



CITY OF COVINGTON, GA
**Stormwater Management
Program (SWMP)**

**NPDES Permit No. GAG610000
for Small Municipal Separate
Storm Sewer Systems (MS4)
2022-2027**

PREPARED FOR:

The City of Covington



PREPARED BY:



GWES Project No.: 060.16.6.23
May 31, 2023

STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Storm Water Management Program (SWMP)

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

1. General Information

- A. Name of small MS4: City of Covington
- B. Name of responsible official: Steve Horton
Title: Mayor
Mailing Address: 2194 Emory Street
City: Covington State: GA Zip Code: 30015
Telephone Number: 770-385-2000
- C. Designated stormwater management program contact:
Name: Mike Willis
Title: Engineering Manager
Mailing Address: 2194 Emory Street
City: Covington State: GA Zip Code: 30015
Telephone Number: 678-372-6777
Email Address: mwillis@cityofcovington.org
- D. Provide the river basin(s) to which your MS4 discharges:
1. Dried Indian Creek-Yellow River
(030701030502)
2. Wrights Creek-Alcovy River (030701030801)
- E. Provide the latitude and longitude of the MS4 center (e.g. City Hall, County offices, MS4 mailing address) using Global Positioning System (GPS) –WG 84:
Latitude: 33.599594 Longitude: -83.862905
- F. Provide the date that the municipality received Phase II MS4 designation:
2007

2. Sharing Responsibility

- A. Has another entity agreed to implement a control measure on your behalf? Yes X
_____No (See Appendix A)

Control Measure #1:

1. Name of entity: Keep Covington/Newton Beautiful (KCNB)
2. Control measure or component of control measure to be implemented by entity on your behalf:
Public Education and Outreach-Educational Outreach Programs

Control Measure #2:

1. Name of entity: KCNB
2. Control measure or component of control measure to be implemented by entity on your behalf: Public Involvement and Participation

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

3. Minimum Control Measures

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

4. Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly

responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: Steve Horton Date: 5/31/2023

Signature: Steve Horton Title: Mayor

TABLE OF CONTENTS

1. Georgia Environmental Protection Division Review of 22-27 SWMP
 - A. Review letter with EPD Comments
 - B. Review Letter with City Comments
 - C. EPD Approval Letter

2. BMP 1: Public Education and Outreach, Table 4.2.1 (a) of the Permit
 - A. BMP #A1 – Enviroscope
 - B. BMP #A2 – Seymore Green Puppet Show
 - C. BMP #A3 – Community Presentations and Exhibits
 - D. BMP #A4 – Maintenance and Update of Stormwater Website

3. BMP 2: Public Involvement/Participation, Table 4.2.2 (a) of the Permit
 - A. BMP #B1 – Amnesty Day
 - B. BMP #B2 – Great American Cleanup
 - C. BMP #B3 – Rivers Alive
 - D. BMP #B4 – Adopt-A-Mile

4. BMP 3: Illicit Discharge Detection and Elimination, Table 4.2.3 (a) of the Permit
 - A. BMP #C1 – Legal Authority
 - B. BMP #C2 – Outfall Map and Inventory
 - C. BMP #C3 – IDDE Plan
 - D. BMP #C4 – Education
 - E. BMP #C5 – Complaint Response
 - F. BMP #C6 – Industrial Inspection and Education Program
 - G. BMP #C7 – Highly Visible Pollutant Sources (HVPS) Business Inspection and Education Program

5. BMP 4: Construction Site Stormwater Runoff Control, Table 4.2.4 (a) of the Permit
 - A. BMP #D1 – Legal Authority
 - B. BMP #D2 – Site Plan Review Procedures
 - C. BMP #D3 – Inspection Program
 - D. BMP #D4 – Enforcement Procedures
 - E. BMP #D5 – Complaint Response
 - F. BMP #D6 – Certification

6. BMP 5: Post Construction Stormwater Management, Table 4.2.5 (a) of the Permit
 - A. BMP #E1 – Legal Authority
 - B. BMP #E2 – Inventory
 - C. BMP #E3 – Inspection Program
 - D. BMP #E4 – Maintenance Program
 - E. BMP #E5 – GI/LID Program
 - F. BMP #E6 – GI/LID Structure Inventory
 - G. BMP #E7 – GI/LID Structure Inspection Program
 - H. BMP #E8 – GI/LID Structure Maintenance Program
 - I. BMP #E9 – GI/LID Ordinance Review

7. BMP 6: Pollution Prevention/Good Housekeeping for Municipal Operations, Table 4.2.6 (a) of the Permit.
 - A. BMP #F1 – MS4 Control Structure Inventory and Map
 - B. BMP #F2 – MS4 Inspection Program
 - C. BMP #F3 – MS4 Maintenance Program
 - D. BMP #F4 – Street Sweeping and Parking Lot Cleaning
 - E. BMP #F5 – Employee Training
 - F. BMP #F6 – Waste Disposal
 - G. BMP #F7 – New Flood Management Projects
 - H. BMP #F8 – Existing Flood Management Projects
 - I. BMP #F9 – Municipal Facilities

APPENDICIES

Appendix A	Intergovernmental Agreements
Appendix B	Illicit Discharge Ordinance
Appendix C	Outfall Map and Inventory
Appendix D	Illicit Discharge Detection and Elimination Plan
Appendix E	Enforcement Response Plan
Appendix F	Outfall Inspection Form
Appendix G	Notice of Stormwater Violation Letter Template
Appendix H	IDDE Educational Program Materials
Appendix I	Industry Inspection and Education Program
Appendix J	Highly Visible Pollutant Source Inspection and Education

Appendix K	Soil Erosion, Sedimentation, and Pollution Control Ordinance
Appendix L	Site Plan Review and Construction Site Management
Appendix M	E&S Complaint Response Procedures
Appendix N	Certifications
Appendix O	Post Construction Stormwater Management Ordinance
Appendix P	Post Construction Stormwater Management Inventory
Appendix Q	MS4 Operations and Maintenance Procedures
Appendix R	GI/LID Program
Appendix S	Employee Training Procedures
Appendix T	Impaired Waters Plan
Appendix U	Municipal Facilities

For access to appendices please send a request in writing to engineering@cityofcovington.org. Please reference the specific appendix requested.

September 18, 2024

Honorable Steve Horton, Mayor
City of Covington
2194 Emory Street
Covington, GA, 30014

RE- Phase II Municipal Separate Storm Sewer
System
NPDES Permit No. GAG610000
2023 Stormwater Management Program

Dear Mayor Horton:

Georgia Environmental Protection Division (EPD) re-issued NPDES Permit No. GAG610000 (permit) on November 21, 2022 with an effective date of December 6, 2022. The permit required the submittal of a Stormwater Management Program (SWMP) within 180 days of permit re-issuance, by June 4, 2023. The City of Covington's (City) SWMP was postmarked on June 2, 2023. Revisions are required before we can determine that the SWMP is acceptable. Our comments are summarized on the attached pages.

The additional information should be submitted for our review by November 1, 2024. Thank you for your cooperation in this matter. If you have any questions, please contact me at 470-607-2604 or hailey.rinehart@dnr.ga.gov.

Sincerely,



Hailey Rinehart
Environmental Compliance Specialist
Municipal Stormwater Team

Cc: Hunter Little, Stormwater Permit Contact

**EPD COMMENTS
CITY OF COVINGTON**

Table 4.2.1(a) Public Education

1. The City has a total of 6 BMPs for this section. Having more than 4 BMPs is not required, but this is perfectly acceptable. This comment is included to ensure that the City understands they do not have to undertake any additional work if they do not want to implement and document all 6 BMPs. If the City wishes to only be responsible for 4 BMPs, the City should delete 2 BMPs from the SWMP or, if they want to retain more than 4 options, then include 2 BMPs as alternative options under 1 BMP heading.

Table 4.2.3(a) Illicit Discharge Detection and Elimination

1. The City included two extra BMPs titled, “BMP #C6- Industry and Education Program” and “BMP #C7- Highly Visible Pollutant Source (HVPS) Business Inspection and Education Program”. If the City wishes to inventory and inspect industrial facilities/sites and commercial facilities it may, but it is not required by the permit for the City to do so. If the City wishes to keep this BMP to help “identify illicit discharges,” please make sure it refers to section 4.2.3.6 in the permit as failure to fully implement the additional BMP may be considered permit noncompliance.

Table 4.2.5(a) Post-Construction Stormwater Management

1. BMP #6- Please submit an inventory for GI/LID structures if applicable.

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

1. BMP #1- Please include inventories and map(s) for the MS4 structures: Catch basins, storm drain lines, ditches, and ponds/underground detention.
2. BMP #3- The City should be aware that they may need to apply for a City-wide stream buffer variance to do maintenance work on their MS4 when it occurs within a stream buffer. Additional information can be found at:
<https://epd.georgia.gov/watershed-protection-branch/erosion-and-sedimentation>.
Contact EPD's Watershed Protection Branch, Nonpoint Source Program, Erosion and Sedimentation Unit if there are additional questions.
3. BMP #9- Please provide the inventory for municipal facilities (with the potential to cause pollution). Also please add that “at a minimum, the permittee will conduct inspections on 5% of the municipal facilities annually,” if there are more than 5 facilities in the City’s inventory and if there are fewer than 5 municipal facilities, then

EPD COMMENTS
CITY OF COVINGTON

at least one inspection must be conducted per reporting period (as of this review the City reports 7 facilities).

Impaired waters

1. Please update the MIP to identify that Bio F is the pollutant in Dried Indian Creek.



2194 EMORY STREET N.W. * P.O. Box 1527
COVINGTON, GEORGIA 30015

Phone: (770) 385-2000
Fax: (770) 385-2060

Fleeta Baggett - Mayor
E.F. (Tres) Thomas, III - City Manager

September 18, 2024

Hailey Rinehart
Environmental Compliance Specialist
Municipal Stormwater Team
Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1470A, East Tower
Atlanta, Georgia 30334
404-463-1511

RE- Phase II Municipal Separate Storm Sewer
System
NPDES Permit No. GAG610000
2023 Stormwater Management Program

Dear Mrs. Rinehart:

Georgia Environmental Protection Division (EPD) re-issued NPDES Permit No. GAG610000 (permit) on November 21, 2022 with an effective date of December 6, 2022. The permit required the submittal of a Stormwater Management Program (SWMP) within 180 days of permit re-issuance, by June 4, 2023. The City of Covington's (City) SWMP was postmarked on June 2, 2023. In response to the requested revision identified in the letter from you dated September 18, 2024, the City's formal response is provided on the attached pages, and supporting documents.

If you have any questions, please contact me at [470-607-2604](tel:470-607-2604) or hlittle@cityofcovington.org.

Sincerely,

Hunter Little
Engineering Technician II
Municipal Stormwater Team

Cc: Michael Willis, Engineering Department Manager
Tres Thomas, City Manager

Table 4.2.1(a) Public Education

1. The city has a total of 6 BMPs for this section. Having more than 4 BMPs is not required, but this is perfectly acceptable. This comment is included to ensure that the city understands they do not have to undertake any additional work if they do not want to implement and document all 6 BMPs. If the City wishes to only be responsible for 4 BMPs, the city should delete 2 BMPs from the SWMP or, if they want to retain more than 4 options, then include 2 BMPs as alternative options under 1 BMP heading.

City Response:

Upon approval the City will remove the following BMPs from the SWMP; BMP #A2 – Learning Lab, and BMP #A6 – Video and or Television Ads. The city will continue reporting on the remaining BMPs beginning in the 2024 annual report.

Table 4.2.3(a) Illicit Discharge Detection and Elimination

1. The city included two extra BMPs titled, “BMP #C6- Industry and Education Program” and “BMP #C7- Highly Visible Pollutant Source (HVPS) Business Inspection and Education Program”. If the City wishes to inventory and inspect industrial facilities/sites and commercial facilities it may, but it is not required by the permit for the city to do so. If the City wishes to keep this BMP to help “identify illicit discharges,” please make sure it refers to section 4.2.3.6 in the permit as failure to fully implement the additional BMP may be considered permit noncompliance.

City Response:

The inventory and inspection of industrial and commercial facilities can help identify illicit discharges and the potential for pollution in stormwater runoff from these facilities. To help eliminate the discharge of pollutants from these point sources the city finds it is in our best interest to continue administration of these BMPs. We have reviewed section 4.2.3.6 in the permit and feel our BMP policies and procedures are in compliance with the requirements outlined in the permit. The city will continue to submit inspection reporting year in our annual report under the applicable BMP.

Table 4.2.5(a) Post-Construction Stormwater Management

1. BMP #6- Please submit an inventory for GI/LID structures if applicable.

City Response:

The city has updated its inventory list of publicly-owned and privately-owned parcels that have implemented GI/LID BMPs as part of their overall post-construction stormwater management. This list has been labeled “Attachment A”, and attached to this document for review. The city will continue to update this list each reporting year in our annual report under the applicable BMP labeled “Appendix E5 – GI_LID Inventory”.

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

1. BMP #1- Please include inventories and map(s) for the MS4 structures: Catch basins, storm drain lines, ditches, and ponds/underground detention.

City Response:

The city has recently updated this inventory and map and provided this documentation in the City’s 2023 annual report submitted in January of 2024. A copy of the inventory list and map have been labeled “Attachment B” and attached to this document for review. The city will continue to update this list and map on an annual basis as new infrastructure is added. The city will provide the updated list and map each reporting year in our annual report under the applicable BMP labeled “Appendix F1 – MS4 Control Structure Inventory and Map”.

2. BMP #3- The city should be aware that they may need to apply for a City-wide stream buffer variance to do maintenance work on their MS4 when it occurs within a stream buffer. Additional information can be found at:
<https://epd.georgia.gov/watershed-protection-branch/erosion-and-sedimentation>.
Contact EPD’s Watershed Protection Branch, Nonpoint Source Program, Erosion and Sedimentation Unit if there are additional questions.

City Response:

The city has taken this under advisement and will coordinate with the Georgia EPD on the needs and approval of this variance.

3. BMP #9- Please provide the inventory for municipal facilities (with the potential to cause pollution). Also please add that “at a minimum, the permittee will conduct inspections on 5% of the municipal facilities annually,” if there are more than 5 facilities in the City’s inventory and if there are fewer than 5 municipal facilities, then

at least one inspection must be conducted per reporting period (as of this review the city reports 7 facilities).

City Response:

The city has updated the inventory and map of the municipal facilities. The city is unclear how it was determined the city reports 7 facilities. The city currently operates 4 facilities with a total of 11 post-construction BMPs. A comprehensive list of the facilities and BMPs contained at each facility has been labeled “Attachment C” and attached to this document for review. Being that the city operates only 4 municipal facilities, the city will continue to inspect 100% of its facilities each year. Inventory updates, maintenance and inspection reports will be provided each reporting year in our annual report under the applicable BMP labeled “Appendix F9 – Municipal Facilities”. Based on the City’s policies and procedures regarding this BMP, it is of the opinion there is no change needed to the SWMP as these actions will result in the city exceeding our measurable goals for each reporting year.

Impaired waters

1. Please update the MIP to identify that Bio F is the pollutant in Dried Indian Creek.

City Response:

The pollutant of concern (POC) for Dried Indian Creek is sediment caused by urban runoff and non-point source pollution. As a result, the impairment identified in the latest 350(b) 303(d) list of impaired waters for the applicable segment of Dried Indian Creek is Biota F (Biota Fish and Macroinvertebrates). The City’s Impaired Waters Plan has been revised to reflect the identified impairment. A copy of the revised Impaired Waters Plan has been labeled “Attachment D” and attached to this document for review. The city will incorporate the revised plan into its SWMP and include it in the reports provided each reporting year in our annual report under the applicable BMP labeled “Appendix G1 – Impaired Waters Plan & Sampling Results”.



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

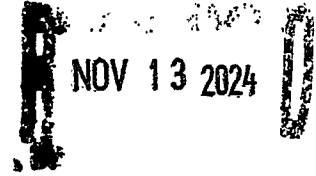
Jeffrey W. Cown, Director

Watershed Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1470A, East Tower
Atlanta, Georgia 30334
404-463-1511

November 6, 2024

Honorable Steve Horton, Mayor
City of Covington
2194 Emory Street
Covington, GA, 30014



RE: Phase II Municipal Separate Storm Sewer
System
NPDES Permit No. GAG610000
2023 Stormwater Management Program

Dear Mayor Evans:

In an email dated October 21, 2024, the Georgia Environmental Protection Division (EPD) received the City of Covington's (City) requested revisions to its 2023 Stormwater Management Program. Based on our review, we have determined that the update is acceptable.

In response to EPD's first comment for **Table 4.2.1(a) Public Education**, the EPD approves the removal of BMP #A2 and BMP #A6 from their SWMP. Please update the City's SWMP to reflect these changes.

Thank you for your cooperation in this matter. If you have any questions, please contact me at 470-607-2604 or hailey.rinehart@dnr.ga.gov.

Sincerely,

Hailey Rinehart
Environmental Compliance Specialist
Municipal Stormwater Team

Cc: Hunter Little, hlittle@cityofcovington.org (email only)

Stormwater Management Program
Public Education and Outreach on Storm Water Impacts

Table 4.2.1(a) of the Permit

A. BMP #A1-Enviroscape

1. Target audience: General Public - Children

2. Description of BMP: Enviroscape allows children to gain an understanding of their local government and learn about interesting topics dealing with ecological and biological components of land, streams and rivers, and lakes. The program will include stormwater/water quality management issues and adverse effects on physical and ecological habitat.

3. Measurable Goal(s): Enviroscape presentations will be made to 4th and 5th grade students in City of Covington schools annually. At least one presentation, per school, will be performed annually.

4. Documentation to be submitted with each Annual Report: Presentation Dates, Presentation Host School, Student Attendance Records for the Presentation

5. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): Hold Annual Event(s)
 - d. Month/Year of each action (if applicable): _____

6. Person (position) responsible for overall management and implementation of the BMP: KCNB

7. How you will determine whether this BMP is effective in reducing pollution to storm water in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the number of participants educated each year. By educating the students, this BMP should bring early awareness to the issues of the environment. This early awareness will perhaps lead to conscious efforts, by the participants, to protect the environment.

B. BMP #A2-Seymore Green Puppet Show

1. Target audience: General Public - Children

2. Description of BMP: KCNB coordinates the production of a new puppet show each year. All shows star Seymore Green, beloved raccoon mascot of KCNB. The puppet shows deliver important environmental messages such as litter and pollution prevention and the importance of recycling and conservation in a way that is fun and interesting to children.

3. Measurable Goal(s): This puppet show is being performed for all age groups. At least one presentation will be performed annually within the City of Covington's jurisdictional boundaries.

4. Documentation to be submitted with each Annual Report: Presentation Dates, Attendance Records for the Presentation

5. Schedule:
 - a. Interim Milestone Dates (if applicable): _____

 - b. Implementation Date (if applicable): 2007

 - c. Frequency of actions (if applicable): Hold Annual Event(s)

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

6. Person (position) responsible for overall management and implementation of the BMP: KCNB

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the number of participants educated each year. By educating the participants, this BMP should bring early awareness to the issues of the environment. This early awareness will perhaps lead to conscious efforts, by the participants, to protect the environment.

C. BMP #A3-Community Presentations and Exhibits

1. Target audience: General Public -Children
2. Description of BMP: KCNB provides exhibits and conducts community presentations, pertaining to stormwater, water quality or solid waste management, to various organizations throughout the year.
3. Measurable Goal(s): At least one community presentation will be held annually within the City of Covington's jurisdictional boundaries.
4. Documentation to be submitted with each Annual Report: Presentation Dates, Attendance Records for the Presentation
5. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): Hold Annual Event
 - d. Month/Year of each action (if applicable): _____
6. Person (position) responsible for overall management and implementation of the BMP: KCNB
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the number of participants educated each year. By educating the participants, this BMP should bring early awareness to the issues of the environment. This early awareness will perhaps lead to conscious efforts, by the participants, to protect the environment.

D. BMP #A4-Maintenance and Update of StormwaterWebsite

1. Target audience: GeneralPublic
2. Description of BMP: Maintenance and update of stormwater website. Stormwater regulations, related events, and tips will be reviewed on a semi- annual basis and updated as necessary.

City of Covington Stormwater Management Website

https://www.cityofcovington.org/index.php?section=stormwater_management3

KCNB Website

<https://cityofcovington.org/index.php?section=projects-module&projectsection=14&project=118>

3. Measurable Goal(s): The goal is to measure the number of hits that the website(s) receive annually.
4. Documentation to be submitted with each Annual Report: Copy of the number of hits received by the website(s).
5. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): Semi-annual updates
 - d. Month/Year of each action (if applicable): _____
6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: A website counter will allow the City to track the number of active hits on the Stormwater Management site. This count will show the number of citizens being reached by this particular information delivery method.

Public Involvement/Participation

Table 4.2.2 (a) of the Permit

A. BMP #B1-Amnesty Day

1. Target audience/stakeholder group: General Public
2. Description of BMP: Amnesty Day (Household Hazardous Waste (HHW) Collection and E-Cycle: KCNB), on behalf of the City and County, will facilitate an amnesty day for individuals in the community to dispose of household wastes such as used motor oil, paints, and solvents.
3. Measurable Goal(s): At least one advertisement will be placed on the KCNB website, City of Covington website or the local newspaper prior to the event. The amount of household hazardous waste presented for disposal will be documented.
4. Documentation to be submitted with each Annual Report: Tracking log of the amount of household hazardous waste received at the events, for the reporting period. A copy of the advertisement(s) will be included as documentation.
5. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): Hold Monthly Event
 - d. Month/Year of each action (if applicable): _____
6. Person (position) responsible for overall management and implementation of the BMP: KCNB
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP is related to the amount of household hazardous materials that is collected each month. An increase in collections could indicate that the public outreach methods are effective, and the target audience is being reached. A decrease could indicate that more effective public outreach is needed to inform the target audience of this event.

B. BMP #B2 – Great American Cleanup

1. Target audience/ Stakeholder group: General Public
2. Description of BMP: The Great American Cleanup , the nation 's largest community improvement program, takes place annually during the spring, involving more than 5 million volunteers and participants. This event is coordinated by Keep America Beautiful.
3. Measurable Goal(s): KCNB, on behalf of the City and County, will coordinate a cleanup day with state and local affiliates. In honor of the Great American Cleanup event, KCNB organizes a major cleanup day in the spring of each year. In addition, KCNB also encourages local volunteer groups to organize and participate in their own cleanup events during this period. At least one advertisement will be placed on the KCNB website, City of Covington website or the local newspaper prior to the event. The amount of trash collected by the volunteers will be documented.
4. Documentation to be submitted with each Annual Report: A copy of the Great American Cleanup Wrap-up report submitted to Keep Georgia Beautiful.
5. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): Hold Annual Event
 - d. Month/Year of each action (if applicable): Spring/Annually
7. Person (position) responsible for overall management and implementation of the BMP: KCNB
8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP is determined by the number of participants at the annual event and the amount of waste collected from the rivers and streams. An increase or decrease in participation rates should directly correlate to an increase or decrease in year-over-year waste collections. An annual increase in participation rates could indicate that the public outreach methods are effective, and the target audience is being reached. An annual decrease could indicate that more effective public outreach is needed to inform the target audience of this event.

C. **BMP #B3 – Rivers Alive**

1. Target audience/ Stakeholder group: General Public
2. Description of BMP: Rivers Alive is Georgia's annual volunteer waterway cleanup event. The event is held during the fall of the year. This statewide event targets cleanups across all waterways in Georgia. The City actively participates in this program which is coordinated by KCNB and the local office of the Georgia Wildlife Federation. All of the collected waste is disposed of in one of the many waste recycling centers located around the County.
3. Measurable Goal(s): At least one advertisement will be placed on the KCNB website, City of Covington website or the local newspaper prior to the event. The amount of trash collected by the volunteers will be documented.
4. Documentation to be submitted with each Annual Report: A copy of the completed Rivers Alive report submitted to EPD.
5. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): Hold Annual Event
 - d. Month/Year of each action (if applicable): Fall/Annually
6. Person (position) responsible for overall management and implementation of the BMP: KCNB
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP is determined by the number of participants at the annual event and the amount of waste collected from the rivers and streams. An increase or decrease in participation rates should directly correlate to an increase or decrease in year-over-year waste collections. An annual increase in participation rates could indicate that the public outreach methods are effective, and the target audience is being reached. An annual decrease could indicate that more effective public outreach is needed to inform the target audience of this event.

D. BMP #B4 – Volunteer Monitoring (Adopt-A-Mile)

1. Target audience/ Stakeholder group: Local business, civic groups, and other volunteers

2. Description of BMP: KNB began an Adopt-A-Mile program to encourage volunteer groups to pick up trash along major roadways in the City within the urbanized area. KNB solicits participation in this program by sending emails to local civic groups, churches, businesses, volunteer groups and schools, and by placing ads in the newspaper. Groups are asked to commit to clean up their stretch of roadway four times a year.

3. Measurable Goal(s):
 - a. Annual email to volunteer groups, civic groups, etc.
 - b. Annual ad or article in the newspaper
 - c. Number of groups and people participating

4. Documentation to be submitted with each Annual Report:
 - a. A list or map of the streets or areas cleaned
 - b. A copy of the receipt or bill of lading from recycling or proper disposal of the collected material.

5. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2020, Added to SWMP in 2023
 - c. Frequency of actions (if applicable): Annual emails and newspaper ads
 - d. Month/Year of each action (if applicable): Emails and/or newspaper ads sent out in December of each year

6. Person (position) responsible for overall management and implementation of the BMP: KCNB Director

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The City would like to see the number of participants and the number of bags of litter collected increase each year.

Illicit Discharge Detection and Elimination

Table 4.2.3 (a) of the Permit

A. BMP #C1- Legal Authority

1. Description of BMP: To the extent allowable under State or local law, the City must effectively prohibit, through ordinance, non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions. The IDDE ordinance is included as Appendix B.
2. Measurable goal(s): The City will evaluate annually, and if necessary, modify the existing Illicit Discharge Detection and Elimination ordinance.
3. Documentation to be submitted with each annual report: A copy of the existing ordinance is included with the SWMP. If the ordinance is revised during the reporting period, a copy will be submitted with the Annual Report.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2004
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Designated Program Administrator
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Proper legal authority will allow non-storm water discharges to be terminated. The lack of proper legal authority will not deter non-stormwater discharges.

B. BMP #C2- Outfall Map and Inventory

1. Description of BMP: The City has developed a stormwater Outfall Map and Inventory. The mapped inventory includes all stormwater outfall locations from the MS4 and the names of all Waters of the State that receive discharges. The Outfall Map and Inventory is included as Appendix C.
2. Measurable Goal(s): The City has identified and mapped the stormwater outfalls and their receiving waters within its jurisdictional boundaries. Outfalls developed during new construction and development projects will be added to the map and inventory.
3. Documentation to be submitted with each annual report: A copy of the revised map and inventory, showing the outfalls and the names of their receiving streams; and the total number of outfalls added during the reporting period.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007; Revised 2011
 - c. Frequency of actions (if applicable): Inventory structures as needed
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP is determined by our ability to maintain up-to-date mapping information of the stormwater infrastructure. The updated maps will allow for tracing of stormwater infrastructure that may be related to illicit discharges.

C. BMP #C3 –IDDE Plan

1. Description of BMP: The City of Covington has implemented an IDDE Plan (Appendix D) to detect and address non-storm water discharges to the MS4. The City of Covington has 309 outfalls. The Enforcement Response Plan is included as Appendix E. The City's outfall inspection form is included in Appendix F. A template for a Notice of Stormwater Violation letter is included in Appendix G.
2. Measurable Goal(s):
 - a. When the presence of dry weather flow indicates the potential for illicit discharge, investigative procedures, such as sampling and inspections, will be implemented.
 - b. Enforcement procedures, identified in the Enforcement Response Plan (ERP), will ensure that all identified illicit discharges are eliminated.
 - c. Dry weather screenings will be conducted according to the IDDE Plan.
3. Documentation to be submitted with each annual report: A copy of the revised or current IDDE Plan, when necessary; The number and percentage of completed dry weather screening of outfalls inspections; A copy of the completed outfall inspection reports; and A copy of any documentation of illicit discharge source tracing, compliance, and enforcement activities.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007; rev 2014
 - c. Frequency of actions (if applicable): The program is on-going
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP is determined by our ability to proactively identify potential illicit discharges that may not have been reported through our complaint process. By identifying potential illicit discharges and addressing the causes of these discharges, the City should minimize the impact that illicit discharges have on our stormwater system.

D. BMP #C4 – Education

1. Description of BMP: The City is required to educate the public, businesses, and government employees about the hazards of illicit discharges. This will be accomplished through utility bill messages, brochures, news articles, television advertisements, or other types of media. Educational program materials are included in Appendix H.
2. Measurable goal(s): One advertisement will be placed on the television or radio. One advertisement or article will be placed in the newspaper, mail, or on a utility bill.
3. Documentation to be submitted with each annual report: A copy of the educational and/or outreach material or a table listing the items; how they were distributed; the date distributed; and the audience (public, businesses, or government employees) will be submitted.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2004
 - c. Frequency of actions (if applicable): Annually.
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to storm water in accordance with Part 5.1.4 of the Permit: Educated citizens are less likely to create and more likely to report illicit discharges. If the number of illicit discharges goes down or the number of reported violations goes up, then effectiveness of this BMP will be proven.

E. BMP #C5 – Complaint Response

1. Description of BMP: The City of Covington maintains a comprehensive complaint response database. The database tracks complaints and actions taken in response to complaints regarding illicit discharge. The City has developed procedures for receiving, investigating, and tracking the status of illicit discharge complaints (Appendix E).

2. Measurable Goal(s): The comprehensive inventory database of complaints and their resolutions, taken in response to illicit discharge will be maintained and all illicit discharge complaints will be investigated within a 24-hour period.

3. Documentation to be submitted with each annual report: A copy of any revised procedures, a copy of the complaints received and their resolution, along with a copy of any enforcement actions

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): Revised 2013
 - c. Frequency of actions (if applicable): Update as needed
 - d. Month/Year of each action (if applicable): _____

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP is determined by our ability to identify and record illicit discharges and have the ability to track the actions taken to resolve these issues. By maintaining an up-to-date database, the City can ensure that we are aware of known issues and can track our resolution process.

F. BMP #C6 – Industry Inspection and Education Program

1. Description of BMP: The City of Covington will develop and implement a BMP to inventory industrial sites and perform routine inspections. This BMP will include an educational component to inform property owners of current regulations and to ensure that they are working to prevent adverse conditions that may lead to illicit discharges. The City's Industry Inspection and Education Program is included in Appendix I.
2. Measurable Goal(s): Twenty percent (20%) of the industrial sites will be inspected annually. The City's goal is to inspect at least 5 industrial facilities per year.
3. Documentation to be submitted with each annual report: A copy of the Industrial Inventory and Inspection Procedures; a copy of the Industrial Inventory; a copy of any completed inspection reports, conducted during the reporting period; a copy of any enforcement actions, resulting from enforcement activities or complaints.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2012
 - c. Frequency of actions (if applicable): Inspect 20 percent of the industrial facilities annually
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP is determined by our ability to identify potential illicit discharges at industrial facilities. By identifying potential illicit discharges and addressing the causes of these discharges, the City should minimize the impact that illicit discharges have on our stormwater system.

G. BMP #C7 – Highly Visible Pollutant Source (HVPS) Business Inspection and Education Program

1. Description of BMP: The City of Covington will develop and implement a BMP to inventory highly visible pollutant source (HVPS) sites and perform routine inspections. This BMP will include an educational component to inform property owners of current regulations and to ensure that they are working to prevent adverse conditions that may lead to illicit discharges. The City's HVPS Inspection and Education Program is included in Appendix J.
2. Measurable Goal(s): Twenty percent (20%) of the HVPS sites will be inspected annually.
3. Documentation to be submitted with each annual report: A copy of the HVPS Inventory and Inspection Procedures; a copy of the HVPS Inventory; a copy of any completed inspection reports, conducted during the reporting period; a copy of any enforcement actions, resulting from enforcement activities or complaints.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2012
 - c. Frequency of actions (if applicable): Inspect 20 percent of HVPS sites annually.
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP is determined by our ability to identify potential illicit discharges at highly visible pollutant source (HVPS) facilities. By identifying potential illicit discharges and addressing the causes of these discharges, the City should minimize the impact that illicit discharges have on our stormwater system.

Construction Site Storm Water Runoff Control

Table 4.2.4 (a) of the Permit

A. BMP #D1 - Legal Authority

1. Description of BMP: The City must evaluate, and if necessary, modify the existing E&S ordinance to reduce pollutants in storm water runoff to the MS4 from construction activities that result in land disturbance of greater than or equal to one acre. This includes the control of waste from construction site operators such as: discarded building materials; concrete truck washout; chemical; litter; and sanitary waste, at the construction site. The Soil Erosion, Sedimentation, and Pollution Control Ordinance is included as Appendix K of this document.
2. Measurable goal(s): The City will evaluate annually, and if necessary, modify the existing Soil Erosion and Sedimentation Control ordinance.
3. Documentation to be submitted with each annual report: A copy of the current ordinance is included in the SWMP. If the ordinance is revised during the reporting period, a copy will be submitted.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2001
 - c. Frequency of actions (if applicable): evaluate annually and update as needed
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: City Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: A strong soil erosion and sedimentation control ordinance will help eliminate the accumulation of soil in the rivers and streams. If E&S violations are not reported or observed, then the effectiveness of this BMP will be proven.

B. BMP #D2- Site Plan Review Procedures

1. Description of BMP: The City of Covington utilizes standardized checklists for construction site plan reviews. The City has adopted the Georgia Soil and Water Conservation Commission's (GSWCC) standardized checklists for review. For additional information, refer to Appendix L - Site Plan Review and Construction Site Management Procedures.
2. Measurable Goal(s): The construction site plans reviewed, approved or denied, by the City during the reporting period, will be documented and reported in the annual report.
3. Documentation to be submitted with each annual report: A list of the site plans received, the number of site plans reviewed, whether they were approved or denied, and the total number of LDA permits issued during the reporting period.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): _____
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's continued use of the latest versions of the erosion control checklists for plan review. The use of the checklist should provide consistent comments regardless of the reviewer.

C. **BMP #D3- Inspection Program**

7. Description of BMP: The City of Covington developed a Construction Site Management Procedures (Appendix L) to ensure that structural and non-structural BMPs at construction sites are properly designed and maintained and that construction site waste is properly controlled. The Construction Site Inspection Management Procedures include Erosion and Sediment Control inspection and enforcement procedures. The City will temporarily perform ES&PC inspections for certain City projects within County jurisdiction, in accordance with an intergovernmental agreement, which resulted from a collaborative sewer infrastructure effort between the City and County. Details of this agreement are included in the agreement included in Appendix A.
- 1.
2. Measurable Goal(s): Construction site inspections will be conducted after the initial BMP installation, during active construction and after final stabilization. At a minimum, at least one inspection of each active construction site will be conducted during each reporting period.
3. Documentation to be submitted with each annual report: A list of active construction sites and the number and dates of inspections conducted on each of the sites during the reporting period.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): a minimum of at least one inspection per active construction site per reporting period
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's continued use of its erosion control enforcement procedures during site reviews. The use of the procedures should provide consistent site inspection results regardless of the inspector.

D. BMP #D4- Enforcement Procedures

1. Description of BMP: The City of Covington will implement enforcement procedures for 100% of the E&S violations documented at construction sites during the reporting period. These procedures are documented in the ERP included as Appendix E and Soil Erosion, Sedimentation, and Pollution Control Ordinance included as Appendix K.

2. Measurable Goal(s): Erosion & Sedimentation enforcement procedures will be applied to developments as needed.

3. Documentation to be submitted with each annual report: Documentation will be provided for any enforcement actions taken during the reporting period, including the number and type (e.g. Notice of Violation, Stop Work Order), status (e.g. pending, resolved), and the amount of any assessed penalties.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): _____
 - d. Month/Year of each action (if applicable): _____

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's continued use of its erosion control enforcement procedures during site reviews. The use of the procedures should provide consistent site inspection results regardless of the inspector.

E. BMP #D5 – Complaint Response

1. Description of BMP: The City of Covington maintains a comprehensive complaint response database. The database tracks complaints and actions taken in response to complaints regarding construction runoff. The City has developed procedures for receiving, investigating, and tracking the status of uncontrolled erosion and sediment complaints. A copy of the E&S Complaint Response Procedures is included as Appendix M.

2. Measurable Goal(s): The comprehensive inventory database of complaints and their resolutions, taken in response to construction site runoff, will be maintained, and all construction site runoff complaints will be investigated within a 24-hour period.

3. Documentation to be submitted with each annual report: A copy of any revised procedures, a copy of the complaints received and their resolution, along with a copy of any enforcement actions

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____

 - b. Implementation Date (if applicable): 2007; revised 2011

 - c. Frequency of actions (if applicable): Update as needed

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

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP is determined by our ability to identify and record construction site discharges and have the ability to track the actions taken to resolve these issues. By maintaining an up-to-date database, the City can ensure that we are aware of known issues and can track our resolution process.

F. BMP #D6- Certification

1. Description of BMP: The Engineering Department is responsible for construction site inspections. All City personnel that are involved in construction or inspection should be GSWCC Certified. A list of the City's GSWCC certified personnel is included as Appendix N.
2. Measurable Goal(s): Assure that all City personnel that are involved in construction or inspection are appropriately certified by GSWCC.
3. Documentation to be submitted with each annual report: A list of all GSWCC certified City personnel. The list will include the employees' names, license number, certification level, expiration dates and certification status.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): _____
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's personnel maintaining the appropriate GSWCC certification levels.

Post-Construction Storm Water Management in
New Development and Redevelopment

Table 4.2.5 (a) of the Permit

A. BMP #E1 – Legal Authority

1. Description of BMP: The City is required to annually evaluate, and if necessary, modify the existing ordinance to ensure that legal authority exists to address post construction runoff from new and redevelopment projects. The City adopted the GSMM as a design manual. A copy of the Post Construction Stormwater Management Ordinance is included as Appendix O.
2. Measurable goal(s): The ordinance will be reviewed annually to ensure that legal authority is available to address post construction runoff from new and redevelopment projects.
3. Documentation to be submitted with each annual report: A copy of the current ordinance is included in the SWMP. If the ordinance is revised during the reporting period, the City will submit a copy of the adopted ordinance with the annual report.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2004
 - c. Frequency of actions (if applicable): _____
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: City Manager
6. How you will determine whether this BMP is effective in reducing pollution to storm water in accordance with Part 5.1.4 of the Permit: If downstream flooding from development is eliminated and water quality is enhanced, then the effectiveness of this BMP will be proven.

B. BMP #E2 - Inventory

1. Description of BMP: The City is required to annually update an inventory of all publicly-owned post-construction stormwater management structures (e.g., detention/retention ponds, underground detention). The inventory must also include those privately-owned structures designed after the December 9, 2008, deadline for adoption of the GSMM and those publicly-owned structures owned by other entities (e.g. Board of Education and other entities not covered by an MS4 permit that the City has the legal authority to inspect) with construction completed after December 6, 2012. The inventory must include information on the number and type of structures, and ownership (i.e., publicly-owned, privately-owned, publicly-owned by other entities). The inventory must be updated as new structures are completed or existing structures are identified. The City may choose to also include non-City owned structures designed prior to the December 9, 2008 deadline for adoption of the GSMM on the inventory. The City must ensure that maintenance agreements are executed for all newly designed non-permittee owned structures.

2. Measurable goal(s):
 - a. Annually update an inventory of all post-construction stormwater management structures.
 - b. Inventory must include, in addition to publicly-owned structures, privately-owned structures designed after December 9, 2008 and publicly-owned structures owned by other entities, for which the City has the legal authority to inspect, which were constructed after December 6, 2012.

3. Documentation to be submitted with each annual report: The current inventory is included in the SWMP (Appendix P). If additional structures are constructed or identified, the inventory will be revised and submitted with the annual report. The inventory will include the following information:
 - a. The number and type of structures;
 - b. Whether the structures are public or private;
 - c. Whether there is a maintenance agreement with the owner;
 - d. When the structures were designed (if known);
 - e. When the structures were constructed (if known);
 - f. When the structures were inspected (if known);
 - g. When the structures were cleaned (if known); and
 - h. When the structures were maintained (if known).

4. Schedule:

a. Interim Milestone Dates (if applicable): _____

b. Implementation Date (if applicable): 2009

c. Frequency of actions (if applicable): update annually

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

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to storm water in accordance with Part 5.1.4 of the Permit: If post-construction storm water management structures are properly accounted for, inspection and maintenance will be feasible and will result in storm water pollution reductions. If no structures, which are unaccounted for, are identified, this BMP will be considered effective.

C. BMP #E3 – Inspection Program

1. Description of BMP: The City is required to inspect all of the post-construction storm water management structures included on the inventory so that 100% of the structures are inspected within the 5-year permit term. The MS4 Operations and Maintenance (O&M) Procedures are included as Appendix Q.
2. Measurable goal(s): Twenty percent of the storm water management structures will be inspected annually.
3. Documentation to be submitted with each annual report: All Inspection reports will be submitted.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): _____
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If the post-construction storm water management structures are functioning properly, the effectiveness of this BMP will be proven.

D. BMP #E4 – Maintenance Program

1. Description of BMP: The City will implement a long-term operation and maintenance program for post-construction stormwater management structures. The MS4 (O&M) Procedures are included as Appendix Q. The program addresses publicly-owned structures owned by other entities (e.g. Board of Education and other entities not covered by an MS4 permit that the permittee has the legal authority to inspect) and those privately-owned structures with construction completed after the effective date of the previous permit iteration (December 6, 2012). Maintenance will be performed to the maximum extent practicable.

2. Measurable Goal(s):
 - a. Maintain all post-construction stormwater management structures, which are publicly-owned or publicly-owned by other entities and for which the City has the authority to inspect, according to the maintenance schedules outlined in the City's O&M Manual and the GSMM, to the maximum extent practicable.

 - b. Maintain all privately-owned detention ponds, retention ponds, water quality structures, and infiltration devices, constructed after December 6, 2012, for which the City has maintenance responsibility, according to the maintenance schedules outlined in the City's O& M Manual and the GSMM, to the maximum extent practicable.

 - c. Obtain maintenance agreements outlining the owner's and the City's responsibilities on publicly-owned structures owned by other entities and privately-owned structures, constructed after December 6, 2012.

 - d. Maintain a copy of all maintenance agreements between the City and property owners with structures (finalized after December 6, 2012) concerning maintenance of these structures.

3. Documentation to be submitted with each annual report: A list of structures maintained or repaired (publicly-owned, privately owned, and publicly-owned by other entities), including type of maintenance performed and documentation of maintenance activities performed during the reporting period. A summary list (updated annually) of maintenance agreements between the City and other parties or entities (private and public) regarding maintenance responsibilities for structures.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____

 - b. Implementation Date (if applicable): 2007

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

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

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's continued evaluation of our policies and procedures related to the operation and maintenance of the stormwater management system.

E. BMP #E5 – GI/LID Program

1. Description of BMP: The City will evaluate the Green Infrastructure/Low-Impact Development (GI/LID) program (Appendix R) annually to determine if revisions are necessary. The program shall describe the GI/LID practices (e.g. better site planning techniques, better site design techniques) to be implemented by the permittee.

2. Measurable goal(s): The program shall include:
 - a. Background information on the MS4 (e.g. geology, hydrology)
 - b. Procedures for evaluating the feasibility and site applicability of different GI/LID techniques and practices to be considered, including specific feasibility criteria.
 - c. The GI/LID structures considered for construction within the permittee’s jurisdiction. Procedures for the inspection and maintenance of the GI/LID structures, including City-owned structures, publicly-owned structures owned by other entities, and privately-owned non-residential. The inspection program must include a schedule for conducting inspections on the GI/LID structures listed on the inventory required by BMP 5 above so that 100% of the structures are inspected within a 5-year period. At a minimum, the permittee must conduct inspections on 5% of the structures annually so that some structures are inspected each reporting period. If a low percentage of inspections is conducted during one reporting period, then the permittee must increase the inspection frequency in subsequent reporting periods to ensure that 100% of the structures are inspected within a 5-year period. The inspection details must be described in the program (e.g. who inspects, inspection schedule, method of documentation, example inspection forms).
 - d. Procedures for the maintenance of the GI/LID structures detailed in the program, including City-owned structures, publicly-owned by other entities, and privately-owned non-residential (e.g. who maintains, maintenance schedule, method of documentation of maintenance activities, execution of maintenance agreements, example maintenance agreement).

3. Documentation to be submitted with each annual report: The GI/LID program is included with the SWMP and will be included with each annual report. See BMPs #E6, #E7, and #E8 regarding additional annual reporting requirements.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): _____

c. Frequency of actions (if applicable): evaluate annually and update as necessary

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

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Proper inspections and maintenance activities, including appropriate annual documentation, will ensure effective implementation of the GI/LID program and therefore, reductions in pollution to stormwater.

F. BMP #E6 – GI/LID Structure Inventory

1. Description of BMP: The City is required to develop an inventory of water quality- related GI/LID structures located within the permitted area and at a minimum, constructed after December 6, 2012. The GI/LID inventory will include the total number of each type of structure (e.g., bioswales, pervious pavement, rain gardens, cisterns, and green roofs). The inventory must, at a minimum, include City-owned GI/LID structures, those publicly-owned structured owned by other entities (e.g. Board of Education and other entities not covered by an MS4 permit that the City has the legal authority to inspect), and privately-owned non-residential GI/LID structures (e.g. mixed use development, commercial). Track the addition of new water quality-related GI/LID structures through the plan review process, ensuring the structures are added to the inventory and that maintenance agreements are executed for all non-City owned structures.

2. Measurable goal(s): An inventory of water quality-related GI/LID structures will be developed. Updates will be submitted as required. The City is currently finalizing their GI/LID structure map and inventory. The updated map and inventory will be included with the annual report for the 2023 reporting year.

3. Documentation to be submitted with each annual report: An updated inventory, including those structures added during the reporting period.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): _____
 - c. Frequency of actions (if applicable): update annually_____
 - d. Month/Year of each action (if applicable): _____

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to storm water in accordance with Part 5.1.4 of the Permit: If GI/LID structures are properly accounted for, inspection and maintenance will be feasible and will result in storm water pollution reductions. If no GI/LID structures, which are unaccounted for, are identified, this BMP will be considered effective.

G. BMP #E7 – GI/LID Structure Inspection Program

1. Description of the BMP: Ensure that 100% of the structures are inspected within a 5-year period. At a minimum, the permittee must conduct inspections on 5% of the structures annually so that some structures are inspected each reporting period. If a low percentage of inspections is conducted during one reporting period, then the permittee must increase the inspection frequency in subsequent reporting periods to ensure that 100% of the structures are inspected within a 5-year period.

2. Measurable goal(s): 100% of structures are inspected within a 5-year period.

3. Documentation to be submitted with each annual report: the number and percentage of structures inspected and documentation of the inspections performed during the reporting period in each annual report.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): June 5, 2023
 - c. Frequency of actions (if applicable): annually (minimum of 5% in a given year)
 - d. Month/Year of each action (if applicable): _____

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to storm water in accordance with Part 5.1.4 of the Permit: If GI/LID structures are functioning properly, the effectiveness of this BMP will be proven. Proper functionality requires maintenance, which requires routine inspections.

H. BMP #E8 – GI/LID Structure Maintenance Program

1. Description of the BMP: Conduct maintenance on the permittee-owned GI/LID structures as needed. Ensure publicly-owned structures owned by other entities and privately-owned non-residential structures are maintained as needed.

2. Measurable goal(s): Implement the maintenance procedures described in the GI/LID structure maintenance program. Develop a summary list of maintenance agreements executed to date and update the summary list as new maintenance agreements are executed.

3. Documentation to be submitted with each annual report: Provide the number of structures maintained and documentation of the maintenance performed during the reporting period. Provide an updated summary list and documentation of any activities taken to ensure maintenance of the structures (e.g. letters to owners, enforcement action).

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): June 5, 2023
 - c. Frequency of actions (if applicable): maintain as needed; annual documentation
 - d. Month/Year of each action (if applicable): _____

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to storm water in accordance with Part 5.1.4 of the Permit: If GI/LID structures are functioning properly, the effectiveness of this BMP will be proven.

I. **BMP #E9- GI/LID Ordinance Review**

1. Description of BMP: The City will review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration. At a minimum, the City will assess those regulations governing road design and parking requirements. During the review, the City will consider the inclusion of incentives for use of GI/LID practices into the regulatory documents.

2. Measurable Goal(s): The City will perform a comprehensive evaluation during the first year of the permit and submit the results with the first annual report. For subsequent years of the permit term, the City will either reference the first-year comprehensive evaluation and certify that no additional ordinance revisions are necessary or complete a comprehensive evaluation.

3. Documentation to be submitted with the annual report: Results of comprehensive evaluation or reference to first-year comprehensive evaluation and certification that no additional ordinance revisions are necessary.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): June 5, 2023
 - c. Frequency of actions (if applicable): first year comprehensive evaluation, then annual comprehensive evaluation or annual certification that no revisions are necessary
 - d. Month/Year of each action (if applicable): _____

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: GI/LID practices reduce the amount of runoff through infiltration, evaporation, and evaporation.

Pollution Prevention/Good Housekeeping for Municipal Operations

Table 4.2.6 (a) of the Permit

A. BMP #F1 – MS4 Control Structure Inventory and Map

1. Description of BMP: The City is required to develop or update an inventory and map of the MS4 control structures.
2. Measurable goal(s): Update annually. At a minimum, the inventory must include catch basins, ditches (miles or linear feet), detention/retention ponds, underground detention, and storm drains (miles or linear feet) owned and/or operated by the permittee. Both will be revised as needed.
3. Documentation to be submitted with each annual report: A copy of the revised map and inventory, if necessary, and the total number of structures (by type) added during the reporting period will be submitted.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): The inventory and map will be updated any time new MS4 structural controls are added
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If MS4 control structures are structures are being inspected and maintained on a regular basis, then the effectiveness of the BMP will be proven.

B. BMP #F2 – MS4 Inspection Program

1. Description of BMP: The City is required to conduct inspections on the MS4 control structures so that 100% of the structures are inspected within a 5-year period. MS4 O&M Procedures are included in Appendix Q. Inspections will be conducted according to the MS4 O&M Procedures. The control structures to be inspected are, at a minimum, catch basins, ditches, detention/retention ponds, and storm drain lines.
2. Measurable goal(s): 20% of the MS4 control structures will be inspected annually so that 100% of the MS4 structures will be inspected within the 5 year Permit period.
3. Documentation to be submitted with each annual report: The number and type of structures inspected annually will be submitted. The following information will also be submitted:
 - a) A copy of the revised or current MS4 O&M Procedures;
 - b) The number (both the number and the percentage of the total of each type of structure) of MS4 structural control inspections;
 - c) A copy of the completed inspection reports; and
 - d) Any documentation of compliance and enforcement activities.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2004
 - c. Frequency of actions (if applicable): 20% of structures to be inspected annually
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If MS4 control structures are functioning properly, the effectiveness of this BMP will be proven.

BMP #F3 – MS4 Maintenance Program

1. Description of BMP: The City is required to conduct maintenance on the MS4 control structures as needed. The procedures concerning maintenance and repair of these structures, as outlined in the MS4 O&M Procedures and the Georgia Stormwater Management Manual. The MS4 O&M Procedures are included in Appendix Q. The MS4 control structures to be maintained or repaired are, at a minimum, catch basins, ditches, detention/retention ponds, and storm drain lines.

2. Measurable goal(s): MS4 control structures will be maintained as needed.

3. Documentation to be submitted with each annual report: The number and type of structure maintained and documentation of the maintenance activities conducted during the reporting period.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____

 - b. Implementation Date (if applicable): 2004

 - c. Frequency of actions (if applicable): Program is on-going

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

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to storm water in accordance with Part 5.1.4 of the Permit: If the MS4 control structures are functioning properly, the effectiveness of this BMP will be proven.

C. **BMP #F4- Street and Parking Lot Cleaning**

1. Description of BMP: Covington has implemented a City-wide program for street sweeping and catch basin cleaning that addresses approximately 20 miles of curb and gutter streets daily as outlined in the City's MS4 O&M Procedures in Appendix Q. A regular street sweeping program should reduce the chance of stormwater inlets becoming clogged from trash and debris and should increase aesthetics. The City will inspect 20% of catch basins and inlets structures on an annual basis.
2. Measurable Goal(s): This program is on-going. The City owns one street sweeper which are used to clean all City streets with curb and gutter; approximately 20 miles daily. Those containing trash and debris will be cleaned quarterly.
3. Documentation to be submitted with each annual report: A street sweeping log and a tally of the debris collected will be provided annually.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): Monthly
 - d. Month/Year of each action (if applicable): Monthly
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's ability to maintain its street sweeping schedule.

D. BMP #F5- Employee Training

1. Description of BMP: The City will maintain a training program/seminar for City employees in Pollution Prevention/Good Housekeeping. The City's Employee Training Program includes provision of one training class per year for City departments that are most involved with stormwater and water related issues. Departments that require training include: Engineering, Fleet Maintenance, Airport, Environmental Compliance, Water, Sewer, Solid Waste, and Sanitation. The program covers topics focused on stormwater related issues such as erosion and sedimentation control, IDDE, pollution prevention, and good housekeeping. Training will be provided via educational videos followed by quizzes. Training videos cover topics such as: stormwater at construction sites, IDDE, and pollution prevention for MS4s (e.g. basic BMPs, facility maintenance, parking lots and streets, storm drain system cleaning, landscaping and grounds maintenance, working near surface waters). Training will be documented with sign-in sheets. Employee training procedures are included in Appendix S.

2. Measurable Goal(s): At a minimum, all new employees hired within the reporting year will receive training. New employee training must occur annually.

3. Documentation to be submitted with each annual report: A list of training dates, topics, and attendees for each training activity conducted during the reporting period will be submitted.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2004 _____
 - c. Frequency of actions (if applicable): Hold annual training program/seminar
 - d. Month/Year of each action (if applicable): _____

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's ability to ensure that all required employees receive annual training. The annual training should ensure that our employees are aware of potential issues and will take care to prevent or maintain any issues that may occur.

E. BMP #F6 – Waste Disposal

1. Description of BMP: The City is required to implement procedures regarding the proper disposal of waste removed from the MS4. Waste disposal (including recycling), resulting from MS4 maintenance will follow the procedures outlined in the MS4 O&M Procedures in Appendix Q.

2. Measurable goal(s): A review of the City's current MS4 O&M Procedures, to see if it needs revision concerning waste disposal, including any possible recycling, will be conducted on an as need basis. All materials collected during catch basin cleaning and street sweeping are appropriately disposed of by the City of Covington Solid Waste Management Office.

3. Documentation to be submitted with each annual report: To demonstrate proper disposal, landfill or recycling manifests or receipts will be submitted.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2004
 - c. Frequency of actions (if applicable): _____
 - d. Month/Year of each action (if applicable): _____

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to storm water in accordance with Part 5.1.4 of the Permit: If the water quality of local rivers and streams improves, the effectiveness of this BMP will be proven.

F. BMP #F7- New Flood Management Projects

1. Description of BMP: The City has adopted the Georgia Stormwater Management Manual (GSMM). Owners of new developments requiring a stormwater management facility must have the facility designed and constructed in accordance with the water quality stipulations of the GSMM. To assess water quality impacts of a proposed flood management project, the City reviews each project for consistency with the application, site feasibility, planning, and design criteria identified in Sections 4.25.4 and 4.25.5 of the GSMM Vol. 2. Additionally, the City ensures that proper design procedures, as identified in Section 4.25.6 of the GSMM Vol. 2, have been followed.

2. Measurable Goal(s): New flood management facilities are required to comply with the requirements of the GSMM for water quality treatment.

3. Documentation to be submitted with each annual report: A list of plans reviewed where flood management projects were assessed for water quality impacts with notation of those plans that resulted in improved pollutant reduction during the reporting period.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): _____
 - d. Month/Year of each action (if applicable): _____

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager

6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's continued evaluation of proposed stormwater management facilities as a component of the stormwater management program.

G. BMP #F8- Existing Flood Management Projects

1. Description of BMP: The City will continue to evaluate existing flood management facilities and other types of City owned stormwater infrastructure (i.e., catch basins, junction boxes, drop inlets, wash areas, etc.) in accordance with the GSMM to determine their effectiveness and the feasibility of retrofitting them for water quality treatment.
2. Measurable Goal(s): One to three structures will be evaluated annually.
3. Documentation to be submitted with each annual report: A copy of any assessment conducted on existing flood management structures or paperwork documenting any retrofitting of existing flood management structures will be submitted.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): 1-3 times per year
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's continued evaluation of existing stormwater management facilities as a component of the stormwater management program.

H. BMP #F9- Municipal Facilities

1. Description of BMP: The City will conduct inspections on 100% of the municipal facilities within the 5-year permit term in accordance with the GSMM.
2. Measurable Goal(s): 100% of municipal facilities will be inspected within the 5-year permit period.
3. Documentation to be submitted with each annual report: An updated inventory of municipal facilities as well as documentation of inspections conducted during the reporting period.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): _____
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): Perform annual inspections (100% in 5 years)
 - d. Month/Year of each action (if applicable): _____
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Program Manager
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the City's continued inspection and maintenance of its municipal facilities.

CITY OF COVINGTON

ENFORCEMENT RESPONSE PLAN FOR STORMWATER VIOLATIONS

As a requirement of the General NPDES Stormwater Permit No. GAC610000 for Stormwater Discharges Associated with Small Municipal Separate Storm Sewer Systems (MS4), the City of Covington has developed this Enforcement Response Plan (ERP). The Enforcement Response Plan describes the actions to be taken for violations associated with the General Permit and the Stormwater Management Plan (SWMP). The ERP details the City's responses to any noted stormwater violations including escalating enforcement responses to address repeat and continuing violations.

The Enforcement Response Plan is divided into the following areas:

- I. Ordinances Providing Legal Authority
 - Title 1 General Provisions
 - Title 8 Health and Safety
 - Title 13 Public Services
 - Title 14 Development Regulations
 - Title 15 Buildings and Construction
 - Title 16 Zoning

- II. Identification of Potential Violations
 - Complaint Procedures
 - Inspection Procedures

- III. Enforcement Mechanisms and Actions
 - Verbal Warnings
 - Notice to Comply
 - Citations
 - Stop Work Orders
 - Withholding Plan Approval or Other Authorizations
 - Other Measures

I. ORDINANCES PROVIDING LEGAL AUTHORITY

The City of Covington has established the following ordinances related to Stormwater and Erosion, Sedimentation and Pollution Control. These ordinances provide the legal mechanisms for the City to respond to and enforce stormwater violations. The full description of these ordinances can be found on the Municode website at the following link:

<http://www.municode.com/Library/GA/Covington>

A. Title 1-GENERAL PROVISIONS

Chapter 1.12-General Penalty
1.12.010-General Penalty

B. Title 8-HEALTH AND SAFETY

Chapter 8.04-Garbage, Yard Trimmings and Weeds
Article 1- In General
8.04.010-Definitions

Article 3-Yard Waste
8.04.010-Disposal of yard waste
8.04.110-Notification of and penalties for violation of this article

Chapter 8.12-Nuisances Generally
8.12.010-Nuisance defined
8.12.020-Specified acts, things, conditions or noises constituting nuisances
8.12.030-Abatement of nuisances-Procedure
8-12-040-Order of abatement--Form—Notice
8.12.050-Notice—Nonresidents
8.12.060-Failure to abate nuisance—Penalty
8.12.070-Abatement by city entry on private property
8.12.080-Costs of abating nuisance—Execution—Levy
8.12.090-Provisions cumulative

Chapter 8.28-Litter Control
8.28.010-Statement of purpose
8.28.020-Definitions
8.28.030-Littering on public or private property or in waters
8.28.040-Construction and demolition sites
8.28.050-Prima face evidence-Rebuttal presumption
8.28.060-Penalties
8.28.070-Enforcement

C. Title 13-PUBLIC SERVICES

Chapter 13.16-Sewer Systems
13.16.010-Definitions
13.16.090-Explosive or inflammable matter, discharge into sewer prohibited
13.16.120-Discharge of polluted waters to natural outlets or storm sewers prohibited
13.16.140- Installation of facilities and connection to public sewer after notice
13.16.250-Prohibited discharge of surface and subsurface water into sanitary sewer
13.16.260-Method of disposal of storm water and polluted drainage
13.16.280-Power and authority of inspectors
13.16.290-Penalties

Chapter 13.40-Stormwater System
13.40.010-Findings of fact

- 13.40.020-Definitions
- 13.40.030-Establishment of stormwater utility
- 13.40.040-Establishment of enterprise fund
- 13.40.050-Establishment of stormwater utility fee
- 13.40.060-Exemptions
- 13.40.070-Reserved (Repealed February 16, 2009)
- 13.40.080-Credits
- 13.40.090-Appeals
- 13.40.100-Stormwater utility bills, payment, delinquency and collection
- 13.40.110-Stormwater utility inspections; enforcement

D. Title 14-DEVELOPMENT REGULATIONS

Chapter 14.04-Subdivisions Generally

- 14.04.010-Short title
- 14.04.020-Purpose
- 14.04.030-Definitions
- 14.04.040-Administration
- 14.04.050-Violation and penalty
- 14.04.060-Amendments

Chapter 14.12-Required Improvements

- 14.12.010-Installation required
- 14.12.040-Curbs and gutters
- 14.12.080-Storm drainage

Chapter 14.16-Design Standards

- 14.16.010-Suitability of the land

Chapter 14.20-Protection of Groundwater Recharge Areas

- 14.20.040-Protection criteria
- 14.20.060-Administration and enforcement

Chapter 14.24-Stormwater Management

Article 1-Connection and Discharge In to Storm Sewer System

- 14.24.010-Findings of fact
- 14.24.020-Definitions
- 14.24.030-Illicit Discharges
- 14.24.040-Illegal Connections
- 14.24.050-Location of Connections
- 14.24.060-Industrial or construction activity discharges
- 14.24.070-Access and inspection of properties and facilities
- 14.24.080-Notification of Accidental Discharges and Spills

Article 2-Post-development Stormwater Control

- 14.24.090-Applicability
- 14.24.100-Stormwater design manual
- 14.24.110-Permit application
- 14.24.120-Stormwater management plan
- 14.24.130-Application procedure
- 14.24.140-Post-development Stormwater Management Performance Criteria
- 14.24.150-Construction inspections of post-development stormwater management system
- 14.24.160-Stormwater management facility dedication to city

Article 3-Enforcement; Appeal; Penalties

- 14.24.170-Notice of Violation
- 14.24.180-Appeals
- 14.24.190-Enforcement
- 14.24.200- Penalties
- 14.24.210-Stormwater management regulations

- Chapter 14.28-Tree Preservation
- 14.28.010-Title
- 14.28.020-Purpose
- 14.28.030-Definitions
- 14.28.040-Applicability
- 14.28.050-Tree canopy cover measurements
- 14.28.070-Soil and tree conservation
- 14.28.080-Timber harvesting
- 14.28.090-Right-of-way encroachment

- Chapter 14.32-Overlay Districts
- 14.32.020-Wetlands protection overlay zoning district
- 14.32.030-Watershed protection overlay zoning district

E. Title 15-BUILDINGS AND CONSTRUCTION

- Chapter 15.36-Soil Erosion, Sedimentation and Pollution Control
- 15.36.010 – Title
- 15.36.020 - Definitions
- 15.36.030 – Exemptions
- 15.36.040 - Minimum requirements for erosion, sedimentation and pollution control
- 15.36.050 - Application/permit process
- 15.36.060 - Inspection and enforcement
- 15.36.070 - Penalties and incentives
- 15.36.080 - Education and certification
- 15.36.090 - Administrative appeal, judicial review
- 15.36.100 - Validity and liability

- Chapter 15.48-Flood Damage Prevention
- Article 1 - Statutory Authorization, Findings of Fact, Purpose and Objectives
- 15.48.010 – Authorization
- 15.48.020 - Findings of fact
- 15.48.030 - Statement of purpose
- 15.48.040 – Objectives

- Article 2 - General Provisions
- 15.48.050 – Definitions
- 15.48.060 - Lands to which this chapter applies
- 15.48.070 - Basis for establishing the areas of special flood hazard
- 15.48.080 - Establishment of development permit
- 15.48.090 – Compliance
- 15.48.100 - Abrogation and greater restrictions
- 15.48.110 – Interpretation
- 15.48.120 - Warning and disclaimer of liability
- 15.48.130 - Penalties for violation

- Article 3 – Administration
- 15.48.140 - Designation of ordinance administrator
- 15.48.150 - Permit procedures
- 15.48.160 - Duties and responsibilities of the city engineering department

- Article 4 - Provisions for Flood Hazard Reduction
- 15.48.170 - General standards
- 15.48.180 - Specific standards
- 15.48.190 - Building standards for streams without established base flood elevations and/or floodway (A-Zones)
- 15.48.200 - Standards for areas of special flood hazard (Zones AE) with established base flood elevations without designated floodways
- 15.48.210 - Standards for areas of shallow flooding (AO Zones)
- 15.48.220 - Standards for subdivisions

15.48.230 - Standards for critical facilities

Article 5 - Variance Procedures

15.48.240 - Variance procedures

15.48.250 - Conditions for variances

15.48.260 - Severability

F. Title 16-ZONING

Chapter 16.12-Procedures

16.12.050-Additional application requirements

16.12.140-Special Use Permits

II. IDENTIFICATION OF POTENTIAL VIOLATIONS

A. COMPLAINT PROCEDURES

The following information applies to general complaints and investigative procedures including illicit discharge detection & elimination and erosion, sediment and pollution control.

The City maintains a website and complaint tracking system. If a citizen has a complaint, he/she can go to the website (www.cityofcovington.org) under the Stormwater Management Department and submit the complaint via email. The email is sent directly to the City Engineer. After being reviewed by the City Engineer, it is sent to City hall where it is coded according to the appropriate department in which it will be handled. Maintaining a comprehensive inventory database is beneficial to evaluate the progress of the program. This allows personnel responsible for this program to maintain and track records of complaints, problem locations, and potential water quality effects, and how they were resolved.

A citizen can also make a direct complaint by calling Customer Service at (770) 385-2000 or the Engineering Department at (770) 385-2022. All complaints are handled on a case-by-case basis.

B. INSPECTION PROCEDURES

Refer to the Appendix F. Illicit Discharge, Detection, and Elimination Complaint Response Procedures and Appendix I. E&S Complaint Response Procedures of the Stormwater Management Program

III. ENFORCEMENT ACTIONS AND MECHANISMS

The following actions are escalating enforcement mechanisms used to correct violations associated with this NPDES Permit and the Stormwater Management Program.

- **Verbal Warnings-** When a possible E&S violation is reported or observed, the inspector may issue the contractor/developer/builder or other responsible party a verbal warning to comply with the ordinance. This is usually reserved for the most minor violations such as trash-pickup.
- **Notice to Comply** - A Notice to Comply form is used when land disturbing activity (LDA) does not conform to the approved and permitted plans. After a verbal warning is given, the next step of enforcement would be a Notice to Comply. This is a verbal or written warning to the responsible party of a violation that must immediately be addressed. The responsible party is given time to address the violation and bring the site into compliance, usually 72 hours.

- **Citation-** A citation is a written summons to a responsible party to appear in court to answer a charge of violating the ordinance. A citation may be written after the Notice of Comply period has expired and the responsible party has not complied with the ordinance. The responsible party is given a citation that includes a court appearance date and notice of a fine and notice of possible jail time, up to 30 days. The fine for Illicit Discharge violations is \$1000. The fine for Erosion and Sediment Control violations is \$2500 per violation per day. For a major violation, a citation may be written immediately.
- **Stop-Work Order-**A Stop-work order is a mechanism to force a responsible party to immediately stop all site activities until ordinance violations are resolved. This order may be issued if major violations are observed or discovered on a site. The responsible party is given up to 72 hours to address the violation. The only work allowed during this time must be related to the addressing the violation. The stop-work order carries a \$250 fine. Additionally, a citation may be written at the same time as the Stop Work Order.
- **Withholding Plan Approval or Other Authorizations-**The Certificate of Occupation may be held until a site fully complies with the E&S ordinance.
- **Other Measures**
 - A Grading Permit and an Erosion and Sediment Control Permit are issued for a proposed LDA that is approved by the Engineering Department.
 - A Stop Work Notice and a Citation and Summons is issued to developers and builders, involved with LDA, who neglect the directive provided in the Notice to Comply form.
 - An Erosion and Sediment Control Bond or an Irrevocable Letter of Credit may be required by the Engineering Department prior to the issuance of a LDA Permit. The amount, not to exceed, \$3,000 per acre of disturbed land, can be drafted by the City to rectify erosion and sediment violations

Appendix G1 – Impaired Waters Plan & Sampling Results

Impaired Waters Plan

The City is required to develop and implement an Impaired Waters Plan to reduce the pollutants of concern (POCs) in impaired waters within the City Limits. The plans will include the following items:

Identification of impaired waters;
Map of the impaired waters;
Sample locations;
Sample type and frequency; Implementation
schedule for monitoring; and,
Best Management Practices for POC reduction.

Identification of Impaired Waters

A review of the latest EPD 305(b)/303(d) list was reviewed for impaired waters within the City Limits of Covington. The entire 10 mile length of Dried Indian is on the list of streams not supporting their designated use. The POC is sediment caused by urban runoff and nonpoint source pollution. This stream is located in the Ocmulgee River Basin, and a large portion runs through the City Limits.

Map of Impaired Waters

The section of Dried Indian that runs through the City is shown on Figure 1. All MS4 outfalls, within one linear mile upstream of Dried Indian Creek, are also shown.

Impaired Streams Map

Legend

- Outfalls_Within1Mile
- 📍 Sampling_Points
- Dried_Indian_Creek
- City Limits

0 0.250.5 1 1.5 2 Miles

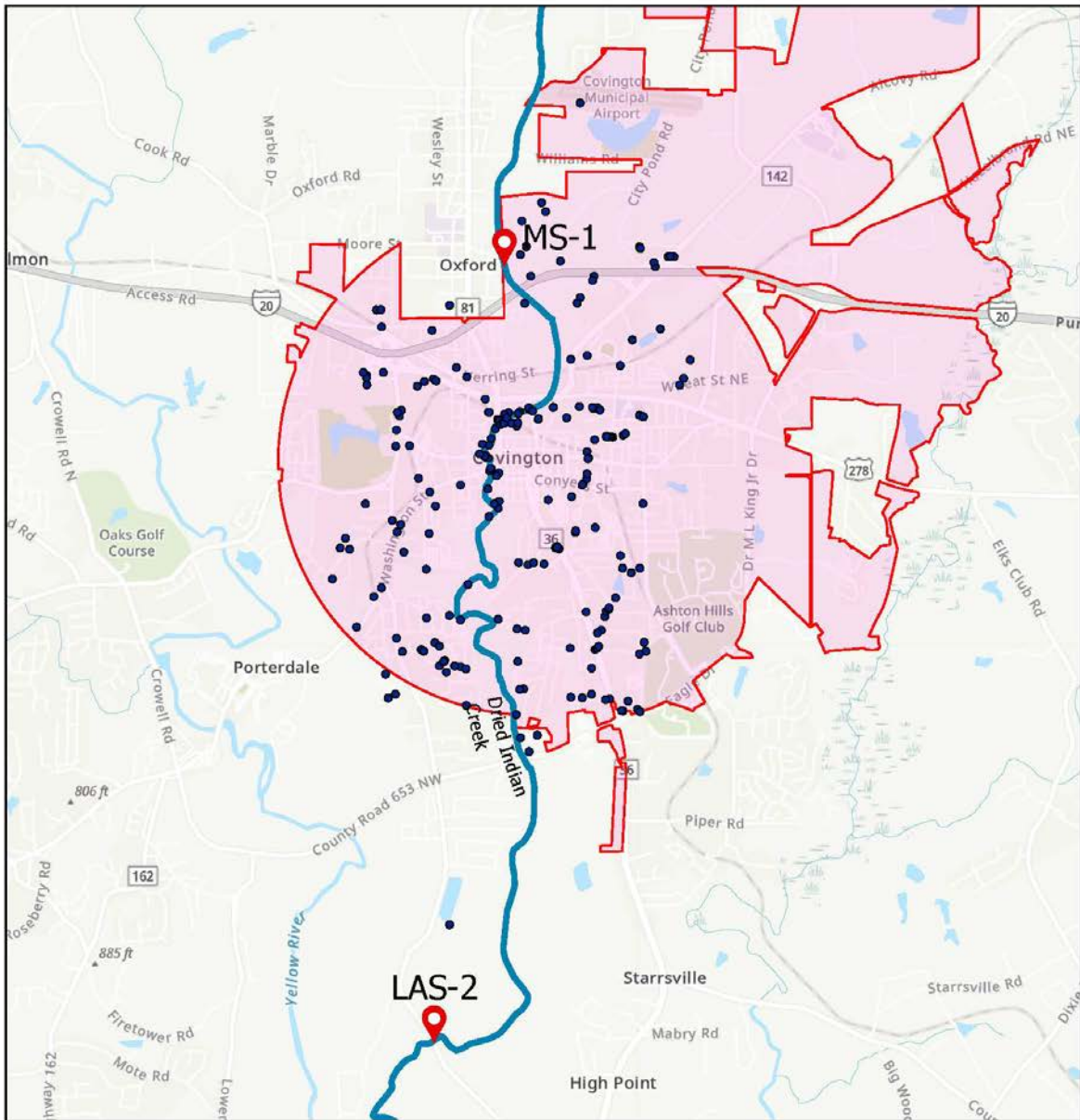


Figure 1

Sample Locations

One upstream and one downstream sampling location was chosen for this Plan. Monitoring station MS-1, located on Bonnel Street in Oxford, is the upstream location. Monitoring station LAS-2, located on Flat Shoals Road, is the downstream sampling location. Both are long term sampling stations associated with the Yellow River Watershed Protection Plan and are shown on Figure 1.

Sample Type and Frequency

Instream samples will be collected quarterly. Grab samples will be taken from monitoring stations MS-1 and LAS-2. To account for seasonal variation, at least one sampling event will be conducted during a wet weather event. The concentration of Total Suspended Solids (TSS) is the parameter that will be used to evaluate BMP effectiveness.

Implementation Schedule for Monitoring

The schedule below provides typical quarterly sampling dates.

First Quarter – March 15th

Second Quarter – June 15th

Third Quarter – September 15th

Fourth Quarter – December 15th

Sampling results will be entered into a spreadsheet and monitored throughout the year. Monitoring data, along with trend data, will be included in the MS4 annual report. Trend data will be used to track the effectiveness of the BMPs.

Best Management Practices for POC Reduction

The following BMPs, associated with the Covington Storm Water Management Program, will be used to reduce the POC. These BMPs are related to the management of construction site runoff. If not managed properly, construction site runoff can be the biggest contributor of sediment to creeks and streams.

Impaired Waters Plan Data and BMP Effectiveness Assessment

2024 Annual Report

January 31, 2024

Background

The City is required to implement an Impaired Waters Plan to reduce pollutants of concern (POCs) in impaired waters within the City Limits. The latest EPD 305(b)/303(d) list was reviewed for impaired waters within the City Limits of Covington. The entire 10-mile length of Dried Indian Creek is on the list of streams not supporting their designated use within the City limits. The impairment for Dried Indian Creek is Biota F (Biota Fish and Macroinvertebrates). The POC for this impairment is sediment caused by urban runoff and nonpoint source pollution. BMPs, associated with management of construction site runoff, and post construction stormwater management were chosen to reduce the POC. To analyze the effectiveness of the BMPs, one upstream and one downstream sampling location was chosen for this Plan. Grab samples are taken from monitoring stations MS-1 and LAS-2 on a quarterly basis and analyzed for their concentration of Total Suspended Solids (TSS), which is used as the parameter to evaluate BMP effectiveness.

BMP Summary

As a part of the overall Stormwater Management Plan, the City of Covington has chosen to implement and enforce several BMPs to aid in the reduction and removal of Total Suspended Solids. Those BMP include management of construction site runoff, and post construction stormwater management. If not managed properly, construction site runoff can be the biggest contributor of sediment to creeks and streams. Also, the use of post construction stormwater management practices, with a focus on those practices that help to improve water quality, can have a profound effect in the reduction of Total Suspended Solids (TSS) in stormwater runoff.

BMP Effectiveness Summary

In accordance with the Implementation Schedule for Monitoring, grab samples were taken quarterly at the locations identified in Figure 1 of the Impaired Waters Plan and analyzed for their concentrations of Total Suspended Solids (TSS). An average concentration of 9.1 mg/L was measured at the upstream location, MS-1, while an average of 23.25 mg/L was measured at the downstream location, LAS-2. As shown below, the first quarter yielded exceptionally high results, reflecting an increase of 14.15 mg/L for the year. However, excluding the first quarter, the average upstream sample was 6.6 mg/L, and the average downstream sample was 6.2 mg/L, indicating a decrease of 0.4 mg/L over the remaining three quarters.

After careful review, the City of Covington has determined that this data supports the effectiveness of the BMP used to reduce Total Suspended Solids (TSS) in stormwater runoff, thereby improving the overall quality of the impaired stream, Dried Indian Creek.