

2023
Stormwater Management Program



City of Eton, GA
Phase II MS4

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

General Information for Submitting a SWMP

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

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

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

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

Stormwater Management Program (SWMP)

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

1. General Information

- A. Name of small MS4: City of Eton
- B. Name of responsible official: Billy Cantrell
Title: Mayor
Mailing Address: PO BOX 407
City: Eton State: GA Zip Code: 30724
Telephone Number: 706-695-2652
- C. Designated stormwater management program contact:
Name: Stephen Smith
Title: General Manager, Eton Water Works Commission
Mailing Address: PO Box 100
City: Chatsworth State: GA Zip Code: 30705
Telephone Number: 706-695-3132
Email Address: steves@Chatsworthwater.com
- D. Provide the river basin(s) to which your MS4 discharges: Upper Mill Creek,
Lower Mill Creek
- 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: 34.8250 Longitude: -84.7626

2. Sharing Responsibility

- A. Has another entity agreed to implement a control measure on your behalf?
Yes X No _____ (If no, skip to Part 3)
- Control Measure or BMP:
1. Name of entity Chatsworth Water Works Commission
 2. Control measure or component of control measure to be implemented by
entity on your behalf:
See Memorandum of Agreement (Attachment 1)

- 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: _____ Date: _____

Signature: _____ Title: _____

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 - Website

1. Target audience: General public, employees, developers, and schools
2. Description of BMP: The website (etonstormwater.com) is used to provide information, resources and contact information about stormwater and erosion control in Eton. The home page provides education for the public. The community page provides resources for citizens, links to local programs and ordinances, and a section used to report stormwater issues. The development page provides developers with links to manuals, checklists, applications, ordinances, etc. for local and state requirements. The resources page provides additional links to stormwater and erosion control related websites, publications, and programs, as well as a section of resources specifically for students and educators.
3. Measurable goal(s): Evaluate the website to ensure that it meets the needs of the target audience. Update the website when necessary.
4. Documentation to be submitted with each annual report: A report of the annual visitors to the website will be provided for each reporting period. The City will provide the website updates that occurred during the reporting period. The website can be viewed at: <https://etonstormwater.com>.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): July 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies
6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Coordinator, Eton Water Works Commission
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If the website report shows that the website is being used frequently, and the website has been evaluated to ensure that it meets the needs of the target audience, then this BMP will be considered effective.

B. BMP #2 – Presentation to Government Officials

1. Target audience: government officials and general public
2. Description of BMP: City council meetings are held each month in which the mayor, city council and the general public discuss city business. During at least one of these meetings, a stormwater presentation will be given. The presentation can include educational material, program updates, issues, finances and/or regulatory changes.
3. Measurable goal(s): The mayor and city council will receive at least one briefing on the city's stormwater program each year.
4. Documentation to be submitted with each annual report : A copy of the meeting minutes for the stormwater program presentation will be provided. The City will provide a copy of the presentation.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): July 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies
6. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If at least one stormwater briefing is given at a city council meeting, this BMP will be considered effective.

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

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

A. Best Management Practice (BMP) #1 – Recycling Event

1. Target audience/stakeholder group: General Public
2. Description of BMP: At least one recycling event will be held each year in which citizens have the opportunity to participate.
3. Measurable goal(s): At least one community recycling event will be held each year in which citizens have the opportunity to participate.
4. Documentation to be submitted with each annual report: A report of the totals of recycled materials and waste collected during the event, and the total number of participants, will be provided. Pictures, newspaper articles, or social media posts, as applicable, used to promote the event will be included in the report.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A

 - b. Implementation date (if applicable): July, 2022

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

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

6. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If at least one community waste collection event, in which citizens have the opportunity to participate, is held, this BMP will be considered effective.

B. BMP #2 – Report a Problem

1. Target audience/stakeholder group: General Public
2. Description of BMP: The stormwater website includes a section for reporting stormwater problems. At the top of the “Community” web page is the “Report a Problem” button. Complaints can be submitted using the form provided on the webpage, and an email confirmation is sent to the appropriate stormwater email account.
3. Measurable goal(s): The City will track the issues submitted through its webpage via the Report a Problem link and document how each issue is addressed.
4. Documentation to be submitted with each annual report : A complaint log containing all stormwater complaints will be provided.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A

 - b. Implementation date (if applicable): July, 2018

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

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

6. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If the “Report a Problem” section of the website is available for public use throughout the reporting period, then this BMP will be considered effective.

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

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

A. BMP #1 – IDDE Ordinance

1. Description of BMP: The IDDE ordinance is the local governing authority that enables the city to prohibit non-stormwater discharges to the MS4 through legal compliance and enforcement.
2. Measurable goal(s): Evaluate, and if necessary, modify the existing ordinance.
3. Documentation to be submitted with each annual report: If the ordinance is revised during the reporting period, an updated copy of the ordinance will be provided.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Director of Planning & Zoning, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be determined to be effective through evaluation of enforcement and compliance throughout the reporting period.

SWMP Attachments:

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

B. BMP #2 – Outfall Map and Inventory

1. Description of BMP: A GIS map of the MS4 is used to inventory the outfalls. Location, name and waters of the State to which outfalls discharge are collected and recorded, as part of the inventory, when new outfalls are discovered. See Attachment 4 for the map and Attachment 5 for the inventory.
2. Measurable goal(s): Maintain an updated map and an inventory showing the location of all outfalls from the MS4 and the names and locations of all waters of the State that receive discharges from those outfalls. Provide the number of outfalls added during the reporting period and the total number of outfalls in each annual report.
3. Documentation to be submitted with each annual report : The City will submit an outfall map and inventory, provide the number of outfalls added during the reporting period, and the total number of outfalls in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July 2018
 - c. Frequency of actions (if applicable): As Required
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Coordinator, Eton Water Works Commission
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If the outfall map and inventory are updated as new outfalls are discovered, this BMP will be proven effective.

SWMP Attachments:

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

C. BMP #3 – IDDE Plan

1. Description of BMP: The IDDE Plan includes procedures for outfall dry-weather screening and inspections, sampling, investigation and follow-up for identified illicit discharges, and enforcement actions for eliminating the illicit discharges. See Attachment 6 for outfall screening procedures. See Attachment 7 for complaint response procedures. See Attachment 34 for enforcement procedures.

2. Measurable goal(s): Implement the IDDE Plan below to detect and address non-stormwater discharges to the MS4. The components of the IDDE Plan are as follows: 1) Conduct dry weather screening (DWS) inspections on 100% of the total outfalls within the 5-year permit term or use an alternate method approved by EPD. At a minimum, the permittee must conduct DWS inspections on 5% of the outfalls annually, or if the inspections are done by a geographical area, then one area or sector must be inspected each year, so that inspections are performed during each reporting period. The permittee must document and report the number of outfalls screened using each method (e.g. dry weather screening, stream walks, alternate approved method). Provide the number of outfall inspections conducted during the reporting period and documentation of the outfall inspections in each annual report. 2) Implement investigative and follow-up procedures when the results of the DWS indicate a potential for an illicit discharge, including the sampling and/or inspection procedures described in the IDDE Plan. If the source of the illicit discharge is identified as deriving from an adjacent MS4, the permittee must notify that MS4. Provide information on any illicit discharge detection activities performed during the reporting period in each annual report. 3) Ensure any identified illicit discharges are eliminated. If necessary, implement enforcement procedures described in the Enforcement Response Plan (ERP) in Part 4.3 of the Permit. Provide information on any eliminated discharges or on any enforcement actions taken to eliminate illicit discharges, such as through a spreadsheet or table, during the reporting period in each annual report.

3. Documentation to be submitted with each annual report : If the IDDE Plan is revised during the reporting period, a copy will be submitted. Outfall DWS inspection, sampling and lab result information will be provided for the outfalls screened during the reporting period. Information for any identified illicit discharges and the actions taken to eliminate them will be provided for the reporting period in which they were resolved. See attachment (6 – IDDE Plan)

4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July 2018
 - c. Frequency of actions (if applicable): Annually

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

5. Person (position) responsible for overall management and implementation of the BMP: The Stormwater Coordinator, Water/Wastewater Superintendent, and the Lead Wastewater Plant Operator for Eton Water Works Commission are responsible for sampling. A Wastewater Plant Operator for Eton Water Works Commission is responsible for testing of the samples and recording the data. The Director of Planning & Zoning for the City of Eton is responsible for the IDDE Plan, inspections and IDDE identification and elimination procedures.
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If discovered illicit discharges are identified and eliminated, this BMP will be proven effective.

SWMP Attachments:

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

D. BMP #4 – Education

1. Description of BMP: For the general public, IDDE educational material is posted on the website and will be updated as needed. The website can be viewed at <https://Etonstormwater.com/>. For businesses, an IDDE educational info sheet (See Attachment 8) and/or letter to business owners (See Attachment 9) is included with yearly business license renewal notices. For government employees, IDDE education will be included with the government employee stormwater training (see Pollution Prevention/ Good Housekeeping BMP #5). Each of these educational opportunities will be made available on an annual basis.
2. Measurable goal(s): Continue to implement a program to educate the public, businesses, and government employees about hazards of illicit discharges as described in the SWMP. Conduct an educational activity for each target audience at least annually.
3. Documentation to be submitted with each annual report : The website can be viewed at <https://etonstormwater.com/>. Documentation used for IDDE education, such as newsletters, brochures, other inserts, sign-in sheets, training notes, etc., will be provided, depending upon what is used during each reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If educational materials are distributed, and if resources and training are provided, to the general public, businesses and government employees, this BMP will be deemed effective.

E. BMP #5 – Complaint Response

1. Description of BMP: IDDE complaints should be followed by an investigation and tracked until the issue is either resolved, proven to be outside of the City’s jurisdiction, or proven to not be a problem. Complaints can be received online, by going to <https://Etonstormwater.com/> and clicking the “Report a Problem” button, by phone, or by word of mouth from employees or citizens. Complaints received online are automatically recorded. Complaints received by phone or word of mouth will be manually recorded. Investigations will be tracked and recorded, and, when complete, a report of the process will be created. See Attachment 7 for complaint response procedures.
2. Measurable goal(s): Implement the EPD approved procedures for receiving, investigating, and tracking the status of illicit discharge complaints. Provide a report on each illicit discharge related complaint received and investigated during the reporting period (e.g. complaint date, type of complaint, complaint status) in each annual report.
3. Documentation to be submitted with each annual report : A report for each illicit discharge related complaint received, investigated and/or resolved during the reporting period will be provided.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July 2018
 - c. Frequency of actions (if applicable): As Required
 - d. Month/Year of each action (if applicable): Varies
5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Complaint response will be proven effective if reported illicit discharge issues are resolved and recorded, as they are discovered.

SWMP Attachments:

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

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

A. BMP #1 – ESPC Ordinance

1. Description of BMP: The Erosion, Sedimentation and Pollution Control (ESPC) ordinance enables the City to ensure proper disposal of construction waste and management of sediment through legal compliance and enforcement. See Attachment 10 for a revised E&S ordinance.
2. Measurable goal(s): Evaluate, and if necessary, modify the existing E&S ordinance for compliance with the Permit. Ensure either the E&S or litter ordinance requires construction site operators to control waste at the construction site, such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste.
3. Documentation to be submitted with each annual report: If the ordinance is revised during the reporting period, an updated copy of the adopted ordinance will be submitted.
4. Schedule:
 - a. Interim milestone dates (if applicable): August 7, 2018

 - b. Implementation date (if applicable): January 5, 2010

 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be determined to be effective through evaluation of enforcement and compliance throughout the reporting period.

SWMP Attachments:

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

B. BMP #2 - Site Plan Review

1. Description of BMP: Plans for proposed projects that disturb 1 acre or more are reviewed for compliance with Georgia Soil and Water Conservation Commission (GSWCC) requirements by the local National Resources Conservation Service (NRCS) representative and by the Local Issuing Authority (LIA). A project can be put on hold during this process until all requirements are satisfied. Plans will be reviewed according to the most recent GSWCC Erosion, Sedimentation & Pollution Control Plan Checklist. Plans will be reviewed according to the most recent GSWCC Erosion, Sedimentation & Pollution Control Plan Checklist
2. Measurable goal(s): Implement the site plan review procedures in accordance with the Georgia Soil and Water Conservation Commission (GSWCC) requirements. Provide a list of the site plans received and the number of site plans reviewed, approved, or denied during the reporting period in each annual report.
3. Documentation to be submitted with each annual report : GSWCC semi-annual reports, which show the number of plans reviewed, approved and/or denied, will be used to report plan reviews (See Attachment 11). The City will provide a list of the site plans received and the number of plans reviewed, approved or denied during the reporting period. Plan review tracking log can be found in (attachment 12).
4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Before MS4 designation
 - c. Frequency of actions (if applicable): As Required
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Local Issuing Authority, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If projects with reviewed and accepted plans are completed in accordance with all ordinances and requirements, this BMP will be proven effective.

SWMP Attachments:

- Site plan review procedures
- Example plan review forms

- Example plan review tracking log

C. BMP #3 – Site Inspections

1. Description of BMP: Construction site inspections are performed per GSWCC requirements. These inspections are performed to ensure that BMPs are properly installed and maintained throughout construction, and that the BMP schedule is followed. A construction site inventory will be used to keep track of contact information, plan review dates, inspection dates, enforcement actions and overall status (See Attachment 12). A site inspection form will be used during site visits (See Attachments 13). Site Inspection procedures can be found in (attachment 13B.)
2. Measurable goal(s): Maintain a list of active construction sites and perform and document E&S inspections according to GSWCC requirements.
3. Documentation to be submitted with each annual report : The construction site inventory will be provided for each reporting period. The City will provide a list of active construction sites and copies of completed inspection forms.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Before MS4 Designation
 - c. Frequency of actions (if applicable): As required
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Land Use Administrator, Murray County
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be determined to be effective through evaluation of compliance and enforcement throughout the reporting period.

SWMP Attachments:

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

D. BMP #4 – Enforcement Procedures

1. Description of BMP: If ordinances and/or GSWCC requirements are violated, enforcement procedures, such as a Notice of Violation or a Stop Work Order, will be used to maintain or achieve compliance. These procedures are described in the Enforcement Response Plan (ERP) (See Attachment 32). All enforcement actions will be recorded in the construction site inventory (See Attachment 12). A notice of violation form (See Attachment 14) will be used to notify the permittee of non-compliance. A stop work order form (See Attachment 15) will be used in the event of continued violation.
2. Measurable goal(s): Implement enforcement procedures for E&S violations documented at construction sites during the reporting period as described in the Permit. Provide documentation of any enforcement actions taken during the reporting period in each annual report, including the number and type (e.g. Notice of Violation, Stop Work Order) and status (e.g. pending, resolved).
3. Documentation to be submitted with each annual report : Documentation of any enforcement actions taken during the reporting period, including the number and type, status, and copies of the enforcement actions taken in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Before MS4 Designation
 - c. Frequency of actions (if applicable): As required
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Fire/Building Inspector, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be determined to be effective through evaluation of enforcement and compliance throughout the reporting period.

SWMP Attachments:

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

E. BMP #5 – Complaint Response

1. Description of BMP: Construction site complaints should be followed by an investigation and tracked until the issue is either resolved, proven to be outside of the City’s jurisdiction, or proven to not be a problem. Complaints can be received online, by going to <https://etonstormwater.com/> and clicking the “Report a Problem” button, by phone, or by word of mouth from employees or citizens. Complaints received online are automatically recorded. Complaints received by phone or word of mouth will be manually recorded. Investigations will be tracked and recorded, and, when complete, a report of the process will be created. See Attachment 7 for complaint response procedures. All complaints will be recorded in the construction site inventory (See Attachment 12).
2. Measurable goal(s): Implement the EPD approved E&S complaint receipt, investigation, response, and tracking procedures developed as part of the SWMP. Provide information on complaints received and investigated during the reporting period (e.g. complaint date, type of complaint, complaint status) in each annual report.
3. Documentation to be submitted with each annual report : The City will provide information on the complaints received and investigated during the reporting period, including the complaint date, type of complaint, and complaint status.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): As required
 - d. Month/Year of each action (if applicable): Varies
5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Complaint response will be proven effective if reported construction site issues are resolved.

SWMP Attachments:

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

F. BMP #6 – Certification

1. Description of BMP: All employees involved in land disturbing related activities must, at a minimum and dependent on their level of involvement, meet education requirements per the GSWCC requirements. See Attachments (16A and 16B) for current certifications and licenses.
2. Measurable goal(s): Ensure that any MS4 staff involved in construction activities subject to the Construction General Permits (CGPs) are trained and certified in accordance with the rules adopted by the GSWCC. Provide the number and type of current certifications held by MS4 staff in each annual report.
3. Documentation to be submitted with each annual report: When certifications and/or licenses are renewed, added or removed, and differ from the document submitted with this SWMP, the revised document will be submitted with the annual report. The City will include the certification number and expiration date and/or a copy of the certification card held by MS4 staff in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): Before MS4 Designation
 - c. Frequency of actions (if applicable): As required
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Director of Planning & Zoning, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If all employees involved in land disturbing related activities remain current with required GSWCC certifications, this BMP will be considered effective.

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

A. BMP #1 – Legal Authority

1. Description of BMP: The post-development stormwater management ordinance enables the City to ensure proper on-site management of stormwater through legal compliance and enforcement. See Attachment 17 and 17B.
2. Measurable goal(s): Evaluate, and if necessary, modify the existing ordinance.
3. Documentation to be submitted with each annual report: If the ordinance is revised during the reporting period, an updated copy of the adopted ordinance will be submitted.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): August 4, 2015
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies
5. Person (position) responsible for overall management and implementation of the BMP: Director of Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be determined to be effective through evaluation of enforcement and compliance throughout the reporting period.

SWMP Attachments:

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

B. BMP #2 - Inventory

1. Description of BMP: An inventory of previously identified and newly constructed post-construction stormwater management structures will be maintained, as required. The inventory will include the location, type and owner of the structures. See Attachment 18.
2. Measurable goal(s): Annually update an inventory of all publicly-owned post-construction stormwater management structures (e.g. detention/retention ponds, water quality vaults) and only those privately-owned structures designed after the December 9, 2008 deadline for adoption of the GSMM (i.e. new structures). The inventory shall include information on the number and type of structures, and ownership (i.e. publicly-owned, privately-owned).
3. Documentation to be submitted with each annual report: If the inventory is revised, an updated inventory will be submitted.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies
5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If the inventory is kept up-to-date, this BMP will be considered effective.

SWMP Attachments:

- Inventory of detention/retention ponds and water quality vaults

C. BMP #3 – Inspection Program

1. Description of BMP: Post-construction stormwater management structures will be inspected, per the Permit requirements, for compliance with maintenance agreement terms and ordinances. The inspection procedures are included in the Inspection, Operations and Maintenance (IOM) Procedures document (See Attachment 19). An inspection form from the 2016 Georgia Stormwater Management Manual (GSMM), specific to the structure type, will be used for the inspections (See Attachment 20). The date of inspections, and any comments, will be recorded in the post-construction stormwater inventory (See Attachment 18).
2. Measurable goal(s): Conduct inspections of all post-construction stormwater management structures included on the inventory required in BMP #2 above, so that 100% of the structures are inspected within the 5-year permit term. At a minimum, the permittee must conduct inspections on 5% of the structures annually, or if inspections are done by geographical area, then one entire area or sector must be inspected each year.
3. Documentation to be submitted with each annual report: The post-construction stormwater inventory, which includes the inspection date, will be submitted.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies
5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If inspections are conducted and proper records are kept, this BMP will be considered effective.

SWMP Attachments:

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

D. BMP #4 – Maintenance Program

1. Description of BMP: Maintenance will be performed, based on either the designer or manufacturer recommendations, on post-construction stormwater management structures owned by the City. See (Attachment 19) for maintenance procedures. The structures which are maintained and the maintenance activities performed will be recorded. The date of maintenance will be included in the post-construction stormwater inventory (See Attachment 18). All other structures should be maintained by the owner, or owner’s representative, based on the maintenance agreements. Maintenance agreements are required for privately-owned structures during the plan review phase (See Attachment 21).

2. Measurable goal(s): At a minimum, the maintenance program must address all permittee-owned structures, those publicly-owned structures by other entities (e.g. Board of Education), and those privately-owned structures with construction completed after the effective date of the previous permit iteration (December 6, 2012). The maintenance may be performed by the owner/operator of the structure. Maintenance must be performed to the maximum extent practicable. For permittee-owned structures, provide a list of structures maintained and type of maintenance performed, including documentation of maintenance activities performed during the reporting period with each annual report. For publicly-owned structures owned by other entities and those privately-owned structures with construction completed after the December 6, 2012 date, the permittee must either conduct maintenance or require maintenance agreements. If the permittee conducts the maintenance, provide a list of structures maintained and the type of maintenance performed, including documentation of maintenance activities performed during the reporting period in each annual report. If maintenance is to be performed by an owner/operator in accordance with a maintenance agreement, the permittee must retain copies of maintenance agreements finalized after December 6, 2012, and submit a summary list of these agreements with each annual report.

3. Documentation to be submitted with each annual report: Active maintenance agreements will be recorded in the post-construction stormwater inventory (BMP #2 above). Maintenance logs with activities conducted by the City for maintenance of City-owned structures, and which structures have been maintained, will be submitted.

4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July, 2018

c. Frequency of actions (if applicable): Annually

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

5. Person (position) responsible for overall management and implementation of the BMP: Director of Planning & Zoning, City of Eton

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If publicly-owned structures are maintained properly and maintenance agreements are attained for privately-owned structures, this BMP will be proven effective.

SWMP Attachments:

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

E. BMP #5 – GI/LID Program

1. Description of BMP: For those permittees with a population less than 10,000 at the time of this permit issuance, develop a program for the inspection and maintenance of the GI/LID structures, including permittee-owned, publicly-owned structures owned by other entities, and privately-owned non-residential (e.g. who inspects, who maintains, inspection and maintenance schedule, method of documentation of the inspection and maintenance activities). The GI/LID inspection and maintenance program must be submitted to EPD by February 15, 2020. The program must be included in the SWMP and must be implemented by the permittee. If the GI/LID program is revised during the reporting period, submit the revised program to EPD for review with the annual report. See attachment (17C – GI LID Program)
2. Measurable goal(s): Our program and measurable goal to be included in the SWMP: Inspect 100% of permittee owned GI/LID structures annually and perform maintenance as required. Require and enforce a stormwater facility maintenance agreement for all GI/LID structures that are privately owned or publicly owned by others that were or will be constructed after December 6, 2012. Inspect 100% of private and publicly owned by others GI/LID structures in each five-year permit period.
3. Documentation to be submitted with each annual report : The City will provide an updated inventory, including those structures added during the reporting period, in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If the inventory is kept up-to-date, this BMP will be considered effective.

SWMP Attachments:

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

F. BMP #6 – GI/LID Structure Inventory

1. Description of BMP: GI/LID structures will be included in the post-construction stormwater inventory (BMP#2 above). The inventory will include the location, type and owner of the structures. See Attachment 18.
2. Measurable goal(s): Annually update an inventory of water quality related GI/LID structures located within the permitted area and at a minimum, constructed after December 6, 2012, including the total number of each type of structure (e.g. bioswales, pervious pavement, rain gardens, cisterns, and green roofs). The inventory must, at a minimum, include permittee-owned GI/LID structures, those publicly-owned structures owned by other entities, and privately-owned non-residential GI/LID structures. 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. Provide an updated inventory, including those structures added during the reporting period, in each annual report.
3. Documentation to be submitted with each annual report: The GI/LID will be updated and submitted each reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): February 10, 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Director of Planning & Zoning, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If the GI/LID inventory is reviewed and maintained during the reporting period, this BMP will be considered effective.

SWMP Attachments:

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

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

1. Description of BMP: GI/LID inspection and maintenance procedures will be implemented per the GI/LID Program (see BMP #6 above). The City will conduct inspections on the GI/LID structures so that 100% of the structures are inspected within the 5-year permit cycle. GI/LID structures will be inspected, per the Permit requirements, for compliance with maintenance agreement terms and ordinances. An inspection form from the GSMM, specific to the structure type, will be used for the inspections (See Attachment 20). Maintenance will be performed, based on either the designer or manufacturer recommendations, on GI/LID structures owned by the City. The structures which are maintained and the maintenance activities performed will be recorded. All other structures should be maintained by the owner, or owner’s representative, based on the maintenance agreement. Maintenance agreements are required for privately-owned structures during the plan review phase.

2. Measurable goal(s): Beginning in 2020, conduct inspections and/or ensure inspections are conducted on 100% of the GI/LID structures included in the inventory created in BMP 5.a above, within a 5-year period. The inspections must be completed in accordance with the schedule submitted in the GI/LID program submitted in BMP 6 above. Provide documentation of the inspections conducted during the reporting period in each annual report. Conduct maintenance on the permittee-owned GI/LID structures, as needed. Provide the number of structures and percentage of the total structures maintained during the reporting period in each annual report. Implement the maintenance procedures in accordance with the GI/LID program submitted in BMP 6 above for ensuring publicly-owned structures owned by other entities and privately-owned non-residential GI/LID structures are maintained as needed.

3. Documentation to be submitted with each annual report : Inspection dates as well as active maintenance agreements will be recorded in the post-construction stormwater inventory (BMP #2 above). Maintenance logs with activities conducted by the City for maintenance of City-owned structures, and which structures have been maintained, will be submitted.

4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): February 15, 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

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-
5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton

 6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If inspections are conducted and proper records are kept, and if publicly-owned structures are maintained properly and maintenance agreements are attained for privately-owned structures, this BMP will be proven effective.

SWMP Attachments:

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

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

1. Description of BMP: GI/LID inspection and maintenance procedures will be implemented per the GI/LID Program (see BMP #6 above). The City will conduct inspections on the GI/LID structures so that 100% of the structures are inspected within the 5-year permit cycle. GI/LID structures will be inspected, per the Permit requirements, for compliance with maintenance agreement terms and ordinances. An inspection form from the GSMM, specific to the structure type, will be used for the inspections (See Attachment 20). Maintenance will be performed, based on either the designer or manufacturer recommendations, on GI/LID structures owned by the City. The structures which are maintained and the maintenance activities performed will be recorded. All other structures should be maintained by the owner, or owner’s representative, based on the maintenance agreement. Maintenance agreements are required for privately-owned structures during the plan review phase.

2. Measurable goal(s): Conduct inspections and/or ensure inspections are conducted on 100% of the GI/LID structures included in the inventory created in BMP 5.a above, within a 5-year period. The inspections must be completed in accordance with the schedule submitted in the GI/LID program submitted in BMP 6 above. Provide documentation of the inspections conducted during the reporting period in each annual report. Conduct maintenance on the permittee-owned GI/LID structures, as needed. Provide the number of structures and percentage of the total structures maintained during the reporting period in each annual report. Implement the maintenance procedures in accordance with the GI/LID program submitted in BMP 6 above for ensuring publicly-owned structures owned by other entities and privately-owned non-residential GI/LID structures are maintained as needed.

3. Documentation to be submitted with each annual report : Inspection dates as well as active maintenance agreements will be recorded in the post-construction stormwater inventory (BMP #2 above). Maintenance logs with activities conducted by the City for maintenance of City-owned structures, and which structures have been maintained, will be submitted.

4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): February 15, 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If inspections are conducted and proper records are kept, and if publicly-owned structures are maintained properly and maintenance agreements are attained for privately-owned structures, this BMP will be proven effective.

SWMP Attachments:

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

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

A. BMP #1 – MS4 Structure Inventory and Map

1. Description of BMP: A GIS map is used to keep an inventory of all MS4 control structures. As new structures are added to the MS4, they will be shot with gps equipment and added to the map. As structures are removed or replaced, the map will be updated accordingly. At the end of each reporting period, a query will be used to determine the total number of structures in the MS4. See Attachment 22 for the current map and Attachment 22A, 22B, and 22C for the inventories.
2. Measurable goal(s): Annually update an inventory and map of the MS4 control structures. At a minimum, the inventory and map must include catch basins, ditches (miles or linear feet), detention/retention ponds, and storm drain lines (miles or linear feet). Provide the updated map and inventory, the number of structures added during the reporting period, and the total number of structures in each annual report.
3. Documentation to be submitted with each annual report : The City will provide an updated map and inventory, the number of structures added during the reporting period, and the total number of structures in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): January 2015
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Coordinator, Eton Water Works Commission
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If the map is updated to reflect any changes that are made to the MS4, during each reporting period, this BMP will be considered effective.

SWMP Attachments:

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

B. BMP #2 – MS4 Inspection Program

1. Description of BMP: Inspections of MS4 components, such as storm drains, ditches, curb & gutter, inlets, outlets and junctions, will be conducted so that 100% of the components are inspected within the 5-year permit cycle. At least one inspection will be conducted each year. See Attachment 19 for inspection procedures. Custom electronic inspection forms will be utilized (See Attachment 24). Each inspection will then be recorded in a spreadsheet (See Attachment 25). Inspection dates will also be included in the MS4 Inventory. Any problems discovered will be reported for further attention. At the end of each reporting period, the number of total inspections, as a number and percentage, will be calculated.
2. Measurable goal(s): Conduct inspections on the MS4 control structures so that 100% of the structures are inspected within a 5-year period. All permittees must conduct at least one inspection per year. The MS4 must develop an inspection schedule and include the schedule in the SWMP. Provide the number and percentage of structures inspected during the reporting period in each annual report.
3. Documentation to be submitted with each annual report : The City will provide the number and percentage of the structures inspected during the reporting period. The City will submit copies of the completed inspection forms.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Director of Planning & Zoning, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If MS4 control structures are inspected on an annual basis and proper records are kept, this BMP will be considered effective.

SWMP Attachments:

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

C. BMP #3 – MS4 Maintenance Program

1. Description of BMP: MS4 structures and conveyances will be maintained as needed. See (Attachment 19) for maintenance procedures and (Attachment 19b) for a copy of the maintenance form. The type of structure or conveyance maintained and the maintenance activities performed will be recorded. The date a structure is maintained and any comments will be recorded in the MS4 Inventory.
2. Measurable goal(s): Conduct maintenance on the MS4 control structures as needed. Provide the number of each type of structure maintained during the reporting period in each annual report.
3. Documentation to be submitted with each annual report : The MS4 Inventory, which includes the maintenance date, will be submitted. The City will provide the number of each type of structure maintained during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If MS4 structures and conveyances are maintained properly and recorded, this BMP will be proven effective.

SWMP Attachments:

- Maintenance procedures
- Example maintenance forms

D. BMP #4 – Street and Parking Lot Cleaning

1. Description of BMP: As a service to city residents, the public works department will remove trash and debris from yards one time per week. Routine weekly routes are used to ensure that nothing is missed. The weight of trash and debris collected will be recorded. In addition, the sheriff’s office and Keep Eton Murray Beautiful remove trash and litter from road right-of-ways when time and resources are allowed. All street cleaning activities will follow the waste disposal procedures found in the Inspection, Operation, and Maintenance (IOM) (Attachment 19)
2. Measurable goal(s): Conduct street and parking lot cleaning using either of the following methods: 1. Conduct street sweeping at a frequency of at least 1 mile per year. Provide documentation of any street sweeping activities conducted during the reporting period in each annual report. 2. If the MS4 does not engage in street sweeping, then implement an alternate method of street cleaning, such as trash/litter removal. Provide documentation of the litter removal activities conducted during the reporting period in each annual report.
3. Documentation to be submitted with each annual report : The City will provide the total amount of waste collected and documentation of the final disposal. Log sheets with weight of trash and debris collected, and the date, will be provided.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If litter removal is continued and recorded throughout the year, this BMP will be considered effective.

SWMP Attachments:

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

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

E. BMP #5 – Employee Training

1. Description of BMP: A stormwater training will be held at least one time each year on various topics, including: good housekeeping, IDDE, construction site inspections and GI/LIDs. An invitation will be sent to various city departments. A sign-in sheet will be kept as a record of attendance (See Attachment 26).
2. Measurable goal(s): Implement the employee training program described in the SWMP. At a minimum, employee training must occur annually. The training should include such topics as good housekeeping at municipal facilities, illicit discharge detection, construction site inspections, and green infrastructure. Provide documentation of the educational activities conducted during the reporting period in each annual report.
3. Documentation to be submitted with each annual report : The City will provide an agenda, sign-in sheets, and a copy of the training presentation.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Clerl, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If at least one training event occurs during each reporting period, this BMP will be considered effective.

SWMP Attachments:

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

F. BMP #6 – Waste Disposal

1. Description of BMP: Trash collected from street cleaning (BMP #4 above) and maintenance activities (BMP #3 above) will be disposed of at the Murray County Landfill. Tickets from the landfill will be used to keep track of the weight and amount of trash and debris that the city disposes of at the landfill (See Attachment 27). Step by step procedures for the proper disposal of waste removed from the MS4 are currently being developed. Once the procedures are finalized, a copy of the log sheet to be used to document this activity will be provided.
2. Measurable goal(s): Implement procedures regarding the proper disposal of waste removed from the MS4 as described in the SWMP. Provide documentation of activities performed during the reporting period in each annual report.
3. Documentation to be submitted with each annual report : The City will provide the total MS4 waste collected and the documentation of the final disposal.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies
5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If waste is collected, properly disposed of and recorded, this BMP will be considered effective.

SWMP Attachments:

- Waste disposal procedures
- Example form for tracking waste disposal

G. BMP #7 – New Flood Management Projects

1. Description of BMP: Proposed project plans that include flood management are reviewed for compliance with MS4 requirements and local ordinances. This is referred to as the “stormwater review”. A project can be put on hold during this process until all requirements are satisfied. A checklist is used for the plan review (See Attachment 28). Additional details are recorded in a plan review log (See Attachment 29).
2. Measurable goal(s): Ensure proposed flood management projects (e.g. detention and retention ponds) are assessed for water quality impacts during the design phase. Provide the number of plans reviewed where flood management projects were assessed for water quality impacts during the reporting period in each annual report.
3. Documentation to be submitted with each annual report : A plan review log with project names and dates that plans are received, approved or denied from the stormwater review will be provided with each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Coordinator, Chatsworth Water Works Commission
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If proposed projects are reviewed and only approved when MS4 requirements and ordinances have been met, this BMP will be proven effective.

SWMP Attachments:

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

H. BMP #8 – Existing Flood Management Projects

1. Description of BMP: No existing permittee-owned flood management projects have been identified to date. If there are any discovered, they will be assessed for potential retrofitting. A water quality evaluation flow chart (See Attachment 30) will be used for assessments. At least one structure must be assessed annually or if the permittee has less than five structures, then assess 100% within the 5-year permit cycle. After each assessment, a determination will be made on the plan of action for that particular structure. The plan of action can be to retrofit the structure, determined infeasible, or determined to be adequate as is. A summary of the assessment and the plan of action for each structure assessed will be recorded.

2. Measurable goal(s): Conduct an assessment of existing permittee-owned flood management projects (e.g. detention and retention ponds) for potential retrofitting to address water quality impacts and conduct any retrofitting activities. Assess at least 1 structure annually or if the permittee has less than 5 structures, then assess 100% within a 5-year period. Provide information on any assessment and/or retrofitting activities conducted during the reporting period in each annual report.

3. Documentation to be submitted with each annual report: A summary of the assessment and plan of action for each structure assessed, during the reporting period, will be submitted with the annual report.

4. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): July, 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Varies

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Coordinator, City of Eton

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If existing structures are identified and at least one structure is assessed each year, this BMP will be considered effective.

SWMP Attachments:

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

I. BMP #9 – Municipal Facilities

1. Description of BMP: Municipal facility inspections will be conducted so that 100% of the facilities are inspected within the 5-year permit cycle. At least 5% of the total facilities must be inspected each year. See (Attachment 31) for the municipal facilities inspection procedures and inspection checklists. Any problems discovered will be reported for further attention.

2. Measurable goal(s): Annually update an inventory of municipal facilities with the potential to cause pollution. The inventory must be submitted with each annual report. Conduct inspections on 100% of the municipal facilities within the 5-year period in accordance with the procedures described in the SWMP. At a minimum, the permittee must conduct inspections on 5% of the municipal facilities annually, or if inspections are done by geographical area, then one entire area or sector must be inspected. Provide documentation of the inspections conducted during the reporting period in each annual report.

3. Documentation to be submitted with each annual report : Completed inspection forms of the municipal facilities inspected will be provided.

4. Schedule:
 - a. Interim milestone dates (if applicable): _____

 - b. Implementation date (if applicable): July, 2018

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

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

5. Person (position) responsible for overall management and implementation of the BMP: Clerk, City of Eton

6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If municipal facilities are inspected on an annual basis and proper records are kept, this BMP will be considered effective.

SWMP Attachments:

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

Appendix A

Enforcement Response Plan

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program during a previous permit iteration.
 - A. Provide the date the ERP was approved by EPD: The approval date of the ERP is unknown. The ERP is being submitted along with this annual report.
 - B. If the ERP has not yet been approved, provide the date submitted to EPD: 12/18/2019
2. The ERP is to be evaluated annually and revised as needed. Provide the most recent version of the ERP as an attachment to this Appendix. (See Attachment 32)

Appendix B

Impaired Waters

1. Population based on the latest U.S. Census: 824

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. See (Attachment 33)