



# Stormwater Management Program

For The

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

Prepared For

City of Clarkston

September 2024

Prepared By



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

**Stormwater Management Program (SWMP)**

**1. General Information**

- A. Name of small MS4: City of Clarkston
- B. NPDES Permit Number: GAS000106
- C. Mailing Address (if providing a post office box, also provide a street address):  
City of Clarkston  
1055 Rowland Street  
Clarkston, GA 30021
- D. Name of responsible official: Tammi Saddler Jones  
Title: Interim City Manager  
Mailing Address: 1055 Rowland Street  
City: Clarkston State: GA Zip Code: 30021  
Telephone Number: (404) 296-6489  
Email Address: tsjones@cityofclarkston.com
- E. Designated stormwater management program contact:  
Name: Marcus Seaton  
Title: Director of Public Works  
Mailing Address: 3620 Montreal Creek Ct.  
City: Clarkston State: GA Zip Code: 30021  
Telephone Number: (404) 296-6489  
Email Address: mseaton@cityofclarkston.com
- F. Provide the river basin(s) to which your MS4 discharges: Chattahoochee and Ocmulgee
- G. Provide the latitude and longitude of the MS4 center (e.g. City Hall, County offices, MS4 mailing address) using Global Positioning System (GPS) –WG 84:  
Latitude: 33.80905°N Longitude: -84.23838°W

**2. Sharing Responsibility**

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

SWMP Component:

1. Name of entity: DeKalb County
  2. SWMP component to be implemented by entity on your behalf:  
Impaired Stream Water Quality Monitoring (See Appendix K)
- B. Attach an additional page if necessary to list additional shared responsibilities. **It is mandatory that you submit a copy of a written agreement between your MS4 and the other entity demonstrating written acceptance of responsibility.**

3. **Certification Statement**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly 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: Tammi Saddler Jones

Title: Interim City Manager

Signature: Tammi Saddler Jones

Date: 11/26/2024

**Structural and Source Control Measures**  
**Table 3.3.1 of the Permit**

**1. MS4 Control Structure Inventory and Map**

**1. Description of SWMP Component:**

The City 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 the following:

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

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, the total number of MS4 structures, and an updated inventory and map will be included in the annual report for that permit year.

**2. Measurable goal(s): Update the MS4 structure inventory and map annually.**

**3. Documentation to be submitted with each Annual Report: Updated MS4 structure inventory and map. The number of MS4 structures added or deleted during the reporting period. The total number of structures.**

**SWMP Attachments:**

- MS4 Structure Inventories
- MS4 Structure Map

## 2. **MS4 Inspection and Maintenance Program**

1. **Description of SWMP Component (Ensure the text describes both the inspection and maintenance of the MS4 structures):**

### *Inspection Program*

The City will continue to implement an MS4 inspection program. The City will be inspected on a geographic area basis. The City has been divided into 5 areas and will be inspected such that each area will be inspected once and 100% of the structures inside the City Limits will be inspected over the course of the permit. Generally, the MS4 structures will be inspected for evidence of sedimentation, debris, or structural defects. Each year, the results of inspections will be recorded in a table format and provided in the annual report for that year.

### *Maintenance Program*

The City will implement an MS4 maintenance program. The program will be based on the results of the MS4 inspection program as well as citizen complaints received via various reporting methods. Completion of maintenance activities will depend upon budget availability. The maintenance program will generally be implemented based on the Operation and Maintenance Procedures.

2. **Measurable goal(s):** Conduct inspections in one geographic area annually. Inspect 100% of the MS4 structures within the 5-year permit term. Maintain MS4 structures as needed.
3. **Documentation to be submitted with each Annual Report:** Completed pond inspection forms and a database of MS4 structures inspected during the reporting period. Number and percentage of MS4 structures inspected during the reporting period. Work orders of structures maintained during the reporting period. Number of MS4 structures maintained during the reporting period.

### **SWMP Attachments:**

- MS4 Inspection Sector Map
- Detention Pond Inspection Form
- Operation and Maintenance Procedures

### 3. **Planning Procedures**

1. **Description of SWMP Component:** On September 17, 2021, the City adopted an update to the 2040 Comprehensive Plan. The Comprehensive Plan addresses future land use and future areas of development, while also encouraging the protection of groundwater recharge areas and wetlands. In addition, the plan focuses on the conservation of existing green space, the creation of new green spaces, and the use of low impact development, specifically in the areas of groundwater recharge. A copy of the current 2040 Comprehensive Plan can be found at:  
<https://www.clarkstonga.gov/planning-development/2040-comprehensive-plan>
2. **Measurable goal(s):** Evaluate the Comprehensive Plan annually to determine if updates are needed.
3. **Documentation to be submitted with each Annual Report:** A description of any changes made to the Comprehensive Plan during the reporting period.

4. **Street Maintenance**

1. **Description of SWMP Component:** The City conducts street cleaning using a contracted street sweeping service. Street sweeping reduces polluted runoff from vehicle traffic, leaks and spills, and litter. The contractor sweeps the public curb and gutter roads, usually on a monthly basis. City employees pick up litter along road rights-of-way, especially prior to mowing ditches, and usually on a monthly basis. The City also utilizes a private contractor to conduct approximately 25% of the litter removal.
2. **Measurable goal(s):** Sweep at least one mile of roads per reporting period. Pick up litter along City roads at least one time during the reporting period.
3. **Documentation to be submitted with each Annual Report:** Street sweeping invoices. Litter collection logs.

## 5. **Flood Management Projects**

1. **Description of SWMP Component (Ensure the text describes procedures for both proposed and existing detention/retention ponds):**

### New Flood Management Projects

The City requires all new development to comply with the Post-Construction Stormwater Management ordinance, which adopts requirements of the Georgia Stormwater Management Manual. These requirements include provisions mandating that water quality enhancements be included within the design of the project. All new flood management projects will be assessed to determine if water quality will be impacted by the project and if water quality measures are warranted.

### Existing Structure Flood Control Devices

The City will assess all existing City owned/maintained flood management projects (i.e. detention and retention ponds designed prior to April 15, 2016) for potential retrofitting to address water quality impacts. To determine if the facility should be retrofitted, the City will utilize the Water Quality Improvement Worksheet. If an assessment was previously performed prior to June 11, 2024 (effective date of the NPDES permit) on an existing flood management project, then the City will provide documentation of the assessment in the 2024-2025 annual report and no further assessment of these structures will be performed. The City will assess the remaining structures, with at least one structure assessed each reporting period, ensuring that 100% of the structures have been assessed within the 5-year permit term. If a structure 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 the City's budget process.

2. **Measurable goal(s):** Ensure all plan reviews are conducted using the Georgia Stormwater Management Manual (GSMM) resulting in 100% of all new flood management projects being assessed for water quality impacts. Provide a list of previously assessed existing City-owned flood management projects with the 2024-2025 annual report. Assess at least one of the remaining existing City-owned flood management projects annually, ensuring 100% of the projects are assessed within the 5-year permit term.
3. **Documentation to be submitted with each Annual Report:** A list of plans reviewed during the reporting period and the number of resulting detention/retention facilities. For the 2024-2025 annual report, documentation of previous assessments and the status of any retrofits. Completed Water Quality Improvement Worksheets and the status of any retrofit activities conducted during the reporting period.

### **SWMP Attachment:**

- Water Quality Improvement Worksheet



6. **Municipal Facilities Excluding Any Industrial Facilities (Addressed in Permit Section 3.3.3)**

1. **Description of SWMP Component (Ensure the text addresses both the inventory and the inspection of the facilities:** The City will maintain an updated municipal facility inventory. The inventory will include those facilities owned and/or maintained by the City with the potential to cause pollution.

The City will implement an inspection program for the municipal facilities on the inventory to identify and address potential pollution sources. The inspector will conduct an inspection of the entire facility, paying close attention to areas that could contribute to runoff pollution. This will include looking at areas for the improper storage of materials, such as leaking drums or products exposed to rainfall. The inspection will also look for any obvious pollutant sources, such as stains and spills on the ground and improperly maintained waste storage areas. The City will ensure 100% of all the municipal facilities are inspected within the 5-year permit term. If sites are found to need improvement, the appropriate department will be notified of the problem and given a time frame to correct the issues. The Public Works Department will perform a re-inspection, after the stipulated time frame, to ensure proper corrective action has been taken.

2. **Measurable goal(s):** Update the municipal facility inventory once each reporting period. Conduct inspections on a minimum of 5% of the municipal facilities listed on the inventory each reporting period, ensuring that 100% of the facilities are inspected within the 5-year permit term.
3. **Documentation to be submitted with each Annual Report:** Updated municipal facility inventory. Completed inspection checklist for each municipal facility inspected during the reporting period.

**SWMP Attachments**

- Municipal Facility Inventory
- Municipal Facility Inspection Checklist

7. **Pesticide, Fertilizer, and Herbicide Application**

1. **Description of SWMP Component (Ensure the text addresses both commercial applicators and municipal use:**

*Commercial Applicators and Distributors*

The City relies on the State Department of Agriculture (DoA) to address the requirements for this part of the program. The State DoA requires commercial applicators of pesticides, fertilizers, and herbicides to obtain and retain a “Commercial Pesticide Applicators License.” The State DoA also requires distributors of restricted pesticides to obtain and retain “Distributor Licenses.” Continuing education units are required each year to maintain the license.

*Municipal Pesticide Use*

If the City stores any PFH’s, it will be minimal quantities of store-bought PFH’s. These products do not have professional strength and will be limited in usage. The City uses a private contractor for the application of restricted PFH’s, ensuring that the contractor has applicable, up-to-date certifications prior to issuing the notice to proceed.

2. **Measurable goal(s):** In the event that the City purchases non-restricted PFH’s, maintain an updated inventory. As needed, contract with a licensed contractor performing PFH application in the City.

3. **Documentation to be submitted with each Annual Report:** If any non-restricted PFH’s are stored at the City, provide an inventory. A copy of any invoices from a licensed PFH applicator, if applicable.

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

**1. Legal Authority**

1. **Description of SWMP Component:** The City adopted an Illicit Discharge and Illegal Connection ordinance on September 1, 2009. The ordinance has been incorporated into the City's Code of Ordinances (Municode). The ordinance meets the requirements of the NPDES Phase I MS4 permit as well as the requirements of the Metropolitan North Georgia Water Planning District. If the requirements of these programs conflict, the more stringent requirement will be enforced. The ordinance provides the authority to conduct inspections and monitoring, control illicit discharges and connections, and control illegal dumping and spills into the MS4.
2. **Measurable goal(s):** Evaluate the Illicit Discharge and Illegal Connection ordinance annually.
3. **Documentation to be submitted with each Annual Report:** If the ordinance is revised during the reporting period, a copy of the adopted ordinance will be submitted with the annual report.

**SWMP Attachment:**

- Illicit Discharge and Illegal Connection ordinance

## 2. **Outfall Inventory and Map**

1. **Description of SWMP Component:** The City has developed an outfall inventory and a map showing the location of all outfalls from the MS4 and the names and location of all waters of the State that receive discharges from those outfalls. Each year, the City will update the outfall inventory and map to reflect the addition of outfalls from new infrastructure projects or developments or the removal of outfalls that have been reclassified or removed. The outfall inventory database will include an inspection year field in order to track which outfalls have been inspected. The City will track the number of outfalls added or removed during the reporting period and the total number of outfalls and include the information in the annual report.
2. **Measurable goal(s):** Update the outfall inventory and map annually.
3. **Documentation to be submitted with each Annual Report:** Updated outfall inventory. The number of outfalls added or deleted during the reporting period. The total number of outfalls.

### **SWMP Attachments:**

- MS4 Outfall Map
- MS4 Outfall Inventory
- MS4 Inspection Sector Map

### 3. **IDDE Plan**

1. **Description of SWMP Component (Ensure the text discusses the outfall inspections, any stream walks activities, illicit discharge tracing, and illicit discharge elimination):** The City's Illicit Discharge Detection and Elimination (IDDE) Plan consists of inspecting outfalls to ensure illegal dumping is not occurring, sampling any dry weather flow to determine if upstream facilities are discharging non-stormwater flows to the drainage system, and eliminating all identified illicit discharges.

The City inspects outfalls during a period of dry weather, which is defined as a period of precipitation of <0.1" within the previous 72 hours. The City is divided into five sectors (approximately 20% of the outfalls) and dry weather screening is conducted in one sector each reporting year. This ensures that 100% of the total outfalls are inspected within the 5-year permit term. If an outfall is added to the MS4 during the reporting period, the outfall will be screened that year if it is located in the sector to be screened in that year, or if the outfall is located in a previously screened sector. Outfall inspections over the permit cycle are tracked on the outfall inventory.

If a dry weather flow is encountered, the City implements investigative and follow-up procedures including the performance of field tests, sampling, and source tracing to identify any potential illicit discharges. If the source of an illicit discharge is identified as deriving from an adjacent MS4, the City will notify that MS4. Source tracing activities are documented using a memorandum with lab results attached.

The City ensures all identified illicit discharges are eliminated. If necessary, the City implements enforcement procedures described in the Enforcement Response Plan (ERP). More detailed outfall screening, source tracing, and illicit discharge detection procedures are included in the IDDE Plan.

2. **Measurable goal(s):** The City will dry weather screen one sector annually, with a minimum of at least 5% of the outfalls screened each reporting period. The City will ensure that 100% of the total outfalls are screened within the 5-year permit term. The City will investigate 100% of suspected illicit discharges and ensure that 100% of all identified illicit discharges are eliminated.
3. **Documentation to be submitted with each Annual Report:** The number and percentage of outfall inspections conducted during the reporting period and copies of completed outfall screening forms. In addition, source tracing reports will be submitted for any outfalls with suspected illicit discharges.

### **SWMP Attachments**

- IDDE Plan
- Dry Weather Outfall Screening Form

4. **Spill Response Procedures**

1. **Description of SWMP Component:** DeKalb County maintains and operates the sanitary sewer system within the City of Clarkston. Confirmed or suspected sewage spills will immediately be reported to DeKalb County Watershed Management Dispatch at 770/621-7200.

DeKalb County's Fire Department has a HazMat team that completes spill response for major spills. Records of all spills attended by DeKalb County HazMat are held by the DeKalb County Fire Department and are stored within a computer database.

2. **Measurable goal(s):** Ensure 100% of sanitary sewer spills are reported to DeKalb County for response.
3. **Documentation to be submitted with each Annual Report:** Reports on any spills occurring within the City.

## 5. **Public Reporting Procedures**

1. **Description of SWMP Component:** The City receives complaints from citizens through numerous avenues, including phone calls and emails. The City's website provides information on illicit discharges and a telephone contact number to report an issue to the Public Works Department. In addition, the website includes a "Report a Concern" button that if clicked, will allow the resident to complete an online form reporting the issue. Complaints are received by City staff, who will forward the relevant complaints to the Public Works Department, where a work order is generated. The work order includes such information as the date, name and contact information for the complainant, the location and nature of the complaint, etc. The City investigates all complaints within 3 business days of receipt. All actions are recorded in the work order database. If necessary, the City will take enforcement against the responsible party. The work order is updated to show when the complaint is resolved. The work orders are used to generate a spreadsheet.
2. **Measurable goal(s):** Investigate 100% of all stormwater related complaints within 3 business days of receipt.
3. **Documentation to be submitted with each Annual Report:** A screenshot of the City's website showing notification to the public on how to report illicit discharges. A spreadsheet showing the stormwater related complaint calls received and listing specifics regarding the investigation and resolution of each complaint.

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

1. **Description of SWMP Component:** DeKalb County's Sanitation Department holds a Household Hazardous Waste event, usually twice a year. The event is open to all County residents, including those citizens residing within the City. The events provide residents with a method to dispose of such things as paint, household cleaning products, batteries, swimming pool chemicals and many other types of household waste. The City maintains a link on the City's website to DeKalb County's sanitation department event schedule, where all recycling events, including the household hazardous waste event are posted:  
<https://www.clarkstonga.gov/public-works/sanitation>
2. **Measurable goal(s):** Maintain a link on the City's website to the DeKalb County sanitation event schedule webpage each reporting period.
3. **Documentation to be submitted with each Annual Report:** Screenshots of the City's website showing the DeKalb County link and the DeKalb County Sanitation Department event webpage.



7. **Sanitary Sewer Infiltration Controls**

1. **Description of SWMP Component:** DeKalb County maintains and operates the sanitary sewer system within the City. The City will conduct dry weather screening of outfalls each reporting period. Any illicit discharges that could indicate infiltration of sewage into the MS4, any observed leaking or overflowing sewer lines, or suspected sewage spills from the sanitary sewer system will be immediately reported to DeKalb County Watershed Management.
2. **Measurable goal(s):** Ensure that 100% of confirmed or suspected sanitary sewer spills are reported to DeKalb County Watershed Management.
3. **Documentation to be submitted with each Annual Report:** List of any sewage spills reported to DeKalb County Watershed Management.

**Industrial Facility Stormwater Discharge Control**  
**Table 3.3.3 of the Permit**

**1. Industrial Facility Inventory**

1. **Description of SWMP Component:** The City currently maintains an industrial facility inventory list. This list is based on EPD's Industrial Storm Water General Permit (IGP), Notice of Intent (NOI) and No Exposure Exclusion (NEE) online listings. The inventory contains facilities using, storing or manufacturing onsite hazardous or potentially polluting materials. The City will update the inventory each reporting period based on EPD's database and City records.
2. **Measurable goal(s):** Update the industrial facility inventory one time each reporting period.
3. **Documentation to be submitted with each Annual Report:** Updated industrial facility inventory

**SWMP Attachment**

- Industrial Facility Inventory

## 2. Inspection Program

1. **Description of SWMP Component:** The City conducts stormwater inspections onsite at industries on the industrial facility inventory. A standardized Industrial Site Stormwater Inspection checklist is used to document the inspection. A database is used to track the date of all inspections, problems found, and actions taken. The City will check to ensure that an NOI has been submitted (if it is required) and will review and check the implementation status of the associated Stormwater Pollution Prevention Plan (SWP3). Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the industry or business, provide them with a copy of the inspection checklist and a time frame in which to correct the issue, and perform a re-inspection to ensure all necessary corrections were made. City staff will also notify the GA EPD if assistance is needed for enforcement, if there is a threat to Waters of the State, or if a regulated facility has not submitted an NOI.

If the City believes that on-site activities at an industrial facility, waste facility, or hazardous waste treatment, storage and disposal facility are contributing to runoff pollution entering the MS4, the City may require monitoring by the facility. This will include any facility that the City determines is contributing a substantial pollutant load to the MS4.

2. **Measurable goal(s):** Conduct at least one inspection each reporting period if there are less than 5 facilities on the inventory or inspect at least 5% of the facilities if there are more than 5 facilities on the inventory. Ensure that 100% of the industrial facilities on the inventory are inspected within the 5-year permit term.
3. **Documentation to be submitted with each Annual Report:** The total number of industrial facilities, the number and percentage of industrial facilities inspected, and a completed inspection checklist for each industrial facility inspected during the reporting period.

### SWMP Attachment

- Industrial Facility Inspection Checklist

### 3. **Enforcement Procedures**

1. **Description of SWMP Component:** If evidence is found during an industrial facility inspection that activities onsite are contributing to pollution in the MS4, the site owners will be notified of the violation. Site owners will be given a specific time period, proportional to the violation, in which to correct the problem. A re-inspection will be performed by the City. If the problem is not corrected, enforcement actions as described in the City's Enforcement Response Plan (ERP), will be taken. If the noncompliance continues, EPD will be notified of the problem.
2. **Measurable goal(s):** Ensure 100% of identified violations are addressed using the ERP.
3. **Documentation to be submitted with each Annual Report:** Copies of any enforcement actions taken against an industrial user during the reporting period.

4. **Educational Activities**

1. **Description of SWMP Component:** During the inspection of the industrial facility, the inspector will point out any stormwater related issues identified to the on-site facility representative. At the conclusion of the inspection, the inspector will summarize these issues and discuss correction of the problems. Finally, the inspector will provide the facility representative with an educational brochure. The distribution of the brochure will be noted on the completed inspection form.
2. **Measurable goal(s):** Distribute an educational brochure during each industrial facility inspection conducted during the reporting period.
3. **Documentation to be submitted with each Annual Report:** Copy of each completed inspection form showing the distribution of an educational brochure.

**Construction Site Management**  
**Table 3.3.4 of the Permit**

**1. Legal Authority**

1. **Description of SWMP Component:** The City adopted an updated Soil Erosion and Sedimentation (E&S) and Pollution Control ordinance, which was updated on February 5, 2019. This ordinance meets the requirements of the NPDES Phase I Large MS4 permit as well as the requirements of the Georgia Erosion & Sedimentation Act (GESA). If the requirements of these programs conflict, then the most stringent requirement will be enacted.
2. **Measurable goal(s):** Evaluate the E&S ordinance once each reporting period and revise the ordinance if necessary.
3. **Documentation to be submitted with each Annual Report:** If the E&S ordinance is revised during the reporting period, a copy of the adopted ordinance.

**SWMP Attachment**

- Soil Erosion and Sedimentation and Pollution Control Ordinance

## 2. **Site Plan Review Procedures**

1. **Description of SWMP Component:** The City is certified as a Local Issuing Authority and remains in compliance with the Georgia Erosion and Sedimentation Control Act (GESA) of 1975, as amended. Accordingly, all developers are required to comply with the local Soil E&S and Pollution Control 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.

The City does not currently have a Memorandum of Agreement with the Georgia Soil and Water Conservation District (GSWCD) such that in-house plan reviews, including Erosion, Sedimentation and Pollution Control (ES&PC) plans, are performed by the City. Instead, the City sends all ES&PC plans to the GSWCD for review. The Land Disturbance Activity (LDA) plans are reviewed by either City staff or the City's contracted City engineer. The City ensures 100% of all ES&PC plans are reviewed and approved prior to issuance of a Land Disturbing Activity (LDA) permit. The LDA permit is issued by the City Planning & Development Director. The plans received and reviewed and their status (approved or denied), and issuance of LDA permits, are tracked in a log.

2. **Measurable goal(s):** Ensure that 100% of site plans for projects disturbing 1.0 or more acres of land are reviewed and approved prior to issuance of a LDA permit.
3. **Documentation to be submitted with each annual report:** The City will provide a list of the site plans received; the number of site plans reviewed, approved or denied; and the total number of LDA permits issued during the reporting period.

### **SWMP Attachment**

- Plan Review Checklist
- Plan Review Response Comment Form
- Plan Review Tracking Spreadsheet

### 3. **Inspection Program**

1. **Description of SWMP Component:** The City inspects all active construction sites within the City limits that have been issued a Land Disturbance Activity permit. Inspections usually occur after the initial installation of construction site BMPs, during active construction, and after final stabilization. The inspection ensures that the sites are in compliance with the Manual for Erosion and Sediment Control in Georgia, including the design and installation of structural and non-structural BMPs.
2. **Measurable goal(s):** Conduct at least one inspection at each active construction site during the reporting period.
3. **Documentation to be submitted with each annual report:** The City will provide a list of active construction sites and the number and dates of inspections conducted on each site during the reporting period.

#### **SWMP Attachment**

- Site Inspection Report Checklist



#### 4. **Enforcement Procedures**

1. **Description of SWMP Component:** If an inspection of a construction site determines the site is in non-compliance with the City's E&S and Pollution Control ordinance, the LDA permit holder will be notified. The contractor is notified of any violations and given a timeline for compliance. The site is then re-inspected to ensure the corrective actions were taken. Following the third and each subsequent violation, an immediate stop work order is issued. No work can occur on the site except to address the deficiencies noted during the inspections. Stop work orders are issued immediately without prior warning if any of the following violations are identified:
  - Land disturbing activities are being performed without a LDA permit;
  - Failure to maintain a stream buffer;
  - Significant amounts of sediment are being discharged into State waters and best management practices have not been properly designed, installed, or maintained.

The City implements enforcement procedures described in the Enforcement Response Plan and ensures all identified E&S violations are addressed.

2. **Measurable goal(s):** The City will take enforcement for 100% of E&S violations identified during construction site inspections.
3. **Documentation to be submitted with each annual report:** The City will provide documentation of any enforcement actions taken during the reporting period, including the number and type (e.g. Notice of Violation, Stop Work Order), and the amount of any assessed penalties.

## 5. **Certification**

1. **Description of SWMP Component:** The City ensures that any staff involved in construction activities subject to the Construction General Permits, such as conducting plan reviews or E&S inspections, are trained and obtain the proper certification in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission (GSWCC). In addition, the City requires all builders, developers, contractors, and other entities involved in construction activities to comply with the certification requirements.
2. **Measurable goal(s):** Ensure that 100% of all MS4 staff involved in construction activities subject to the Construction General Permits are certified.
3. **Documentation to be submitted with each annual report:** Copies of GSWCC certification cards or printouts from the GSWCC website.

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

**1. HVPS Facility Inventory**

1. **Description of SWMP Component:** The City maintains an inventory of commercial businesses and facilities that are considered to be a highly visible source of pollutants. The types of businesses included on the inventory are:

- Auto Repair/Maintenance Facilities
- Gas Stations
- Landscape and Garden related businesses (not homeowner businesses)
- Car Washes
- Commercial/Retail
- Restaurants
- Apartment Building Operators
- Laundromats
- Dry Cleaners

The inventory is updated each reporting period based on the current business license database.

2. **Measurable goal(s):** Update the HVPS facility inventory one time each reporting period.
3. **Documentation to be submitted with each Annual Report:** Updated inventory of HVPS facilities.

**SWMP Attachment**

- HVPS Facility Inventory

## 2. **Inspection Program**

1. **Description of SWMP Component:** The City conducts stormwater inspections onsite at facilities on the highly visible pollutant sources (HVPS) inventory. A standardized HVPS Site Stormwater Inspection checklist shall be used to document the inspection. A database is used to track all inspections conducted. Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the business, provide them with a copy of the inspection checklist, and a time frame in which to correct the problem. The City will perform a re-inspection (if necessary) to ensure that any mandatory corrections were made. The City will also provide the business owner or site representative, if available, with educational materials to assist them with making the necessary corrections.
2. **Measurable goal(s):** Conduct inspections on a minimum of 5% of the HVPS facilities each reporting period, ensuring that 100% of the HVPS facilities on the inventory are inspected within the 5-year permit term.
3. **Documentation to be submitted with each Annual Report:** A copy of a completed inspection checklist for each HVPS facility inspected during the reporting period. The total number of facilities and the number and percentage of inspections conducted each reporting period.

### **SWMP Attachment**

- HVPS Facility Inspection Checklist

### 3. **Enforcement Procedures**

1. **Description of SWMP Component:** If evidence is found during an HVPS facility inspection that activities onsite are contributing to pollution in the MS4, the site owners will be notified of the violation. Site owners will be given a specific time period, proportional to the violation, in which to correct the problem. A re-inspection will be performed by the City. If the problem has not been corrected, enforcement actions as described in the City's Enforcement Response Plan (ERP), will be taken.
2. **Measurable goal(s):** Ensure 100% of identified violations are addressed using the ERP.
3. **Documentation to be submitted with each Annual Report:** Copies of any enforcement actions taken against an HVPS facility during the reporting period.

#### 4. **Educational Activities**

1. **Description of SWMP Component:** During the inspection of the HVPS facility, the inspector will point out any stormwater related issues identified to the on-site facility representative. At the conclusion of the inspection, the inspector will summarize these issues and discuss correction of the problems. Finally, the inspector will provide the facility representative with an educational brochure. The distribution of the brochure will be noted on the completed inspection form.
2. **Measurable goal(s):** Distribute an educational brochure during each HVPS facility inspection conducted during the reporting period.
3. **Documentation to be submitted with each Annual Report:** Copy of each completed inspection form showing the distribution of an educational brochure.

#### **SWMP Attachment**

- Educational Brochure

**Public Education**  
**Table 3.3.9 of the Permit**

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

**1. Public Education - Educational Activity #1 - Website**

1. **Description of SWMP Component:** The City maintains a Stormwater webpage on the City's official website for disseminating information to the public. This page contains stormwater related educational materials. The website is updated periodically to include new stormwater related information. The City's website is being modified to have the ability to track the number of visitors to the website. Once this SWMP document is approved by EPD, it will be posted on the City's website. The website can be accessed at:  
<https://www.clarkstonga.gov/>
2. **Measurable goal(s):** Track the number of visitors to the website each reporting period.
3. **Documentation to be submitted with each Annual Report:** Analytics showing the number of visitors to the website.

4. **Public Education - Educational Activity #2 – Stormwater Brochures**

1. **Description of SWMP Component:** The City will stock educational brochures with stormwater related information at City Hall and the City Hall Annex. The brochures will be obtained from the Clean Water Campaign and other sources. The City will count the number of brochures and replenish copies as needed. The City will track the number of brochures stocked, distributed, and replaced using a log.
2. **Measurable goal(s):** Supply 25 copies of at least one educational brochure at City Hall and at City Hall Annex. Track the number of brochures distributed during the reporting period.
3. **Documentation to be submitted with each annual report:** Tracking log showing the number of copies of the brochure picked up each month.



5. **Public Education - Educational Activity #3 – National Night Out**

1. **Description of SWMP Component:** National Night Out is an annual community-building campaign that promotes police-community partnerships in an attempt to make the City a safer, more caring place to live. During the event, the City provides fun activities for kids and free food. During the event, the Public Works Department will host an information tent where information related to stormwater and pollution prevention will be distributed and volunteers will be solicited.
2. **Measurable goal(s):** Participate in the National Night Out event one time during the reporting period.
3. **Documentation to be submitted with each Annual Report:** Copy of advertisement and photograph of the information booth.

6. **Public Education - Educational Activity #4 – Social Media**

1. **Description of SWMP Component:** The City periodically posts information on Facebook to disseminate stormwater related educational information to the public. In addition, the City uses the social media networking site to notify residents of upcoming stormwater related public involvement events. Facebook allows the City to track the number of viewers for each post.
3. **Measurable goal(s):** Post at least one stormwater related educational message on Facebook during the reporting period.
4. **Documentation to be submitted with each annual report:** Screenshot of Facebook post(s) showing the date of posting.

**Public Involvement**  
**Table 3.3.10 of the Permit**

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

**1. Public Involvement - Activity #1 – Bring One for the Chipper**

1. **Description of SWMP Component:** Beginning the day after Christmas, the City participates in the Bring One for the Chipper program. The goal is to reduce illegal dumping of trees along roadsides. Residents are encouraged to drop their old Christmas trees off at the Public Works facility to be recycled into mulch.
2. **Measurable goal(s):** Hold one “Bring One for the Chipper” event during the reporting period.
3. **Documentation to be submitted with each Annual Report:** Advertisement of the event. Log or other form showing the number of trees recycled.

2. **Public Involvement - Activity #2 – Rivers Alive Stream Cleanup**

1. **Description of SWMP Component:** The Rivers Alive cleanup program is an ongoing program administered by the City. The purpose of the program is to provide an organized event to remove litter from local streams and rivers within the City. Litter is collected by volunteers and placed in trash bags provided by the City. Following collection of the litter, the bags are then collected by City personnel and properly disposed of.
2. **Measurable Goals:** Hold one Rivers Alive event each reporting period.
3. **Documentation to be submitted with each Annual Report:** Advertisement of the event. Photographs and tally of collected materials.

3. **Public Involvement - Activity #3 – Public Complaint Stormwater Reporting**

1. **Description of SWMP Component:** The City receives complaints from citizens through numerous avenues, including phone calls and emails. The City’s website provides information on illicit discharges and a telephone contact number to report an issue to the Public Works Department. In addition, the website includes a “Report a Concern” button that if clicked, will allow the resident to complete an online form reporting the issue. Complaints are received by City staff, who will forward the relevant complaints to the Public Works Department, where a work order is generated. The work order includes such information as the date, name and contact information for the complainant, the location and nature of the complaint, etc. The City investigates all complaints within 3 business days of receipt. All actions are recorded in the work order database. If necessary, the City will take enforcement against the responsible party. The work order is updated to show when the complaint is resolved. The work orders are used to generate a spreadsheet.
2. **Measurable goal(s):** Investigate 100% of all stormwater related complaints within 3 business days of receipt.
3. **Documentation to be submitted with each Annual Report:** A screenshot of the City’s website showing notification to the public on how to report an issue. A spreadsheet showing the stormwater related complaint calls received and listing specifics regarding the investigation and resolution of each complaint.

4. **Public Involvement - Activity #4 – Yard Debris Pickup**

1. Description of SWMP Component: Falling leaves and other yard debris can create maintenance issues for stormwater infrastructure, especially if residents blow leaves into the street. Wind and rain can cause these leaves to block stormwater inlets resulting in flooding. The leaves and debris can also enter catch basins and reduce the capacity of these structures. The City provides a yard debris pickup service. Residents leave bagged yard debris along the street curb and call the Public Works Department, who pick up the bags weekly.
2. **Measurable goal(s):** The City will provide residents with a yard debris pickup service at least once per month during the reporting period.
3. **Documentation to be submitted with each annual report:** Screenshot of City website describing the yard debris program. Log of yard debris collected.

**Post-Construction**  
**Section 3.3.11 of the Permit**

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

- A. Provide the date of the adoption of the Post-Construction ordinance: July 6, 2023  
(Updated)
- B. Provide the date of the adoption of the Georgia Stormwater Management Manual:  
September 6, 2005
- C. Ensure a copy of the Post-Construction ordinance is attached to the SWMP.
- D. Describe the status of implementing the stormwater runoff quality/reduction performance standard (Section 3.3.11(a)(2) of the Permit), including the implementation of Option (a) by the deadline date of December 10, 2020: On September 6, 2005, the GSMM was adopted through the City's Post-Construction ordinance. The Post-Construction ordinance was revised and adopted on July 6, 2023 in accordance with the Metropolitan North Georgia Water Planning District requirements. The City Community Development Department ensures that plan reviews for all proposed projects are conducted using the GSMM to evaluate water quality impacts and to institute runoff reduction standards.

**2. Linear Transportation Project**

- A. The linear transportation feasibility program is voluntary. Have you developed or are you planning to develop a linear transportation feasibility program?  
Yes \_\_\_\_ No X
- B. If yes, is the linear transportation feasibility program attached to the SWMP?  
Yes \_\_\_\_ No \_\_\_\_
- C. If you plan to develop a linear transportation feasibility program, provide the schedule for submitting the program: \_\_\_\_\_  
\_\_\_\_\_

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

**1. Legal Authority**

1. **Description of SWMP Component (the text must describe the method used to conduct the review of the ordinances and building codes):** The City conducted a review of its codes and ordinances using the Center for Watershed Protection's (CWP) Code and Ordinance Worksheet. The resulting score indicated that no revisions to the City's codes or ordinances were warranted. However, as required by the NPDES permit, the City will continue to review and revise, where necessary, building codes, ordinances, and other regulations to ensure that they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration. The City will complete a review of the codes and ordinances using the 2017 version of the CWP's Code and Ordinance Worksheet during the first year of the permit term (2024-2025). In future annual reports, the City will reference this worksheet and provide a status update on any ordinance revisions.
2. **Measurable goal(s):** Complete a CWP Code and Ordinance worksheet during the 2024-2025 reporting period. In subsequent reporting periods, reference this worksheet and revise any ordinances necessary.
3. **Documentation to be submitted with each Annual Report:** A completed CWP Code and Ordinance Worksheet with the 2024-2025 annual report. A status report on any ordinance revisions in subsequent annual reports.

**SWMP Attachments**

- Post-Construction Ordinance
- CWP Code and Ordinance Worksheet

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



## 2. **GI/LID Program**

1. **Description of SWMP Component:** The GI/LID program was approved by EPD on August 17, 2020. The program was updated in August 2024 to address the requirements of the 2024 NPDES Permit. The GI/LID program was developed to encourage and track the use of GI/LID structures and provide procedures for evaluating the feasibility and site applicability of different GI/LID structures. The program describes the GI/LID structures the City most often approves, but clarifies that additional structure types may be proposed and utilized. The GI/LID program details how the City will inspect and maintain publicly-owned, publicly-owned by other entities, and privately-owned non-residential GI/LID structures. During the permit period, the City will continue to implement the GI/LID program. If the program is revised during the reporting period, the City will submit the revised program to EPD for review and approval with each annual report.
2. **Measurable goal(s):** Evaluate the GI/LID program once each reporting period.
3. **Documentation to be submitted with each Annual Report:** Either a statement that the GI/LID program was evaluated and no revisions were warranted, or a revised GI/LID program.

### **SWMP Attachment**

- GI/LID Program

### 3. **GI/LID Structure Inventory**

1. **Description of SWMP Component:** The City maintains an inventory of City-owned, privately owned non-residential (e.g. any mixed use development, commercial, etc.) and publicly-owned by other entities (e.g. Board of Educations and other entities not covered by an NPDES permit and that the permittee has the legal authority to inspect) water quality-related Green Infrastructure (GI)/Low Impact Development (LID) structures located within the City limits. The inventory will include those GI/LID structures constructed after June 11, 2014. The inventory will include at a minimum bioswales, pervious pavements, cisterns and green roofs. The City will allow the construction of other types of GI/LID structures that are deemed appropriate.

The City will track the addition of new water quality-related GI/LID structures through the plan review process and ensure the structures are added to the inventory. The City will ensure that maintenance agreements are executed for non-City-owned structures constructed after June 11, 2024, the effective date of the NPDES permit.

2. **Measurable goal(s):** Update the GI/LID Structure inventory once each reporting period.
3. **Documentation to be submitted with each Annual Report:** An updated inventory and the total number of structures

#### **SWMP Attachment**

- GI/LID Structure Inventory

#### 4. **Inspection and Maintenance Program**

1. **Description of SWMP Component:** The City will inspect 100% of the GI/LID structures included in the inventory within the 5-year permit term. If the City has less than five inventoried GI/LID structures, then the City will inspect a minimum of one GI/LID structure each reporting period. If the inventory includes five or more GI/LID structures, then the City will inspect a minimum of 5% of the inventory each reporting period. The City will ensure that 100% of the GI/LID structures are inspected within the 5-year permit term. Inspections will be conducted using the example forms included in the City's GI/LID program and the GSMM, Volume 2, Appendix E, Operations and Maintenance Manual.

Maintenance activities vary depending upon the type of GI/LID structure. The GSMM, Volume 2, Appendix E, Operations and Maintenance Manual includes maintenance plans for various types of GI/LID structures. For the four types of structures most commonly constructed within the City, these maintenance plans have been reiterated in the City's GI/LID program. Based on the results of the GI/LID structure inspection, the City maintains City-owned GI/LID structures as needed. For those GI/LID structures that are privately-owned non-residential or publicly-owned by other entities, constructed after June 11, 2014, maintenance activities will be regulated using the Post-Construction ordinance and the Enforcement Response Plan. GI/LID structures that are privately-owned non-residential and publicly-owned by other entities, that are constructed after June 11, 2024, are required to have maintenance agreements. The City will retain copies of maintenance agreements for these structures and develop a list of these agreements. If deficiencies are noted during the inspection, a letter will be sent to the owner of the property setting a time frame for correcting the problem.

2. **Measurable goal(s):** Inspect either one GI/LID structure annually or if the inventory includes more than five structures, inspect 5% of the total structures annually. Ensure that 100% of the GI/LID structures are inspected within the 5-year permit term.

Conduct maintenance on 100% of the City-owned GI/LID structures where inspections noted needed maintenance. Annually update the summary list of executed maintenance agreements for publicly-owned by other entities and privately-owned non-residential GI/LID structures. Notify owners of publicly-owned by other entities and privately-owned non-residential GI/LID structures of needed maintenance through letters transmitted within 6 months of a completed inspection.

3. **Documentation to be submitted with each annual report:** The number and percentage of GI/LID structures inspected. Completed inspection forms for those structures inspected during the reporting period.

The number of City-owned structures maintained and completed work orders. An updated summary list of maintenance agreements for publicly-owned by other entities and privately-owned non-residential GI/LID structures and copies of any letters sent to these owners regarding needed maintenance.

**SWMP Attachment**

- GI/LID Inspection Forms
- Example Maintenance Agreement

## **Appendix G**

### **Enforcement Response Plan (ERP)**

#### **Section 3.3.6 of the Permit**

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program.
  - A. Provide the date the ERP was approved by EPD: August 17, 2020
  - B. If the ERP has not yet been approved, provide the date submitted to EPD: N/A
2. A copy of the ERP must be attached to this Appendix.

#### **SWMP Attachment**

- Appendix G – Enforcement Response Plan

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

## **Appendix H**

### **Impaired Waters** **Section 3.3.7 of the Permit**

1. Population at the time of permit issuance: 14,537
2. The Impaired Waters Plan (see Part 3.3.7 of the NPDES Permit) must, at a minimum, include:
  - A list of impaired waters and the pollutant(s) of concern, including the date of the 303(d) list used;
  - A map showing the location of the impaired waters, the monitoring location, and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters and within the same watershed;
  - The sample location (instream or at the outfalls);
  - Information on the sample type, frequency and any seasonal considerations;
  - Schedule for starting monitoring for any newly identified pollutants
  - BMPs that will be implemented to address each pollutant of concern; and
  - A schedule for implementing the BMPs;
  - The information to be included in each annual report, including the monitoring data, an assessment of data trends, and an assessment of the effectiveness of the BMPs.
3. If the population exceeds 10,000, and a water is impaired for bacteria, then the MS4 must also address the following in the Impaired Water Plan:
  - Sample frequency for bacteria
  - A description of the development of a Sampling Quality and Assurance Plan if the bacteria data is below water quality standards for two years.

#### **SWMP Attachment**

- Appendix H – Impaired Waters Monitoring and Implementation Plan (Approved by EPD on August 17, 2020; minor updates in 2024 MIP to include change in personnel, change from fecal coliform bacteria to *E. coli* bacteria and to reference 2024 approved 305(b)/303(d) list.

**NOTE:** Upon completion, the Impaired Waters Plan will be attached to this page as an Appendix to the SWMP. Ensure the Appendix has a number or letter designation (e.g. Appendix #2, Appendix B).

## **Appendix I**

### **Municipal Employee Training** **Section 3.3.8 of the Permit**

1. **Description of the Employee Training Program:** The City will utilize a variety of methods to train employees involved in the stormwater program on various stormwater related topics. The topics to be covered may include such things as erosion and sediment control, illicit discharge detection, MS4 structure inspection and maintenance, good housekeeping at municipal facilities, etc. The City will try to utilize numerous methods of training and address new topics every year in order to keep employees engaged. The City may send employees involved in the stormwater program to training provided by outside contractors. Certificates provided by the company showing completion of the training course will be obtained. The training may be conducted by showing employees a PowerPoint presentation, followed by discussion. The City may locate YouTube videos on stormwater related topics and hold a training session for employees to view these videos. If this method of training is used, employees will sign a sign-in sheet to document the date and topic of the training, including the URL of any viewed videos.
2. **Measurable goal(s):** Either hold an employee training session one time each reporting period or have employees attend a training course held by an outside contractor.
3. **Documentation to be submitted with each Annual Report:** Certificates of course completion or sign-in sheets showing the date and topic of training.

#### **SWMP Attachments:**

- Sign-in Sheet