

STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

GEORGIA NOTICE OF INTENT (GaNOI)

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

I. General Information

A. Ownership Status (Please check one):

- Municipal Separate Storm Sewer System
 Federal Facility
 State Facility

B. Name of small MS4: City of Covington

C. Name of responsible official: Steve Horton
Title: City of Covington
Mailing Address: 2194 Emory Street
City: Covington State: Georgia Zip Code: 30015
Telephone Number: 770-385-2070

D. Designated stormwater management program contact:
Name: Tres Thomas
Title: City Engineer/Assistant Public Works Director
Mailing Address: 2194 Emory Street
City: Covington State: Georgia Zip Code: 30015
Telephone Number: 770-385-2180
Email Address: tthomas@cityofcovington.org

II. Sharing Responsibility

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

Control Measure #1:

1. Name of entity N/A

2. Control measure or component of control measure to be implemented by entity on your behalf:

N/A

Control Measure #2:

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

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

III. For Federal or State-Owned MS4s

(If you are a municipally owned MS4, skip to Part IV)

A. Location of MS4:

1. Name of Urbanized Area or municipality where your MS4 is located: N/A
2. Name of your organization N/A
3. The latitude and longitude of the approximate center of your MS4:
Latitude N/A Longitude N/A

IV. Known or Suspected Water Quality Problems

- A. The name(s) of the receiving waters to which your MS4 discharges (attach a separate list if necessary):
Dried Indian Creek, Turner Lake, Covington Reservoir
- B. Indicate any receiving water stream segments to which your MS4 discharges, which are included on the 303(d) list:
Dried Indian Creek
- C. Describe any known or suspected water quality concerns within your jurisdictional area (e.g. stream siltation, 303(d) listed streams, habitat degradation, elevated levels of pollutants, etc.), including location (attach additional page(s) if necessary):
Trash, debris, sediment

D. Indicate any stream segments to which your MS4 discharges which have a Total Maximum Daily Load (TMDL):
Yellow River

E. For those stream segments with a TMDL, indicate if you are participating in an approved TMDL Implementation Plan or have BMPs in place to address the pollutant(s) of concern:
Yes refer to Figure 1 attached with this document.

V. Minimum Control Measures

The NOI must include at least two BMPs for each of the six 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

VI. 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: Kim Carter

Date: August 1, 2007-original date
February 11, 2008-revised date

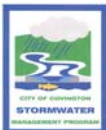
Signature: 

Title: Mayor

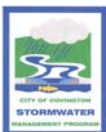
**STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION SERVICE**

**Georgia Notice of Intent (GaNOI)
Georgia NPDES Permit No. GAG610000 for
Small Municipal Separate Storm Sewer Systems (MS4)**

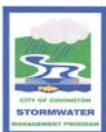
Minimum Control Measure: Public Education and Outreach	
BMP ID Number:	A1
BMP:	Educational Outreach Programs
Target Audience:	General Public
Description of BMP:	<p>Several educational outreach programs are being implemented by Keep Covington/Newton Beautiful (KCNB). They include Enviroscope, Learning Lab, Seymore Green Puppet Show, and Community Presentations. A description of each program is provided below.</p> <p><u>Enviroscope</u></p> <p>The Enviroscope allows children to gain an understanding of their local environment and learn about interesting topics dealing with ecological and biological components of land, streams and rivers, and lakes. The program is structured around stormwater/water quality management issues and the potential adverse affects water pollution can have on physical and ecological habitat.</p> <p>Currently, an Enviroscope is being used in 4th and 5th grade schools. This program will continue and will be further refined to include additional stormwater and water quality related issues. Approximately 2,500 students attend the annual event each year. Participating schools include portions of East Newton, West Newton, Fairview, Ficquett, Heard Mixon, Livingston, Mansfield, Middle Ridge, Oak Hill, Palmer Stone, and Porterdale Elementary.</p> <p><u>Learning Lab</u></p> <p>In a two hour session, small groups of students, emulating pieces on a game board, follow “the recycling trail” and visit 8 different learning stations where they become familiar with the many aspects</p>



	<p>of solid waste and citizens' responsibilities to the environment.</p> <p>The Learning Lab is being used in 3rd, 4th, and 5th grade schools. Approximately 600 students participate in this program each year. Participating schools and organizations include Rainbow Lake, Boy Scouts, Ficquett Elementary, Porterdale Elementary, Middle Ridge Elementary, East Newton Elementary, Middle Ridge Elementary, and home school organizations.</p> <p><u>Seymore Green</u></p> <p>Seymore Green, a raccoon pollution detective, is the main character in a series of interactive, musical, fun filled puppet shows. Seymore and his critter friends focus on one environmental issue, such as water pollution or solid waste management, during each program. This puppet show is being performed for all age groups. Approximately 7,000 people are entertained and educated by this program each year. Participating schools and organizations include East Newton, West Newton Elementary, Fairview Elementary, Ficquett Elementary, Heard Mixon Elementary, Livingston Elementary, Mansfield Elementary, Middle Ridge Elementary, Oak Hill Elementary, Clements Middle School, Covington Rotary Club, First Baptist Church, Zion Baptist Church, Newton County Library, and Turner Lake Senior Service.</p> <p><u>Community Presentations and Exhibits</u></p> <p>KCNB provides exhibits and conducts presentations, pertaining to water quality or solid waste management, to various organizations throughout the year. Approximately 1,500 people see an exhibition or hear a presentation every year. Participating organizations include Satsuki Garden Club, DAR, Girl Scouts, Covington Garden Club, Covington Women's Club, Oxford College, Satsuki Garden Club, DAR, Girl Scouts, Covington Garden Club, Covington Women's Club, Oxford College, YMCA, KATE, Square Market, Charlie Elliot, FUMC, Cousins Middle School, and Good Hope Baptist Church.</p>
<p>Measurable Goal(s):</p>	<p><u>Enviroscape</u></p> <p>Approximately 2,500 4th and 5th grade students attend the event from portions of 11 elementary schools. The existing program will continue on an annual basis. It is also anticipated that the program will be expanded to include students from the middle school (6th, 7th, and 8th grades) by the third year.</p>



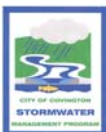
	<p><u>Learning Lab</u></p> <p>The Learning Lab is currently being used in 3rd, 4th, and 5th grade schools. Approximately 600 students participate in this program each year and the existing program will continue on an annual basis.</p> <p><u>Seymore Green</u></p> <p>This puppet show is being performed for all age groups. Approximately 7,000 people are entertained and educated by this program each year. The existing program will continue on an annual basis.</p> <p><u>Community Presentations and Exhibits</u></p> <p>KCNB provides exhibits and conducts presentations, pertaining to water quality or solid waste management, to various organizations throughout the year. Approximately 1,500 people see an exhibition or hear a presentation every year. This program will continue on an annual basis.</p>
Responsible Party:	Stormwater Program Manager
Rationale:	A cost-effective method of teaching important concepts of stormwater/water quality management and ecological protection to young people. This allows them to gain an understanding of the importance of these issues at an early age.
Implementation Schedule:	
Year 2007:	Hold Annual Event
Year 2008:	Hold Annual Event
Year 2009:	Hold Annual Event
Year 2010:	Hold Annual Event
Year 2011:	Hold Annual Event



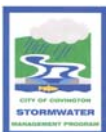
Minimum Control Measure: Public Education and Outreach	
BMP ID Number:	A2
BMP:	Maintenance and update of stormwater website
Target Audience:	General Public
Description of BMP:	The stormwater website will be maintained and/or updated on a semi-annual basis to ensure the most current information is available to the public regarding the stormwater management program.
Measurable Goal(s):	Stormwater regulations, related events, and tips will be reviewed on a semi-annual basis and updated as necessary. A counter will be added and the number of website “hits” will be monitored.
Responsible Party:	Stormwater Program Manager
Rationale:	This allows masses of people to obtain the most current information regarding the water quality/stormwater management programs throughout the City.
Implementation Schedule:	
Year 2007:	Semi-annual reviews/updates of the website content.
Year 2008:	Semi-annual reviews/updates of the website content.
Year 2009:	Semi-annual reviews/updates of the website content.
Year 2010:	Semi-annual reviews/updates of the website content.
Year 2011:	Semi-annual reviews/updates of the website content.



Minimum Control Measure: Public Education and Outreach	
BMP ID Number:	A3
BMP:	Video and/or television ads
Target Audience:	General Public
Description of BMP:	Videos and television ads will be purchased to educate the general public on important stormwater, water quality, and ecological issues, which may include conservation of water, nutrient, herbicide and pesticide management, pet waste disposal/management, trash and landscaping debris disposal/management, riparian buffers, septic systems, and household/commercial waste disposal. The videos and/or ads will be aired on the local cable station owned by Charter Communications.
Measurable Goal(s):	A television advertisement or video, on the local cable station, will be broadcast annually.
Responsible Party:	Stormwater Program Manager
Rationale:	This allows for convenient access and a cost-effective method for reaching large groups of people regarding important stormwater, water quality, and ecological issues.
Implementation Schedule:	
Year 2007:	Continue Running Ads.
Year 2008:	Continue Running Ads.
Year 2009:	Continue Running Ads.
Year 2010:	Continue Running Ads.
Year 2011:	Continue Running Ads.



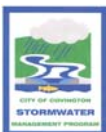
Minimum Control Measure: Public Involvement/Participation	
BMP ID Number:	B1
BMP:	Amnesty Day
Target Audience:	General Public
Description of BMP:	KCNB, on behalf of the City and County, will facilitate an amnesty day for individuals in the community to dispose of household wastes such as used motor oil, paints, and solvents. The goal of the program will be to limit the introduction of potential contaminants to illicit discharges, landfill leachate systems and to wastewater systems. This program will encourage residents to bring hazardous materials to one of 11 recycling centers located throughout the County. Notification of the events will be conducted through newspaper notices, signs at the Recycling Centers and the aforementioned website. Each event will be held in October.
Measurable Goal(s):	Advertisements will be placed on the radio, in the local newspapers, and in the mail prior to the event. This activity will be held annually.
Responsible Party:	Stormwater Program Manager
Rationale:	This is a proactive action plan that encourages the community to be responsible in disposing chemical wastes and used motor oil. By implementing this program the chances of these substances being dumped, directly into the water system or on the land, are diminished.
Implementation Schedule:	
Year 2007:	Advertise the event in September and October & host the event this year.
Year 2008:	Advertise the event in September and October & host the event this year.
Year 2009:	Advertise the event in September and October & host the event this year.



Year 2010:	Advertise the event in September and October & host the event this year.
Year 2011:	Advertise the event in September and October & host the event this year.



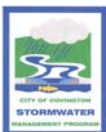
Minimum Control Measure: Public Involvement/Participation	
BMP ID Number:	B2
BMP:	Great American Cleanup
Target Audience:	General Public
Description of BMP:	<p>The Great American Cleanup, the nation's largest community improvement program, takes place annually from March 1 through May 31, involving an estimated 2.8 million volunteers and attendees. This event is coordinated by Keep America Beautiful.</p> <p>KCNB, on behalf of the City and County, will coordinate a cleanup day with state and local affiliates. As a part of this event, KCNB asks volunteer groups to pick up litter in their neighborhoods and local areas. In honor of the Great American Cleanup event, KCNB organizes a major cleanup day in April of each year. In addition, KCNB also encourages local volunteer groups to organize and participate in their own cleanup events during this period.</p>
Measurable Goal(s):	Advertisements will be placed on the radio, in the local newspapers, and in the mail prior to the event. This activity will be held annually.
Responsible Party:	Stormwater Program Manager
Rationale:	Litter is a major source of stormwater pollution in the city. By involving the public in litter cleanups, the city not only removes a large amount of trash from the water ways, but also teaches the public about the problem. Educated citizens are more likely to dispose of trash correctly and less likely to litter the city.
Implementation Schedule:	
Year 2007:	Advertise the event in March and April & host the event this year.
Year 2008:	Advertise the event in March and April & host the event this year.
Year 2009:	Advertise the event in March and April & host the event this year.
Year 2010:	Advertise the event in March and April & host the event this year.



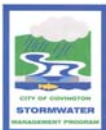
Year 2011:	Advertise the event in March and April & host the event this year.



Minimum Control Measure: Public Involvement/Participation	
BMP ID Number:	B3
BMP:	Rivers Alive
Target Audience:	General Public
Description of BMP:	Rivers Alive is Georgia's annual volunteer waterway cleanup event. Held throughout 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 Keep Covington/Newton Beautiful and the local office of the Georgia Wildlife Federation. In Newton County, there are four access points along the Yellow River and eight access points along the Alcovy River. A designated group reports to a specific access point, during the event, to pick up litter and debris. A radius of approximately one to two hundred feet, from the access point, is covered by the participants. These volunteers are solicited from civic groups, youth groups, schools, and through the local newspaper. Bags, gloves, and other supplies, including food and drinks, are supplied by local donors such as Kroger Grocery Store, and the City of Covington. All of the collected waste is disposed of in one of the many waste recycling centers located around the County.
Measurable Goal(s):	This is an annual event usually held in October. The City will attempt to increase attendance at this event by 10% each year.
Responsible Party:	Stormwater Program Manager
Rationale:	Rivers Alive is a good way for the public to actively participate in an effort to cleanup local streams and rivers.
Implementation Schedule:	
Year 2007:	Continue on-going event.
Year 2008:	Continue on-going event.
Year 2009:	Continue on-going event.



Year 2010:	Continue on-going event.
Year 2011:	Continue on-going event.



Illicit Discharge Detection and Elimination

40 CFR Part 122.34(b)(3) Requirement: You must develop, implement and enforce a program to detect and eliminate illicit discharges into your small MS4. You must:

- A) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls;
- B) Effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions;
- C) Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to your system; and
- D) Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

A. Storm Sewer Map

- 1. Does the MS4 have a completed storm sewer map showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls? Yes No

If yes, submit the storm sewer system map as an addendum to this form.

- 2. If the storm sewer system map must be developed, provide a schedule for completion (e.g. 30% of system to be mapped each year):

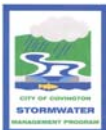
This map was completed in August 2007. It includes all outfalls and other storm components.

B. Ordinance/ Regulatory Mechanism Evaluation

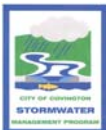
- 1. Does the MS4 have an ordinance or regulatory mechanism that effectively prohibits illicit discharges? Yes No

If yes, submit a copy as an addendum to this form.

This ordinance was adopted in October 2004. The map was completed in 2007.



Minimum Control Measure: Illicit Discharge Detection & Illimination	
BMP ID Number:	C1
BMP:	Comprehensive inventory/map of stormwater management facilities and outfalls within the City
Target Audience:	General Public
Description of BMP:	The City has developed a storm sewer mapping/GIS program. Mapped items include storm system conveyances, outfall locations, and stormwater detention ponds. This allows the City to have extensive knowledge of the locations for all City maintained stormwater structures and components. A summary of the components mapped is included as an appendix to this BMP.
Measurable Goal(s):	The City will continue the inventory and update changes as needed.
Responsible Party:	Stormwater Program Manager
Rationale:	It is important for the City to maintain this type of inventory/map to understand the system itself. This allows the City to see where existing structures, facilities, and outfalls are and where BMPs can best be implemented. In case of spill, having this in place will allow City personnel to respond to appropriate locations to prevent discharge to receiving waters.
Implementation Schedule:	
Year 2007:	Inventory new structures as needed.
Year 2008:	Inventory new structures as needed.
Year 2009:	Inventory new structures as needed.
Year 2010:	Inventory new structures as needed.
Year 2011:	Inventory new structures as needed.

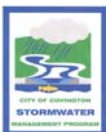


BMP ID Number C1 (Appendix)

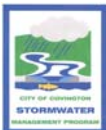
The City of Covington completed its initial Stormwater Inventory during 2007, identifying a total of 4,965 point elements (inlets, manholes, junction boxes, etc.), 5,993 linear elements (pipes, ditches, swales, and network connectors), 280 outfalls, and 161 detention ponds.



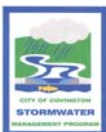
Minimum Control Measure: Illicit Discharge Detection & Elimination	
BMP ID Number:	C2
BMP:	Comprehensive inventory database of complaints and actions taken in response to complaints regarding illicit discharges
Target Audience:	General Public
Description of BMP:	<p>Maintaining a comprehensive inventory database is beneficial to evaluate the progress of the illicit discharge program. This allows personnel, responsible for this program, to maintain track records of complaints, dumping locations, industrial discharges, and how they were resolved.</p> <p>To date, the City has the website online along with a complaint tracking system. If a citizen has a complaint, he/she can go to the website and submit, via e-mail, the complaint. 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.</p> <p>A citizen can also make a direct complaint by calling Customer Service or the Engineering Department. All complaints are handled on a case-by-case basis.</p>
Measurable Goal(s):	The comprehensive inventory database of complaints and actions will be maintained and updated as needed. Illicit discharge statistics will be tracked throughout the year and included in the annual report.
Responsible Party:	Stormwater Program Manager
Rationale:	An inventory database of complaints and actions enables the City to track illicit discharges and the actions that were taken to eliminate the problem. Long-term evaluations will allow City personnel to develop trends, if any, and establish prevention plans accordingly, and evaluate the efficiency of response to complaints.
Implementation Schedule:	
Year 2007:	Continue complaint inventory database program.



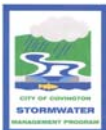
Year 2008:	Continue complaint inventory database program.
Year 2009:	Continue complaint inventory database program.
Year 2010:	Continue complaint inventory database program.
Year 2011:	Continue complaint inventory database program.



Minimum Control Measure: Illicit Discharge Detection & Illimination	
BMP ID Number:	C3
BMP:	Illicit discharge detection screening program
Target Audience:	General Public
Description of BMP:	<p>If an illicit discharge is determined, the identification of the source will be determined through evaluation of the existing storm sewer system draining the outfall. Laboratory analyses may be run to determine the extent, if any, of pollutants discharging from the outfall. Upon completion of the evaluation, enforcement actions will be taken. The enforcement action will be determined on a case-by-case basis and will be appropriate to the situation. This may include written notice, fines, or facility shutdown. Once a discharge has been determined, follow-up testing, visual inspection and/or laboratory analyses, will continue.</p> <p>The City of Covington completed its initial stormwater inventory during 2007, and an initial illicit discharge detection screening was completed concurrently with this inventory. A total of 280 outfalls were located and screened through 2007.</p> <p>On-going monitoring will be performed in commercial and industrial, and other “hot spot” areas.</p>
Measurable Goal(s):	Twenty percent of these structures will be screened annually.
Responsible Party:	Stormwater Program Manager
Rationale:	An outfall screening program will allow City personnel to observe potential illicit discharges that may or may not be reported and have gone unnoticed. On-going monitoring will help to detect those discharges in high potential areas. By combining this BMP with the comprehensive storm sewer system inventory, these inspections can be completed with minimal effort.



Implementation Schedule:	
Year 2007:	Perform on-going screening and monitoring of commercial, industrial, and high potential areas for illicit discharge connections.
Year 2008:	Perform on-going screening and monitoring of commercial, industrial, and high potential areas for illicit discharge connections.
Year 2009:	Perform on-going screening and monitoring of commercial, industrial, and high potential areas for illicit discharge connections.
Year 2010:	Perform on-going screening and monitoring of commercial, industrial, and high potential areas for illicit discharge connections.
Year 2011:	Perform on-going screening and monitoring of commercial, industrial, and high potential areas for illicit discharge connections.



Construction Site Storm Water Runoff Control

40 CFR Part 122.34(b)(4) Requirement: You must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. Your program must include:

- A) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance;
- B) Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;
- C) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
- D) Procedures for site plan review which incorporate consideration of potential water quality impacts;
- E) Procedures for receipt and consideration of information submitted by the public; and
- F) Procedures for site inspection and enforcement of control measures.

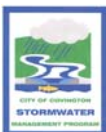
A. Ordinance Evaluation

- 1. Does the MS4 have an ordinance which is adequate to require erosion and sediment controls at construction sites? Yes No
- 2. Does the ordinance include sanctions for failure to comply with erosion and sediment control requirements? Yes No

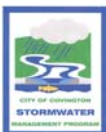
This ordinance was adopted in October 2001.



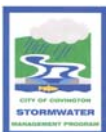
Minimum Control Measure: Construction Site Stormwater Runoff Control	
BMP ID Number:	D1
BMP:	Comprehensive inventory database of complaints and actions taken in response to complaints regarding construction site runoff
Target Audience:	General Public
Description of BMP:	<p>Maintaining a comprehensive 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.</p> <p>To date, the City has a website and complaint tracking system. If a citizen has a complaint, he/she can go to the website and submit, via e-mail, the complaint. 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.</p> <p>A citizen can also make a direct complaint by calling Customer Service or the Engineering Department. All complaints are handled on a case-by-case basis.</p>
Measurable Goal(s):	The comprehensive inventory database of complaints and actions, taken in response construction site runoff, will be maintained, and all construction site runoff complaints will be investigated within a 24-hour period. These statistics will be tracked throughout the year and included in the annual report.
Responsible Party:	Stormwater Program Manager
Rationale:	An inventory database of complaints and actions enables the City to track insufficient on-site BMPs (erosion and sediment control measures) and the actions that were taken to eliminate the problem. Long-term evaluations will allow City personnel to develop trends, if any, and establish prevention plans accordingly. It also allows the City to evaluate the efficiency of complaints and how each situation was resolved.



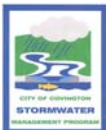
Implementation Schedule:	
Year 2007:	Continue complaint inventory database program.
Year 2008:	Continue complaint inventory database program.
Year 2009:	Continue complaint inventory database program.
Year 2010:	Continue complaint inventory database program.
Year 2011:	Continue complaint inventory database program.



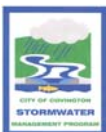
Minimum Control Measure: Construction Site Stormwater Runoff Control	
BMP ID Number:	D2
BMP:	Checklists revision for design requirements for erosion and sediment control plans
Target Audience:	General Public
Description of BMP:	<p>Current Covington Protocol is as follows:</p> <p>Plans reviewed for erosion and sedimentation control are measured against the Erosion and Sediment Control Plan Review Checklist. Verification, of NPDES NOIs submitted to EPD, must be provided with each plan submittal. This information is kept in the job file. Included in the Erosion and Sediment Control Plan Review form is A Report of Technical Review, which accompanies each plan. Final approval is contingent on the developer/engineer meeting all the stipulations provided on this form. A Land Disturbance Agreement, contained within the Application for Land Disturbing Permit form, must be signed by the permittee. This Agreement certifies that the person(s) involved in land disturbing activity (LDA) understands the provisions of the City Erosion and Sediment Control Ordinance and Program and is responsible for complying with the approved Erosion and Sediment Control Plan. Each set of approved plans contain a stamp indicating who approved the erosion and sedimentation plan; the date is also included. Other stamps are provided on a case by case basis. They include directives regarding the type of silt fence to be used, the inspection frequency, and maintenance frequency.</p>
Measurable Goal(s):	Erosion & sedimentation checklists for plan development will be enforced for new plans submittals and revised as needed. The plans reviewed and approved by the City will be documented and reported in the annual report. All plans will be reviewed in accordance with these checklists.
Responsible Party:	Stormwater Program Manager
Rationale:	The existing City checklists will be used and revised as needed to ensure it is meeting the most stringent requirements for erosion and sediment control regulations and maintaining compliance with the



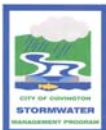
	stormwater management program.
Implementation Schedule:	
Year 2007:	Continue use of checklist.
Year 2008:	Continue use of checklist.
Year 2009:	Continue use of checklist.
Year 2010:	Continue use of checklist.
Year 2011:	Continue use of checklist.



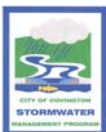
Minimum Control Measure: Construction Site Stormwater Runoff Control	
BMP ID Number:	D3
BMP:	Erosion and sediment control enforcement procedures and additional staff evaluation
Target Audience:	General Public
Description of BMP:	<p>Current Covington Protocol is as follows:</p> <p>A Notice of Permit Requirement form is used when non permitted land disturbing activity (LDA) is detected. A Grading Permit and a Sediment & Erosion Permit is issued for a proposed LDA that is approved by the Engineering Department. A Notice to Comply form is used when LDA does not conform to the approved and permitted plans. 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 Irrevocable Letter of Credit can be required by the Engineering Department prior to the issuance of a 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. In lieu of this, the Engineering Department has required that a developer or builder craft a contract with a local erosion and sediment control company. The language in the contract must provide the contractor with an adequate means to address any erosion control problems within a reasonable amount of time. This contract must be approved by the Engineering Department.</p>
Measurable Goal(s):	Erosion & Sedimentation enforcement procedures will be applied to developments as needed. Enforcement action will be taken on all violations. This data will be documented and included in the annual report.
Responsible Party:	Stormwater Program Manager
Rationale:	The current enforcement procedures will be used and periodically evaluated to ensure they are strict enough to deter inadequate erosion and sediment control measures. Should additional staff be needed to undertake enforcement, then the City will do so.



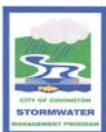
Implementation Schedule:	
Year 2007:	Enforce procedures. Review and develop/adopt changes as needed.
Year 2008:	Enforce procedures. Review and develop/adopt changes as needed.
Year 2009:	Enforce procedures. Review and develop/adopt changes as needed.
Year 2010:	Enforce procedures. Review and develop/adopt changes as needed.
Year 2011:	Enforce procedures. Review and develop/adopt changes as needed.



Minimum Control Measure: Construction Site Stormwater Runoff Control	
BMP ID Number:	D4
BMP:	Standardized inspection checklists for all City personnel involved with inspection of erosion and sediment control BMPs
Target Audience:	General Public
Description of BMP:	<p>Current Covington Protocol is as follows:</p> <p>The Engineering Department is responsible for the site inspections. Currently, there is two full-time E&S Inspectors and one part-time E&S Inspector.</p> <p>During the construction of a house; development of a subdivision; or development of a commercial site, the typical inspection frequency is once per week for the duration of the project. This inspection frequency is augmented on an as need basis. For example: If it rains extremely hard and a substantial amount of stormwater runoff is generated, the Inspectors work diligently to visit the sites most likely to have E&S problems. If the Engineering Department receives a complaint regarding silted streams or erosion problems, a visit is made to the site causing the problem. At times, a thorough investigation is needed to pinpoint the correct site, especially if the complaint involves a silted stream. The Engineering Department has extensive GIS mapping capabilities to facilitate this effort.</p> <p>An Erosion and Sediment Control Site Inspection Report is completed at each site visit. The approved E&S Plan, for the site, is reviewed and compared to the actual field conditions to ensure that the control measures have been properly implemented. Deficiencies and general comments are recorded on the aforementioned form. An Erosion & Sedimentation Final Inspection form is completed at or near final completion of the project. The subject site is reviewed to ensure that the area is adequately stabilized and all temporary BMPs (silt fence, construction exits, ect.) have been removed. If deficiencies are observed, the Certificate of Occupancy (CO) for the site is held until the appropriate corrective measures have been taken.</p>



Measurable Goal(s):	Erosion & sedimentation inspection checklists will be maintained and revised as needed. All sites will be inspected on a weekly basis. This data will be documented and included in the annual report.
Responsible Party:	Stormwater Program Manager
Rationale:	The current standardized inspection checklists for City personnel involved with erosion and sediment control will be periodically evaluated to ensure a comprehensive standard inspection method will be followed in all cases, and all individuals involved with construction activities will be aware of the policies and procedures.
Implementation Schedule:	
Year 2007:	Continue use of checklist.
Year 2008:	Continue use of checklist.
Year 2009:	Continue use of checklist.
Year 2010:	Continue use of checklist.
Year 2011:	Continue use of checklist.



**Post-Construction Storm Water Management in
New Development and Redevelopment**

40 CFR Part 122.34(b)(5) Requirement: You must develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. You must:

- A) Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;
- B) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development or redevelopment projects; and
- C) Ensure adequate long-term operation and maintenance of BMPs.

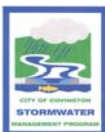
A. Ordinance Evaluation

- 1. Does the MS4 have an ordinance that effectively controls runoff from new development or redevelopment construction sites?

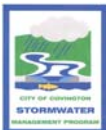
Yes No

If yes, submit a copy as an addendum to this form.

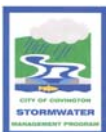
This ordinance was adopted in October 2004.



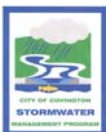
Minimum Control Measure: Post Construction Stormwater Management in New Development and Redevelopment	
BMP ID Number:	E1
BMP:	Georgia Stormwater Management Manual
Target Audience:	General Public
Description of BMP:	The City adopted the Georgia Stormwater Management Manual (GSMM) in October of 2004.
Measurable Goal(s):	The standards and specifications of the Georgia Stormwater Management Manual will be enforced on new development.
Responsible Party:	Stormwater Program Manager
Rationale:	The Georgia Stormwater Management Manual is a very comprehensive and thorough manual, and will be adopted to ensure the material is followed and incorporated.
Implementation Schedule:	
Year 2007:	Continue use of manual.
Year 2008:	Continue use of manual.
Year 2009:	Continue use of manual.
Year 2010:	Continue use of manual.
Year 2011:	Continue use of manual.



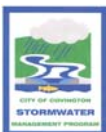
Minimum Control Measure: Post Construction Stormwater Management in New Development and Redevelopment	
BMP ID Number:	E2
BMP:	Checklist for use in plan reviews to ensure compliance with water quality control and channel protection measures per the Georgia Stormwater Management Manual
Target Audience:	General Public
Description of BMP:	A review checklist ensures the design and layout of stormwater infrastructure will attain stormwater and water quality management goals as required by the Georgia Stormwater Management Manual. The City currently uses checklists for all plans that are submitted for land disturbance permits. This checklists will be reviewed and revised, as necessary, to comply with the requirements of GSMM.
Measurable Goal(s):	Checklists, pertaining to the Georgia Stormwater Management Manual, will be used to review future plan submittals.
Responsible Party:	Stormwater Program Manager
Rationale:	A checklist will ensure proper techniques and methods are incorporated into developments to maintain water quality and stormwater management and prevent degradation of adjacent surface waters
Implementation Schedule:	
Year 2007:	Continue use of checklist.
Year 2008:	Continue use of checklist.
Year 2009:	Continue use of checklist.
Year 2010:	Continue use of checklist.
Year 2011:	Continue use of checklist.



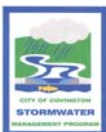
Minimum Control Measure: Post Construction Stormwater Management in New Development and Redevelopment	
BMP ID Number:	E3
BMP:	Policies and procedures for stormwater system maintenance on public and private properties
Target Audience:	General Public
Description of BMP:	The City will maintain policies and procedures involved with stormwater system maintenance on both public and private properties. This includes evaluating regulations and requirements, code enforcement, operation and maintenance procedures, resources, and other issues regarding stormwater system maintenance.
Measurable Goal(s):	Policies and procedures for stormwater system maintenance on public and private properties will be maintained and updated as needed.
Responsible Party:	Stormwater Program Manager
Rationale:	It is important that the city personnel thoroughly understand the policies and procedures for maintaining storm sewer systems. This will ensure stormwater management is performed in a manner that best suits the city and the general public.
Implementation Schedule:	
Year 2007:	Continue review of policies and procedures.
Year 2008:	Continue review of policies and procedures.
Year 2009:	Continue review of policies and procedures.
Year 2010:	Continue review of policies and procedures.
Year 2011:	Continue review of policies and procedures.



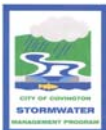
Minimum Control Measure: Pollution Prevention/Good Housekeeping	
BMP ID Number:	F1
BMP:	Training program/seminar for City employees in Pollution Prevention/Good Housekeeping
Target Audience:	City Personnel
Description of BMP:	The City will maintain a training program/seminar for City employees in Pollution Prevention/Good Housekeeping. Items that may be addressed include hazardous materials handling, operation and maintenance, policies and procedures, materials storage, and other issues dealing with Pollution Prevention/Good Housekeeping.
Measurable Goal(s):	All employees exposed to some level of outdoor work will be trained annually.
Responsible Party:	Stormwater Program Manager
Rationale:	A training program/seminar will ensure all department supervisors involved with municipal operations have been introduced to and are familiar with pollution prevention and good housekeeping policies, procedures, and techniques so they may educate their staff.
Implementation Schedule:	
Year 2007:	Hold annual training program/seminar.
Year 2008:	Hold annual training program/seminar.
Year 2009:	Hold annual training program/seminar.
Year 2010:	Hold annual training program/seminar.
Year 2011:	Hold annual training program/seminar.



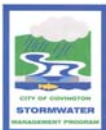
Minimum Control Measure: Pollution Prevention/Good Housekeeping	
BMP ID Number:	F2
BMP:	Program for sweeping City-owned facilities, City maintained streets/roads, and catch basin/inlet cleaning within City-owned right-of-way
Target Audience:	General Public
Description of BMP:	<p>Implementing a regular sweeping program reduces the chance of stormwater inlets to become clogged from trash and debris and increases aesthetics. The City already owns two street sweepers and has a program for street sweeping and catch basin cleaning. The program is City-wide and consists of all streets that have curb and gutter which is approximately 30 miles. All 30 miles are cleaned on a monthly basis. Catch basins are cleaned on an as needed basis. All materials collected are appropriately disposed of by the City of Covington Solid Waste Management Office.</p> <p>Catch basin and inlet structures will be inspected and cleaned as deemed necessary.</p>
Measurable Goal(s):	<p>This program is on-going. The City owns two street sweepers which are used to clean all City streets with curb and gutter; approximately 30 miles monthly.</p> <p>The City will inspect 20% of catch basins and inlets structures on an annual basis. Those containing trash and debris will be cleaned in the Spring or Fall of each year.</p>
Responsible Party:	Stormwater Program Manager
Rationale:	A sweeping and catch basin/inlet cleaning program increases aesthetics, reduces floatables draining to stormwater conveyances, reduces clogging, and cleaning the catch basins allows them to function properly and flow to be unobstructed.
Implementation Schedule:	
Year 2007:	Continue program.



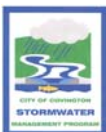
Year 2008:	Continue program.
Year 2009:	Continue program.
Year 2010:	Continue program.
Year 2011:	Continue program.



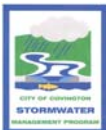
Minimum Control Measure: Pollution Prevention/Good Housekeeping	
BMP ID Number:	F3
BMP:	Monitoring of City-owned facilities for compliance with NPDES regulations for industrial activities
Target Audience:	City Personnel
Description of BMP:	The City will monitor City-owned industrial facilities to ensure each facility is maintaining compliance with the requirements of their NPDES permit for industrial activities. There are six City-owned facilities. They include: Land Application Facility; Electrical Storage Yard; Waste Water Reclamation Facility; Solid Waste Management Facility; Administrative, Warehouse, and Maintenance Complex; and Airport. Each facility will be inspected by designated personnel on an annual basis to ensure that each is compliance with the NPDES permit and the corresponding Stormwater Pollution Prevention Plan. A copy of each plan is kept at the corresponding facility and is on file with EPD.
Measurable Goal(s):	Facility inspections will be conducted in accordance with the requirements of the SWPPPs.
Responsible Party:	Stormwater Program Manager
Rationale:	An NPDES compliance review allows the City to ensure municipal facilities are not a cause for concern related to stormwater management.
Implementation Schedule:	
Year 2007:	Perform annual site visit and compliance review.
Year 2008:	Perform annual site visit and compliance review.
Year 2009:	Perform annual site visit and compliance review.
Year 2010:	Perform annual site visit and compliance review.
Year 2011:	Perform annual site visit and compliance review.



Minimum Control Measure: Pollution Prevention/Good Housekeeping	
BMP ID Number:	F4
BMP:	Evaluation of existing stormwater management facilities for retrofitting for water quality treatment
Target Audience:	General Public
Description of BMP:	<p>The City has evaluated approximately 10 basins for regional detention and water quality treatment. Four of these basins were further evaluated through hydraulic modeling. They include: 1) a 3,394 acre basin north of Herring Street; 2) a 177 area basin near the intersection of Pace Street and Hwy. 278; 3) a 135 acre basin behind the YMCA; and 4) a 27 acre basin at Newton Medical Center. Several concept designs were created for a water quality pond at the Newton Medical Center. The presence of bedrock, encountered during a geotechnical field study, has impeded the progress of this project. A summary of the modeled results is included as an appendix to this BMP.</p> <p>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, ect.) to determine their effectiveness and the feasibility of retrofitting them for water quality treatment.</p>
Measurable Goal(s):	One to three structures will be evaluated annually.
Responsible Party:	Stormwater Program Manager
Rationale:	Retrofitting existing flood management facilities for water quality treatment can be beneficial and improve water quality in nearby streams.
Implementation Schedule:	
Year 2007:	Evaluate the potential to retrofit existing facilities and implement where feasible.
Year 2008:	Evaluate the potential to retrofit existing facilities and implement



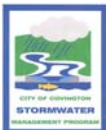
	where feasible.
Year 2009:	Evaluate the potential to retrofit existing facilities and implement where feasible.
Year 2010:	Evaluate the potential to retrofit existing facilities and implement where feasible.
Year 2011:	Evaluate the potential to retrofit existing facilities and implement where feasible.



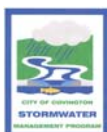
BMP ID Number F4 (Appendix)



Minimum Control Measure: Pollution Prevention/Good Housekeeping	
BMP ID Number:	F5
BMP:	Evaluation of proposed stormwater management facilities for water quality treatment
Target Audience:	General Public
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.
Measurable Goal(s):	New flood management facilities are required to comply with the requirements of the GSMM for water quality treatment.
Responsible Party:	Stormwater Program Manager
Rationale:	It is important that new flood management facilities be required to provide water quality treatment.
Implementation Schedule:	
Year 2007:	Continue enforcement.
Year 2008:	Continue enforcement.
Year 2009:	Continue enforcement.
Year 2010:	Continue enforcement.
Year 2011:	Continue enforcement.



Minimum Control Measure: Pollution Prevention/Good Housekeeping	
BMP ID Number:	F6
BMP:	Operations and maintenance of publicly and privately owned stormwater management facilities
Target Audience:	General Public
Description of BMP:	<p>An operation and maintenance program has been developed for regular upkeep of public and private stormwater conveyance and management facilities. This program will be coordinated with the Street Department. Some of the O&M tasks will be outsourced to an independent contractor as needed.</p> <p>A copy of the City of Covington Stormwater Management Facilities Operations and Maintenance Plan is included as an appendix to this BMP.</p>
Measurable Goal(s):	Structures will be maintained in accordance to the Covington Stormwater Management Facilities Operations and Maintenance Plan
Responsible Party:	Stormwater Program Manager
Rationale:	An operation and maintenance program for stormwater conveyance and management facilities will ensure proper functioning and long-term service life.
Implementation Schedule:	
Year 2007:	Continue Program.
Year 2008:	Continue Program.
Year 2009:	Continue Program.
Year 2010:	Continue Program.
Year 2011:	Continue Program.



BMP ID Number F6 (Appendix)

