordance with the GSMM standards. The City will provide information in the annual report on the number of existing flood control projects assessed and the number of flood control projects retrofitted to meet GSMM standards.

F.9. MUNICIPAL FACILITIES

F.9.1. Description of BMP

The City will develop an inventory of municipal facilities with the potential to cause pollution that are City-owned and located within the permitted area. The City will update its Municipal Facility Inventory at least once each reporting period and City staff or their designated representatives will inspect 100% of inventoried municipal facilities within the 5-year permit period (at least one inspection will be conducted each reporting period). If more than five (5) municipal facilities are listed on the inventory, the City will inspect at least 5% of the municipal facilities each reporting period. Inspections of Municipal Facilities will be documented using a paper checklist or through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer. The field collection application and paper inspection checklist contain the same questions.

If sites with needed improvements are identified, the appropriate department will be notified of the problem and a site re-inspection may be performed if deemed necessary. Records will be maintained on problems found and actions taken.

F.9.2. Measurable Goal(s):

a. Develop an inventory of municipal facilities with the potential to cause pollution within the permitted area
b. Update inventory of municipal facilities with the potential to cause pollution each reporting period
c. Inspect 100% of inventoried facilities every 5 years, with at least one inspection conducted each reporting period. If there are more than five (5) municipal facilities on the inventory, 5% of the municipal facilities will be inspected each reporting period.
d. Document inspections

F.9.3. Documentation For Annual Report:

a. Copy of updated municipal facility inventory
b. Documentation of inspections conducted, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed inspection checklist for each municipal facility inspected during the reporting period
c. Documentation of any activities conducted to address issues identified during the site inspection

F.9.4. Schedule:

a. Completed municipal inventory, no later than October 10, 2026 submitted with Annual Report (February 2027)
b. Inventory update each reporting period thereafter
c. Inspections, 2026 – 2027

F.9.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

F.9.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will reduce the potential for pollutants to be discharged from municipal sites into the MS4 as a result of the inspections performed which should identify potential storm water pollution issues and remove them prior to discharge.

F.9.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain records of municipal facility inspections and document any pollutant discharges noted on municipal sites. If the site inspections are done on a regular basis then the likelihood of pollutant discharges should be minimized as a result of those proactive measures taken by the City.

ENFORCEMENT RESPONSE PLAN

G.1. ENFORCEMENT RESPONSE PLAN (ERP)

G.1.1. Description of BMP

The City is working to develop an ERP, which will include references to the applicable ordinances that provide legal authority to implement the SWMP, the types of enforcement mechanisms available, escalation of enforcement, time frames for investigation, and the method to be used to track instances of non-compliance. The ERP will be developed once the City's Post-Construction Stormwater Management Ordinance has been reviewed, approved, and codified. Once finalized, the City's Post-Construction Stormwater Management Ordinance and ERP will be provided to EPD for review and approval with the subsequent Annual Report (Feb 2027). Once approved, the City will review the ERP each subsequent reporting period and revise it as necessary. If the ERP is revised, the City will submit it to EPD for review.

G.1.2. Measurable Goal(s):

a. Develop ERP

b. Implement ERP

c. Review the ERP each subsequent reporting period to determine if any updates are needed

G.1.3. Documentation for Annual Report:

a. Copy of ERP

b. Documentation of enforcement actions taken during the reporting period (number, type, and status of enforcements actions)

G.1.4. Schedule:

a. Enforce ERP: 2026 Annual Report (Feb 2027)

b. Enforce ERP: Ongoing 2027

c. Review and Update ERP: Each reporting period

G.1.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

G.1.6. Rationale for choosing BMP and setting measurable goal(s):

Effective enforcement of the City ordinances is necessary to ensure that they appropriately regulate various aspects of the SWMP to protect water quality.

G.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

The City will maintain records of the number and nature of enforcement actions undertaken through the ERP.

IMPAIRED WATERS PLAN

H.1. IMPAIRED WATERS PLAN (IWP)

H.1.1. Description of BMP

The City has been designated as a permittee with a population exceeding 10,000 and therefore must identify any impaired waters located within City limits, if present, and prepare Monitoring Implementation Plan (MIP) that meets the requirements of Section 4.4.2 of the City's MS4 Permit, including:

- A list of the impaired waters on the current 303(d) listed and the associated pollutant of concern (POC);
- A map showing the location of impaired waters and all identified MS4 outfalls located on the impaired waters or within one linear mile upstream of the impaired waters;
- BMPs that will be implemented to address the POCs;
- A schedule for implementing the BMPs.

Two stream were listed on the 2024 305(b)/303(d) list for bacteria impairments (fecal coliform): Marburg Creek and Cedar Creek. In accordance with the permit, the City will prepare a MIP within four (4) years of the date of designation (October 10, 2030) and submit to EPD for review and approval. The MIP will establish sampling locations and procedures, to include frequency and seasonal considerations for bacteria sampling.

The 305(b)/303(d) list is updated every two (2) years. The City will check the most updated list and ensure the MIP accurately represents the most recently listed streams located within one (1) linear mile downstream of an MS4 outfall prior to submitting the MIP. Following approval of the MIP, the City will conduct sampling and submit findings, BMP evaluations, and any updates to the MIP with each annual report.

H.1.2. Measurable Goal(s):

a. Develop MIP

b. Conduct sampling in accordance with approved MIP

c. Perform assessment to determine the effectiveness of the BMPs employed and if additional BMPS may be necessary and/or if the MIP needs to be revised; revise if necessary

d. Review the latest 305(b)/303(d) list and MS4 outfalls each reporting period to determine if the City is required to revise its MIP

H.1.3. Documentation for Annual Report:

a. Copy of MIP

b. Annual report containing sampling results

c. Assessment to determine the effectiveness of the BMPs and if any additional BMPS are necessary

H.1.4. Schedule:

a. Develop MIP: with 2030 Annual Report (Feb 2031)

b. Annual Report Submittal: Ongoing following MIP approval

c. BMP Assessment: Each reporting period following MIP approval

H.1.5. Person (Position) Responsible for Overall BMP Management and Implementation:

Utilities Director

H.1.6. Rationale for choosing BMP and setting measurable goal(s):

Identifying and implementing BMPs targeted at the POC(s) will help to address known water quality impairments within local streams.

H.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit?

Prioritized implementation of BMPs targeted at the POC of listed waterways should improve water quality conditions within these waterways.