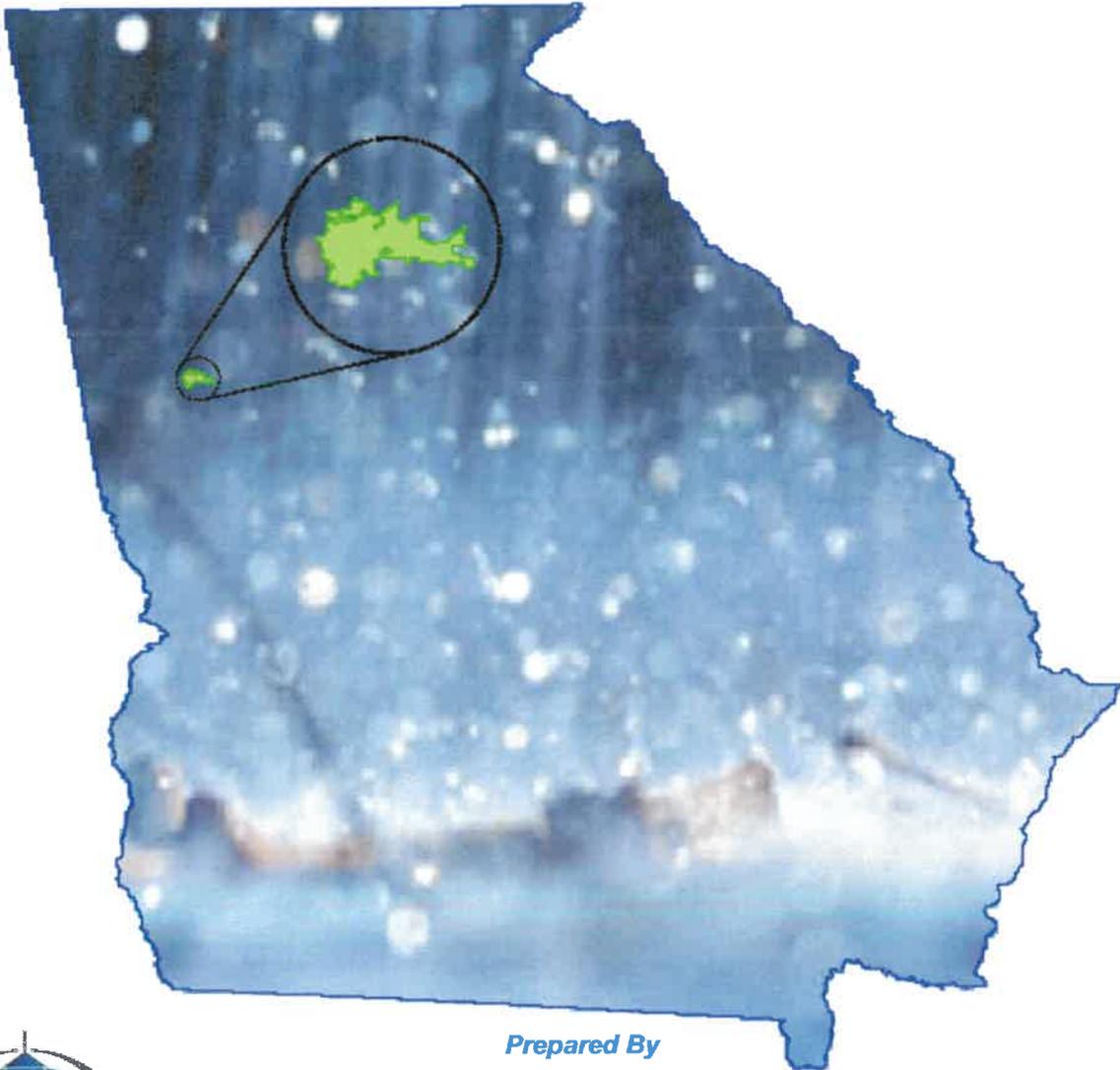


Stormwater Management Program



For The
2023 — 2027 Reporting Period

**National Pollutant Discharge Elimination System (NPDES)
Phase II Municipal Separate Storm Sewer System Permit**



Prepared By

City of Newnan

Stormwater Management

25 LaGrange Street

Newnan, GA 30263

June 2023



NEWNAN
GEORGIA

Existing Phase II MS4 Stormwater Management Program Template

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

General Information for Submitting a SWMP

- Your Stormwater Management Program (SWMP) must be a comprehensive document containing all the necessary components. The SWMP must include the most recent version of all of the required supporting documents. These supporting documents must be submitted on a flash drive or CD. Ensure that the files can be opened and read by EPD. In rare cases, EPD will accept hard copies of documents. Ensure that you submit all of the necessary components, including copies of the latest versions of the following:
 - 1) Adopted stormwater ordinances (Illicit Discharge, Erosion and Sedimentation, and Post-Construction). If you are located within the Metropolitan North Georgia Planning District, then your SWMP must also include District ordinances (Floodplain, Litter, Stream Buffer);
 - 2) Standard Operating Procedures (e.g. dry weather screening procedures, construction site inspection procedures, street sweeping procedures);
 - 3) Blank copies of forms to be used to implement the SWMP, including inspection forms;
 - 4) Signed Memorandum of Agreements; and
 - 5) Maps and inventories.

A bulleted list of the documents to be attached to the SWMP is included on each BMP page. This list is only to assist the permittee as a reminder and is not a definitive list. The permittee may determine some of the listed documents do not apply or that additional documents should be provided.

- For some BMPs, the NPDES Permit requires the submittal of procedures. These procedures may be described in the “Description of BMP” section of each BMP page, if they are not lengthy, or included as a separate attachment to the SWMP.
- The NPDES Permit contains tables listing the various BMPs. The MS4 is required to set a measurable goal for each BMP. In some cases, the Permit establishes the goal (e.g. inspect 100% of the structures within a 5-year period), while in other cases the MS4 must set a specific measurable goal. Ensure that each measurable goal is numeric and trackable.
- The NPDES Permit specifies that the MS4 must provide documentation of each activity implemented. Each BMP must specify the documentation to be submitted with each annual report (e.g. completed inspection forms, work orders, etc.). In some cases, the Permit specifies the documentation to be submitted (e.g. maps and inventories). In other cases, the MS4 will have to establish the documentation to be submitted. Ensure that each BMP spells out the specific documentation to be submitted with each annual report in the section titled “Documentation to be submitted with each Annual Report”.

**STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

Stormwater Management Program (SWMP)

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

1. General Information

- A. Name of small MS4: City of Newnan, GA
- B. Name of responsible official: Keith Brady
Title: Mayor
Mailing Address: 25 LaGrange Street
City: Newnan State: GA Zip Code: 30263
Telephone Number: (770) 253-2682
- C. Designated stormwater management program contact:
Name: Rob Hill
Title: Stormwater Coordinator
Mailing Address: 25 LaGrange Street
City Newnan State: GA Zip Code: 30263
Telephone Number: (678) 673-5477 Direct Dial Number
Email Address: RHill@NewnanGA.gov
- D. Provide the river basin(s) to which your MS4 discharges:
Chattahoochee River & Flint River
- E. Provide the latitude and longitude of the MS4 center (e.g. City Hall, County offices, MS4 mailing address) using Global Positioning System (GPS) –WG 84:
Latitude: 33.37316 Longitude: 84.80105

2. Sharing Responsibility

- A. Has another entity agreed to implement a control measure on your behalf?
Yes _____ No X (If no, skip to Part 3)

Control Measure or BMP:

1. Name of entity _____
2. Control measure or component of control measure to be implemented by entity on your behalf:

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

3. **Minimum Control Measures and Appendices**

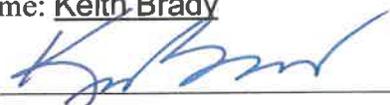
- A. Public Education and Outreach
- B. Public Involvement/Participation
- C. Illicit Discharge Detection and Elimination
- D. Construction Site Stormwater Runoff Control
- E. Post-Construction Stormwater Management in New Development and Redevelopment
- F. Pollution Prevention/Good Housekeeping
- G. Appendix A – Enforcement Response Plan
- H. Appendix B – Impaired Waters

4. **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: Keith Brady

Date: 5/23/2023

Signature: 

Title: Mayor

Stormwater Management Program

Public Education and Outreach on Storm Water Impacts

Table 4.2.1(a) of the Permit

A. Best Management Practice (BMP) #1 – School Education

1. Target audience: School Children

2. Description of BMP: The City of Newnan educates School Children on the importance of our water resources through a series of workshops. The workshops are developed by the City of Newnan using an Enviro-Scape. The live workshops consist of demonstrations of how our daily activities can impact our environment, followed by a questions and answers portion.

3. Measurable goal(s): It is the goal of the City of Newnan to educate school children on the importance of our water resources by performing a minimum of 3 live workshops to select classes.

4. Documentation to be submitted with each annual report:
 - Summary of Live Demonstrations
 - List of Schools/ Classes to which it was presented
 - Dates of live demonstrations.

5. Schedule:
 - a. Interim milestone dates (if applicable):
 - Contact school system by August of each permit year
 - Identify a minimum of 3 classes/ groups by August of each permit year

 - b. Implementation date (if applicable):
Conduct live workshops by December of each permit year

 - c. Frequency of actions (if applicable): Annually

 - d. Month/Year of each action (if applicable):
 - Conduct Minimum of 3 Live Workshops by December 2023
 - Conduct Minimum of 3 Live Workshops by December 2024
 - Conduct Minimum of 3 Live Workshops by December 2025
 - Conduct Minimum of 3 Live Workshops by December 2026
 - Conduct Minimum of 3 Live Workshops by December 2027

6. Person (position) responsible for overall management and implementation of the BMP: Page Beckwith (Keep Newnan Beautiful)

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Although not a direct indicator of water quality in the streams and rivers of the city, it is believed that education will have an intangible benefit on water quality and documenting the class rooms reached each year will ensure that the population of Newnan that has received some form of outreach is continually increasing. For the purposes of this SWMP, the BMP will be deemed effective if the at least three classes receive live demonstrations each permit year.

B. BMP #2 – Construction Site Operator Education

1. Target audience: Construction Site Operators

2. Description of BMP: The City of Newnan distributes Stormwater Educational and Ordinance Brochures to all developers, builders, or contractors receiving a Land Disturbance Permit from the City of Newnan Building Department and during Pre-Construction Meetings. The brochure highlights examples of quality BMP's that may be used in the field to protect our water resources during the critical time of land disturbance. The brochure also includes any new or updated water quality information as it relates to local, state, or federal law. The brochure is reviewed and may be changed on an annual basis, as needed. Please see Appendix S for our updated Brochure.

3. Measurable goal(s): It is the goal of the City of Newnan to inform local developers, builders, and grading contractors of educational topics and ordinance requirements by distributing brochures to 100% of the persons who receive a Land Disturbance Permit and to a representative during 100% of all Pre-Construction Meetings.

4. Documentation to be submitted with each annual report:
 - Example of Brochure(s) distributed during permit year
 - Total number of brochures distributed during permit year
 - Land Disturbance Permit Log of those receiving brochures during permit year
 - Pre-Construction Meeting Log of those receiving brochures during permit year

5. Schedule:
 - a. Interim milestone dates (if applicable):
 - Review and update (as needed) brochures by January each permit year
 - Print brochures by January each permit year
 - Re-Print brochures, as needed, during each permit year

 - b. Implementation date (if applicable):
 - Begin dispersing brochures by January of each permit year

 - c. Frequency of actions (if applicable):
 - Brochure(s) to be handed out with every Land Disturbance Permit issued during each permit year
 - Brochure(s) to be handed out with every Pre-Construction Meeting during each permit year
 - Re-Print brochures, as needed, during each permit year

 - d. Month/Year of each action (if applicable):

- January 2023 - Review, update as needed, print, & begin handing out brochures to all receiving a Land Disturbing Permit and at Pre-Construction Meetings
 - January 2024 - Review, update as needed, print, & begin handing out brochures to all receiving a Land Disturbing Permit and at Pre-Construction Meetings
 - January 2025 - Review, update as needed, print, & begin handing out brochures to all receiving a Land Disturbing Permit and at Pre-Construction Meetings
 - January 2026 - Review, update as needed, print, & begin handing out brochures to all receiving a Land Disturbing Permit and at Pre-Construction Meetings
 - January 2027 - Review, update as needed, print, & begin handing out brochures to all receiving a Land Disturbing Permit and at Pre-Construction Meetings
6. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality. The City wishes to ensure that land disturbance permit holders are aware of the City's focus on water quality and desire to protect local water resources. The City believes that this BMP will be an effective practice to protecting water quality by ensuring that each permit includes literature discussing water quality protection means. For the purposes of this SWMP, this BMP will be considered effective if a brochure is made available to all persons securing a Land Disturbance Permit and to a representative during all Pre-Construction Meetings.

Note: For those permittees with a population of less than 10,000, the MS4 should implement at least 2 BMPs. For those permittees with a population greater than 10,000, the SWMP must include at least four BMPs. For each additional BMP, you should attach an additional BMP page in the SWMP.

C. BMP #3 – Municipal Website

1. Target audience: General Public

2. Description of BMP: The City of Newnan will maintain a Municipal Website Stormwater Page with useful contact information, important links to regulatory agencies, links to City Stormwater Ordinances, related forms and brochures, Environmental Hotline phone number, etc. The Stormwater Page is part of the City's existing website, as a linked page.

3. Measurable goal(s): The City will maintain the Municipal Website Stormwater Page within the City's existing City website at all times during the course of the permit. The City will evaluate and update the Stormwater Page annually.

4. Documentation to be submitted with each annual report:
 - Provide a screen shot of examples of representative posts from the reporting period
 - Total number of page hits/ views received for the Stormwater Page from the reporting period

5. Schedule:
 - a. Interim milestone dates (if applicable):
 - Annual Review and update (as needed) of Municipal Website Stormwater Page each permit year

 - b. Implementation date (if applicable):
 - Initial Publishing of Municipal Website Stormwater Page was September 2018
 - Review and update (as needed) of Municipal Website Stormwater Page by December of each permit year

 - c. Frequency of actions (if applicable):
 - Annual review and update (as needed) of Municipal Website Stormwater Page.

 - d. Month/Year of each action (if applicable):
 - December 2023 – Annual Review of Municipal Website Stormwater Page
 - December 2024 – Annual Review of Municipal Website Stormwater Page
 - December 2025 – Annual Review of Municipal Website Stormwater Page

- December 2026 – Annual Review of Municipal Website Stormwater Page
- December 2027 – Annual Review of Municipal Website Stormwater Page

6. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City will report the number of page hits/ views to the page as part of the City's annual report due on February 15th of each year the permit is in effect. Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality. For the purposes of this SWMP, the BMP will be deemed effective if the City maintains and updates the Municipal Website Stormwater Page with stormwater related information.

D. BMP #4 – Newnan Citizens Academy

1. Target audience: Citizens of City of Newnan

2. Description of BMP: The City of Newnan hosts the Newnan Citizen Academy program annually, that helps foster informed and engaged residents and business owners in the city of Newnan. Participants enjoy a behind-the-scenes look at how the city's government provides quality services to the community. Program participants interact with leaders in their city government and visit city facilities and departments. During the program, the Engineering Department will discuss topics such as our Public Education & Outreach Programs, Public Involvement & Participation Programs, Environmental Hotline, discussions of how our daily activities can impact our environment, and hand out brochures and a “Only Rain Down the Storm Drain” Refrigerator Stormwater Magnet. The program will also have a questions and answers portion.

3. Measurable goal(s): It is the goal of the City of Newnan to educate Newnan Citizens on the importance of our protecting our environment and the City’s Stormwater Programs by performing a minimum of 1 presentation during Newnan Citizens Academy.

4. Documentation to be submitted with each annual report:
 - Provide total number of Newnan Citizens in attendance during Engineering Departments presentation
 - Provide examples of brochures & magnet handed out during presentation
 - Provide description of topics discussed during presentation

5. Schedule:
 - a. Interim milestone dates (if applicable):
 - Contact City staff responsible for organizing Newnan Citizens Academy to set up Stormwater portion of program of Newnan Citizens Academy by October each permit year

 - b. Implementation date (if applicable):
 - Conduct the Stormwater portion of program of Newnan Citizens Academy by November each permit year

 - c. Frequency of actions (if applicable): Annually

 - d. Month/Year of each action (if applicable):
 - November 2023 – Conduct minimum of 1 presentation to Newnan Citizens Academy

- November 2024 – Conduct minimum of 1 presentation to Newnan Citizens Academy
- November 2025 – Conduct minimum of 1 presentation to Newnan Citizens Academy
- November 2026 – Conduct minimum of 1 presentation to Newnan Citizens Academy
- November 2027 – Conduct minimum of 1 presentation to Newnan Citizens Academy

6. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City will report the number of Newnan Citizens in attendance, examples of brochures and magnets handed out, and a description of topics discussed during presentation as part of the City's annual report due on February 15th of each year the permit is in effect. Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality. For the purposes of this SWMP, the BMP will be deemed effective if the City continues to educate the Citizens of Newnan during the Newnan Citizens Academy.

Public Involvement/Participation
Table 4.2.2 (a) of the Permit

A. Best Management Practice (BMP) #1 – Storm Drain Marking

1. Target audience/stakeholder group: General Public

2. Description of BMP: The City of Newnan began a Storm Drain Marking Program that involves gluing markers which tell citizens not to dump things in the storm drains. This BMP is performed by volunteers such as boy scouts, civic clubs, school students, or City employees. After the location is chosen to mark, City Staff reaches out to school groups, community groups, and organizations in the area surrounding the marking location to seek volunteers. The volunteers are provided with a map of which storm drains are to be marked. The volunteers are supervised by a trained City employee.

3. Measurable goal(s): It is the goal of the City of Newnan to utilize volunteer groups to hold one event per year, where we glue markers with the logo “Only Rain Down the Drain – No Dumping”. It will take several years to mark all storm drains. After all storm drains have been marked, the program will revert to inspecting storm drains yearly and remark where necessary.

4. Documentation to be submitted with each annual report:
 - Identification of the school groups, community groups, and/or organizations that marked in that year
 - Sign-In Sheets and/ or photograph(s) to illustrate the total number of volunteers participating that year

5. Schedule:
 - a. Interim milestone dates (if applicable):
 - Identify cooperating volunteer group by June of each permit year.
 - Sign a Memorandum of Understanding with the volunteer group(s) by August of each permit year.
 - Meet with the volunteer group(s) to distribute markers and glue and provide instructions by September of each permit year.

 - b. Implementation date (if applicable):
 - Begin gluing the storm drain markers by October of each permit year.

 - c. Frequency of actions (if applicable): Annually

- d. Month/Year of each action (if applicable):
- October 2023 – Hold One Event to Mark Storm Drains
 - October 2024 – Hold One Event to Mark Storm Drains
 - October 2025 – Hold One Event to Mark Storm Drains
 - October 2026 – Hold One Event to Mark Storm Drains
 - October 2027 – Hold One Event to Mark Storm Drains

6. Person (position) responsible for overall management and implementation of the BMP: Dean Smith (City Planner)

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City believes that this BMP will provide a dual purpose of providing great awareness for volunteers that perform the storm drain marking by helping them to understand the connection between drainage system inlets and local streams and water bodies. Additionally, this BMP will serve as a longer-term educational tool for those who don't participate in the marking event since the storm drain markers remain educating those who see them in the future. Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality. By ensuring that the City's storm drains are marked and in later years, remarked, it is believed that potential illicit discharges and dumping may be avoided. For the purpose of this SWMP, this BMP will be deemed effective if storm drains are marked per year or confirmed to be marked in later years after all drains have been marked at least once in the City.

B. BMP #2 – Adopt-A-Street Program

1. Target audience/stakeholder group: General Public
2. Description of BMP: The Adopt-A-Street program is an ongoing program in Newnan administered by the Keep Newnan Beautiful program. The purpose of the program is to provide an organized program to remove litter from public rights-of-way within the City via volunteer groups. Litter is collected by volunteers and placed in City provided trash bags. Following collection of the litter, the bags are then placed along the roadway and City personnel collect and properly dispose of the litter.
Information for this program is available to the public at the Keep Newnan Beautiful website: www.keepnewnanbeautiful.org as well as brochures provided by Keep Newnan Beautiful. Please see Appendix S for our Adopt-A-Street Participating Groups List and Brochure.
3. Measurable goal(s): The City will Hold 5 Street Clean-Up Events per year.
4. Documentation to be submitted with each annual report:
 - Identification of number of clean up events held during the permit year
 - Status Report Update and/ or photographs from Volunteer Groups to identify the number of participants
 - Updated List of Volunteer Groups
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable):
 - Jan-Dec 2023 – Hold 5 Street Clean-Up Events per year
 - Jan-Dec 2024 – Hold 5 Street Clean-Up Events per year
 - Jan-Dec 2025 – Hold 5 Street Clean-Up Events per year
 - Jan-Dec 2026 – Hold 5 Street Clean-Up Events per year
 - Jan-Dec 2027 – Hold 5 Street Clean-Up Events per year
6. Person (position) responsible for overall management and implementation of the BMP: Page Beckwith (Keep Newnan Beautiful Coordinator)

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Given that much of the City's rights-of-way include ditches and drainage systems (i.e. MS4 components), removal of litter from the right-of-way prevents gross pollutants from entering the MS4 and being discharged to streams and rivers. By holding at least 5 Street Clean-up events to remove litter from the roads, removing pollution that would have entered the City's streams and rivers can be effective. For the purposes of this SWMP, the BMP will be deemed effective if the City continues the program and reports the number of clean-up events to remove litter from the rights-of-way per year.

Note: For those permittees with a population of less than 10,000, the MS4 should implement at least 2 BMPs. For those permittees with a population greater than 10,000, the SWMP must include at least four BMPs. For each additional BMP, you should attach an additional BMP page in the SWMP.

C. BMP #3 – E-Collection Recycling Program

1. Target audience/stakeholder group: General Public
2. Description of BMP: The E-Collection Recycling Program is an ongoing program in Newnan administered by the Keep Newnan Beautiful program. The purpose of the program is to provide an organized program to encourage the proper recycling / disposal of electronics within the City of Newnan. Each year, the City organizes a minimum of one event whereby residents can bring their old electronics and dispose of them properly. Examples of electronics that can be disposed of for recycling include computers, monitors TVs, cell phones, ink cartridges, household batteries, etc. The organization the City works with sends the collected material to a recycling end-market to be manufactured into recycled content products.
3. Measurable goal(s): The City will conduct at least one recycling event per year whereby residents can bring their electronics to a central facility (typically City Hall) to properly dispose of them.
4. Documentation to be submitted with each annual report:
 - Report the day(s) E-Collection events were held
 - Total of material collected as reported by recycling organization
 - Sign-In Sheets from E-Collection Event(s)
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable):
 - Jan-Dec 2023 – Hold 1 E-Recycling Event per year
 - Jan-Dec 2024 – Hold 1 E-Recycling Event per year
 - Jan-Dec 2025 – Hold 1 E-Recycling Event per year
 - Jan-Dec 2026 – Hold 1 E-Recycling Event per year
 - Jan-Dec 2027 – Hold 1 E-Recycling Event per year
6. Person (position) responsible for overall management and implementation of the BMP: Page Beckwith (Keep Newnan Beautiful Coordinator)

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: By measuring the amount of electronics removed from the community, the amount of pollution / debris that could have potentially entered the City's streams and rivers can be determined. For the purposes of this SWMP, the BMP will be deemed effective if the City continues the program with two collection events and reports the amount of electronics collected per year in each annual report.

D. BMP #4 – Citizen Hotline

1. Target audience/stakeholder group: General Public/ Newnan Citizens
2. Description of BMP: The City published an “environmental concern hot-line” for citizens to report illicit discharges, illegal connections, soil erosion problems, sewer spills, clogged storm drains, and other environmental related issues. The hot-line number has been placed on the City’s website. All complaints received will be inspected within 3 business days and/ or directed to the required department/ agency. The results of the inspections will also be documented.
3. Measurable goal(s): It is the goal of the City of Newnan to respond to all complaints received from the environmental concern hot-line within 3 business days.
4. Documentation to be submitted with each annual report:
 - Summary of complaints / concerns and correction action taken for each if warranted.
 - The results of all follow-up inspections will be documented.
 - Each year, the City will provide a list of all complaints received and document the date received, date investigated, as well as the results of the investigation / actions taken to resolve the issue.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A On-Going
 - b. Implementation date (if applicable): On-Going
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable):
 - Jan-Dec 2023 – Respond to all complaints received, document & report
 - Jan-Dec 2024 – Respond to all complaints received, document & report
 - Jan-Dec 2025 – Respond to all complaints received, document & report
 - Jan-Dec 2026 – Respond to all complaints received, document & report
 - Jan-Dec 2027 – Respond to all complaints received, document & report
6. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be deemed to be effective if all complaints received by the City are investigated in a timely manner and appropriate action is taken to resolve the issue.

Illicit Discharge Detection and Elimination
Table 4.2.3 (a) of the Permit

A. BMP #1 – Legal Authority

1. Description of BMP: The City of Newnan will maintain an illicit discharge prohibition ordinance within the City of Newnan Code of Ordinances meeting the requirements of the NDPEs Phase II MS4 permit as well as the requirements of the Metropolitan North Georgia Water Planning District. If the requirements of the aforementioned programs conflict, the more stringent requirement will be maintained. A copy of the ordinance can be found in Appendix C.

2. Measurable goal(s): The City will maintain an illicit discharge prohibition ordinance within the City of Newnan Code of Ordinances at all times during the course of the permit. Each year, the City will evaluate the ordinance to determine if revisions are required. If revisions are required, the City will submit a copy of the revised ordinance to EPD to be included in the SWMP.

3. Documentation to be submitted with each annual report:

- Memo stating no revisions to ordinance are required or a copy of the revised ordinance if modified.

4. Schedule:

a. Interim milestone dates (if applicable): N/A On-Going

b. Implementation date (if applicable): N/A On-Going

c. Frequency of actions (if applicable): Annual

- Annual Review of Illicit Discharge Prohibition Ordinance

d. Month/Year of each action (if applicable):

- December 2023 – Annual Review of Illicit Discharge Prohibition Ordinance
- December 2024 – Annual Review of Illicit Discharge Prohibition Ordinance
- December 2025 – Annual Review of Illicit Discharge Prohibition Ordinance

- December 2026 – Annual Review of Illicit Discharge Prohibition Ordinance
- December 2027 – Annual Review of Illicit Discharge Prohibition Ordinance

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The ability to cease discharges of pollutants from non-exempt illicit dry weather discharges is critical to reducing the pollutant loading of local streams and water bodies. As such, this BMP will be determined to be effective if the City maintains an illicit discharge prohibition ordinance throughout the duration of this permit. Additionally, the City will evaluate the ordinance once per year and revise the ordinance if deemed ineffective.

SWMP Attachments:

- Illicit Discharge Detection and Elimination ordinance, showing adoption date
- If you are located within the Metropolitan North Georgia Planning District (District), attach copies of all of the District ordinances, showing the adoption dates, to the SWMP.

B. BMP #2 – Outfall Map and Inventory

1. Description of BMP: The City of Newnan has created a map and inventory of all regulated outfalls in the City. Each year, the City will update the map and inventory to reflect the addition of outfalls from new infrastructure projects or developments. Additionally, the City will also remove outfalls that have been reclassified or removed. A copy of the City’s MS4 Outfall Map and Inventory List has been included in Appendix D.

2. Measurable goal(s): The City will annually update a map and inventory of all MS4 outfalls within the city limits of Newnan and provide a copy of the map and inventory as part of the City’s annual report due on February 15th of each year the permit is in effect.

3. Documentation to be submitted with each annual report:

- Updated Outfall Inventory
- Updated Outfall Map showing outfalls and receiving streams, & stream names
- Provide the number of outfalls added during the reporting period and the total number of outfalls in each annual report

4. Schedule:

a. Interim milestone dates (if applicable): N/A On-Going

b. Implementation date (if applicable): January 2013

c. Frequency of actions (if applicable): Annual

d. Month/Year of each action (if applicable):

- December 2023 – Update MS4 Outfall Map and Inventory
- December 2024 – Update MS4 Outfall Map and Inventory
- December 2025 – Update MS4 Outfall Map and Inventory
- December 2026 – Update MS4 Outfall Map and Inventory
- December 2027 – Update MS4 Outfall Map and Inventory

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Determining where outfalls discharge is critical to preventing illicit discharges to Waters of the State and is a key component of screening (to be

addressed in a separate BMP). Through knowledge of the system, the City believes that illicit discharges can be more effectively identified and addressed. This BMP will be determined to be effective if the City maintains an updated map and Inventory of all known MS4 outfalls on an annual basis as demonstrated through submittal of a new map each year in the annual report due on or before February 15th documenting the previous year's activities.

SWMP Attachments:

- Outfall inventory
- Outfall map showing the outfalls and the receiving streams, including stream names

C. BMP #3 – IDDE Plan

1. Description of BMP: The City of Newnan dry weather screening program consists of inspecting outfalls and sampling any dry weather flow to determine if upstream facilities/connections are discharging non-stormwater flows to the drainage system. The City will utilize approved EPD procedures to conduct dry weather screening of 100% of the City's outfalls within the 5-year permit term. If there is dry weather flow, and if the detected limits of any of the sampling parameters are above their acceptable baseline limits, the City will initiate a source tracing and removal program.

The City will implement investigative and follow-up procedures when the results of the DWS indicate a potential for an illicit discharge, including the sampling and/or inspection procedures described in the IDDE Plan. If the source of the illicit discharge is identified as deriving from an adjacent MS4, the City will notify that MS4. The City will provide information on illicit discharge detection activities performed during the reporting period in each annual report.

The City will ensure any identified illicit discharges are eliminated. The City will follow our Enforcement Response Plan (ERP). The City will provide information on any (100%) eliminated discharges or any enforcement actions taken to eliminate (100% of) illicit discharges, during the reporting period in each reporting period.

Please note that the City will be screened on a geographic area basis. The City has been divided into 5 areas and will be screened such that each area will be screened once and the entire regulated area of the City will be screened over the course of the permit. If a low percentage of inspections is conducted during one reporting period, the City will ensure subsequent reporting periods will be increased, to ensure 100% of the outfalls are completed during the 5-year permit term. A copy of the City's dry weather screening procedures has been included in Appendix E. A copy of the City's dry weather screening sector area map has been included in Appendix F.

If an outfall is added to the City during the course of a permit year through a new infrastructure project or development project, the outfall will be screened in that year if:

- The outfall is located in the sector to be screened in that year
- Or the outfall is located in a previously screened sector

Please note that outfalls added to the City after the dry weather screening for that year has been completed, will be dry weather screened the following year if located in a previously screened area.

City outfalls that are found to have a dry weather flow regardless of their sector will be screened that year and appropriate action taken as outlined in the approved dry weather screening procedures and Enforcement Response Plan to remove the dry weather flow unless exempt under the provisions of the Illicit Discharge Ordinance.

2. Measurable goal(s): Provide a map and completed dry weather screening forms for all dry weather screened outfalls completed within the permit year in each year's annual report.

3. Documentation to be submitted with each annual report:
- Map of all MS4 outfalls screened in that year
 - Completed Dry Weather Screening Forms for all outfalls screened in that year
 - Summary report of all suspected illicit discharges and corrective actions taken if non- exempt
 - Number & Percentage of outfall inspections conducted in that year

4. Schedule:

a. Interim milestone dates (if applicable): N/A On-Going

b. Implementation date (if applicable): January 2013

c. Frequency of actions (if applicable): Annually

d. Month/Year of each action (if applicable):

- 2023 – Dry Weather Screen Sector 1
- 2024 – Dry Weather Screen Sector 2
- 2025 – Dry Weather Screen Sector 3
- 2026 – Dry Weather Screen Sector 4
- 2027 – Dry Weather Screen Sector 5

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City believes that identifying and eliminating illicit discharges of pollutants will reduce the pollutant loading of the City's streams and rivers. This BMP will be determined to be effective if the City screens one sector of the City per year such that over the course of the permit every MS4 outfall is inspected a minimum of once.

SWMP Attachments:

- Illicit Discharge Detection and Elimination Plan
- Outfall inspection form
- If using an alternate method in place of outfall inspections, the form to document activities
- Form to document stream walks
- Form to document source tracing
- Form to document illicit discharge elimination
- Example table to track outfall inspections over the permit cycle

D. BMP #4 – Education

1. Description of BMP: The City of Newnan annually mails a brochure to restaurants, institutions, hospitals, industries, and automotive service establishments in the City. The brochure is a notice explaining the problems associated with improper disposal of waste as it relates to these particular establishments. The brochure, which may change from year-to-year, is educational in nature by providing tips on proper disposal.

The City of Newnan educates the Public about the hazards of illicit discharge in BMP 1 School Education, Stormwater Municipal Website BMP 3 & BMP 4 Newnan Citizens Academy, Public Participation BMP 1 Storm Drain Marking, & BMP 2 Adopt-A-Street Program. The City educates Government Employees in BMP #F5 (Employee Training). The City also educates contractors and builder/ developers about illicit discharge through Public Education & Outreach BMP 2 Construction Site Education Brochure Program.

2. Measurable goal(s): It is the goal of the City of Newnan to mail 50 brochures a year to restaurants, institutions, hospitals, industries, and automotive service establishments in the City. Each year, the City will submit as part of the annual report, a list of businesses (with addresses) which received a brochure along with an example of the brochure.

3. Documentation to be submitted with each annual report:

- Example(s) of brochure(s) mailed to businesses
- List of businesses which received the brochure(s) in that permit year

4. Schedule:

a. Interim milestone dates (if applicable): On-Going

- Develop a list of businesses to receive the brochure by July of each permit year
- Identify/ Develop the brochure by August of each permit year
- Provide the brochures by August of each permit year
- Mail brochures by September of each permit year

b. Implementation date (if applicable): January 2013

c. Frequency of actions (if applicable): Annually

d. Month/Year of each action (if applicable):

- September 2023 – Mail 50 brochures
- September 2024 – Mail 50 brochures
- September 2025 – Mail 50 brochures

- September 2026 – Mail 50 brochures
 - September 2027 – Mail 50 brochures
5. Person (position) responsible for overall management and implementation of the BMP: Tracy Dunnavant (Planning Director)
 6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality through avoidance of illicit discharges. For the purposes of this SWMP, this BMP will be deemed to be effective if the City mails at least fifty (50) brochures to businesses with a higher potential for pollutant discharges.

E. BMP #5 – Complaint Response

1. Description of BMP: The City published an “environmental concern hot-line” for citizens to report illicit discharges, illegal connections, soil erosion problems, sewer spills, clogged storm drains, and other environmental related issues. The hot-line number has been placed on the City’s website. All complaints received will be inspected within 3 business days and/ or directed to the required department/ agency. The results of the illicit discharge & illegal connection inspections will be documented and reported under Illicit Discharge BMP 5, Complaint Response. The results of the erosion control related inspections will be documented and reported under Construction Site Stormwater Runoff Control BMP 5, Complaint Response.

2. Measurable goal(s): It is the goal of the City of Newnan to respond to all complaints received from the environmental concern hot-line within 3 business days.

3. Documentation to be submitted with each annual report:
 - Summary of complaints / concerns related to stormwater management issues and correction action taken for each if warranted.
 - The results of all follow-up inspections will be documented.
 - Each year, the City will provide a list of all complaints received related to illicit discharges and document the date received, date investigated, as well as the results of the investigation / actions taken to resolve the issue.

4. Schedule:
 - a. Interim milestone dates (if applicable): N/A On-Going
 - b. Implementation date (if applicable): N/A On-Going
 - c. Frequency of actions (if applicable): On-Going Annually
 - d. Month/Year of each action (if applicable): On-Going Annually

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be deemed to be effective if all complaints received by the City are investigated in a timely manner and appropriate action is taken to resolve the issue.

SWMP Attachments:

- Complaint procedures, including receipt, investigation and enforcement
- Form used to document complaint receipt, handling, and resolution

Construction Site Storm Water Runoff Control
Table 4.2.4 (a) of the Permit

A. BMP #1 – Legal Authority

1. Description of BMP: The City of Newnan will maintain an erosion and sediment control ordinance within the City of Newnan Code of Ordinances meeting the requirements of the NDPEs Phase II MS4 permit as well as the requirements of the Georgia Erosion & Sedimentation Act (GESA). If the requirements of the aforementioned programs conflict, the more stringent requirement will be maintained. The ordinance was most recently adopted on November 22, 2016 and a copy of the ordinance can be found in Appendix G. The City adopted a Litter Ordinance on November 22, 2005 and a copy of the ordinance can be found in Appendix G. The Litter Ordinance is used to control of construction waste, such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste.

2. Measurable goal(s): The City will maintain an erosion and sediment control ordinance within the City of Newnan Code of Ordinances at all times during the course of the permit. Each year, the City will evaluate the ordinance to determine if revisions are required. If revisions are required, the City will submit a copy of the revised ordinance to EPD to be included in the SWMP.

3. Documentation to be submitted with each annual report:
- Memo stating no revisions to ordinance are required or a copy of the revised ordinance if modified.

4. Schedule:

a. Interim milestone dates (if applicable): N/A On-Going

b. Implementation date (if applicable): N/A On-Going

c. Frequency of actions (if applicable): Annually

d. Month/Year of each action (if applicable):

- December 2023 – Annual Review of Erosion & Sediment Control Ordinance
- December 2024 – Annual Review of Erosion & Sediment Control Ordinance
- December 2025 – Annual Review of Erosion & Sediment Control Ordinance
- December 2026 – Annual Review of Erosion & Sediment Control Ordinance

- December 2027 – Annual Review of Erosion & Sediment Control Ordinance
5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)
 6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The ability to require construction site operators to design, implement and maintain erosion and sedimentation controls on active construction sites is critical to protecting local streams and water bodies. As such, this BMP will be determined to be effective if the City maintains an erosion and sediment control ordinance throughout the duration of this permit. Additionally, the City will evaluate the ordinance once per year and revise the ordinance if deemed ineffective.

SWMP Attachments:

- Erosion and Sedimentation ordinance, showing adoption date. If the required construction waste wording is contained in another ordinance (e.g. litter), then submit that adopted ordinance also.

B. BMP #2 - Site Plan Review Procedures

1. Description of BMP: The City of Newnan is its own Issuing Authority, and remains in compliance with Georgia Erosion and Sediment Control Act (GESA) of 1975 as amended. Accordingly, all developers are required to comply with the local E&S Ordinance and obtain a land disturbance permit prior to the start of any land disturbing activities that will disturb one (1.0) or more acres of land within the City Limits.

ESPCP plans submitted to the City are reviewed by a Newnan staff member who has received the State sponsored E&S training. Newnan has entered into a Memorandum of Agreement with the National Resources Conservation District to review and approve its own ESPCPs. Plans must meet the requirements of GESA and the Newnan E&S Ordinance, which includes the requirement to control turbidity in the site runoff, control impacts on receiving streams and the implementation of the minimum control measures. City staff also reviews the site plan to ensure that the stormwater management plan meets requirements for water quality and water quantity treatment as described in the Stormwater Ordinance. City staff will work with a developer to improve a plan until it meets all applicable requirements. Once a plan is approved by Newnan, the developer is issued a Land Disturbing Activities Permit and can commence with land disturbing activities.

Newnan's E&S Ordinance requires that local developers pay permit fees of \$40.00 per disturbed acre to the City. Since GESA contains requirements for these fees to be paid, Newnan is notifying developers of this requirement and collecting the associated fees.

Please see Appendix R for the Plan Review Checklists the City uses for plan review of construction plans.

2. Measurable goal(s): Review 100% of ESPCPs for compliance with GESA and the Newnan E&S Ordinance and grant Land Disturbance Permit only after ESPCP is approved
3. Documentation to be submitted with each annual report:
 - Summary of ESPCPs reviewed during permit year and action taken for each review
 - Provide a list of site plans received and the number of site plans reviewed, approved, or denied during the reporting period in each annual report
 - Provide the total number of Land Disturbance Permits issued during each reporting period.
4. Schedule:

- a. Interim milestone dates (if applicable): N/A On-Going
- b. Implementation date (if applicable): N/A On-Going
- c. Frequency of actions (if applicable): Annually
- d. Month/Year of each action (if applicable): On-Going
 - 2023 – Review 100% of ESPCPs for compliance
 - 2024 – Review 100% of ESPCPs for compliance
 - 2025 – Review 100% of ESPCPs for compliance
 - 2026 – Review 100% of ESPCPs for compliance
 - 2027 – Review 100% of ESPCPs for compliance

5. Person (position) responsible for overall management and implementation of the BMP: Mike Kessler (Engineering Inspector-Erosion Control)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. By ensuring that no land disturbing projects are authorized without first developing a plan to meet the requirements of GESA and the local E&S ordinance, the City believes that this BMP will provide a significant safeguard against potential water quality impacts. For the purposes of this SWMP, this BMP will be deemed effective if no land disturbance permits are issued without first meeting the requirements of the City's E&S ordinance through the design of site specific structural and non-structure best management practices.

SWMP Attachments:

- Site plan review procedures
- Example plan review forms
- Example plan review tracking log

C. BMP #3 – Inspection Program

1. Description of BMP: The City of Newnan currently inspects all active construction projects within the City that maintain Land Disturbance Permits. Sites are inspected for compliance with their approved ESPCP plan. All construction sites are inspected shortly after land disturbing activities have commenced to ensure that all E&S BMPs are in place. Regular inspections will take place after that based on the following priorities:

- Evidence of erosion or sediment leaving the site
- History of non-compliance with ESPCP plan and E&S regulations
- Citizen complaints
- Proximity to local waterways

Throughout the length of the project, the E&S certified person responsible for the ESPCP implementation onsite is responsible for coordinating status of that implementation. All construction sites are inspected after construction activity has ceased to ensure that the site has been properly stabilized. An example of the inspection form utilized by City staff has been included in the SWMP as Appendix H. A log is maintained by Newnan of all E&S inspection records.

During inspections, City staff will check for compliance with the approved ESPCP, the City's Erosion & Sedimentation Ordinance, and with the illicit discharge provisions of the Stormwater Ordinance. Staff will ensure that BMP's are in place to control discarded building materials, concrete truck washout, chemical storage, litter, sanitary waste, and other items that could cause adverse impacts to water quality.

2. Measurable goal(s): At a minimum, the City will conduct at least one inspection of active construction site during each reporting period.

3. Documentation to be submitted with each annual report:

- Summary list of all inspections & dates conducted during the reporting period
- Summary list of all active Construction Sites during the reporting period
- Representative sample of inspection sheets filled out on all inspections

4. Schedule:

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

- 2023 – Inspect Active Construction Sites
- 2024 – Inspect Active Construction Sites
- 2025 – Inspect Active Construction Sites
- 2026 – Inspect Active Construction Sites
- 2027 – Inspect Active Construction Sites

5. Person (position) responsible for overall management and implementation of the BMP: Mike Kessler (Engineering Inspector-Erosion Control)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. By ensuring that land disturbing projects are inspected regularly to confirm compliance the requirements of GESA, the local E&S ordinance, and the site E&S plans, the City believes that this BMP will provide a significant safeguard against potential water quality impacts. For the purposes of this SWMP, this BMP will be deemed effective if all active construction sites are inspected to ensure that the sites are meeting the requirements of the City’s E&S ordinance and site-specific erosion, sedimentation and pollution control plan.

SWMP Attachments:

- Construction site inspection procedures
- Example inspection forms
- Example site inspection tracking log

D. BMP #4 – Enforcement Procedures

1. Description of BMP: If upon inspection, a site is found to be in non-compliance, the Land Disturbance Permit holder will be notified. The contractor is provided with a copy of the inspection report and will be given a timeline for compliance (not to exceed five days). City E&S inspectors then re-inspect the site to ensure that the appropriate measures have been implemented. Following the third and each subsequent violation, an immediate stop-work order shall be issued. No work shall be allowed on the site except to address those deficiencies identified in the inspection and subsequent re-inspections.

Stop work orders shall be issued immediately without prior warnings if any of the following are identified on a site:

- Regulated land disturbing activities are being undertaken without a Land Disturbance Permit
- Failure to maintain a stream buffer
- Significant amounts of sediment as determined by the local issuing authority or by the director or his or her designee, have been or are being discharged into state waters and where best management practices have not been properly designed, installed, and maintained

For a more detailed description of enforcement procedures regarding E&S violations, the reader is directed to the Erosion and Sediment Control ordinance in Appendix G as well as the Enforcement Response Plan following approval in Appendix P.

2. Measurable goal(s):

- Follow enforcement procedures outlined in the City's E&S ordinance and ERP.
- Enforcement will be taken on 100% of noted violations

3. Documentation to be submitted with each annual report:

- Log of all violations and enforcement procedures undertaken during the reporting period in each annual report including the number and type (e.g., Notice of Violation, Stop Work Order) and status (e.g., Pending, Resolved) and the amount of any assessed penalties.
- Provide copies of a representative amount of enforcement actions taken during the reporting period

4. Schedule:

- a. Interim milestone dates (if applicable): N/A On-Going
- b. Implementation date (if applicable): N/A On-Going

c. Frequency of actions (if applicable): Annually On-Going

d. Month/Year of each action (if applicable):

- 2023 – Enforce & Document Active Construction Sites
- 2024 – Enforce & Document Active Construction Sites
- 2025 – Enforce & Document Active Construction Sites
- 2026 – Enforce & Document Active Construction Sites
- 2027 – Enforce & Document Active Construction Sites

5. Person (position) responsible for overall management and implementation of the BMP: Mike Kessler (Engineering Inspector-Erosion Control)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. By ensuring that land disturbing projects conform to the requirements of GESA, the local E&S ordinance, and the site E&S plans, the City believes that this BMP will provide a significant safeguard against potential water quality impacts. For the purposes of this SWMP, this BMP will be deemed effective if construction sites are meeting the requirements of the City's E&S ordinance and site-specific erosion, sedimentation and pollution control plan. Sites found not to be in compliance will be cited (either verbally or in writing) and appropriate actions taken. A copy of the enforcement procedures implemented each permit year will be included in the annual report.

SWMP Attachments:

- Example enforcement forms or letters (e.g., Stop Work Order, Warning Notice)
- Example enforcement action tracking log

E. BMP #5 – Complaint Response

1. Description of BMP: The City published an “environmental concern hot-line” for citizens to report illicit discharges, illegal connections, soil erosion problems, sewer spills, clogged storm drains, and other environmental related issues. The hot-line number has been placed on the City’s website. All complaints received will be inspected within 3 business days and/ or directed to the required department/ agency. The results of the illicit discharge & illegal connection inspections will be documented and reported under Illicit Discharge BMP 5, Complaint Response. The results of the erosion control related inspections will be documented and reported under Construction Site Stormwater Runoff Control BMP 5, Complaint Response.

2. Measurable goal(s): It is the goal of the City of Newnan to respond to all complaints received from the environmental concern hot-line within 3 business days.

3. Documentation to be submitted with each annual report:
 - Summary of complaints / concerns related to erosion control issues and correction action taken for each if warranted.
 - The results of all follow-up inspections will be documented.
 - Each year, the City will provide a list of all complaints received related to erosion control and document the date received, date investigated, as well as the results of the investigation / actions taken to resolve the issue.

4. Schedule:
 - a. Interim milestone dates (if applicable): N/A On-Going
 - b. Implementation date (if applicable): N/A On-Going
 - c. Frequency of actions (if applicable): On-Going Annually
 - d. Month/Year of each action (if applicable): On-Going Annually
 - 2023 – Inspect, Enforce & Document Complaints
 - 2024 – Inspect, Enforce & Document Complaints
 - 2025 – Inspect, Enforce & Document Complaints
 - 2026 – Inspect, Enforce & Document Complaints
 - 2027 – Inspect, Enforce & Document Complaints

5. Person (position) responsible for overall management and implementation of the BMP: Mike Kessler (Engineering Inspector-Erosion Control)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be deemed to be effective if all complaints received

by the City are investigated in a timely manner and appropriate action is taken to resolve the issue.

SWMP Attachments:

- Complaint procedures, including receipt, investigation and enforcement
- Form used to document complaint receipt, handling, and resolution

F. BMP #6 – Certification

1. Description of BMP: GESA, as amended, requires that all construction site operators and all local government staff involved with E&S inspections or ECPCP review receive training from the GWSCC on proper E&S control. The City of Newnan will require that all its E&S inspectors receive this training.

2. Measurable goal(s):

- Ensure that all MS4 staff involved in construction activities subject to the Construction General Permits (GCPs) are trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission.
- Provide the number and type of current certifications held by MS4 staff in each annual report.

3. Documentation to be submitted with each annual report:

- Printouts from the GSWCC Website of the number and type of current certifications held by MS4 staff

4. Schedule:

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

- December 2023 – Verify & Document current certifications held by MS4 staff
- December 2024 – Verify & Document current certifications held by MS4 staff
- December 2025 – Verify & Document current certifications held by MS4 staff
- December 2026 – Verify & Document current certifications held by MS4 staff
- December 2027 – Verify & Document current certifications held by MS4 staff

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. By ensuring that construction inspectors / operators are properly trained in E&S requirements, the City believes that this BMP will provide a significant safeguard against potential water quality impacts. For the purposes of this SWMP, this BMP will be deemed effective if City staff involved in land disturbing activities or approval of land disturbance permits maintain current certification with the GSWCC. A copy of the certification card verification for City staff will be submitted with each annual report.

**Post-Construction Storm Water Management in
New Development and Redevelopment**
Table 4.2.5 (a) of the Permit

A. BMP #1 – Legal Authority

1. Description of BMP: The City of Newnan will maintain a post construction stormwater runoff control ordinance within the City of Newnan Code of Ordinances meeting the requirements of the NDPEs Phase II MS4 permit as well as the requirements of the Metropolitan North Georgia Water Planning District. If the requirements of the aforementioned programs conflict, the more stringent requirement will be maintained. Please note that the ordinance was adopted in a previous permit year and a copy of the ordinance can be found in Appendix I.

2. Measurable goal(s): The City will maintain a post construction stormwater runoff control ordinance within the Code of Ordinances at all times during the course of the permit. Each year, the City will evaluate the ordinance to determine if revisions are required. If revisions are required, the City will submit a copy of the revised ordinance to EPD to be included in the SWMP.

3. Documentation to be submitted with each annual report:

- Memo stating no revisions to ordinance are required or a copy of the revised ordinance if modified.

4. Schedule:

a. Interim milestone dates (if applicable): N/A On-Going

b. Implementation date (if applicable): N/A On-Going

c. Frequency of actions (if applicable): On-Going Annually

d. Month/Year of each action (if applicable): On-Going Annually

- December 2023 – Annual Review of Post Construction Stormwater Runoff Control Ordinance
- December 2024 – Annual Review of Post Construction Stormwater Runoff Control Ordinance
- December 2025 – Annual Review of Post Construction Stormwater Runoff Control Ordinance
- December 2026 – Annual Review of Post Construction Stormwater Runoff Control Ordinance

- December 2027 – Annual Review of Post Construction Stormwater Runoff Control Ordinance

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The ability to require the design, construction and maintenance of best management practices to offset the impacts of development projects is critical to protecting local streams and water bodies. As such, this BMP will be determined to be effective if the City maintains a post construction stormwater runoff control ordinance throughout the duration of this permit. Additionally, the City will evaluate the ordinance once per year and revise the ordinance if deemed ineffective.

SWMP Attachments:

- Post-Construction ordinance, showing adoption date
- If the population exceeds 10,000, a completed worksheet or other method used to conduct the code and ordinance evaluation (e.g. Center for Watershed Protection's Code and Ordinance Worksheet, EPA's Scorecard)

B. BMP #2 - Inventory

1. Description of BMP: The City of Newnan has developed an inventory list of all publicly-owned post-construction stormwater management structures (e.g. detention / retention ponds, water quality vaults, infiltration structures), publicly owned by other entities (i.e. Board of Education), and those privately-owned structures designed after December 9, 2008 within the City Limits of Newnan. The inventory list is in a table format. The inventory list includes information on the number and type of structures, address or coordinate, ownership (i.e. publicly-owned, privately-owned, or publicly owned by other entities) and other descriptive attributes of each post-construction structure.

The City of Newnan will update the inventory list as new structures are completed or existing structures are identified. Please see Appendix J for updated inventory list.

2. Measurable goal(s):

- Annually update an inventory list of all publicly-owned post-construction Stormwater management structures, publicly owned by other entities with construction completed after December 6, 2012, privately-owned structures designed after December 9, 2008, including those structures added during the reporting period.
- Update the aforementioned inventory list each year and include it in each annual report, including those structures added during the reporting period.

3. Documentation to be submitted with each annual report:

- Inventory List of Post Construction Stormwater Management Structures

4. Schedule:

- a. Interim milestone dates (if applicable): N/A On-Going
- b. Implementation date (if applicable): N/A On-Going
- c. Frequency of actions (if applicable): On-Going Annually
- d. Month/Year of each action (if applicable): On-Going Annually
 - December 2023 – Update Inventory List with new structures or existing structures identified in that year
 - December 2024 – Update Inventory List with new structures or existing structures identified in that year
 - December 2025 – Update Inventory List with new structures or existing structures identified in that year
 - December 2026 – Update Inventory List with new structures or existing structures identified in that year
 - December 2027 – Update Inventory List with new structures or existing structures identified in that year

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Maintenance of stormwater management control structures is critical to ensuring long term operation of the structures. As such, identification will assist the City in protecting water quality in streams and rivers from the stormwater impacts of the developments that these structures service. For the purposes of this SWMP, this BMP will be deemed effective if the City can maintain awareness of all recently constructed post construction stormwater management structures via the maintenance of a map and inventory of all City owned structures, publicly owned by other entities (i.e. Board of Education), and private structures designed after December 9, 2008. A copy of the updated map will be provided with the annual report each year.

SWMP Attachments:

- Inventory of detention/retention ponds and water quality vaults

C. BMP #3 – Inspection Program

1. Description of BMP: The City of Newnan will inspect 100% of the structures identified in the Post- Construction Stormwater Management Structure Inventory BMP (see BMP #E2) within the 5-year Permit term, with at least 5% being inspected annually. The inspection program will be implemented such that over the course of the permit period all structures will be inspected at least once. If a low percentage of inspections is conducted during one reporting period, the City will increase the inspection frequency in subsequent reporting periods to ensure that 100% of the structures are inspected within the 5-year permit term. A copy of the inspection form to be utilized in the inspection program has been included in Appendix J.

2. Measurable goal(s): Inspect 100% of the City’s (public, publicly owned by other entities, and private listed in the updated Inventory) Post Construction Stormwater Management Structures within the 5-year Permit term, with at least 5% being inspected annually.

3. Documentation to be submitted with each annual report:

- Completed Inspection Forms (2023-2027 Permit Years)
- Include a copy of the form for inspections performed in each Annual Report
- Number and percentage of structures inspected

4. Schedule:

- a. Interim milestone dates (if applicable): N/A On-Going
- b. Implementation date (if applicable): N/A On-Going
- c. Frequency of actions (if applicable): On-Going Annually
- d. Month/Year of each action (if applicable): On-Going Annually
 - Jan - Dec 2023 – Inspect minimum of 5% of the City’s Post Construction Stormwater Management Structures & 100% during 5-year Permit term
 - Jan - Dec 2024 – Inspect minimum of 5% of the City’s Post Construction Stormwater Management Structures & 100% during 5-year Permit term
 - Jan - Dec 2025 - Inspect minimum of 5% of the City’s Post Construction Stormwater Management Structures & 100% during 5-year Permit term
 - Jan - Dec 2026 – Inspect minimum of 5% of the City’s Post Construction Stormwater Management Structures & 100% during 5-year Permit term
 - Jan - Dec 2027 – Inspect minimum of 5% of the City’s Post Construction Stormwater Management Structures & 100% during 5-year Permit term

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Maintenance of stormwater management control structures is critical to ensuring long term operation of the structures. As such, inspection will assist the City in protecting water quality in streams and rivers from the stormwater impacts of the developments that these structures service. For the purposes of this SWMP, this BMP will be deemed effective if the City can inspect every post construction stormwater management facility identified in BMP E2 within the 5 years of this permit. It is anticipated that the City will inspect approximately twenty percent (20%) of the structures per year. Documentation of the inspections will be included in each year's annual report for those years in which inspections were conducted.

SWMP Attachments:

- Inspection procedures
- Example inspection forms
- Example table for tracking inspections conducted over permit cycle

D. BMP #4 – Maintenance Program

1. Description of BMP: The City of Newnan will maintain all of the publicly owned post-construction stormwater management control structures identified in the Post-Construction Stormwater Management Structure Inventory (see BMP #E2). Generally, maintenance will consist of vegetation maintenance (i.e., mowing, removal of invasive species, etc.) as appropriate as well as litter and trash removal. If structural deficiencies are identified in a structure, then a work order will be generated and maintenance scheduled. If the scope of the work is such that the work cannot be completed in a short period of time, then the project will be added to the City's capital improvements projects list.

Private structures designed after December 9, 2008 and publicly owned by other entities (i.e., Board of Education) where construction was completed after December 6, 2012 will be maintained by the owner / operators of the sites, at a minimum.

A maintenance agreement will be referred to for the means by which a private structure facility will be maintained. The City will retain copies of the maintenance agreements for all new structures completed after the effective date of the permit. A summary list of the maintenance agreements will be included in each annual report. If a deficiency is noted during an inspection, then the City will notify the owner / operator of the results of the inspection and suggested actions to take.

2. Measurable goal(s):
- Maintain 100% of the structures identified in the Post- Construction Stormwater Management Structure Inventory BMP (see BMP #E2) over the course of the permit.
 - The City will prepare a summary table outlining maintenance activities undertaken over the course of each permit year and include it in the annual report due for that year.
 - The City will ensure that maintenance agreements are obtained on 100% of the privately-owned ponds constructed after December 6, 2012 within the City limits.
3. Documentation to be submitted with each annual report:
- Summary of maintenance activities performed on all Post-Construction Stormwater Management Structures each permit year
 - Summary of Maintenance Agreements recorded during that permit year
 - The City will include a copy of each maintenance agreement recorded that permit year
 - The City will include copies of all letters, work orders, e-mails, or other correspondences requiring maintenance activities, and follow up inspection photographs, for all post-construction stormwater management control structures inspected that year that required maintenance.

4. Schedule:
 - a. Interim milestone dates (if applicable): N/A On-Going
 - b. Implementation date (if applicable): N/A On-Going
 - c. Frequency of actions (if applicable): On-Going Annually
 - d. Month/Year of each action (if applicable): On-Going Annually
 - Jan-Dec 2023 Maintain 100% of the structures identified in the Post-Construction Stormwater Management Structure Inventory BMP and record Maintenance Agreements
 - Jan-Dec 2024 Maintain 100% of the structures identified in the Post-Construction Stormwater Management Structure Inventory BMP and record Maintenance Agreements
 - Jan-Dec 2025 Maintain 100% of the structures identified in the Post-Construction Stormwater Management Structure Inventory BMP and record Maintenance Agreements
 - Jan-Dec 2026 Maintain 100% of the structures identified in the Post-Construction Stormwater Management Structure Inventory BMP and record Maintenance Agreements
 - Jan-Dec 2027 Maintain 100% of the structures identified in the Post-Construction Stormwater Management Structure Inventory BMP) and record Maintenance Agreements

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Maintenance of stormwater management control structures is critical to ensuring long term operation of the structures. As such, maintenance of these facilities will assist the City in protecting water quality in streams and rivers from the stormwater impacts of the developments that these structures service. For the purposes of this SWMP, this BMP will be deemed effective if the City maintains every post construction stormwater management facility identified in BMP E2 owned / maintained by the City of Newnan within the 5 years of this permit. Documentation of maintenance activities performed by the City on City owned ponds will be included in each year's annual report. Additionally, the City will include a summary of the maintenance agreements for those post construction stormwater management control facilities permitted in that year.

SWMP Attachments:

- Example form for documenting maintenance
- Example maintenance agreements
- List of maintenance agreements executed to date
- Example letters to notify owners of maintenance deficiencies

E. BMP #5 – GI/LID Program

1. Description of BMP: The City of Newnan’s population is greater than 10,000 and as required in the National Pollutant Discharge Elimination System (NPDES) Phase II Municipal Separate Storm Sewer System (MS4) permit, the City of Newnan must review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI / LID practices, including infiltration, reuse, and evapotranspiration. In order to determine if modifications are required, the City will utilize the Code & Ordinance Worksheet evaluation tool developed by the Center for Watershed Protection to evaluate the City’s various codes, ordinances, and other regulations.

The City evaluated our Local Ordinances and Regulations, as they relate to Green Infrastructure / Low Impact Development. The City of Newnan’s Engineering Department met with our Planning and Zoning Department in March 2013 to evaluate our Local Ordinances and Regulations, as they relate to Green Infrastructure / Low Impact Development and we noted revisions were required to remove conflicts with and to allow Green Infrastructure / Low Impact Development. The City added a reference to “Coastal Stormwater Supplement” under our Pervious Pavement section. We deleted text referring to specific types of paving materials to remove a conflict with other provisions in the ordinance to allow pervious paving material in parking areas. We also added a reference to “Coastal Stormwater Supplement” under Better Site Design Practice and Techniques. These three (3) changes to our Local Ordinances and Regulations were proposed the Planning Commission meeting on April 9, 2013, and were approved. These changes went into effect on May 28, 2013. I have included a copy of the revised ordinances.

With the adoption of the latest Post Construction Runoff Reduction Performance Standard, included in the Post Construction Model Ordinance, adopted in December of 2020, all plan submittals must include Runoff Reduction, utilizing GI/LID Structures, as part of their Stormwater Management Plan, when submitted on or after December 6, 2020. If Runoff Reduction cannot be achieved, the plan must include a Runoff Reduction Infeasibility Form, to be reviewed by the City, with the plan submittals. The Runoff Reduction Infeasibility Form includes certain site conditions, with supporting documentation. The Runoff Reduction Infeasibility Form may be located in Appendix D, pages 29-31 of City’s GI/LID Program, located in folder Appendix O.

To meet the requirements for Post-Construction Stormwater Management in New Development and Redevelopment GI/LID Program Ordinance Review (BMP E5), the City of Newnan will continue to maintain the City’s Ordinances and Regulations, as they relate to GI/LID and will continue to evaluate to determine if revisions are required. If modifications are required, the City will submit a copy of the revised ordinance to the EPD, included in our SWMP.

2. Measurable goal(s): The City will maintain Ordinances and Regulations, as they relate to GI/LID and will continue to evaluate to determine if revisions are required, at all times during the course of the permit. Each year, the City will evaluate the ordinance to determine if revisions are required.
3. Documentation to be submitted with each annual report:
 - Memo stating no revisions to ordinance are required or a copy of the revised ordinance if modified.
4. Schedule:
 - a. Interim milestone dates (if applicable): 2/15/2020 - On-Going
 - b. Implementation date (if applicable): 2/15/2020 - On-Going
 - c. Frequency of actions (if applicable): On-Going Annually
 - d. Month/Year of each action (if applicable): On-Going Annually
 - December 2023 – Annual Review GI/LID Program, Ordinances and Regulations
 - December 2024 – Annual Review GI/LID Program, Ordinances and Regulations
 - December 2025 – Annual Review GI/LID Program, Ordinances and Regulations
 - December 2026 – Annual Review GI/LID Program, Ordinances and Regulations
 - December 2027 – Annual Review GI/LID Program, Ordinances and Regulations
5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The ability to require the design, construction and maintenance of best management practices to offset the impacts of development projects is critical to protecting local streams and water bodies. As such, this BMP will be determined to be effective if the City maintains a GI/ LID Program, including Ordinances and regulations, throughout the duration of this permit. Additionally, the City will evaluate the GI/ LID Program, including Ordinances and regulations once per year and revise the ordinance if deemed ineffective.

SWMP Attachments:

- GI/LID Program, including example inspection forms and maintenance agreements

F. BMP #6 – GI/LID Structure Inventory

1. Description of BMP: The City of Newnan has developed and will update an inventory of water quality-related Green Infrastructure (GI) / Low Impact Development (LID) structures located within the City Limits of Newnan. This inventory contains all GI/LID structures constructed after December 6, 2012. The inventory includes Public (City) Owned GI/LID structures, publicly owned by other entities (i.e. Board of Education), and privately owned non-residential GI/LID Structures. The inventory will include at a minimum bioswales, pervious pavements, rain gardens, cisterns, green roofs, and any other structure deemed appropriate by the Stormwater Coordinator. The inventory will be reported in a table format that will include the following information:

- Type of Structure
- Owner of Structure
- Location of Structure (Lat & Long)
- Estimated Date of Construction

In addition to the type and location of each structure, the table will also include a summary of the total number of each structure. Following development of the initial inventory, new structures will be identified through the plan development process.

2. Measurable goal(s): Annually update the inventory of all GI/LID structures located within the City Limits.

3. Documentation to be submitted with each annual report: Inventory list of all GI/LID structures in the City constructed after December 6, 2012.

4. Schedule:

- a. Interim milestone dates (if applicable): 2/15/2020 - On-Going
- b. Implementation date (if applicable): 2/15/2020 - On-Going
- c. Frequency of actions (if applicable): On-Going Annually
- d. Month/Year of each action (if applicable): On-Going Annually
 - December 2023 – Update Inventory
 - December 2024 – Update Inventory
 - December 2025 – Update Inventory
 - December 2026 – Update Inventory
 - December 2027 – Update Inventory

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. By tracking the construction of these structures as well as ensuring the long-term maintenance of these structures through maintenance agreements, the City believes that future impacts from development can be offset to a greater extent than historical development standards. For the purposes of this SWMP, this BMP will be deemed effective if the City maintains an inventory list / database of every Green Infrastructure / Low Impact Development structure constructed in the City since December 9, 2012. Each year, the City will submit of a copy of the inventory list / database with the annual report.

SWMP Attachments:

- Inventory of all permittee-owned GI/LID structures, and structures publicly-owned by other entities and privately-owned non-residential constructed after 12/6/12.

G. BMP #7 – GI/LID Structure Inspection Program

1. Description of BMP: The City of Newnan will inspect 100% of the structures identified in the GI/LID Structures Inventory BMP (see BMP #E6) within the 5-year Permit term, with at least 5% being inspected annually. The inspection program will be implemented such that over the course of the permit period all structures will be inspected at least once. If a low percentage of inspections is conducted during one reporting period, the City will increase the inspection frequency in subsequent reporting periods to ensure that 100% of the structures are inspected within the 5-year permit term. The City will utilize an inspection form provided by the Engineer of Record that designed the GI/LID Structure or the appropriate inspection form from the Georgia Stormwater Management Manual (GSWMM), latest edition.

2. Measurable goal(s):

- Inspect 100% of the City’s GI/LID Structures over the course of the permit.
- Inspect 100% of Privately-owned non-residential GI/LID structures of the sites where construction was completed after December 6, 2012 over the course of the permit.
- Inspect 100% of the publicly owned by other entities (i.e. Board of Education) GI/LID Structures over the course of the permit.

3. Documentation to be submitted with each annual report:

- Documentation of inspections performed on all GI/LID Structures in each Annual Report
- Number and percentage of structures inspected

4. Schedule:

a. Interim milestone dates (if applicable): 2/15/2020 - On-Going

b. Implementation date (if applicable): 2/15/2020 - On-Going

c. Frequency of actions (if applicable): On-Going Annually

d. Month/Year of each action (if applicable): On-Going Annually

- Jan - Dec 2023 – Inspect minimum of 5% of the City’s GI/LID Structures & 100% during 5-year Permit term
- Jan - Dec 2024 – Inspect minimum of 5% of the City’s GI/LID Structures & 100% during 5-year Permit term
- Jan - Dec 2025 - Inspect minimum of 5% of the City’s GI/LID Structures & 100% during 5-year Permit term
- Jan - Dec 2026 – Inspect minimum of 5% of the City’s GI/LID Structures & 100% during 5-year Permit term
- Jan - Dec 2027 – Inspect minimum of 5% of the City’s GI/LID Structures & 100% during 5-year Permit term

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Inspections of post-construction GI/LID structures are critical to ensuring long term operation of the structures. As such, maintenance of these facilities will assist the City in protecting water quality in streams and rivers from the stormwater impacts of the developments that these structures service. For the purposes of this SWMP, this BMP will be deemed effective if the City inspects every post construction GI/LID Structure identified in BMP E5 owned / maintained by the City of Newnan within the 5 years of this permit.

SWMP Attachments:

- Example inspection forms
- Example table for tracking inspections conducted over permit cycle

H. BMP #8 – GI/LID Structure Maintenance Program

1. Description of BMP: The City of Newnan will maintain all of the publicly owned GI/LID Structures identified in the GI/LID Structures Inventory (see BMP #E6). Generally, maintenance will consist of vegetation maintenance (i.e. mowing, removal of invasive species, etc.) as appropriate as well as litter and trash removal. If structural deficiencies are identified in a structure, then a work order will be generated and maintenance scheduled. If the scope of the work is such that the work cannot be completed in a short period of time, then the project will be added to the City's capital improvements projects list.

Privately owned non-residential GI/LID structures and publicly owned by other entities (i.e. Board of Education) will be maintained by the owner / operators of the sites where construction was completed after December 6, 2012, at a minimum. A maintenance agreement will be referred to for the means by which a privately owned non-residential GI/LID structures will be maintained. The City will retain copies of the maintenance agreements for all new structures completed after the effective date of the permit. A summary list of the maintenance agreements will be included in each annual report. If a deficiency is noted during an inspection, then the City will notify the owner / operator of the results of the inspection and suggested actions to take.

2. Measurable goal(s):
 - The City will ensure that maintenance agreements are obtained on 100% of the privately-owned non-residential GI/LID Structures finalized after December 6, 2017 within the City limits
 - Maintain 100% of the City's GI/LID Structures over the course of the permit.
 - Ensure Maintenance of 100% of Private GI/LID structures of the sites where construction was completed after December 6, 2012 over the course of the permit
 - Ensure Maintenance of 100% of the publicly owned by other entities (i.e. Board of Education) GI/LID Structures over the course of the permit.
3. Documentation to be submitted with each annual report:
 - Summary of maintenance activities performed on all GI/LID Structures each permit year
 - Summary of Maintenance Agreements recorded during that permit year
 - The City will include a copy of each maintenance agreement recorded that permit year
 - The City will include copies of all letters, work orders, e-mails, or other correspondences requiring maintenance activities, and follow up inspection photographs, for all GI/LID structures inspected that year that required maintenance.
4. Schedule:
 - a. Interim milestone dates (if applicable): 2/15/2020 - On-Going

- b. Implementation date (if applicable): 2/15/2020 - On-Going
- c. Frequency of actions (if applicable): On-Going Annually
- d. Month/Year of each action (if applicable): On-Going Annually
5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Maintenance of post-construction GI/LID structure is critical to ensuring long term operation of the structures. As such, maintenance of these facilities will assist the City in protecting water quality in streams and rivers from the stormwater impacts of the developments that these structures service. For the purposes of this SWMP, this BMP will be deemed effective if the City maintains every post construction GI/LID Structure identified in BMP E5 owned / maintained by the City of Newnan within the 5 years of this permit. Documentation of maintenance activities performed by the City on City owned GI/LID Structures will be included in each year's annual report. Additionally, the City will include a summary of the maintenance agreements for those post construction GI/LID Structures permitted in that year.

SWMP Attachments:

- Example form for documenting maintenance
- Example maintenance agreements
- List of maintenance agreements executed to date
- Example letters to notify owners of maintenance deficiencies

Pollution Prevention/Good Housekeeping for Municipal Operations
Table 4.2.6 (a) of the Permit

A. BMP #1 – MS4 Structure Inventory and Map

1. Description of BMP: The City of Newnan will continue to maintain a GIS based map and inventory of all MS4 components owned or maintained by the City within the City Limits. At a minimum, the inventory and map will include all of the following:

- Catch Basins
- Ditches (miles or linear feet)
- Detention/ Retention Ponds
- Storm Drain Lines (miles or linear feet)

As part of the inventory / map, the City will include a summary of the totals for each MS4 component. Each year, the City will update the inventory and map as new structures are added or existing structures are removed. A summary of the total number of structures added / removed each year will be included in the annual report for that permit year.

2. Measurable goal(s): Annually update the MS4 Control Structure Inventory List and Map, number of structures added, and total number of structures.

3. Documentation to be submitted with each annual report:

- Updated MS4 Control Structure Inventory List and Map
- Number of structures added during reporting period
- Total number of structures

4. Schedule:

- a. Interim milestone dates (if applicable): N/A On-Going
- b. Implementation date (if applicable): N/A On-Going
- c. Frequency of actions (if applicable): On-Going Annually
- d. Month/Year of each action (if applicable): On-Going Annually
 - December 2023 – Update MS4 Control Structure Inventory & Map
 - December 2024 – Update MS4 Control Structure Inventory & Map
 - December 2025 – Update MS4 Control Structure Inventory & Map
 - December 2026 – Update MS4 Control Structure Inventory & Map
 - December 2027 – Update MS4 Control Structure Inventory & Map

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality by ensuring that City staff is aware of infrastructure for which the City is responsible. This awareness will then aid the City in ensuring the long-term maintenance of the system. For the purposes of this SWMP, this BMP will be deemed effective if the City maintains a map / database of every known MS4 control structure owned or maintained by the City. Each year, the City will submit a copy of the map / database with the annual report beginning with the annual report.

SWMP Attachments:

- Inventory listing 4 structure types (catch basins, ditches, pipes, permittee-owned ponds)
- Map showing 4 structure types

B. BMP #2 – MS4 Inspection Program

1. Description of BMP: The City of Newnan will continue to implement a MS4 inspection program. Please note that the City will be screened on a geographic area basis. The City has been divided into 5 areas and will be screened such that each area will be screened once and the entire regulated area of the City will be screened over the course of the permit. A copy of the City’s MS4 inspection sector area map has been included in Appendix K. Generally, the MS4 will be inspected for evidence of sedimentation, debris, or structural defects. Each year, the results of inspection will be recorded in a table format and provided in the annual report for that year. An example of the table format has been included in Appendix L.

Please note that MS4 control structures added to the City after the inspections for that year has been completed will be inspected the following year if located in a previously screened area.

2. Measurable goal(s): The City will inspect the MS4 one sector per year such that the City will be inspected over the course of the permit.

3. Documentation to be submitted with each annual report:

- Number & percentage of total structures inspected during reporting period
- Documentation in spreadsheet format of inspections completed during reporting period

4. Schedule:

- a. Interim milestone dates (if applicable): N/A On-Going
- b. Implementation date (if applicable): N/A On-Going
- c. Frequency of actions (if applicable): On-Going Annually
- d. Month/Year of each action (if applicable): On-Going Annually
 - Jan-Dec 2023 – Inspect all MS4 Control Structures in Sector 1
 - Jan-Dec 2024 – Inspect all MS4 Control Structures in Sector 2
 - Jan-Dec 2025 – Inspect all MS4 Control Structures in Sector 3
 - Jan-Dec 2026 – Inspect all MS4 Control Structures in Sector 4
 - Jan-Dec 2027 – Inspect all MS4 Control Structures in Sector 5

5. Person (position) responsible for overall management and implementation of the BMP: Mike Kessler (Engineering Inspector-Erosion Control)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality.

Through inspection of the MS4, the City will likely identify structural issues, illicit discharges, illegal connections and other concerns that may affect water quality in downstream water bodies. For the purposes of this SWMP, this BMP will be deemed effective if the City inspects one sector of the city per year such that over the course of the permit, Newnan's MS4 has been completely inspected. Each year, the City will submit a copy of the map / database with the annual report.

SWMP Attachments:

- Inspection program, including implementation schedule
- Example inspection forms
- Example table for tracking inspections over the permit cycle

C. BMP #3 – MS4 Maintenance Program

1. Description of BMP: The City of Newnan has implemented an MS4 maintenance program. The program is based on the results of the MS4 inspection program (see BMP #F2) as well as citizen complaints received via various reporting measures. Each year, the City will report the number of work orders developed related to maintenance of the MS4 system as well as the actions taken on each work order during the permit year in the annual report due on February 15th of the following year.
2. Measurable goal(s): It is the goal of the City to maintain structures identified as needing maintenance each year.
3. Documentation to be submitted with each annual report:
 - Number of each type of structures maintained during reporting period
 - Documentation of work orders for maintenance completed during reporting period
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A On-Going
 - b. Implementation date (if applicable): N/A On-Going
 - c. Frequency of actions (if applicable): On-Going Annually
 - d. Month/Year of each action (if applicable): On-Going Annually
 - Jan-Dec 2023 – Complete work orders generated in reporting period
 - Jan-Dec 2024 – Complete work orders generated in reporting period
 - Jan-Dec 2025 – Complete work orders generated in reporting period
 - Jan-Dec 2026 – Complete work orders generated in reporting period
 - Jan-Dec 2027 – Complete work orders generated in reporting period
5. Person (position) responsible for overall management and implementation of the BMP: Ray Norton (Public Works Director)
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. The City believes that addressing known issues within the MS4 will help to ensure that pollutants and sediment are prevented from entering local streams and rivers. For the purposes of this SWMP, this BMP will be deemed effective if the City continues to maintain the City's MS4 system by completing work orders generated for the MS4 system in that year.

SWMP Attachments:

- Maintenance procedures
- Example maintenance forms

D. BMP #4 – Street and Parking Lot Cleaning

1. Description of BMP: The City developed a program to use the street sweeper to sweep debris off City streets and parking lots before they enter the storm sewer system. The street sweepers are operated and maintained out of the Public Works Department. The City of Newnan runs one street sweeper every week to clean the street of debris. The Public Works Department developed a map of the service routes of the sweeper. The mileage is recorded daily as well as the number of loads dumped from the sweepers. Debris from the operation will be deposited at the City’s transfer station.
2. Measurable goal(s): It is the goal of the City to sweep a minimum of 1 mile of streets each permit year.
3. Documentation to be submitted with each annual report:
 - Summary of street sweeping operations during the permit year including miles swept and amount of material collected
 - Sweeper Logs of streets and parking lot cleaning during the permit year
 - Transfer Station Invoices from Sweeper Trucks during the permit year
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A On-Going
 - b. Implementation date (if applicable): N/A On-Going
 - c. Frequency of actions (if applicable): On-Going Annually
 - d. Month/Year of each action (if applicable): On-Going Annually
 - Jan-Dec 2023 – Sweep min. of 1 mile of City streets each reporting period
 - Jan-Dec 2024 – Sweep min. of 1 mile of City streets each reporting period
 - Jan-Dec 2025 – Sweep min. of 1 mile of City streets each reporting period
 - Jan-Dec 2026 – Sweep min. of 1 mile of City streets each reporting period
 - Jan-Dec 2027 – Sweep min. of 1 mile of City streets each reporting period
5. Person (position) responsible for overall management and implementation of the BMP: Ray Norton (Public Works Director)
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. Given that much of the City’s rights-of-way include ditches and drainage systems (i.e. MS4 components), removal of litter from the right-of-way and parking lots prevents gross pollutants (i.e. trash and litter) from entering the MS4 and being discharged to streams and rivers. By measuring the amount of litter removed from the roads, the amount of pollution that would have entered the

City's streams and rivers can be determined. For the purposes of this SWMP, this BMP will be deemed effective if the City 1 mile of streets and parking lots each permit year.

SWMP Attachments:

- Street sweeping procedures
- Street sweeping log page or other form
- Litter removal procedures
- Litter removal log page or other form

E. BMP #5 – Employee Training

1. Description of BMP: The City of Newnan instituted a training program for City workers in Public Works, Engineering, and Right-of-Way Beautification. The training program uses a mixture of presentations, brochures, and videos provided by the EPA/EPD and other sources (i.e. YouTube) to show good housekeeping practices at municipal facilities, illicit discharge detection and reporting, proper storage of material and chemicals, vehicle wash/ maintenance facilities, etc. The training sessions are led by the Stormwater Coordinator.

The topics of the training session are changed each year based upon group(s) receiving training, evaluation, and needs. Potential topics may include park maintenance, street maintenance, construction site inspections, land disturbing practices, Green Infrastructure/ Low Impact Development, vehicle washing/ maintenance practices, material handling and disposal, good housekeeping practices at municipal facilities, etc.

2. Measurable goal(s): It is the goal of the City of Newnan to conduct one formal education session on a selected department each permit year.

3. Documentation to be submitted with each annual report:

- Sign-in sheet documenting workers that received training in that permit year
- Outline of training conducted and topics covered

4. Schedule:

- a. Interim milestone dates (if applicable): N/A On-Going
- Select department to receive training by June each permit year
 - Select video(s) and material for training session(s) by July each permit year
 - Send a notice to all affected employees about the training session by August of each permit year
- b. Implementation date (if applicable): N/A On-Going
- Conduct the training session by December each permit year
- c. Frequency of actions (if applicable): On-Going Annually
- The training session will take place by December each permit year
- d. Month/Year of each action (if applicable): On-Going Annually
- December 2023 – Conduct minimum of one training session per year
 - December 2024 – Conduct minimum of one training session per year
 - December 2025 – Conduct minimum of one training session per year
 - December 2026 – Conduct minimum of one training session per year
 - December 2027 – Conduct minimum of one training session per year

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. Cleaning agents, oil and other substances not properly disposed will ultimately reach streams and water bodies by way of contaminating stormwater runoff. These substances could potentially have an adverse effect on aquatic life and plants. As such, while water quality improvements or protection cannot be directly measured, it is the City's belief that this BMP will aid in protecting existing water quality. For the purposes of this SWMP, this BMP will be deemed effective if City employees responsible for lawn care, street maintenance, vehicle maintenance, stormwater and erosion control inspections receive training over the course of the permit. As part of the annual report submitted each year, the City will submit a copy of the training materials utilized in the permit year as well as a sign-in sheet listing the names of the employees which were trained that year.

SWMP Attachments:

- Employee training program
- Example sign-in sheet or other documentation forms

F. BMP #6 – Waste Disposal

1. Description of BMP: The City of Newnan will continue our program to ensure the waste collected from the maintenance of our MS4, including the cleaning of our catch basins, pipes, ditches, etc., is disposed of properly, during each reporting period. Each year, the total amount of materials disposed of will be documented as well as the manner in which it was disposed. All results will be documented in the annual report for each reporting period.

2. Measurable goal(s): Provide an amount of waste generated and the means of disposal for each waste stream in the annual report for that year.

3. Documentation to be submitted with each annual report:
 - Summary of waste generated and means of disposal
 - Transfer Station Invoices from waste generated from MS4 maintenance

4. Schedule:
 - a. Interim milestone dates (if applicable): N/A On-Going

 - b. Implementation date (if applicable): N/A On-Going

 - c. Frequency of actions (if applicable): On-Going Annually

 - d. Month/Year of each action (if applicable): On-Going Annually
 - December 2023 – Document waste collected in reporting period
 - December 2024 – Document waste collected in reporting period
 - December 2025 – Document waste collected in reporting period
 - December 2026 – Document waste collected in reporting period
 - December 2027 – Document waste collected in reporting period

5. Person (position) responsible for overall management and implementation of the BMP: Ray Norton (Public Works Director)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. Waste can ultimately reach streams and water bodies by way of contaminating stormwater runoff. These substances could potentially have an adverse effect on aquatic life and plants. As such, while water quality improvements or protection cannot be directly measured, it is the City's belief that this BMP will aid in protecting existing water quality. For the purposes of this SWMP, this BMP will be deemed effective if waste streams identified in this BMP are properly disposed of. As part of the annual report submitted each year, the City will provide a total amount of waste generated and the means of disposal for each waste.

SWMP Attachments:

- Waste disposal procedures
- Example form for tracking waste disposal

G. BMP #7 – New Flood Management Projects

1. Description of BMP: The City of Newnan requires that all new developments comply with the Post Construction Stormwater Management ordinance which includes new City facilities. These requirements include provisions that mandate runoff reduction and/ or water quality enhancements be included within the design of the facility. The City will continue to comply with these requirements. Additionally, the City will assess all new flood management projects (i.e. projects associated with development of a new building, parking lot, etc.) to determine if runoff reduction and/ or water quality will be impacted by the project and if runoff reduction and/ or water quality measures are warranted.

With the adoption of the latest Post Construction Runoff Reduction Performance Standard, included in the Post Construction Model Ordinance, adopted in December of 2020, all plan submittals must include Runoff Reduction as part of their Stormwater Management, when submitted on or after December 6, 2020. If Runoff Reduction cannot be achieved, the plan must include a Runoff Reduction Infeasibility Form, to be reviewed by the City, with the plan submittals. If Runoff Infeasibility Form is approved, the project would be required to provide water quality.

A copy of the Stormwater Management Plan Review Checklist will be submitted for each new project and included in the annual report for each reporting period. A copy of the Stormwater Management Plan Review Checklist and water quality flow chart will be submitted for each new City project and included in the annual report for each reporting period. For an example of the check list and flow chart see Appendix M.

2. Measurable goal(s): It is the Goal of the City that 100% of all plans received will be reviewed using the GSMM. A copy of the Stormwater Management Plan Review Checklist will be submitted for each new project, and included in the annual report for each reporting period. A copy of the Stormwater Management Plan Review Checklist and water quality flow chart will be submitted for each new City project, and included in the annual report for each reporting period.

3. Documentation to be submitted with each annual report:

- A copy of the Stormwater Management Plan Review Checklist will be submitted for each new project, and included in the annual report for each reporting period.
- A copy of the Stormwater Management Plan Review Checklist and water quality flow chart will be submitted for each new City project, and included in the annual report for each reporting period.
- A list of all plans reviewed of new flood management projects (i.e. projects associated with development of a new building, parking lot, etc.) to determine runoff reduction and/ or water quality requirements

4. Schedule:

- a. Interim milestone dates (if applicable): N/A On-Going
- b. Implementation date (if applicable): N/A On-Going
- c. Frequency of actions (if applicable): On-Going Annually
- d. Month/Year of each action (if applicable): On-Going Annually
 - 2023 – Review 100% of New Flood Management for compliance
 - 2024 – Review 100% of New Flood Management for compliance
 - 2025 – Review 100% of New Flood Management for compliance
 - 2026 – Review 100% of New Flood Management for compliance
 - 2027 – Review 100% of New Flood Management for compliance

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City believes that including water quality components in flood control projects is prudent when permissible from a fiscal and regulatory perspective and which result in protection or improvement of downstream water quality. As such, the implementation of this BMP will enhance water quality when it results in construction of properly designed and constructed structural components to enhance water quality. For the purposes of this SWMP, this BMP will be deemed effective if 100% of all new flood control projects are assessed for water quality impacts and inclusion of water quality BMPs. As part of the annual report submitted each year, a copy of the water quality flow chart and design check list will be submitted for each new project.

SWMP Attachments:

- Procedures for assessing new plans for water quality impacts
- Example forms used to document the assessment of new plans

H. BMP #8 – Existing Flood Management Projects

1. Description of BMP: The City of Newnan will conduct assessments on existing City owned / maintained drainage flood control facility (i.e. detention pond) designed prior to the 2016 Georgia Stormwater Management Manual for potential retrofitting to address water quality impacts. To determine if the facility should be retrofitted, the City will utilize the checklist included in the SWMP in Appendix M. If a facility is determined to be suitable for retrofit, the facility will be added to the City’s Capital Improvements Program needs list and programmed for funding as part of Newnan’s improvements/rehabilitation program.

The City has more than 5 structures, so the City will assess 100% within the 5-year permit term, with at least one structure assessed annually.

2. Measurable goal(s):
 - Review a minimum of one City owned / maintained drainage flood control facility (i.e. detention pond) designed prior to the 2016 Georgia Stormwater Management Manual per year utilizing the checklist
 - Review 100% of City owned / maintained drainage flood control facility (i.e. detention pond) designed prior to the 2016 Georgia Stormwater Management Manual within the 5-year permit term utilizing the checklist.
3. Documentation to be submitted with each annual report:
 - A copy of the water quality flow chart and design check list for existing flood management facility for each reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A On-Going
 - b. Implementation date (if applicable): N/A On-Going
 - c. Frequency of actions (if applicable): On-Going Annually
 - d. Month/Year of each action (if applicable): On-Going Annually
 - May 2023 – Review minimum of one existing flood control facility
 - May 2024 – Review minimum of one existing flood control facility
 - May 2025 – Review minimum of one existing flood control facility
 - May 2026 – Review minimum of one existing flood control facility
 - May 2027 – Review minimum of one existing flood control facility (100% reviewed within 5-year permit term)
5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City believes that including water quality components in flood control projects is prudent when permissible from a fiscal and regulatory perspective and which result in protection or improvement of downstream water quality. As such, the implementation of this BMP will enhance water quality when it results in construction of properly designed and constructed structural components to enhance water quality. For the purposes of this SWMP, this BMP will be deemed effective if at least one (1) existing flood control facility is assessed per year and 100% of all existing flood control facilities designed prior to the 2016 Georgia Stormwater Management Manual for water quality impacts and inclusion of water quality BMPs. As part of the annual report submitted each year, a copy of the water quality flow chart and design check list will be submitted for each analysis.

SWMP Attachments:

- Procedures for assessing existing flood management structures for potential retrofit
- List of existing flood management structures
- Example forms used to document the assessment of existing structures

I. BMP #9 – Municipal Facilities

1. Description of BMP: The City of Newnan developed a municipal facility inventory and map to document the location of each facility owned and/or maintained by the City with the potential to cause pollution. As part of this BMP, the City implemented an inspection program for the facilities to identify and address potential pollution sources. The inventory and map of the City were developed in 2013. As part of the inventory, the City has established an inspection date for each facility. Following establishment of the inventory and map, the City will continue inspecting each facility per the schedule identified in the map. It is the intent of this schedule to ensure that 100% of all City facilities are inspected over the course of the permitting period. A copy of the inspection check list for each facility inspected in that reporting period will be included with the annual report for that year. An example of the inspection checklist and the City’s Inventory of Municipal Facilities are included in Appendix N.

2. Measurable goal(s):

- Maintain an Inventory and Map of all facilities owned and maintained by the City which have the potential to cause pollution.
- Continue an inspection program for all City facilities such that 100% of the facilities are inspected according to the schedule established in the inventory and map.

3. Documentation to be submitted with each annual report:

- Inventory map of all municipal facilities with the potential to cause pollution
- Completed inspection form for all facilities scheduled for inspection that year (2023-2027)

4. Schedule:

- a. Interim milestone dates (if applicable): 2013 On-Going
- b. Implementation date (if applicable): 2013 On-Going
- c. Frequency of actions (if applicable): On-Going Annually
- d. Month/Year of each action (if applicable): On-Going Annually
 - December 2023 – Update Inventory & Map of City Facilities with Inspection Schedule & Inspect 20% of City Facilities
 - August 2024 –Inspect 20% of City Facilities
 - August 2025 –Inspect 20% of City Facilities
 - August 2026 –Inspect 20% of City Facilities
 - August 2027 –Inspect 20% of City Facilities

5. Person (position) responsible for overall management and implementation of the BMP: Rob Hill (Stormwater Coordinator)

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is the intent of this BMP to protect existing water quality. Through inspections of City facilities, potential pollution sources can be identified and then appropriate actions taken to lessen the risk of causing downstream pollution. For the purposes of this SWMP, this BMP will be deemed effective if an inventory of all municipal facilities is maintained, updated and approximately 20% of the facilities are inspected each year thereafter such that 100% of all municipal facilities are inspected as part of this permit period. As part of the annual report submitted each year, a copy of the inventory and inspection reports will be provided for the preceding year.

SWMP Attachments:

- Inventory of municipal facilities
- Procedures for conducting inspections
- Example inspection forms
- Example table to track inspections over permit cycle

Appendix A

Enforcement Response Plan

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program during a previous permit iteration.
 - A. Provide the date the ERP was approved by EPD: 05/12/2014
 - B. If the ERP has not yet been approved, provide the date submitted to EPD: _____
2. The ERP is to be evaluated annually and revised as needed. Provide the most recent version of the ERP as an attachment to this Appendix.
(See Appendix P for Enforcement Response Plan)

Appendix B

Impaired Waters

1. Population based on the latest U.S. Census: 42,544

Date of the latest U.S. Census used: 4/1/2020

If the population is less than 10,000, then see item #2 below.

If the population exceeds 10,000, then see items #3 below.

2. If the population is less than 10,000, then the MS4 must develop an Impaired Waters Plan (IWP) (see Part 4.4.1 of the NPDES Permit) including:
 - A list of impaired waters and the pollutant(s) of concern;
 - A map showing the location of the impaired waters and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters;
 - BMPs that will be implemented to address each pollutant of concern; and
 - A schedule for implementing the BMPs.
3. If the population exceeds 10,000, then the MS4 must develop an Impaired Waters Plan/Monitoring and Implementation Plan (MIP) (see Part 4.4.2 of the NPDES Permit) including:
 - A list of impaired waters and the pollutant(s) of concern, including the date of the 303(d) list used;
 - A map showing the location of the impaired waters, the monitoring location(s), and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters;
 - The sample location (instream or at the outfalls);
 - Information on the sample type, frequency, and any seasonal considerations;
 - Schedule for starting monitoring for any newly identified pollutants;
 - BMPs that will be implemented to address each pollutant of concern;
 - A schedule for implementing the BMPs; and
 - The information to be included in each annual report, including the monitoring data, as assessment of data trends, and an assessment of the effectiveness of the BMPs.
4. The IWP and MIP must be evaluated annually and revised as needed. The most recent version of the IWP or MIP must be submitted as an attachment to this appendix.