

**Existing Phase II MS4
Stormwater Management Program
City of Dunwoody, GA
June 4, 2023**

(December 2, 2024)

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 Dunwoody, Georgia
- B. Name of responsible official: Eric Linton
Title: City Manager
Mailing Address: 4800 Ashford Dunwoody Road
City: Dunwoody State: GA Zip Code: 30338
Telephone Number: 678-382-6700
- C. Designated stormwater management program contact:
Name: Cody Dallas
Title: Stormwater Utility Manager
Mailing Address: 4800 Ashford Dunwoody Road
City: Dunwoody State: GA Zip Code: 30338
Telephone Number: 678-382-6862
Email Address: Cody.Dallas@dunwoodyga.gov
- D. Provide the river basin(s) to which your MS4 discharges: Chattahoochee
- 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: 33.936854 Longitude: -84.338428

2. Sharing Responsibility

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

Control Measure or BMP:

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

- 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: Cody Dallas Date: _____

Signature: _____ Title: Stormwater Utility Manager

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

1. Target audience: General Public
2. Description of BMP: Pamphlet Distribution – Pamphlets and fliers covering stormwater pollution topics are placed by MS4 staff in the lobby of City Hall. Pamphlets and fliers will be restocked if necessary. The number of pamphlets or fliers picked up in a given year will be determined by subtracting the number of pamphlets that are left at the end of the year from the total number of pamphlets stocked throughout the year.
3. Measurable goal(s): 100 pamphlets will be placed in the lobby of City Hall annually.
4. Documentation to be submitted with each annual report: Copies of the brochures placed and a spreadsheet of the tracking information (number placed/restocked, number picked up, etc.) for each brochure title will be provided in the annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The distribution of pamphlets reflects increased community awareness.

B. BMP #2

1. Target audience: General Public
2. Description of BMP: City Website – The City’s Stormwater Management webpage has introductory information about stormwater, including concepts, issues and an explanation of the City’s role in the operation of the MS4 system. A downloadable copy of the City’s Stormwater Management Program is also available on the webpage. The IT Department maintains the website and tracks the number of visitors to the webpage.
3. Measurable goal(s): The City’s website will be updated annually.
4. Documentation to be submitted with each annual report: The number of clicks tracked on the Stormwater Management webpage and the web analytics will be provided in each annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
6. Person (position) responsible for overall management and implementation of the BMP: Communications Director
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City’s involvement of community members in the stormwater program will reflect the effectiveness of the BMP.

C. **BMP #3**

1. Target audience: General Public
2. Description of BMP: Social Media Campaign – The City will use social media to educate the public about stormwater issues by publishing informational posts to one or more of its social media groups. Posts may include updates regarding City services, programs or events that relate to MS4 activities (street-sweeping, stream clean-ups, etc.) and how those services, programs or events improve water quality.
3. Measurable goal(s): At least one stormwater-related post will be shared over one or several of the City’s social media groups annually.
4. Documentation to be submitted with each annual report: The post will be archived through screenshots and submitted in each annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
6. Person (position) responsible for overall management and implementation of the BMP: Communications Director
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City’s efforts to make information on stormwater accessible to its citizens will reflect the effectiveness of the BMP.

D. BMP #4

1. Target audience: General Public
2. Description of BMP: Public/Government Official Presentations – City staff involved in MS4 activities give presentations to the public and government officials that stormwater runoff issues that arise as a result of construction activities and/or the addition of impervious area and how different development choices can affect downstream communities. Presentation topics include the effect of increased impervious area, the use of flood management structures (detention/retention ponds) and residential site selection. The purpose of these presentations is to educate citizens and/or public officials about the importance of incorporating sustainable site development principles into the design process.
3. Measurable goal(s): A presentation will be given to the public and/or elected officials at least once annually.
4. Documentation to be submitted with each annual report: Pictures of the presentation, a list of attendees and any educational materials used will be provided in each annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The involvement of the community in the stormwater program will reflect the effectiveness of the BMP.

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

A. Best Management Practice (BMP) #1

1. Target audience/stakeholder group: General Public
2. Description of BMP: Storm Drain Marker Program – The City will purchase storm drain markers and proper installation equipment so that markers can be attached to catch basins and inlets. City MS4 staff will coordinate with local volunteer groups to have at least one storm drain marking event annually. The City will provide volunteers with the markers, installation materials, maps of the structures to be marked and a sign-in sheet. Volunteers will be asked to sign their names on the maps they are given or the sign-in sheet. As structures are marked, volunteers will check off those structures on the provided maps. Upon completion, volunteers will return completed sign-in sheets, the signed and/or annotated maps to the City to be used as documentation of the activity.
3. Measurable goal(s): Hold one storm drain marking event annually.
4. Documentation to be submitted with each annual report: Sign-in sheets, signed and/or annotated maps returned from volunteers with total number of structures marked will be submitted in each annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Community participation in this activity will reflect increased public awareness about proper use of the MS4.

B. BMP #2

1. Target audience/stakeholder group: General Public
2. Description of BMP: Stream Clean-up – The Public Works Department oversees the organization of an annual stream clean-up event for which volunteers can register themselves or a group to clean a location of their choice. The event is advertised to the public through the City’s website, newsletters and social media platforms. Most debris collected by volunteers is able to be disposed of through established residential trash collection services. Volunteers can also contact the City to pick up larger items not accepted by regular sanitation services.
3. Measurable goal(s): Hold one stream clean-up event per year.
4. Documentation to be submitted with each annual report: Volunteer registration and event posts on the City’s social media platforms will be provided in each annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The number of volunteers participating and the amount of trash removed from the stream will demonstrate the effectiveness of this BMP.

C. **BMP #3**

1. Target audience/stakeholder group: General Public
2. Description of BMP: Recycling Event – The City of Dunwoody hosts recycling events as a way for residents to dispose of items that are not commonly accepted by the County trash pick-up or recycling programs. The events are hosted by the Dunwoody Sustainability Committee as part of the City’s Sustainability Initiative. Scheduled recycling events are advertised to City residents through social media, subscription-based emails and the City’s website calendar. Information including event location, date, time and materials being accepted are also provided. The location of each event is determined based on local availabilities.
3. Measurable goal(s): At least one recycling event will be hosted annually.
4. Documentation to be submitted with each annual report: Pictures of the event and invoices for the recycling of materials collected will be provided in each annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
6. Person (position) responsible for overall management and implementation of the BMP: Sustainability Committee
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The hosting of this type of event and the participation of citizens in the event will reflect the effectiveness of the BMP.

D. BMP #4

1. Target audience/stakeholder group: General Public
2. Description of BMP: Citizen Hotline – The stormwater utility is operated and maintained by the City’s Public Works Department. Citizens are able to call the Public Works Department’s line at any time to report issues or concerns regarding the stormwater system. During non-business hours, the Public Works line rolls over to the scheduled on-call staff member. Calls are documented in the City’s electronic work management system, Cityworks, as service requests. When appropriate, a work order is created and associated with the request. Upon resolution, service requests and work orders are closed. Detailed information about the call, the reported issue and follow-up activities are documented and compiled annually for submission to the EPD.
3. Measurable goal(s): Stormwater Management staff will use Cityworks, the City’s existing electronic request and work order system for the Public Works Department, to track all incoming citizen calls related to stormwater concerns.
4. Documentation to be submitted with each annual report: Records regarding stormwater calls received during the reporting year will be exported from Cityworks to a spreadsheet to be provided in that year’s annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): N/A
6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Stormwater Management staff will continually review this BMP and modify if necessary. Staff will also monitor, track, and document all stormwater related citizen calls. The hosting of this type of event and the participation of citizens in the event will reflect the effectiveness of the BMP.

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

A. BMP #1 – Legal Authority

1. Description of BMP: Code of Ordinances Chapter 32. Article IV, Division 9- Illicit Discharge and Illegal Connection. The BMP is based on the model ordinance of the Metropolitan North Georgia Water and Planning District (MNGWPD).
2. Measurable goal(s): Review ordinance annually for recommended changes made by the MNGWPD and revise the current ordinance as applicable.
3. Documentation to be submitted with each annual report: If revisions are made, a copy of the updated ordinance will be included in that year's annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually as needed
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Effectiveness will be based on the City's ability to remove an illegal connection or illicit discharge from the MS4.

B. BMP #2 – Outfall Map and Inventory

1. Description of BMP: The City's Outfall Map and Inventory is maintained and updated by the GIS staff in coordination with the Public Works Department. Updates are made during field investigations associated with dry weather screening of outfalls and as new construction occurs.
2. Measurable goal(s): The map and inventory of outfalls will be updated annually.
3. Documentation to be submitted with each annual report: The map of inventoried outfalls will be submitted with each annual report, showing the location of the outfalls and names of tributaries. The updated inventory of outfalls will be provided in each annual report, along with the total number of outfalls and the number of outfalls added and/or removed from the inventory.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If the mapped location of the outfall helps find the effluent from or identify the source of an illicit discharge or illegal connection, that will be a measure of the BMP's effectiveness. Absence of illegal connections or illicit discharges will also reflect the overall effectiveness of the BMP and program.

C. **BMP #3 – IDDE Plan**

1. Description of BMP: Illicit discharges are unpermitted non-stormwater flows to the stormwater drainage system. Illicit discharges can be direct discharges or dumping to the stormwater system, or can occur through upstream activities. Illegal connections are physical connections such as pipes that allow illicit discharges to enter the stormwater system on an intermittent or ongoing basis. Screening of stormwater outfalls for illicit discharges is performed during periods of dry weather to avoid the screening of flows that may have resulted from wet weather events. The City screens a minimum of 5% of all outfalls annually, with all outfalls being screened within a 5-year period. When a dry weather flow is observed at an outfall, the procedures for tracing the source of the flow, as well as eliminating any identified illicit discharge or illegal connection, are followed.
2. Measurable goal(s): Perform dry weather screening on a minimum of 5% of all outfalls each year. Screen 100% of outfalls within a 5-year period. Trace and eliminate all dry weather flows as soon as they are discovered.
3. Documentation to be submitted with each annual report: All outfall inspections performed during the reporting year will be logged and provided in each annual report. Documentation of any source tracing and elimination activities conducted will also be provided in that year's report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Detection and removal of illegal connections and illicit discharges discovered in the screening process will reflect the effectiveness of the BMP. Finding no illicit discharges will also reflect the effectiveness of the BMP and program.

D. BMP #4 – Education

1. Description of BMP: Informational material covering topics on illegal discharge prevention will be placed in the lobby of City Hall. Pamphlets and fliers will be restocked if necessary. The number of pamphlets and/or fliers picked up in a given year will be determined by counting the number of pamphlets that are left at the end of the year and subtracting that number from the total number of pamphlets stocked throughout the year. The purpose of this BMP is to inform the public, employees and businesses of the hazards associated with illegal discharges and how to prevent them in the household and/or workplace. Because this BMP is closely related to the Public Education BMP #1, the City will ensure that pamphlets related to illicit discharge topics are included in the education package to be stocked in the lobby of City Hall.
2. Measurable goal(s): 50 pamphlets or fact sheets related to IDDE will be placed in the lobby of City Hall annually.
3. Documentation to be submitted with each annual report: Copies of the brochures placed and a spreadsheet of the tracking information (number placed/restocked, number picked up, etc.) for each brochure title will be provided in the annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Distribution of educational material will reflect public awareness of the problems that the materials identify.

E. BMP #5 – Complaint Response

1. Description of BMP: Complaints are submitted via email, phone, mobile app or in person. Upon receipt of a complaint, the City creates a log of the complaint (date, type and status) in its electronic tracking system, investigates/verifies the complaint, determines responsibility, notifies the responsible party or parties and ensures corrective measures are taken. If an illicit discharge is not found the case is closed as no violation found. If an illicit discharge is located, the responding officer from Code Enforcement and/or Land Development records the findings in case notes and with photo documentation. Cases are followed through until the violation has been resolved. Upon resolution, the complaint is closed in the tracking system.
2. Measurable goal(s): Respond to 100% of illicit discharge complaints received within 3 business days. Record the complaints received and investigated annually.
3. Documentation to be submitted with each annual report: The log of complaints, individual status and any information regarding resolutions will be summarized and provided in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The effectiveness of the BMP will be reflected through the verification of illegal connections and/or illicit discharges from the complaints received.

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 has an Erosion and Sediment Control Ordinance and a Litter Control ordinance to control construction site waste.
2. Measurable goal(s): Annually evaluate and, if necessary, modify the existing ordinances to comply with current laws or regulations.
3. Documentation to be submitted with each annual report: If updates are made to the ordinance, the updated version will be provided in the annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): As needed
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City's ability to enforce regulations regarding site-generated waste will demonstrate this BMP's effectiveness.

B. BMP #2 - Site Plan Review Procedures

1. Description of BMP: A project requires an LDP when 1.0 acre or more will be disturbed. Plans for these projects are reviewed by City of Dunwoody (LIA) certified plan reviewers in the Community Development Department in order to determine their conformance with regulations. Upon receipt of an application and plan for a permit, the City refers these materials to the soil and water conservation district for its review and approval. The district has 35 days to approve or deny plans received. If a determination has not been made by the district after 35 days, the plan is considered approved by the district. Permits are issued or denied by the City within 45 days of receiving a complete application. If the permit is denied, the reason for denial is provided to the applicant. Revised plans must also be approved or denied within 35 days.
2. Measurable goal(s): The City's Site Plan Review Procedures will be followed for all site plans submitted for an LDP.
3. Documentation to be submitted with each annual report: The number of plans submitted, reviewed, approved and/or denied will be provided on a spreadsheet in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): As needed
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Meeting the minimum design standards improves water quality by reducing stream turbidity and site construction waste.

C. **BMP #3 – Inspection Program**

1. Description of BMP: Conduct inspections of construction sites in accordance with the Georgia Soil and Water Conservation Commission (GSWCC). All projects with an active LDP are to be inspected to ensure that proper E&SC measures have been installed and maintained according to the requirements of the GSWCC and the Stormwater Management Ordinance. Inspections are conducted by the Community Development Department by personnel certified in the fundamentals of E&SC. The lead inspector is required to have a Level II certification as a plan reviewer. Inspections are conducted following the Field Manual for Erosion and Sediment Control in Georgia (“Green Book”). Inspections are described in the Code of Ordinances Sec. 16-95. - Inspections and maintenance. Inspections are conducted least once every seven calendar days and within 24 hours of each significant rainfall event.
2. Measurable goal(s): All LDP sites will be inspected throughout the project per the City’s Code of Ordinances Sec. 16-95. - Inspections and maintenance.
3. Documentation to be submitted with each annual report: A list of active LDP sites and inspections conducted will be provided with each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): As needed
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Conducting inspections on construction sites will reflect the effectiveness of this BMP since these limit the number of permit violations.

D. BMP #4 – Enforcement Procedures

1. Description of BMP: Implement enforcement procedures for E&SC violations as outlined in the Code of Ordinances Sec. 16-35 – Enforcement and in the City’s Enforcement Response Plan.
2. Measurable goal(s): Enforcement actions will be taken on all violations found during site inspections.
3. Documentation to be submitted with each annual report: Enforcement actions taken during the reporting period will be provided in each annual report, along with the number of each type of action taken and the status of the action.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City’s ability to enforce E&SC regulations, require corrective measures on a construction site and eliminate sources of pollution demonstrates the effectiveness of this BMP.

E. BMP #5 – Complaint Response

1. Description of BMP: Complaints are submitted via email, phone, mobile app or in person. Upon receipt of a complaint, the City creates a log of the complaint (date, type and status) in its electronic tracking system, investigates/verifies the complaint, determines responsibility, notifies the responsible party or parties and ensures corrective measures are taken. Code Enforcement records the findings in case notes and with photo documentation. Cases are followed through until the violation has been resolved. Upon resolution, the complaint is closed in the tracking system.
2. Measurable goal(s): Respond to 100% of complaints received within 3 business days. Record the complaints received and investigated annually.
3. Documentation to be submitted with each annual report: The log of complaints, individual status and any information regarding resolutions will be summarized and provided in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City's ability to respond to complaints regarding E&SC issues will demonstrate this BMP's effectiveness.

F. BMP #6 – Certification

1. Description of BMP: City Staff involved in construction activities subject to the construction general permits will be trained and certified in accordance with the rules adopted by the GSWCC.
2. Measurable goal(s): City staff involved in MS4 activities will maintain required certifications and renew them as needed annually.
3. Documentation to be submitted with each annual report: Copies of MS4 employee certification cards and/or print-outs from the GSWCC website will be provided in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Training and certification of City staff in E&SC principles will improve implementation of the regulations.

**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: Enforce the Standards of the Stormwater Management Ordinance as adopted in Chapter 16, Article II, Division 5 (Stormwater Management) of the City of Dunwoody, Georgia Code of Ordinances.
2. Measurable goal(s): Annually evaluate and, if necessary, modify the existing ordinance to comply with current laws or regulations.
3. Documentation to be submitted with each annual report: If the ordinance is revised, a copy of the updated ordinance will be submitted with the following annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Enforcement of the design standards will result in the implementation of pollution control devices with greater stormwater runoff control.

B. BMP #2 - Inventory

1. Description of BMP: The City maintains an inventory of all publicly-owned post-construction stormwater management structures (e.g., detention/retention ponds, water quality vaults) and privately-owned structures designed after December 9, 2008 and those other structures that the City maintains. The inventory consists of information on the number and type of structures and the ownership (e.g., public, private).
2. Measurable goal(s): Update the inventory annually as new structures are added to the system.
3. Documentation to be submitted with each annual report: An updated inventory of post-construction stormwater management structures that are publicly-owned, privately-owned and designed after December 9, 2008 and those other post-construction stormwater management structures the City maintains will be provided in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Maintaining an up to date inventory will help keep structures operating properly through scheduled inspection and maintenance, reducing peak runoff and erosion.

C. **BMP #3 – Inspection Program**

1. Description of BMP: The City conducts inspections on all post-construction stormwater management structures included in the inventory, which includes all City-owned ponds, public ponds owned by other entities, privately-owned facilities designed after December 9, 2008 and those other structures the City maintains. The appropriate form in the current Georgia Stormwater Management Manual (GSMM) will be used during all inspections. At a minimum, the City will inspect at least 5% of all inventoried post-construction stormwater management structures annually and will maintain an inspection schedule to inspect 100% of the inventory within a 5-year period. Deficiencies found during the inspection of any post-construction facility will be repaired as soon as practicable or as funding is available. Upon discovery of a deficiency in privately-owned facilities, the property owner will receive a letter outlining the issues and necessary corrections.
2. Measurable goal(s): A minimum of 5% of all structures will be inspected annually, following a schedule to inspect all structures within a 5-year period.
3. Documentation to be submitted with each annual report: Records from inspections conducted during the reporting period will be submitted with that year's annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Inspections provide for the identification of system deficiencies, leading to necessary maintenance activities that reduce potential pollution sources.

D. BMP #4 – Maintenance Program

1. Description of BMP: Maintenance needs will be evaluated during the scheduled inspections of City-owned ponds, privately-owned ponds and ponds owned by other public entities. Inspections are conducted using the appropriate form from the latest version of the GSMM. Upon discovery of deficiencies in privately-owned ponds and other ponds not City-owned, the City will send a letter to the owner outlining the problematic conditions. Deficiencies found in City-owned ponds will be fixed by the City as soon as practicable or as funding is available for the necessary maintenance.
2. Measurable goal(s): All necessary maintenance will be carried out on City-owned ponds as soon as practicable and as funding is available. Owners of other ponds will be notified of any deficiencies within 30 days of inspection.
3. Documentation to be submitted with each annual report: Invoices and/or records of work performed on City-owned ponds during the reporting period will be provided in that year's annual report along with the list of work orders for City-owned facilities obtained from the Cityworks database. The list of maintenance agreements for other ponds and any letters sent notifying owners of needed maintenance will also be provided in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Maintenance activities will potentially eliminate a pollution source and will facilitate the proper functioning of the stormwater structures.

E. BMP #5 – GI/LID Program

1. Description of BMP: The City maintains a GI/LID Program that describes the GI/LID practices to be implemented by the City. The Program includes: background information about the City's hydrology and geology; procedures for evaluating the feasibility and applicability of different GI/LID techniques; a list of the allowed GI/LID structures within the City; inspection and maintenance procedures for all GI/LID structures within the City (includes those owned by the City, those owned by other public entities and privately-owned non-residential structures constructed after December 6, 2012).
2. Measurable goal(s): Evaluate the City's GI/LID Program annually to determine if revisions are necessary.
3. Documentation to be submitted with each annual report: If revisions are made to the City's GI/LID Program, the updated program will be submitted with that year's annual report to be reviewed by the EPD.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The successful installation and operation of GI/LID structures within the City will demonstrate the effectiveness of the BMP.

F. BMP #6 – GI/LID Structure Inventory

1. Description of BMP: The City maintains an inventory of water quality GI/LID structures (e.g., bioswales, pervious pavement, rain gardens, cisterns, green roofs) that are located within the City and that were constructed after December 6, 2012. The inventory includes structures that are City-owned, publicly-owned by other entities and privately-owned non-residential structures. The addition of new GI/LID structures to the inventory is tracked through the plan review process.
2. Measurable goal(s): The inventory of all public and private non-residential GI/LID structures will be updated annually.
3. Documentation to be submitted with each annual report: The updated inventory of GI/LID structures and the total number of each type of structure will be submitted in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: An inventory of GI/LID structures located within the City demonstrates the presence of structures that improve local water quality and that GI/LID practices are being included successfully in local projects. The presence of these structures shows the City's acknowledges the need to include GI/LID when possible.

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

1. Description of BMP: The City performs inspections on all structures in the GI/LID inventory such that all are inspected within a 5-year period. Inspections will be completed on City-owned ponds in accordance with the schedule outlined in the submitted GI/LID program.
2. Measurable goal(s): Conduct annual inspections on all GI/LID structures within a 5-year period, following the GI/LID Program.
3. Documentation to be submitted with each annual report: The number of permittee-owned structures and the percentage of the total permittee-owned structures inspected during the reporting period will be provided in each annual report. Inspection reports from the reporting period will also be submitted in that year's annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The City's routine inspection of private and public GI/LID structures will reflect the effectiveness of this BMP.

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

1. Description of BMP: The City performs maintenance on City-owned GI/LID structures as needed, following procedures outlined in the City's GI/LID Program. GI/LID structures that are publicly-owned by other entities and structures that are both non-residential and privately-owned are maintained by their respective owner(s).
2. Measurable goal(s): Maintain City-owned GI/LID structures as needed. Notify owners of GI/LID structures that are publicly-owned by other entities and structures that are both non-residential and privately-owned about necessary maintenance. Update the list of GI/LID maintenance agreements when new agreements are executed.
3. Documentation to be submitted with each annual report: Provide an updated list of maintenance agreements and correspondence with non-permittee GI/LID structure owners notifying them of any necessary maintenance will be provided in each annual report. Any maintenance performed by the City on City-owned structures during the reporting period will be logged and included in that year's annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): As needed
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Records of maintenance performed on private and public GI/LID structures will reflect the effectiveness of this BMP.

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 maintains an inventory of all City-owned MS4 structures (catch basins, ditches, detention/retention ponds and underground detention, and storm drain lines). The inventory is updated annually and is used to generate an updated map each year.
2. Measurable goal(s): Annually update the inventory and map of structures to include the minimum list of required structures (catch basins, ditches, detention/retention ponds and underground detention, and storm drain lines).
3. Documentation to be submitted with each annual report: An updated map and inventory of the MS4 structures will be provided in each annual report. The number of each type of MS4 structure added during the reporting period and the total number of each type of structure will be submitted in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The inventory will assist in identifying maintenance needs that, when addressed, improve the MS4's functioning and reduce erosion or pollutants.

B. BMP #2 – MS4 Inspection Program

1. Description of BMP: Conduct annual inspections of the MS4 control structures so that 100% of the inventoried structures are inspected within a 5-year period.
2. Measurable goal(s): Inspect at least 5% of all inventoried MS4 structures each year, along with any additional inspections needed to complete inspections of all MS4 structures within a 5-year period.
3. Documentation to be submitted with each annual report: Inspection data from the reporting period will be presented in a spreadsheet generated from the data management system (GIS database) and will be provided in that year's annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Regular inspection of the MS4 results in the proper operation of the MS4 system, reducing the amount of pollution to the stormwater system. The completion of scheduled inspections of the MS4 per the Stormwater Management Program will demonstrate the effectiveness of this BMP.

C. BMP #3 – MS4 Maintenance Program

1. Description of BMP: Provide maintenance to the MS4 control structures as needed as determined by the results of the Inspection Program.
2. Measurable goal(s): Maintain all MS4 structures as needed and to the maximum extent practicable annually.
3. Documentation to be submitted with each annual report: The number of each type of structure maintained annually, as well as work orders for the maintenance activities, will be provided in that year's annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): As needed
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Maintenance will improve operation of the MS4 structures and should reduce erosion and pollution loads entering the stormwater drainage system.

D. BMP #4 – Street and Parking Lot Cleaning

1. Description of BMP: The City's Public Works Department complies with the street and parking lot cleaning requirements by sweeping a minimum of 1 mile of streets annually. Street sweeping is performed through a contracted company.
2. Measurable goal(s): Conduct street sweeping on at least 1 mile of publicly-owned streets annually.
3. Documentation to be submitted with each annual report: The number of miles swept will be tracked through contractor work records and will be provided in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Public Works Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The removal of waste from streets reduces the amount of pollutants entering the stormwater system.

E. BMP #5 – Employee Training

1. Description of BMP: The Public Works Department conducts at least one training session for City employees involved in MS4 activities each year. Training topics focus on pollution prevention during performance of municipal activities and are based on training materials provided by the EPD and/or professional organizations associated with stormwater regulation and management.
2. Measurable goal(s): Conduct at least one training session annually and provide documentation of the educational activity in each annual report.
3. Documentation to be submitted with each annual report: Sign-in sheets and the materials reviewed will be provided in each annual report, along with the date and time of the training.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
5. Person (position) responsible for overall management and implementation of the BMP: Public Works Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Training helps to make employees more aware of the potential water quality impacts their job actions may cause, so that they can take steps to prevent them. Directing training at job activities and pollution concerns should help reduce pollutant impacts.

F. BMP #6 – Waste Disposal

1. Description of BMP: All waste and debris removed from the MS4 will be disposed of such that the waste does not re-enter the MS4 or cause pollution elsewhere. The City has a dedicated dumpster at its maintenance yard in Brook Run Park that is used exclusively for disposal of waste and debris generated by MS4 maintenance activities. The dumpster is serviced regularly and taken to a local transfer station for final disposal.
2. Measurable goal(s): All waste removed from the MS4 will be properly disposed of in locally-available landfills or similar. Waste will be disposed of in such a way that it does not re-enter the MS4 or cause pollution elsewhere.
3. Documentation to be submitted with each annual report: Invoices for MS4 waste disposal activities will be provided in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP provides for the proper disposal of waste generated from stormwater management activities and prevents the waste from re-entering the MS4. The volume of debris removed from the system will demonstrate this BMP's effectiveness.

G. BMP #7 – New Flood Management Projects

1. Description of BMP: The Community Development Department reviews all submitted development plans to determine compliance with the water quality requirements. All plans are reviewed in accordance with the latest edition of the Georgia Stormwater Management Manual (GSMM).
2. Measurable goal(s): All new flood management projects will be reviewed using the GSMM and evaluated for water quality benefits at the design stage.
3. Documentation to be submitted with each annual report: The number of plans reviewed during the reporting period where flood management projects were assessed for water quality impacts will be provided in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Assessing new flood management projects for water quality improvements creates the opportunity to consider the inclusion of water quality structures. Any installation of water quality measures will have a reduction in TSS per the design standards.

H. BMP #8 – Existing Flood Management Projects

1. Description of BMP: The City conducts assessments on all existing, City-owned stormwater management facilities that were designed prior to the City's adoption of the 2016 Georgia Stormwater Management Manual (GSMM) in order to identify potential water quality retrofits. The structure-specific inspection form from the latest version of the GSMM is used to determine if a pond is meeting water quality standards. The retrofits to be considered include BMP practices recommended in the latest version of the GSMM, such as adding a forebay, increasing pond depth and adding a micropool. Retrofits to be considered will be those that fit the needs and constraints of the site.
2. Measurable goal(s): At a minimum, assess 5% of all existing, publicly-owned flood management projects designed prior to the adoption of the 2016 GSMM annually for potential retrofits. Assess all such assets within a 5-year period.
3. Documentation to be submitted with each annual report: Records for any assessments conducted or retrofitting activities performed during the reporting period will be provided in that year's annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2022
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Assessing existing public flood management projects for possible retrofits provides an opportunity to improve the water quality of stormwater runoff. Any retrofit installed will improve water quality and reduce pollution.

I. BMP #9 – Municipal Facilities

1. Description of BMP: Annually update an inventory of municipal facilities with the potential to cause pollution to the MS4 (e.g., parking lot, dumpsters, City vehicles/equipment storage at City Hall) and inspect all inventoried facilities within a 5-year period.
2. Measurable goal(s): Annually update the inventory of Municipal Facilities within the City that have the potential to cause pollution to the MS4. Inspect all facilities by the end of a 5-year period, with a minimum of 5% being inspected annually.
3. Documentation to be submitted with each annual report: An updated inventory of municipal facilities and inspection records from the reporting period will be provided in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Identifying municipal facilities that can pollute stormwater make it possible to schedule inspections of them and encourages practices that are aimed at reducing or eliminating pollutants. Pollution will be reduced if pollutant sources or improper practices are identified and corrected. Conducting inspections of municipal facilities accomplishes this.

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: October 11, 2019.
 - 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.

Appendix B

Impaired Waters

1. Population based on the latest U.S. Census: 51,683

Date of the latest U.S. Census used: 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.