



G A R D E N C I T Y

GARDEN CITY, GEORGIA
PHASE I MEDIUM MUNICIPAL SEPARATE
STORM SEWER SYSTEM (MS4)
STORMWATER MANAGEMENT PROGRAM
(SWMP): 2022 - 2027

NATIONAL POLLUTANT DISCHARGE &
ELIMINATION SYSTEM (NPDES)
PERMIT #:GAS000208

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Appendix H Green Infrastructure/Low Impact Development (GI/LID) Plan

ACRONYMS/DEFINITIONS

| | |
|-------|---|
| BMPs | Best Management Practices |
| CIP | Capital Improvement Project |
| CSS | Coastal Stormwater Supplement to the GSMM |
| DoA | Georgia Department of Agriculture |
| E&S | Erosion & Sedimentation |
| EPD | Georgia Environmental Protection Division |
| ERP | Enforcement Response Plan |
| ESPCP | Erosion & Sedimentation Control Plan |
| GESA | Georgia Erosion & Sedimentation Act |
| GI | Green Infrastructure |
| GIS | Geographic Information System |
| GSMM | Georgia Stormwater Management Manual |
| GSWCC | Georgia Soil & Water Conservation Commission |
| HVPS | Highly Visible Pollution Source |
| IDDE | Illicit Discharge Detection and Elimination |
| IGP | Industrial General Permit |
| LDA | Land Disturbance Activity |
| LEED | Leadership in Energy and Environmental Design |
| LIA | Local Issuing Authority |
| LID | Low Impact Development |
| MOU | Memorandum of Understanding |
| MS4 | Municipal Separate Storm Sewer System |
| MSDS | Materials Safety Data Sheet |
| NPDES | National Pollutant Discharge & Elimination System |
| PFH | Pesticides, Fertilizers & Herbicides |
| POC | Pollutant of Concern |
| ROW | Right-of-Way |
| SWMP | Stormwater Management Program |
| SWP3 | Stormwater Pollution Prevention Plan |

EXECUTIVE SUMMARY

The City of Garden City received renewed coverage under the 2022 – 2027 National Pollutant Discharge and Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) Permit (GAS000208) on April 12, 2022, as required by provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act. A copy of the City’s Permit Reapplication form to renew coverage under this permit and a copy of the City’s 2022 – 2027 MS4 Permit is provided in Appendix A. This permit requires the development of a Stormwater Management Program (SWMP), to address the following program elements:

- Structural and Source Control Measures
- Illicit Discharge Detection and Elimination
- Industrial Facility Stormwater Discharge Control
- Construction Site Management
- Highly Visible Pollutant Sources
- Enforcement Response Plan
- Impaired Waters
- Municipal Employee Training
- Public Education
- Public Involvement
- Post Construction
- Green Infrastructure/ Low Impact Development

The stormwater management program described within this document demonstrates the commitment of the City of Garden City to water resources protection.

SWMP IMPLEMENTATION RESPONSIBILITY

The City of Garden City shares responsibility for BMP permit implementation with one other entity. Unincorporated Chatham County performs routine canal maintenance on larger canals throughout Garden City in accordance with its MOU with the City, a copy of which has been included in Appendix B.

1. STRUCTURAL & SOURCE CONTROL MEASURES

Permit Section 3.3.1: Structural and Source Control Measures, Table 3.3.1

1.1. MS4 STRUCTURE INVENTORY AND MAP

1.1.1. Description

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

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

Garden City's stormwater system is comprised of the following structures that are regulated by the City's MS4 Permit:

- Catch Basins
- Pipes/Storm Drain Lines
- Ditches
- Municipal Detention / Retention Ponds
- Water Quality Vaults

The City of Garden City has completed a Geographic Information System (GIS) inventory and map of the MS4. The MS4 inventory and map is included in Appendix C. The City will continue to maintain and update this inventory each reporting period. This will be accomplished through review of new development as-built maps as well as field inspections.

1.1.2. Measurable Goals:

- Update the inventory and map each reporting period.
- Include the number and/or length of MS4 structures (catch basins, ditches, pipes/storm drain lines, detention/ retention ponds, and water quality vaults) added or deleted during the reporting period and the total number and/or length of structures in the inventory.

1.1.3. Schedule

- Each reporting period, 2022 – 2027.

1.1.4. Annual Report Documentation:

- An updated inventory and map of MS4 structures, including the number and/or length of MS4 structures added or deleted during the reporting period and the total number and/or length of structures in the inventory.

1.2. MS4 INSPECTION AND MAINTENANCE PROGRAM

1.2.1. Description

The City will inspect 100% of the MS4 features identified within the MS4 inventory over the five-year period of this permit, with at least 5% of MS4 structures inspected each reporting period.

Inspection Procedures

The City will visually inspect the MS4 in accordance with the following procedures:

- Inspections will generally include a visual condition assessment of the various system elements including catch basins, storm drain lines, ditches, and visible areas of stormwater controls (i.e. detention/retention ponds and water quality vaults).
- Storm drain lines will be visually inspected where they outfall into a structure or open drainage way, unless access is restricted due to obstructions.
- Visible areas of stormwater quality vaults, such as where stormwater enters or outfalls, will be visually inspected; underground components that are not visible without entry will not be inspected.
- Inspections will be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer.
- A table listing the information that will be collected and documented during site inspections within a GIS database is provided in Appendix D.

Maintenance Procedures (General)

The City will perform maintenance of the MS4 based upon inspection findings. During inspection, the City will determine if maintenance of the various elements is needed. The City will also prioritize maintenance needs based on their potential impact to the functionality of the public MS4. Maintenance shall be prioritized and performed in general accordance with the following standards:

- If maintenance is required, the City will determine if the maintenance need is structural (i.e., the structure needs to be repaired or replaced); or if the maintenance need is routine (i.e., sediment needs to be cleared, debris removed, or vegetation trimmed back).
- Sediments will be removed before 50% of the capacity of the structure has been lost (see Table 1 below for reference).
- The City will also decide if the maintenance need should be prioritized for more immediate action, (i.e., malfunction or failure of the system is possible if the maintenance need is not addressed).
- The City will schedule appropriate maintenance as needed and in accordance with available City resources and standard procedures.
- All stormwater management structures will be maintained such that they function in general accordance with their design and the standards, criteria, and information

presented in the latest edition of the Coastal Stormwater Supplement and Georgia Stormwater Management Manual.

- Materials removed from the MS4 during maintenance will be disposed of properly, in accordance with applicable Federal and State laws.

TABLE 1: MS4 INSPECTION & MAINTENANCE CRITERIA

| | STANDARD FOR MAINTENANCE |
|-------------------------|--|
| Catch Basins | Sediment fills up to the lowest invert |
| Ditches | 50% filled with sediment |
| Piped Storm Drain Lines | 50% filled with sediment |
| Detention Ponds | 50% filled with sediment |
| Water Quality Vault | 50% filled with sediment |

Chatham County will inspect and maintain 12.64 miles of canals within Garden City’s municipal limits. This responsibility has been formally established through the 2020 Intergovernmental Agreement, as described in the SWMP Implementation Responsibility Section on Page 1 of this plan. This agreement is included in Appendix B, and it outlines the canal maintenance procedures.

Maintenance Procedures (Roadside Ditches)

Roadside ditches that are located within the City Right-of-Way (ROW) are considered part of the public MS4 and are inspected and maintained by the Public Works Department to ensure effective operation. The City of Garden City currently maintains approximately 47 miles of roadside ditches.

- Right-of-ways are mowed routinely during the growing season, and ditches are inspected at that time.
- Litter and debris are removed prior to mowing and disposed of at a local landfill.
- When roadside ditch inspections indicate that emergent vegetation is interfering with normal flow, excess emergent vegetation will be removed by hand or machinery to ensure proper functioning of the ditches.
- Roadside ditches are cleaned if accumulated sediment/deposits exceed design depth.
- Roadside ditch inspection and maintenance activities are recorded in Monthly Status Reports.

1.2.2. Measurable Goals

- Conduct inspections of the MS4 structures so that 100% of the structures are inspected within the five-year period, with a minimum of 5% of inspections occurring each reporting period.
- Conduct maintenance on MS4 structures as needed.

1.2.3. Schedule

MS4 Inspections

- Each reporting period, 2022 – 2027.

MS4 Maintenance

- Ongoing, 2022 – 2027.

1.2.4. Annual Report Documentation:

- Summary of MS4 Inspections including the number and percentage of total structures inspected during the reporting period.
- Documentation of inspections conducted, such as a table of individual inspection reports with a record for each structure inspected, and the findings of that inspection.
- Number and/or length and percentage of MS4 structures maintained.
- Documentation of maintenance conducted during the reporting period, such as copies of work orders or Public Works & Water Operations Monthly Status Reports.

1.3. PLANNING PROCEDURES

1.3.1. Description

1.3.1.A. Comprehensive Plan

The City of Garden City's Comprehensive Plan outlines goals and specific policies that are designed to protect the local quality of life. The Comprehensive Plan guides future land use, provides the framework for the City's zoning code, addresses natural resource protection, and recommends stormwater infrastructure improvements. The City updated its Comprehensive Plan in 2020 to establish planning goals through the year 2040. The City's Plan can be viewed at <https://www.gardencity-ga.gov/economic-development/garden-city-comprehensive-plan> and a copy is provided in Appendix B. The City will review and update the Comprehensive Plan as needed each reporting period.

The following goals and policies of the Comprehensive Plan impact the City's stormwater program and help to broaden the City's "green infrastructure" approach to stormwater management.

Vision: "A safe, family-oriented and business friendly city."

Garden City is committed to achieving this vision through:

- Balanced growth - guided by planning and management that promotes interconnected green space, a multi-modal transportation system, and mixed-use development.
- Advancement of community - by providing a variety of commercial, institutional, educational uses as well as housing styles, sizes, and prices.
- Sustainability - through diverse public and private partnerships used to create sustainable and livable communities that protect historic, cultural, and environmental resources.
- Fiscal responsibility - by diversifying local economics to support local needs, encourage cohesiveness, reduce waste, and enhance local wealth.
- Open government - through building local capacity to provide adequate operational management of urban services.
- Natural resource preservation – by recognizing natural resources are necessary to meet the needs of future generations.
- Cultural diversity - by recognizing different cultures bring different perspectives to the table, introducing new ideas, and personalities into strategic planning processes.
- Environmental stewardship - policymakers, regulators and developers supporting sustainable site planning and techniques that create a balance between built and natural systems.

1.3.2. Measurable Goals

- Review and update the Comprehensive Plan as needed.

1.3.3. Schedule

- Each reporting period, 2022 – 2027.

1.3.4. Annual Report Documentation

- Description of any changes made to the Comprehensive Plan.

1.4. STREET MAINTENANCE

1.4.1. Description

1.4.1.B. Street Sweeping Program

The City of Garden City implements a street sweeping program to reduce polluted runoff originating from streets with curb and gutter systems. The City oversees street sweeping along major roads as needed during each reporting period. To reduce polluted runoff originating from streets, roads, and highways from vehicle traffic, leaks and spills, and atmospheric deposition, the Department of Public Works oversees the sweeping of all major curb and gutter roads as needed in Garden City. Debris collected by the street sweeper is ultimately disposed of at a landfill in accordance with the landfill's rules and regulations, and the City maintains records of the lengths of streets swept.

The City will continue to perform routine street sweeping activities for curb and gutter roads, with a minimum of at least 50 miles swept during each reporting period. Records of street sweeping activities will be maintained by the City and submitted in the Annual Report.

1.4.1.C. De-icing Procedures

De-icing is not often necessary in coastal Georgia, and the City of Garden City does not maintain a stockpile of any material for this purpose.

1.4.1.D. Roadway Construction Erosion & Sedimentation Control

The Department of Public Works is responsible for ensuring that all minimum measure BMPs required by the Georgia Erosion and Sedimentation Act are implemented for City of Garden City road construction projects where appropriate.

1.4.2. Measurable Goals:

- Perform routine street sweeping activities for curb and gutter roads, with a minimum of at least 50 miles swept during the reporting period.

1.4.3. Schedule

- Each reporting period, 2022 – 2027.

1.4.4. Annual Report Documentation

- Provide documentation of street sweeping activities, including length of streets swept.

1.5. FLOOD MANAGEMENT PROJECTS

1.5.1. Description

1.5.1.A. *New/Proposed Flood Management Projects*

The City of Garden City currently requires developers to comply with the City's Stormwater Management Ordinance, which detail the rules and regulations governing post-development stormwater management practices for new development and redevelopment. The regulations require developers to submit a stormwater site plan for all developments that are not specifically exempted within the ordinance. Site stormwater management plans must address water quality and water quantity issues in accordance with the requirements of the NPDES Phase I MS4 Permit, the latest edition of the Coastal Stormwater Supplement (CSS), and applicable local development regulations.

The stormwater site plan is reviewed by a Georgia-registered Professional Engineer (contracted or City staff) and approved by the Planning and Zoning Department before a land disturbing activities (LDA) Permit is issued and construction can begin.

The City will ensure that all new/proposed flood management projects are assessed for water quality impacts during the design phase. For the purposes of this BMP, the City interprets "Flood Management Projects" to refer to detention/retention ponds and water quality vaults. All new developments will be required to comply with the City's Post-Construction Runoff Control requirements addressed in the Stormwater Management Ordinance, which require that stormwater management controls address water quality as well as water quantity protection.

1.5.1.B. *Existing Flood Management Projects* The City developed Water Quality Assessment Procedures to ensure that existing City-owned flood management projects (i.e., detention/retention ponds and water quality vaults) are assessed for potential retrofitting to address water quality impacts. The assessments will typically include a field inspection to assess retrofitting needs, which is a separate inspection from proactive inspections used to determine routine maintenance needs as described in Section 1.2 of this Plan. These Procedures were approved by the Georgia EPD during the last permit period for other coastal MS4s and meet the requirements of the City's new MS4 permit. The City's Water Quality Assessment Checklist for Existing Flood Control Structures are provided in Appendix D.

The City or a third-party contractor will perform Water Quality Assessments for 100% of all City-owned detention / retention ponds and water quality vaults during the 5-year permit period to assess the potential to retrofit these publicly-owned structures to incorporate additional control measures to improve water quality treatment. If more than five flood management structures are listed on the inventory, the City will inspect at least one of the flood management structures each reporting period. If, however, an assessment was previously performed on an

existing flood management structure using the 2016 GSMM, prior to the effective date of this permit, then an additional assessment does not need to be performed. Inspections of flood management structures will be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and recorded within the City's GIS layer or using a paper checklist. The field collection application and paper Water Quality Assessment checklist contain the same questions. A table listing the information that will be collected and documented during site assessments within a GIS database and a copy of a paper assessment checklist are provided in Appendix D.

Retrofitting activities will be conducted as funding becomes available for their implementation. If retrofitting activities are conducted during the reporting period, the City will maintain documentation showing the status of the retrofitting and information about what retrofitting activities were conducted.

1.5.2. Measurable Goal:

- a. Ensure 100% of new/proposed flood management projects (i.e., detention/retention ponds and water quality vaults) comply with the City's Stormwater Management Ordinance.
- b. Perform Water Quality Assessment for 100% of City-owned detention / retention ponds and water quality vaults within the 5-year permit period (unless a previous assessment was conducted using the 2016 GSMM and the City has documentation, in which case the assessment does not need repeated).
- c. Evaluate potential retrofitting, if applicable and as funding permits.

1.5.3. Schedule

- Each reporting period, 2022 – 2027.

1.5.4. Annual Report Documentation

- Number of plans reviewed where new/proposed flood management projects were assessed for water quality impacts during the reporting period.
- Documentation all water quality assessments of existing flood management control structures that occurred during the reporting period and status of any retrofitting activities.
- Documentation of any water quality assessments conducted prior to April 12, 2022 of existing flood management control structures and status of any retrofitting activities (with the 2022 – 2023 Annual Report).
- For each reporting period after 2022-2023, a table listing the date and results of the assessment and the status of any retrofitting activities.

1.6. MUNICIPAL FACILITIES

1.6.1. Description

Garden City has developed a municipal facility inventory to document the location of each facility owned and/or maintained by the City with the potential to cause pollution, excluding any facilities that are addressed in Section 3.3.3 (Industrial Facilities). A copy of the City's Municipal Facility Inventory is provided in Appendix C. The inventory will include any municipal facilities owned by the City that are located in another jurisdiction that have the potential to cause pollution, if applicable. This inventory will be updated at least each reporting period.

City staff or their designated representatives will inspect 100% of inventoried municipal facilities within the 5-year permit period and at least one inspection will be conducted each reporting period. If more than five (5) municipal facilities are listed on the inventory, the City will inspect at least 5% of the municipal facilities each reporting period. Inspections of Municipal Facilities will typically be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer. For City staff that do not have the field collection application available and/or in situations when a field collection application cannot be used for other reasons, a paper copy version of the inspection checklist will be used to record the inspections. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist are provided in Appendix D.

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

1.6.2. Measurable Goals

- Update municipal facilities inventory each reporting period.
- Inspect 100% of inventoried facilities every 5 years, with at least one inspection conducted each reporting period. If there are more than five (5) municipal facilities on the inventory, 5% of the municipal facilities will be inspected each reporting period.
- Document inspections on the Stormwater Site Inspection Checklist.

1.6.3. Schedule

- Each reporting period, 2022 – 2027.

1.6.4. Annual Report Documentation

- Copy of updated municipal facility inventory.
- Documentation of inspections conducted, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the

completed inspection checklist for each municipal facility inspected during the reporting period.

- Documentation of any activities conducted to address issues identified during the site inspection such as re-inspection forms, letters to owners/operator, email correspondence or other documentation.

1.7. PESTICIDE, FERTILIZER, & HERBICIDE (PFH) APPLICATION

1.7.1. Description

1.7.1.A. *Commercial Pesticide Applicator & Distributor Certification Program*

Garden City relies on the Georgia Department of Agriculture (DoA) to address requirements for Pesticide Applicator/Distributor Training and Certification. The DoA requires commercial applicators of restricted use pesticides (including herbicides, insecticides, fungicides, plant growth regulators, and defoliants) to obtain and retain a “Commercial Pesticide Applicators License.” The DoA also requires that distributors of restricted use pesticides obtain and retain a “Pesticide Dealer’s License.” Continuing education units are required each year to maintain the license.

Prior to issuing a business license, Garden City will require applicants who are likely to require a commercial pesticide applicators license to provide proof that they hold the appropriate State license.

1.7.1.B. *Municipal PFH Program*

No pesticides, fertilizers, or herbicides (PFHs) are used by City staff to maintain the City of Garden City roadside ditches, canals, and right-of-ways. Vegetative maintenance is performed manually or mechanically. PFHs are not used to maintain vegetative grown at City-owned ponds either. The City Hall pond exists in a natural vegetative state and manual maintenance is conducted if needed. Vegetative maintenance at the Sharon Park pond is performed via biological means; the pond is stocked with grass carp and the City recently installed new aerators to increase oxygen levels and maintain the biological ecosystem. These efforts by the City are protective of water quality and demonstrate the City’s commitment to PFH reduction.

The City currently outsources the application of PFHs for general groundskeeping to a third-party contractor that is licensed by the DoA and maintains copy of the contractor’s DoA certification on file. While not required, the City has opted to provide general training to its employees and the general public, as well as commercial and private businesses, regarding safe and sustainable practices for landscape maintenance via its stormwater webpage. This information is also accessible online at <http://www.gardencity-ga.gov/city-government/public-works/sustainable-land-use>.

A PFH Standard Operating Procedure (SOP) has been prepared to guide City workers in the event that City staff are responsible for PFH application in the future. This SOP consists of operational best management practices (BMPs) developed to minimize or prevent the discharge of chemicals into the City’s stormwater drainage system by promoting proper storage and application of chemicals during landscape maintenance activities. These procedures are critical steps that must be included in every landscape maintenance activity

that includes chemical application to either control weeds and pests or to provide adequate fertilization.

The City's SOP for PFH application is as follows:

1. Conduct chemical application only during days when it is not windy or raining, and when rain is not predicted in the immediate forecast.
2. Consult the Material Safety Data Sheet (MSDS), if available, or package directions for each chemical to ensure all storage, handling, and application precautions are taken.
3. Follow label directions when storing, handling, mixing, recycling and disposing of chemicals and empty containers; properly calibrate application equipment, if applicable, to ensure proper amount of chemicals are applied.
4. DO NOT transfer, pour or dispose of chemicals outdoors, near or in storm drains, or drainage areas; transfer over impervious surface so spills can't seep into ground.
5. Have spill cleanup materials available and ready to go in case of spill; clean up chemical spills promptly, with DRY methods, if possible.
6. When watering landscaped area after fertilizer application, take care to not allow water to runoff into streets or other conduits to waterways.
7. Recycle or dispose of all spent or excess chemicals properly and promptly.
8. Keep all PFHs in leak proof shelters away from elements to help prevent contamination of the stormwater system.
9. Keep unused containers closed tightly; use a tight fitting lid; label containers.
10. The City will comply with the GDoA Program, as needed and appropriate, with regards to training and certification of staff. A Commercial Pesticide Applicator License may be required for City employees that apply restricted use pesticides (i.e., pesticides that are not available to the general public).

1.7.2. Measurable Goals:

- Continue to utilize GDoA Program to certify commercial applicators and distributors within the City.
- Continue to adhere to the PFH Chemical Application SOP above when performing any landscape chemical application within the City.

1.7.3. Schedule:

- Ongoing, 2022-2027.

1.7.4. Annual Report Documentation:

- Documentation of any program activities conducted during the reporting period related to the chemical application of PFHs. This may include DoA certifications, if restricted use PFHs are applied, and/or other documentation.

2. ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE)

Permit Section 3.3.2: Illicit Discharge Detection and Elimination Program (IDDE), Table 3.3.2

2.1. LEGAL AUTHORITY

2.1.1. Description

The City of Garden City has established adequate legal authority through Garden City's Code of Ordinances, [Chapter 30 – Environment; Article V: Stormwater Management](#), last updated in August 2011, to prohibit illicit discharges and conduct an illicit discharge detection and elimination program. [Section 30-240, Illicit Discharge and Illicit Connection](#) of this ordinance prohibits illicit discharges & connections to the public MS4, grants the City the authority to enter private property to investigate suspected illicit discharges, and also provides the City with the means to enforce violations of this ordinance. A copy of the ordinance is provided in Appendix B.

2.1.2. Measurable Goal

- Each reporting period evaluate the Illicit Discharge and Illicit Connection provision of the City's Stormwater Management Ordinance to determine if revisions are required.

2.1.3. Schedule

- Each reporting period, 2022 - 2027.

2.1.4. Annual Report Documentation

- If revisions are required, submit a copy of the revised ordinance to EPD in the Annual Report.

2.2. OUTFALL INVENTORY & MAP

2.2.1. Description

The City of Garden 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. In addition, the City has identified those outfalls that are continuously “wet” due to tidal activity or surcharge of the system, and those that are dry. A “wet” designation means that the invert of the outfall is below the mean high tide or static water level causing the drainage system to be flooded daily.

To view the map and inventory of the MS4 Outfalls, please see the Illicit Discharge Detection and Elimination (IDDE) Plan included in Appendix E. Each year, the City will update the map and inventory to reflect the addition of outfalls from new infrastructure projects or developments and remove any outfalls that have been reclassified or removed.

2.2.2. Measurable Goals

- Maintain and update a map showing the location of all outfalls from the MS4, which outfalls are “wet”, and the names and location of all waters of the State that receive discharges from those outfalls.
- Maintain and update a database inventory of all outfalls from the MS4 within the City limits of Garden City.

2.2.3. Schedule

- Each reporting period, 2022-2027

2.2.4. Annual Report Documentation

- Updated inventory and map of the MS4 outfalls that identifies which MS4 outfalls are “wet”, with the names and locations of all waters of the State that receive discharges from those outfalls.
- The number of outfalls added to the inventory and the total number of outfalls.

2.3. IDDE PLAN

2.3.1. Description

Garden City's IDDE Plan consists of a "wet" and "dry" MS4 outfall inventory and map; outfall reconnaissance inventory and field screening procedures (i.e., dry weather screening); a proactive IDDE inspection program; source tracing through field sampling, visual inspections, site inspections, upstream sampling, and/or dye testing; source removal; and data collection and reporting. The IDDE Plan, included in Appendix E of this Plan, will be used to determine if upstream facilities/connections are discharging non-stormwater flows to the drainage system and to eliminate all identified illicit discharges. An Outfall Reconnaissance Inventory Form and Source Tracing Form are provided in Appendix B of the IDDE Plan.

The City will perform inspections and/or dry weather screening of the MS4 outfalls within its current inventory in accordance with the procedures outlined in the IDDE Plan. The City will investigate any potential illicit discharges in accordance with the procedures in the IDDE Plan. Suspect or obvious illicit discharges require follow-up actions and activities, as specified in the IDDE Plan to determine the specific source(s) of contamination. Should the City positively identify any illicit discharges, the City will perform enforcement actions as dictated by the City's Stormwater Management Ordinance, IDDE Plan, and Enforcement Response Plan (ERP) to remove positively identified illicit discharges. A copy of the City's ERP is included in Appendix F.

The City will screen at least 5% of the total number of stormwater outfalls listed on the City's most current inventory each reporting period and 100% of the inventory of MS4 outfalls will be screened over the 2022-2027 five-year period. A map of the City's dry weather screening zones is included in the IDDE Plan in Appendix E.

2.3.2. Measurable Goals

- Dry weather screen 100% of all MS4 outfalls over a five-year period (with at least 5% of outfalls screened each reporting period).
- Investigate and perform source tracing for 100% of suspected illicit discharges.
- Enforce the Illicit Discharge prohibition of the Stormwater Management Plan, IDDE, and ERP for 100% of positively identified illicit discharges.

2.3.3. Schedule

- Each reporting period, 2022 – 2027: Dry weather screen outfalls.
- Ongoing, 2022 – 2027: Perform source tracing as needed.
- Ongoing, 2022 – 2027: Enforce Illicit Discharge provision of the Stormwater Management Ordinance as needed.

2.3.4. Annual Report Documentation

- Number and percentage of MS4 outfalls inspected during the reporting period.
- Documentation of inspections and dry weather screening, such as a table of individual

inspection reports with a record for each outfalls inspected and the findings of that inspection, or a copy of the completed dry weather screening forms (Outfall Reconnaissance Inventory Form) for all MS4 Outfalls screened within the reporting period.

- Records of any source tracing or enforcement activities conducted as a result of dry weather screening activities.

2.4. SPILL RESPONSE PROCEDURES

2.4.1. Description

The City's Public Works Department maintains spill response materials onsite to respond to and cleanup minor spills at municipal facilities and checks for spill kits and spill response materials when conducting inspections of Highly Visible Pollutant Source (HVPS) facilities and Industrial facilities. Public Works Department staff are also responsible for reporting cleanup of sanitary sewer spills.

All new City of Garden City staff that work with potentially hazardous or polluting materials are trained within one year of the start of employment on proper use, storage, and disposal of commonly used hazardous or potentially polluting materials. Garden City's Fire Department holds a Basic Hazmat Awareness and Spill Training class each reporting period for applicable City employees. Damming and diking procedures are taught during the training program and materials addressed include oil, petroleum products, wastewater, paint, grease, and other materials that might possibly enter the drainage systems.

Garden City staff will maintain records of any spills that occur that may discharge to the MS4 and how those spills were resolved. Those records will be summarized and included in the Annual Report.

2.4.2. Measurable Goal

- Maintain documentation on any spill occurrences and cleanup performed.

2.4.3. Schedule

- Each reporting period, 2022 - 2027.

2.4.4. Annual Report Documentation

- Documentation on any spill occurrences and cleanup performed.

2.5. PUBLIC REPORTING PROCEDURES

2.5.1. Description

The City of Garden City maintains a link on the City's official website that allows citizens and visitors to electronically report concerns, including illicit discharges and illegal dumping. The City main website has a link to the City's Service Request Page for reporting "Issues or Concerns" at <http://www.gardencity-ga.gov/i-want-to/submit-service-request>. Illicit Discharges and other stormwater concerns can also be reported via a link on the Citizen Stormwater Information page at <http://www.gardencity-ga.gov/city-government/public-works/citizen-stormwater-information>. This webpage also lists the telephone number for the Public Works Department to allow citizens to report stormwater issues by phone. The City promotes the stormwater webpage as a part of other public education initiatives.

The City of Garden City has established procedures for addressing citizen complaints about water quality and reports of illicit discharges/illegal dumping. Every time a request for Public Works service is made by phone call, website, written request, email request, or an actual one-on-one request to a PW employee, a "Service Request" is generated. This builds a computerized record of all requests made. A "work order" is created each time a work crew or individual is assigned a task either because of service requests, pre-planned maintenance projects, or by other situations as they arise. This produces a database of work accomplished and the time and materials it took to do the work.

Work orders are considered "open" until the employee / crew physically completes the task in the field. Task are typically completed within three (3) to five (5) business days of initial complaint receipt, and issues that pose a more urgent threat to water quality are prioritized for earlier investigation and follow-up. Upon completion the work order status is changed to "closed". Work Orders are tracked by the Public Works foreman to ensure completion and then submitted to Public Works administrative employee(s) for recordkeeping. Finally, they are verified by the Public Works Director during the monthly report compilation.

Any complaints related to an illicit discharge and/or other stormwater issues are tracked in the manner described above. The Public Works Department maintains a database of citizen complaints and how the complaints were resolved.

2.5.2. Measurable Goals

- Investigate 100% of all water quality complaints received.
- Take appropriate action for 100% of complaints requiring action.
- Record IDDE complaints and actions taken in the City's Work Order Database.
- Notify the public of illicit discharge reporting procedures at least once each reporting period.

2.5.3. Schedule

- Ongoing, 2022 – 2027: Update Work Order Database update as calls are received.
- Ongoing, 2022 – 2027: Take action for complaints received, as appropriate.
- Each reporting period, 2022 – 2027: Ensure stormwater webpage lists proper telephone number and contains a working link for electronic reporting of stormwater issues.

2.5.4. Annual Report Documentation

- Documentation of citizen complaints, investigations, actions taken during the reporting period, and status of the complaint.
- Documentation showing the public was notified of illicit discharge reporting procedures, such as a screenshot from the City website.

2.6. PROPER MANAGEMENT & DISPOSAL OF USED OIL & TOXIC MATERIALS

2.6.1. Description

The City performs multiple activities to promote the proper management and disposal of used oil and toxic materials by the public, including maintaining an informational webpage(s) with relevant links and providing educational materials. Garden City maintains a link to the Georgia Department of Community Affairs (DCA)'s Recycling Markets Directory on the City's webpage to assist residents with locating facilities to recycle items such as motor oil, aluminum, paper, yard trimmings, etc. at the City's following web address: <http://www.gardencity-ga.gov/for-residents/sanitation-information>. The City also maintains a link on the City's webpage to the Chatham County Resource Conservation Education Center. This site provides information on its website to help citizens of the County, including those in Garden City, to dispose of hazardous and nonhazardous household wastes properly. The website includes a listing of facilities and businesses that will accept waste oil, other toxic wastes, and recyclables from the general public. The link can be found at the City's following web address: <http://www.gardencity-ga.gov/for-residents/sanitation-information>.

The City's Stormwater webpage titled "Stormwater Program Elements" at <http://www.gardencity-ga.gov/city-government/public-works/stormwater-program-elements> features downloadable electronic educational brochures that provide information about proper waste management & disposal of hazardous household wastes and other wastes commonly generated by automobile maintenance, gas stations, and restaurants & food service entities.

Additionally, Garden City maintains an inventory of commercial businesses and facilities that are considered to be HVPSSs as well as industrial sites. HVPSSs and industrial facilities are routinely inspected by the City, and industry-specific educational literature, including literature about proper waste management and disposal, is supplied at the time of the site inspection or as part of the follow-up to the site inspection on an "as-needed" basis.

2.6.2. Measurable Goals:

- Promote proper management and disposal of used oil and toxic materials by maintaining a web link to the Chatham County Resources Conservation website and/or DCA Recycling Markets Directory.
- Provide industry-specific educational literature, including literature about proper waste management and disposal, during HVPSS and Industrial Site inspections on an "as-needed" basis.

2.6.3. Schedule

- Each reporting period, 2022 – 2027.

2.6.4. Annual Report Documentation

- Details of any activities performed during the reporting period including screenshot and web link for the Chatham County Resource Conservation Education Center and DCA.
- Summary of and/or copies of industry-specific educational literature, including literature about proper waste management and disposal, distributed during HVPS and Industrial Site inspections.

2.7. SANITARY SEWER INFILTRATION CONTROLS

2.7.1 Description

The City of Garden City maintains the sanitary sewer system by performing a multitude of activities designed to maintain the integrity of the sanitary sewer system and prevent seepage and spillage of sanitary sewer wastes. Activities include, but are not limited to, a routine sewer main chemical treatment program, and an inspection program to determine if the sanitary sewer system has any leaks, damage, or cross connections with the storm sewer or drainage system. Maintenance or capital improvements are performed as needed based on the results of the inspections. Maintenance may include repair, relining, or replacement of malfunctioning system elements.

The City will implement a sewer main chemical treatment at least once each reporting period to prevent seepage and spillage of sanitary sewer wastes, and maintain documentation for the City's Annual Report.

2.7.2 Measurable Goal:

- Conduct sewer main chemical treatment at least once each reporting period.
- Inspect 100% of suspected sewage spills from the sanitary sewer system reported to or by Garden City.
- Resolve 100% of sanitary sewer overflows or cross connections.
- Record and maintain information on all sanitary sewer spills in a database.

2.7.3 Schedule

- Each reporting period, 2022 – 2027.

2.7.4 Annual Report Documentation

- Documentation of sewer main chemical treatment.
- Documentation of sanitary sewer spills and cleanup activities performed.

3 INDUSTRIAL FACILITIES STORMWATER DISCHARGE CONTROL

Permit Section 3.3.3: Industrial Facility Stormwater Discharge Control, Table 3.3.3

3.1 INDUSTRIAL FACILITY INVENTORY

3.1.1 Description

The City of Garden City currently maintains an Industrial Facility Inventory. This inventory is based on a database posted on the Georgia EPD's website about facilities that have applied for coverage under the Industrial Storm Water General Permit (IGP) and/or submitted a No Exposure Exclusion (NEE) for permit exemption. Each reporting period, Garden City reviews the most recent listing of industrial sites posted to EPD's website and updates the Industrial Facility Inventory accordingly.

3.1.2 Measurable Goals

- Each reporting period review EPD database of industrial facility permittees and update Industrial Facility Inventory.

3.1.3 Schedule

- Each reporting period, 2022 – 2027.

3.1.4 Annual Report Documentation

- Copy of updated Industrial Facility Inventory.

3.2 INDUSTRIAL STORMWATER INSPECTION PROGRAM

3.2.1 Description

The City of Garden City will inspect 100% of the facilities listed on the City's Industrial Facility Inventory over the course of the five (5) year permit period (2022 – 2027), with a minimum of at least one industrial inspection conducted each reporting period. If more than five (5) industrial sites are listed on the City's inventory, the City will inspect a minimum of 5% of the industrial facilities each year.

- City staff will first determine whether the industrial facility discharges to the City MS4. If the facility does not discharge to the City MS4, it will be removed from the Industrial Facility Inventory.
- City staff will check to ensure that the facility has submitted a Notice of Intent to be covered under the NPDES Industrial General Permit (IGP), if it is required.
- City staff will perform a cursory review of the implementation status of the facility's associated Stormwater Pollution Prevention Plan (SWP3).
- Industrial site inspections will typically be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer.
- For City staff that do not have the field collection application available and/or in situations when a field collection application cannot be used for other reasons, a paper copy version of the inspection checklist may be used to record the inspections. The field collection application and paper inspection checklist contain the same questions.
- A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist is provided in Appendix D.
- Should an inspection reveal a potential threat to water quality in the MS4, Garden City staff will notify the industry or business, provide them with a copy of the inspection checklist and/or relevant information. If deemed necessary, the City will later perform a re-inspection to ensure that all necessary corrections were made.
- Enforcement of any identified illicit discharges will be handled in accordance with the City's Stormwater Management Ordinance and Enforcement Response Plan.
- If the violation is not corrected, EPD will be notified of the problem. The City will also notify EPD if assistance is needed for enforcement of the NPDES IGP or if there is a threat to Waters of the State. The City of Garden City may elect to perform water quality monitoring to monitor stormwater runoff and/or use monitoring data provided by the industrial facility in order to secure evidence to support the alleged violation.
- The City will maintain records of inspections results, problems found, and actions taken.

3.2.2 Measurable Goals

- Inspect 100% of industrial facilities in the City’s inventory over the 5-year permit period. Inspect at least one industrial site each reporting period, or, if there are more than five sites listed on the City’s inventory, inspect at least 5% of the industrial facilities in the inventory each reporting period.
- Document site inspections and recommended corrective actions/violations.
- Enforce the Stormwater Management Ordinance, IDDE, and ERP as needed.
- Conduct water quality monitoring at industrial facilities if deemed necessary by the City and/or obtain water quality monitoring data from the industrial facility.

3.2.3 Schedule

- Each reporting period, 2022 – 2027.

3.2.4 Annual Report Documentation

- Documentation of inspections, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed site inspection checklist for each Industrial facility inspected during the reporting period and any available follow-up documentation.
- Number and percentage of facilities inspected and total number of facilities in the City.
- Water quality monitoring results, if monitoring is conducted.

3.3 ENFORCEMENT PROCEDURES

3.3.1 Description

If an illicit discharge is identified during an industrial site inspection, the City will initiate enforcement procedures as outlined in the City's Enforcement Response Plan (Appendix F) and maintain documentation.

If an illicit discharge has not taken place but practices onsite indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection and recommend corrective actions to address the potential issue. The City will also make the owner/operator aware of the Georgia Stormwater Management Manual and the Coastal Stormwater Supplement, which address pollution prevention and good housekeeping practices.

3.3.2 Measurable Goals:

- Implement enforcement procedures when illicit discharge violations are discovered during inspections of industrial facilities.
- Document enforcement actions taken in violation/enforcement action log and/or other appropriate written documentation (letter to facility, copy of warning and/or Notice of Violation, etc.).

3.3.3 Schedule

- Ongoing, 2022 – 2027.

3.3.4 Annual Report Documentation

- Documentation of enforcement actions taken during the reporting period.

3.4 EDUCATIONAL ACTIVITIES

3.4.1 Description

- The City will distribute the Georgia EPD's informational handout on the requirements of the NPDES IGP or other industrial stormwater best practices educational information to industrial facilities during industrial stormwater site inspections.

3.4.2 Measurable Goals

- Provide educational information to facilities during industrial site inspections.

3.4.3 Schedule

- Ongoing, 2022 – 2027.

3.4.4 Annual Report Documentation

- Copy of educational information distributed to industrial facilities.

4 CONSTRUCTION SITE MANAGEMENT

Permit Section 3.3.4: Industrial Facility Stormwater Discharge Control, Table 3.3.4

4.1 LEGAL AUTHORITY

4.1.1 Description

The City of Garden City has established legal authority to require and enforce appropriate erosion and sediment controls by adopting the State model Soil Erosion, Sedimentation and Pollution Control Ordinance (E&S Ordinance) that reflects the most recent amendments to the Georgia Erosion and Sedimentation Act (GESA). The City inserted its E&S Ordinance into Chapter 30, Article III of its Code of Ordinances, which was last revised on November 7, 2016. A copy of this ordinance is included in Appendix B. The City will review the E&S ordinance each reporting period and make revisions as needed to ensure appropriate erosion and sediment controls are in place at construction sites.

The City of Garden City is currently a local issuing authority (LIA) for land disturbance activity (LDA) Permits as defined by GESA. Accordingly, the City administers the procedures described below in accordance with the responsibilities related to being an issuing authority. EPD has taken the position that any program in compliance with the regulations of GESA will also be considered in compliance with those requirements of the NPDES Phase I MS4 program for Construction Site Structural and Non-Structural Controls.

4.1.2 Measurable Goals

- Each reporting period evaluate the E&S Ordinance to determine if revisions are required.

4.1.3 Schedule

- Each reporting period from 2022 – 2027: Annual Review of E&S Ordinance.

4.1.4 Annual Report Documentation

- If revisions are required, submit a copy of the updated E&S ordinance.

4.2 SITE PLAN REVIEW PROCEDURES

4.2.1 Description

All qualifying developments are required to comply with the local E&S Ordinance and obtain an LDA Permit prior to the start of any land disturbing activities that will disturb one or more acres of land within the City limits. Phased developments that disturb a total of one acre or more are also required to obtain an LDA Permit.

The City's Erosion and Sedimentation (E&S) Ordinance requires submittal of an approved Erosion, Sedimentation, and Pollution Control Plan (ESPCP) prior to issuance of an LDA Permit. ESPCPs received by Garden City are forwarded to the Georgia Soil and Water Conservation District (GSWCD) who review the plans for compliance with the requirements of GESA and the Georgia Erosion and Sedimentation Control Manual. The ESPCP must be approved by the GSWCC prior to issuance of an LDA Permit by the City.

4.2.2 Measurable Goals

- Provide 100% of ESPCPs to GSWCD for their review and approval of compliance with GESA and the Garden City E&S Ordinance.
- Grant LDA permits only after ESPCP is approved by GSWCD.
- Maintain a Site Plan Review database that summarizes the site plans received and the number of site plans reviewed, approved, or denied and the number of LDA permits issued during the reporting period.

4.2.3 Schedule

- Ongoing, 2022 – 2027: Review ESPCPs as they are submitted.
- Each reporting period, 2022-2027: Prepare and submit Site Plan Review database.

4.2.4 Annual Report Documentation

- List of site plans received.
- Number of site plans reviewed, approved, or denied during the reporting period.
- List or table of LDA Permits issued during the reporting period.

4.3 CONSTRUCTION SITE INSPECTION PROCEDURES

4.3.1 Description

The Garden City Planning and Zoning Department is responsible for the inspection program that targets all construction projects within the City limits. The inspections include checking all E&S control measures for compliance with the approved E&S plans and LDA Permit. The authority for such inspections follows the City's E&S Ordinance. The City inspects construction sites in accordance with the following procedures:

- City staff will conduct site inspections of all sites that have an LDA Permit after land disturbing activities commence to verify compliance with all applicable E&S requirements.
- Once a site is under construction it will be inspected by the City on a regular basis until the site is stabilized, with at least one inspection occurring during the reporting period.
- Inspections during the construction process will be prioritized as follows:
 - Proximity to local waterways
 - A significant rain event
 - Evidence of poor housekeeping
 - History of poor compliance
 - Evidence of absent or malfunctioning controls
- A final comprehensive site inspection will be conducted at all LDA Permit sites after land disturbing activities have ceased to ensure that the site has been adequately stabilized and that all excess materials have been removed.
- An E&S Inspection Checklist will be completed during each inspection. A copy of the checklist is provided in Appendix D. A checklist is used so that all inspections are uniform, and also to provide the City and the Permit holder with a written record of the inspection findings.

4.3.2 Measurable Goals

- Inspect active construction sites with an LDA after installation of initial BMPs, during active construction, and after final site stabilization with at least one site inspection of each active site occurring during the reporting period.
- Complete and maintain E&S Inspection Checklists.
- Maintain a list of active construction sites.

4.3.3 Schedule

- Ongoing, 2022-2027: Inspect and document active construction sites.
- Each reporting period, 2022-2027: Prepare and submit list of active construction sites.

4.3.4 Annual Report Documentation

- List of active construction sites, including the number and dates of inspections conducted at each site. (All completed E&S checklists are maintained on file and can be provided upon request.)

4.4 ENFORCEMENT PROCEDURES

4.4.1 Description

If a site is found to be in violation of the City's ordinance during inspection, the City will issue a written warning to the violator. The violator will then have up to five (5) business days to correct said violation. After five (5) business days, a follow-up inspection by City representatives will take place to verify that corrective measures have been taken for previously documented deficiencies.

Following the third and each subsequent violation, an immediate stop-work order shall be issued. No work shall be allowed on the site except to address those deficiencies identified in the inspection and subsequent re-inspections.

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

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

A detailed description of enforcement procedures regarding E&S violations is included in the City's E&S Ordinance in Appendix B as well as the ERP in Appendix F.

4.4.2 Measurable Goals

- Implement enforcement actions for 100% of identified violations in accordance with E&S Ordinance and ERP.
- Provide a log of all violations and enforcement procedures undertaken during the reporting period, including the number and type (e.g. Notice of Violation, Stop Work Order), status (e.g. pending, resolved), and amount of any assessed penalties.

4.4.3 Schedule

- Ongoing, 2022–2027.

4.4.4 Annual Report Documentation

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

4.6 CERTIFICATION

4.6.1 Description

GESA requires all local government employees involved with plan review, site inspections, or E&S Ordinance enforcement, as well as construction site operators to undergo the applicable training seminars developed by the GSWCC. The City requires all construction site operators to provide evidence in their LDA Permit application that they have received the appropriate certification. Evidence of site personnel certification must also be produced during an inspection, upon request. The City also requires all applicable staff to receive this training as soon as possible after the start of their employment and maintain active certifications.

4.6.2 Measurable Goals

- Provide all City employees involved in the E&S Program with applicable E&S training and certification .
- Ensure all construction site operators with LDP permits have applicable E&S certification .

4.6.3 Schedule

- Ongoing, 2022-2027.

4.6.4 Annual Report Documentation

- Documentation of current GSWCC certifications held by MS4 staff.

5 HIGHLY VISIBLE POLLUTANT SOURCES (HVPS)

Permit Section 3.3.5: Highly Visible Pollutant Sources (HVPS), Table 3.3.5

5.1 HVPS FACILITY INVENTORY

5.1.1 Description

The City maintains an inventory of commercial businesses and facilities that are considered to be highly visible pollutant sources (HVPS). A copy of the City's most current HVPS inventory is provided in Appendix B. For the 2022 – 2027 permit period, the City considers the following types of businesses to be HVPS:

- Auto Repair/Maintenance Facilities
- Gas Stations
- Car Washes
- Landscape and Garden Related Businesses
- Trucking/ Warehousing Facilities (Not listed as Industrial)
- Manufacturing/Assembly Facilities (Not listed as Industrial)

The City's HVPS inventory is reviewed and updated each reporting period based on changes to the business license database.

5.1.2 Measurable Goals

- Update the HVPS Inventory each reporting period.

5.1.3 Schedule

- Each reporting period, 2022-2027.

5.1.4 Annual Report Documentation

- Updated HVPS Inventory.

5.2 HVPS STORMWATER INSPECTION PROGRAM

5.2.1 Description

The City of Garden City will inspect 100% of the facilities listed on the City's HVPS Inventory over the course of the five (5) year permit period (2022 – 2027), with a minimum of at least one HVPS inspection conducted each reporting period. If more than five (5) HVPS facilities are listed on the City's inventory, the City will inspect a minimum of 5% of the HVPS facilities each year.

A City inspector will visit the HVPS site and assess the condition and presence of stormwater pollutants onsite. City staff will inspect the site for evidence of stormwater pollution in the following areas and determine if there is any evidence of an illicit discharge:

- Areas around machinery and/or equipment
- Areas prone to leaks and spills
- Outdoor storage and handling areas
- Waste generation, storage, treatment, and disposal areas
- Vehicle wash-down areas
- Fueling areas
- Loading and unloading areas

The following procedures will be followed during HVPS inspections and as follow-up to the inspections:

- All HVPS inspections will be documented. HVPS inspections will typically be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer. For City staff that do not have the field collection application available and/or in situations when a field collection application cannot be used for other reasons, a paper copy version of the HVPS inspection checklist may be used to record the inspections. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist is provided in Appendix D.
- Educational literature, including literature about proper waste management and disposal and other relevant topics, may be supplied at the time of the site inspection or as part of the follow-up to the site inspection if needed.
- Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the industry or business, and provide them with a copy of the inspection checklist and/or written notification of the issue if deemed necessary. The City may request follow-up documentation and/or perform a re-inspection to ensure that all necessary corrections were made if deemed necessary.
- Enforcement of any identified illicit discharges will be handled in accordance with the

City's Illicit Discharge prohibition in the Stormwater Management Ordinance, IDDE, and ERP.

- If the violation is not corrected, the EPD may be notified of the problem. The City will also notify the EPD if assistance is needed for enforcement or if there is a threat to Waters of the State. The City may, during the investigation of a violation of the City's IDDE Ordinance, complete or require monitoring of a suspected HVPS, in order to secure evidence to support the alleged violation.
- The City will maintain records of inspections results, problems found, and actions taken.

5.2.2 Measurable Goal

- Inspect 100% of HVPS facilities in the City's inventory over the 5-year permit period. Inspect at least one HVPS site each reporting period, or, if there are more than five sites listed on the City's inventory, inspect at least 5% of the HVPS facilities in the inventory each reporting period.
- Document site inspections and recommended corrective actions/violations.
- Enforce the Stormwater Management Ordinance, IDDE, and ERP as needed.

5.2.3 Schedule

- Each reporting period, 2022 – 2027.

5.2.4 Annual Report Documentation

- The total number of HVPS facilities and the number and percentage of inspections conducted during the reporting period.
- Documentation of inspections, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed site inspection checklist for each HVPS facility inspected during the reporting period and any available follow-up documentation.

5.3 ENFORCEMENT PROCEDURES

5.3.1 Description

If an illicit discharge is identified during an HVPS site inspection, the City will initiate enforcement procedures as outlined in the City's Enforcement Response Plan (Appendix F) and maintain documentation.

If an illicit discharge has not taken place but practices onsite indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection and recommend corrective actions to address the potential issue. The City will also make the owner/operator aware of the Georgia Stormwater Management Manual and the Coastal Stormwater Supplement, which address pollution prevention and good housekeeping practices.

5.3.2 Measurable Goal

- Implement enforcement procedures for violations noted during HVPS inspections.
- Document enforcement actions taken in violation/enforcement action log and/or other appropriate written documentation (letter to facility, copy of warning and/or Notice of Violation, etc.).

5.3.3 Schedule

- Ongoing, 2022 – 2027: Take enforcement procedures, as needed and appropriate.

5.3.4 Annual Report Documentation

- Documentation of enforcement actions taken on HVPS sites during the reporting period.

5.4 EDUCATIONAL ACTIVITIES

5.4.1 Description

The City's website maintains stormwater information to inform business owners/operators how to control stormwater pollution according to their specific commercial activities. In addition, City staff distribute educational materials during HVPS inspections as needed.

5.4.2 Measurable Goal(s)

- Maintain HVPS educational material on City website.
- Distribute HVPS educational material during facility inspections as needed.

5.4.3 Schedule

- Ongoing, 2022 – 2027: Maintain educational materials on website.
- As needed, 2022 – 2027: Distribute educational materials during HVPS inspections.

5.4.4 Annual Report Documentation

- Copy of educational material distributed during HVPS inspections.
- Weblink for HVPS educational materials.

6 ENFORCEMENT RESPONSE PLAN (ERP)

Permit Section 3.3.6: Enforcement Response Plan (ERP)

6.1 ERP IMPLEMENTATION

6.1.1 Description

The City's Enforcement Response Plan (ERP) describes the actions taken for violations associated with the NPDES Permit and the SWMP. The ERP, a copy of which is located in Appendix F, details the City's responses to any noted stormwater violations, including escalating enforcement responses to address repeat and continuing violations. The plan details the ordinances providing legal authority, types of enforcement mechanisms available, escalation of enforcement, time frames for investigation, and the method to be used to track instances of non-compliance. Garden City performed a comprehensive update of the ERP in December 2020 that was reviewed and approved by EPD in 2021, and the ERP was updated again in June 2023.

The City will review the ERP each reporting period and revise, as necessary. If the ERP is revised, the City will submit it to EPD for review.

6.1.2 Measurable Goal

- Review the ERP each reporting period and update as needed.
- Take enforcement actions, as needed and appropriate.

6.1.3 Schedule

- Ongoing, 2022 – 2027: Take enforcement actions, as needed and appropriate.
- Each reporting period, 2022 – 2027: Review and update ERP, if necessary.

6.1.4 Annual Report Documentation

- Copy of ERP if revised during the reporting period.

7 MONITORING FOR DISCHARGES TO IMPAIRED WATERS

Permit Section 3.3.7: Impaired Waters

7.1 IMPAIRED WATERS PLAN

7.1.1 Description

Garden City has identified the impaired waters and pollutants of concern (POC) located within its jurisdiction using the latest approved Georgia 305(b)/303(d) List of Waters. The City has developed an Impaired Waters Plan (IWP) addressing each POC and checks whether an impaired waterbody within its jurisdiction has been added to the latest 305(b)/303(d) list. The Plan, a copy of which is included in Appendix G, also includes:

- Sample locations, whether samples are collected instream (i.e., upstream and downstream), from outfalls during wet weather events, or a combination of both locations.;
- Sample type, frequency, and any seasonal considerations;
- Monitoring implementation schedule for each POC;
- 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, or a schedule for confirming the location of these outfalls; and
- Description of proposed BMPs to be used to control and reduce the POCs and a schedule for implementation of these BMPs.

There are currently two stream segments within the City of Garden City that are currently identified on the 2022 Georgia 305(b)/303(d) list for impaired stream segments, as shown in the table below:

TABLE 2. 2022 305(B)/303(D) LIST OF WATERS – NOT SUPPORTING

| Reach Name & Location | Water Use Classification | Criterion Violated | Potential Cause | TMDL Established |
|--|--------------------------|--------------------|--|------------------|
| Pipemakers Canal (upstream of Dean Forest Road to Savannah River) | Fishing | FC | Urban Runoff | Yes (2016) |
| Salt Creek (bend one mile upstream US 17 to Hardin Canal) | Fishing | FC | Nonpoint Source & Urban Runoff | Yes (2016) |
| Salt Creek (Headwaters to Bend 1 mile upstream US 17) | Fishing | DO | Municipal Point Source & Nonpoint Source | No |

The City has water quality monitoring protocol in its IWP as well as BMPs to address fecal coliform and dissolved oxygen impairments. For more information regarding BMPs designed to address water quality impairments, please see the IWP in Appendix G.

The City will perform water quality monitoring as summarized in Section 4 of the City's IWP and analyze the results each reporting period. The City will compare the results to the EPD established criteria for dissolved oxygen and identify any events where water quality did not meet EPD standards. Over the course of this program, the City will attempt to identify water quality trends and potential sources of any water quality impairments or improvements with respect to fecal coliform and dissolved oxygen levels. The City will also perform an assessment to determine the effectiveness of the BMPs employed and what, if any, adaptive BMP measures may be necessary to return the water to compliance with State water quality standards. These analyses will be submitted each reporting period with the City's NPDES Phase I MS4 annual report.

The City will also review Georgia EPD's updated 305(b)/303(d) list each reporting period for waters not supporting their designated use within the jurisdiction. For newly listed waters, the City will propose an update to the IWP for the POC and submit a revised copy of the document to EPD for approval.

7.1.2 Measurable Goal

- Implement IWP.
- Review 305(b)/303(d) list, and update IWP, if necessary.
- Perform assessment of data trends over time for each POC, including a written evaluation on whether water quality is improving, declining, fluctuating, or remaining constant.

- Perform assessment to determine the effectiveness of the BMPs employed and what, if any, adaptive BMP measures may be necessary to return the water to compliance with State water quality standards

7.1.3 Schedule

- Each reporting period, 2022 – 2027.

7.1.4 Annual Report Documentation

- Copy of monitoring data.
- Assessment of data trends.
- Assessment of BMP strategies.
- Copy of updated Plan (if required to revise).

8 MUNICIPAL EMPLOYEE TRAINING

8.1 MUNICIPAL EMPLOYEE TRAINING PROGRAM

8.1.2 Description

The City of Garden City will conduct employee training each reporting period for employees responsible for implementation of the SWMP. Training may be provided via PowerPoint presentations or videos or, alternatively, the City may send employees offsite to an applicable training course. City employees will be trained during each permit period on stormwater topics that are necessary for that employee to do their job, including such topics as good housekeeping, IDDE, industrial and HVPs inspections, E&S inspections, Green Infrastructure/Low Impact Development (GI/LID) and/or pollution prevention procedures. The City will keep records of the training including the training agenda and/or materials, training date(s), as well as a list of attendees.

8.1.3 Measurable Goals

- Provide stormwater training for applicable employees each reporting period.
- Document stormwater training activities.

8.1.4 Schedule

- Each reporting period, 2022-2027.

8.1.5 Annual Report Documentation

- Documentation of training activities, including a summary of training materials or training agenda.
- Copy of sign-in sheets or other documentation showing the name and number of training attendees and the date of training.

9 PUBLIC EDUCATION

Permit Section 3.3.9: Public Education

9.1 WATER UTILITY BILL HEADER/INSERT

9.1.1 Description

In order to reach the widest audience possible, the City will include educational information on stormwater issues in at least one water utility bill during each reporting period that reaches all City customers. The City may opt to include a utility bill stuffer/insert or to put an educational message in the utility bill header. Educational topics may include:

- Advertising the link to the City's Stormwater Webpage
- Information about citizen involvement opportunities
- Nonpoint source pollution and its impact on waterways and wildlife
- Information about how to report illicit discharges and illegal dumping
- Tips to prevent stormwater pollution & illicit discharges and properly manage wastes, such as information about litter reduction; pet waste management; and disposal of fats, oils & greases
- Green Infrastructure / Low Impact Development Techniques
- Proper application practices for pesticides, fertilizers, and herbicides
- Good housekeeping practices for commercial establishments
- Septic tank system maintenance

9.1.2 Measurable Goals

- Include educational message or educational insert in the City's water utility bills.

9.1.3 Schedule

- Each reporting period, 2022-2027.

9.1.4 Annual Report Documentation

- Copy of the water utility bill with educational message or a copy of the educational insert and the month and year of distribution.

9.2 PUBLIC EDUCATION OUTREACH

9.2.1 Description

The City of Garden City has developed a comprehensive public stormwater education program to educate citizens and business owners about the importance of stormwater pollution prevention. Educational activities include, but are not limited to, distributing educational brochure and fliers at City Hall and City outreach events, social media postings, sending educational “blasts” through the City’s website, and publishing educational information in the local newspaper.

The City will conduct at least one dedicated public stormwater educational outreach activity from the list below in Section 9.2.2 each reporting period to educate the public about stormwater topics and maintain documentation of the event. This may include information about the educational topics listed above in Section 9.1.1 of this Plan or other relevant stormwater topics selected by the City.

9.2.2 Measurable Goals

Perform at least one of the following educational outreach activities each reporting period:

- a. Stock educational brochure(s) at City Hall for citizen pickup.
- b. Distribute educational brochures at City events, such as festivals, the Housing Fair, and other public events.
- c. Social media posting and/or copy of the information that was posted via social media.
- d. Send educational “blast” to citizens through City website, or
- e. Publish an educational insert in a local newspaper.

9.2.3 Schedule

- Each reporting period, 2022-2027.

9.2.4 Annual Report Documentation

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

- a. Tracking database showing the name and number of educational brochure(s) distributed at City Hall and a copy of the brochure/flier.
- b. Tracking database showing the name and number of educational brochure(s) distributed at a public City event and a copy of the brochure/flier.
- c. Screenshot of the social media posting and/or copy of the information that was posted via social media.
- d. Screenshot or copy of educational “blast” sent to citizens through City website, or
- e. Copy and date of educational insert published in newspaper.

9.3 STORMWATER WEBPAGE

9.3.1 Description

The City maintains a website for disseminating information to the public. The City currently has three stormwater webpages that are linked to the City's main website. Stormwater webpages include: 1) The Basics of Stormwater 2) Citizen Stormwater Information and 3) Stormwater Program Elements. The stormwater webpages may be accessed from <https://www.gardencity-ga.gov/city-government/public-works/department-of-public-works>.

The City's stormwater webpages include information on stormwater issues and stormwater pollution prevention as well as links to educational brochures and programs intended to protect water quality. Illicit Discharges and other stormwater concerns can also be reported via a link or telephone number listed on the "Citizen Stormwater Information" page, and a copy of the City's most recent SWMP and Stormwater Annual Report are posted on the "Stormwater Program Elements" webpage.

The City will update at least one of its stormwater webpages each reporting period to provide new stormwater-related information and links as necessary. The City will also monitor "hits" to determine how many people visit the webpages each year.

9.3.2 Measurable Goals

- Update stormwater webpage each reporting period.
- Record the number of webpage hits using a tracker, such as Google Analytics or other comparable counting mechanism.

9.3.3 Schedule

- Each reporting period, 2022-2027.

9.3.4 Annual Report Documentation

- Screenshot of updated webpage.
- Number of webpage views.

10 PUBLIC INVOLVEMENT PROGRAM

Permit Section 3.3.10: Public Involvement

10.1 CITIZEN HOTLINE

10.1.1 Description

The City will maintain a Citizen Hotline so that the public can ask questions about stormwater issues and report stormwater and illicit discharge complaints, including illicit discharge complaints. The City's main website has a link to the City's Service Request Page for reporting "Issues or Concerns" electronically at <http://www.gardencity-ga.gov/i-want-to/submit-service-request>. Illicit Discharges and other stormwater concerns can also be reported via a link on the Citizen Stormwater Information page at <http://www.gardencity-ga.gov/city-government/public-works/citizen-stormwater-information>. This webpage also lists the telephone number for the Public Works Department to allow citizens to report stormwater issues by phone and ask questions.

The City of Garden City has established procedures for addressing citizen complaints about water quality and reports of illicit discharges/illegal dumping. Every time a request for Public Works service is made, a "Service Request" is generated. This builds a computerized record of all requests made. A "work order" is created each time a work crew or individual is assigned a task either because of service requests, pre-planned maintenance projects, or by other situations as they arise. Work orders are considered "open" until the employee / crew physically completes the task in the field. Task are typically completed within three (3) to five (5) business days of initial complaint receipt, and issues that pose a more urgent threat to water quality are prioritized for earlier investigation and follow-up. Work Orders are tracked by the Public Works foreman to ensure completion, submitted to Public Works administrative employee(s) for recordkeeping, and verified by the Public Works Director during the monthly report compilation.

10.1.2 Measurable Goal

- Maintain Citizen Hotline.
- Investigate 100% of all water quality complaints received and take appropriate action.
- Record IDDE complaints and actions taken in the City's Work Order Database.

10.1.3 Schedule

- Ongoing, 2022 – 2027.

10.1.4 Annual Report Documentation

- Screenshot of stormwater webpage advertising the Citizen Hotline.
- Documentation of citizen complaints, investigations, actions taken during the reporting period, and status.

10.2 PUBLIC INVOLVEMENT OUTREACH

10.2.1 Description

The City of Garden City provides many opportunities to solicit citizen input and encourage the public to help protect stormwater quality and reduce nonpoint source pollution through City events and participation in community programs. For example, the City hosts its own City events, such as the Housing Fair, and participates in other community events such as Bring One for the Chipper and native plant sales that are open to Garden City residents.

The City will conduct at least one dedicated public stormwater involvement outreach activity from the list below in Section 10.2.2 each reporting period. The City will advertise the event through the City's website, social media, or other methods, and maintain documentation that the event was held.

10.2.2 Measurable Goal

Perform at least one of the following public involvement outreach activities each reporting period:

- a. Operate a recycling / waste collection event (for hard-to-recycle items such as printer ink cartridges and/or batteries, etc.) at a City-sponsored event open to the general public or at City Hall
- b. Participate in a "Bring One for the Chipper" event to encourage City residents to properly dispose of Christmas trees by bringing them to a dedicated location to be chipped and recycled into mulch, or
- c. Participate in a Native Plant Sale to encourage City residents to plant native vegetation and reduce water use.

10.2.3 Schedule

- Each reporting period, 2022-2027.

10.2.4 Annual Report Documentation

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

- a. Documentation of the event advertisement to Garden City residents (such as a screenshot and/or copy of the press release or event flier) and proof that the event was held (such as photographs, the quantity of wastes/recyclables collected at the event, landfill receipt, etc.)
- b. Documentation of the event advertisement to Garden City residents (such as a screenshot and/or copy of the press release or event flier) and proof that the event was held (such as photographs and/or copy of the statewide drop-off location database from Keep Georgia Beautiful Foundation), or
- c. Documentation of the event advertisement to Garden City residents (such as a screenshot and/or copy of the press release or event flier) and proof that the event was held (such as photographs, sign-in sheet, etc.).

10.3 CLEAN-UP EVENT

10.3.1 Description

The City of Garden City will organize a clean-up event each year within the City to remove trash and debris from local roads and/or waterways and invite the general public. The City may coordinate this event through the Garden City Day-of-Service monthly events or in conjunction with other events such as Great American Cleanup, Adopt-A-Stream's Rivers Alive event, or other events. The City will advertise the event through the City's website, social media, or other methods, and maintain documentation that the event was held.

10.3.2 Measurable Goals

- Hold one clean up event each reporting period within the City of Garden City.

10.3.3 Schedule

- Each reporting period, 2022 – 2027.

10.3.4 Annual Report Documentation

- Documentation of the event advertisement to Garden City residents (such as a screenshot and/or copy of the press release or event flier).
- Proof that the event was held (such as photographs, the quantity of wastes/recyclables collected at the event, landfill receipt, etc.).

10 POST CONSTRUCTION

Permit Section 3.3.11: Post Construction

11.1 POST CONSTRUCTION STORMWATER CONTROLS

11.1.1 Description

The City of Garden City has established adequate legal authority through the City's Code of Ordinances, [Chapter 30 – Environment; Article V: Stormwater Management](#) and the Garden City Stormwater Management Local Design Manual (LDM) to address stormwater runoff into the MS4 from new development and redevelopment projects, ensure controls are in place to prevent or minimize water quality impacts, and pursue enforcement. A copy of the City's Stormwater Management Ordinance (updated in August 2011) and LDM (updated in June 2023) are provided in Appendix B.

The City's Stormwater Management Ordinance and accompanying LDM requires the use of post-construction stormwater management and site planning and design criteria to protect stormwater from negative impacts associated with land development, including the stormwater design criteria established in the Coastal Stormwater Supplement (CSS) to the Georgia Stormwater Management Manual (GSMM). The design criteria and performance standards listed in the City's Ordinance and LDM are consistent with the latest version of the GSMM and CSS, and the requirements of Section 3.3.11(a)(2) of the City's MS4 permit. The Ordinance and LDM apply to new development and redevelopment that creates or adds more than 5,000 square feet of impervious surface or that involves land disturbing activities of 1 acre or more, including projects less than 1 acre if they are part of a larger common plan of development or sale.

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

The City will continue to review its Stormwater Management Ordinance each reporting period and revise it as needed to ensure appropriate post-construction stormwater controls are in place. If revisions are made to the City's Ordinance, the City will also ensure the LDM is revised accordingly if needed.

11.1.2 Measurable Goal

- Enforce the use of the Post Construction Runoff Control requirements in the City's Stormwater Management Ordinance and LDM for applicable development and redevelopment.
- Each reporting period evaluate the Stormwater Management Ordinance for post-construction runoff control requirements to determine if revisions are required.
- Update the Ordinance and LDM, if required.
- If and when needed, develop linear project feasibility program to apply to future linear projects.

11.1.3 Schedule

- Ongoing, 2022 – 2027: Enforce the [Stormwater Management Ordinance](#) and LDM.
- Each reporting period, 2022 – 2027: Review and update Ordinance if necessary.

11.1.4 Annual Report Documentation

- Updated Stormwater Management Ordinance and LDM, if revised during the reporting period.
- If developed, linear project feasibility program.

11.2 GREEN INFRASTRUCTURE/LOW IMPACT DEVELOPMENT (GI/LID)

Permit Section 3.3.11: Post-Construction, Table 3.3.11(b)

11.2.1. Legal Authority

11.2.1.A. Description

The City of Garden City performed a comprehensive assessment of its existing codes in 2012 to determine if there were any codes that presented an obstacle to use of GI/LID practices for stormwater management. The City utilized the Code and Ordinance Worksheet developed by the Center for Watershed Protection (CWP), and a copy of the Assessment is provided in Appendix H. Each reporting period, reviews were conducted thereafter as required by the City's permit.

For the 2022-2027 permit period, the City will review and revise each reporting period, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration, and document the assessment. The City will assess those regulations governing residential and commercial development, road design, land use, and parking requirements. During the regulatory review, the City will also consider the inclusion of incentives for use of GI/LID practices into the ordinance. The City will perform a comprehensive review of building codes, ordinance, and other applicable regulations at least once during the 2022-2027 permit period using the Code and Ordinance Worksheet developed by the CWP, the Water Quality Scorecard developed by the Environmental Protection Agency (EPA) or another comprehensive code evaluation tool.

11.2.1.B. Measurable Goals

- Each reporting period review City ordinances, building codes, and other regulations to determine if they impede GI/LID approaches. At least once during 2022-2027, perform comprehensive review using the CWP's Code and Ordinance Worksheet, EPA Scorecard, or another comprehensive code evaluation tool.
- Document the review.

11.2.1.C. Schedule

- Each reporting period, 2022 – 2027.

11.2.1.D. Annual Report Documentation

- Copies of any updated code(s), if revisions were made.
- Documentation of the regulatory review.

11.2.2. GI/LID Program

11.2.2.A. Description

The City has developed and implemented a GI/LID Plan that addresses procedures for evaluating the feasibility and site applicability of different GI/LID techniques, allowable GI/LID structures, and procedures for the inspection and maintenance of the GI/LID structures.

Revisions to the City's GI/LID Plan were submitted to EPD during the former 2017-2022 permit period and approved by the EPD in April 2021. A copy of the City's most recently revised GI/LID Plan is included in Appendix H. The City will review the GI/LID Program each reporting period and make changes as needed.

11.2.2.B. Measurable Goals

- Implement the approved GI/LID Plan.
- Review the GI/LID Plan each reporting period and make updates as needed.

11.2.2.C. Schedule

- Ongoing, 2022-2027: Implement GI/LID Plan.
- Each reporting period, 2022-2027: Review GI/LID Plan, and update as needed.

11.2.2.D. Annual Report Documentation

- Copy of updated GI/LID Plan, if revised.

11.2.3. GI/LID Structure Inventory

11.2.3.A. Description

The City has developed an inventory of water quality-related GI/LID structures. A copy of the City's GI/LID Inventory is provided in the GI/LID Plan in Appendix H. Garden City considers the following structures to be GI/LID structures:

- Bioretention Areas / Rain Gardens
- Dry Enhanced Swale (Bioswale)
- Green Roofs
- Rainwater Harvesting
- Vegetated Filter Strip
- Permeable pavement (pervious concrete, porous asphalt, concrete grid pavers, permeable interlocking pavers, plastic grid pavers, etc.)

Ownership categories listed on the inventory include:

- 1) City-owned structures and/or structures that are the operational responsibility of the City;
- 2) Structures that are owned by a public entity other than the City (such as the Board of Education and other entities not covered by an NPDES permit); and
- 3) Privately-owned, non-residential GI/LID structures constructed after April 12, 2022.

New GI/LID structures added during new development/redevelopment will be identified through the site plan development process, and the City will update the GI/LID inventory during each reporting period if new structures were added. The City will also ensure that maintenance agreements are executed for all new non-permittee owned structures constructed after the effective date of the City's current permit (April 12, 2022).

11.2.3.B. Measurable Goals

- Identify new GI/LID structures during site plan review.
- Update inventory with new GI/LID structures, if needed.
- Ensure maintenance agreements are executed for all new non-permittee owned GI/LID structures constructed after April 12, 2022.

11.2.3.C. Schedule

- Each reporting period, 2022 – 2027.

11.2.3.D. Annual Report Documentation

- Copy of most updated GI/LID Inventory, including the type, ownership, and total number of structures.

11.2.4. Inspection and Maintenance Program

11.2.4.A. Description

Inspections

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

Inspections will be documented using the inspection sheets included within the City's GI/LID Plan (Appendix H) or through a field collection application that is downloaded on City-owned smart phones and/or tablets and recorded within the City's GIS layer. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and copies of paper inspection checklists (contained within the GI/LID Plan) are provided in Appendix D and H, respectively.

Maintenance

In order to ensure that private, non-residential GI/LID structures and publicly-owned structures owned by other entities are maintained by their owner in accordance with the CSS, the City requires developers of GI/LID structures not owned by the City to complete an Inspection & Maintenance Agreement with the City, prior to the issuance of an LDA permit. The Inspection & Maintenance agreement and stormwater management design plan is approved by the City and recorded with the deed upon approval during the site plan review process. The Inspection & Maintenance Agreement, a model of which is included as an attachment to the GI/LID Plan in Appendix H, details the following information:

- The person(s) responsible for carrying out the inspection and maintenance.
- A maintenance schedule stating when and how often routine inspection and maintenance will occur.
- Plans for inspections each reporting period to ensure proper performance of the stormwater management system between scheduled maintenance.

The City will retain copies of maintenance agreements finalized after the effective date of the current permit (April 12, 2022) and develop a summary list of the new agreements. This list will also include any maintenance agreements that were obtained for GI/LID structures constructed in previous permit periods. The summary list will be reviewed and updated each reporting period.

During routine inspections, if the City staff determine that the owner is not properly maintaining their GI/LID structures, they will enforce the provisions of the Inspection & Maintenance Agreement and the Stormwater Management Ordinance.

11.2.4.B. Measurable Goals

- Inspect 100% of inventoried structures every 5 years, with at least one structure inspected each reporting period. If there are more than five (5) structures on the inventory, 5% of the structures will be inspected each reporting period.
- Document inspections on the City’s approved inspection checklists.
- Conduct maintenance of City-owned structures as needed.
- Ensure maintenance of structures not owned by the City is conducted in accordance with the Inspection & Maintenance Agreement.
- Enforce provisions of the Inspection & Maintenance Agreement and the Stormwater Management Ordinance.
- Retain copies of new maintenance agreements and maintain/update a summary list of maintenance agreements.

11.2.4.C. Schedule

- Each reporting period, 2022-2027.
- As needed, 2022-2027: Maintenance

11.2.4.D. Annual Report Documentation

- Number and percentage of GI/LID structures inspected and maintained during the reporting period.
- Documentation of inspections conducted, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed inspection checklist for each structure inspected during the reporting period.
- Documentation of any maintenance and/or enforcement activities conducted to address issues identified during the GI/LID inspections.
- Updated summary list of Inspection & Maintenance Agreements.