



Stormwater Management Program

For The

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

Prepared For

City of Suwanee

August 2024

Prepared By



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STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Stormwater Management Program (SWMP)

1. **General Information**

- A. Name of small MS4: City of Suwanee
- B. NPDES Permit Number: GAS000144
- C. Mailing Address (if providing a post office box, also provide a street address):
City of Suwanee
330 Town Center Avenue
Suwanee, GA 30024
- D. Name of responsible official: Honorable Jimmy Burnette
Title: Mayor
Mailing Address: 330 Town Center Avenue
City: Suwanee State: GA Zip Code: 30024
Telephone Number: (770) 945-8996
Email Address: jburnette@suwanee.com
- E. Designated stormwater management program contact:
Name: Matt Gore
Title: Public Works Director
Mailing Address: 330 Town Center Avenue
City: Suwanee State: GA Zip Code: 30024
Telephone Number: (770) 904-3373
Email Address: mgore@suwanee.com
- F. Provide the river basin(s) to which your MS4 discharges: Chattahoochee and Ocmulgee
- G. Provide the latitude and longitude of the MS4 center (e.g. City Hall, County offices, MS4 mailing address) using Global Positioning System (GPS) –WG 84:
Latitude: 34.0554°N Longitude: -84.0641°W

2. **Sharing Responsibility**

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

SWMP Component:

1. Name of entity _____

2. SWMP component to be implemented by entity on your behalf:

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

3. **Certification Statement**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: Matt Gore

Title: Public Works Director

Signature:  _____

Date: 11/21/24

Structural and Source Control Measures
Table 3.3.1 of the Permit

1. MS4 Control Structure Inventory and Map

1. Description of SWMP Component:

The City of Suwanee will continue to maintain a GIS based map and inventory of all MS4 components owned or maintained by the City within the City Limits. At a minimum, the inventory and map will include the following:

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

Each year, the City will update the inventory and map as new structures are added or existing structures are removed. A summary of the total number of structures added/removed each year, the total number of MS4 structures, and an updated inventory and map will be included in the annual report for that permit year.

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

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

SWMP Attachments:

- Inventory of 4 structure types
- MS4 Inventory Map

2. MS4 Inspection and Maintenance Program

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

Inspection Program

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

Maintenance Program

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

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

SWMP Attachments:

- MS4 Inspection Sector Map
- Detention pond inspection form
- Operation and Maintenance Procedures

3. **Planning Procedures**

1. **Description of SWMP Component:** On February 14, 2019, the City adopted a 2040 Comprehensive Plan, which was amended on March 14, 2024. The Comprehensive Plan addresses zoning and future land use, focusing on “smart growth development” and sustainable design standards. The plan includes conserving and adding dedicated land for greenways, parks, conservation lands and other green spaces. The plan also focuses on the protection of water resources, including streams, groundwater, floodplains, and wetlands. A copy of the current 2040 Comprehensive Plan can be found at:
<https://www.suwanee.com/explore-suwanee/documents-downloads/-folder-266>
2. **Measurable goal(s):** Evaluate the Comprehensive Plan annually to determine if updates are needed.
3. **Documentation to be submitted with each Annual Report:** A description of any changes made to the Comprehensive Plan during the reporting period.

4. **Street Maintenance**

1. **Description of SWMP Component:** The City conducts street cleaning using a contracted street sweeping service. Street sweeping reduces polluted runoff from vehicle traffic, leaks and spills, and litter. The contractor sweeps the public curb and gutter roads several times a year as needed and requested by the City. In addition, the City employs a contractor to pick up litter along road rights-of-way, especially prior to mowing.
2. **Measurable goal(s):** Using a contractor, sweep City streets at least one time per reporting period. Pick up litter along City roads at least one time during the reporting period.
3. **Documentation to be submitted with each Annual Report:** Street sweeping invoices or logs. Litter collection invoices or logs.

5. **Flood Management Projects**

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

New Flood Management Projects

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

Existing Structure Flood Control Devices

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

2. **Measurable goal(s):** Ensure all plan reviews are conducted using the Gwinnett County Stormwater Management Manual (GSMM equivalent) resulting in 100% of all new flood management projects being assessed for water quality impacts. Provide a list of previously assessed existing City-owned flood management projects with the 2024-2025 annual report. Assess at least one of the remaining existing City-owned flood management projects annually, ensuring 100% of the projects are assessed within the 5-year permit term.

3. **Documentation to be submitted with each Annual Report:** A list of plans reviewed during the reporting period and the number of resulting detention facilities. For the 2024-2025 annual report, documentation of previous assessments and the status of any retrofits. Completed Water Quality Improvement Worksheets and the status of any retrofit activities conducted during the reporting period.

SWMP Attachment:

- Water Quality Improvement Worksheet

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

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

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

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

SWMP Attachments

- Municipal Facility Inventory
- Municipal Facility Inspection Checklist

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

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

Commercial Applicators and Distributors

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

Municipal Pesticide Use

The City stores minimal quantities of store-bought PFH’s. These products do not have professional strength and are limited in usage. The City currently has an employee certified to apply PFH’s. Either this certified employee or a private contractor will be used for the application of PFH’s, ensuring that the contractor has applicable, up-to-date certifications prior to issuing the notice to proceed.

2. **Measurable goal(s):** As needed, purchase non-regulated or regulated PFH’s for City use or contract with a licensed contractor performing PFH application in the City.

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

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

1. Legal Authority

1. **Description of SWMP Component:** The City adopted an Illicit Discharge and Illegal Connection ordinance on December 21, 2004, which was amended on November 24, 2009. The ordinance has been incorporated into the City's Code of Ordinances. The ordinance meets the requirements of the NPDES Phase I MS4 permit as well as the requirements of the Metropolitan North Georgia Water Planning District. If the requirements of these programs conflict, the more stringent requirement will be enforced. The ordinance provides the authority to conduct inspections and monitoring, control illicit discharges and connections, and control illegal dumping and spills into the MS4.
2. **Measurable goal(s):** Evaluate the Illicit Discharge and Illegal Connection ordinance annually.
3. **Documentation to be submitted with each Annual Report:** If the ordinance is revised during the reporting period, a copy of the adopted ordinance will be submitted with the annual report.

SWMP Attachment:

- Illicit Discharge and Illegal Connection ordinance

2. **Outfall Inventory and Map**

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

SWMP Attachments:

- MS4 outfall map
- MS4 outfall inventory

3. IDDE Plan

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

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

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

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

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

SWMP Attachments

- IDDE Plan
- Dry Weather Outfall Screening Form

4. Spill Response Procedures

1. **Description of SWMP Component:** Gwinnett County maintains and operates the sanitary sewer system in the City of Suwanee. Confirmed or suspected sewage spills will immediately be reported to Gwinnett County Department of Public Utilities Dispatch at 678-376-7000.

Gwinnett County's HazMat team completes spill response for major spills. A copy of their procedures has been attached. Records of all spills attended by Gwinnett County HazMat are held by the Gwinnett County Fire Department and are stored within a computer database. It should be noted that Gwinnett HazMat staff does not accept responsibility for clean-up; however, the team facilitates clean-up through contractors. Spill response is handled in the following manner:

- Where the company who caused the spill has a clean-up company on retainer to deal with these incidents, Gwinnett HazMat will notify the clean-up company of the need for clean-up and provide information as necessary to assist in the clean-up and appropriate response.
- Where the company or individual does not have a retainer with a clean-up company and:
 - *The company or individual responsible for the spill is willing to work with the HazMat teams and have the spill cleaned up and are willing to pay for such clean-up* – The Hazmat team will provide a list of clean-up companies the company or individual can select. All HazMat trucks have fax machines that can be used by the clean-up company to secure signed paperwork from the company or individual responsible for the spill stating that they accept responsibility for the costs associated with the clean-up. Once the signed statement is received, that clean-up company will commence its response and clean-up.

Or

- *The company or individual responsible for the spill is not willing to work with the HazMat teams and have the spill cleaned up* – The HazMat teams will notify EPD emergency response of the situation and ask for assistance in encouraging the company or individual to clean up the spill. EPD emergency response is notified at any time any hazardous materials enter any drainage structure or water.

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

SWMP Attachments

- Gwinnett County HazMat Spill Response Procedures
- Spill Response Procedures for SSOs

5. **Public Reporting Procedures**

1. **Description of SWMP Component:** The City receives complaints from citizens through numerous avenues, including phone calls and emails. The City’s website includes a “Report an Issue” portal that allows the resident to complete an online form reporting the issue. The complaint portal can be accessed at: <https://www.suwanee.com/services/report-an-issue>. Complaints are received by City staff, who will forward the relevant complaints to the Public Works Department. The City investigates all complaints within 5 business days of receipt. If necessary, the City will take enforcement against the responsible party.
2. **Measurable goal(s):** Investigate 100% of all stormwater related complaints within 5 business days of receipt.
3. **Documentation to be submitted with each Annual Report:** A screenshot of the City’s website showing notification to the public on how to report illicit discharges. A database of stormwater related complaint calls received and listing specifics regarding the investigation and resolution of each complaint.

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

1. **Description of SWMP Component:** Gwinnett Clean and Beautiful (GCB) maintains a website that contains a listing of local sites that will accept waste oil, other toxic materials, and recyclables from the general public. The website also provides information on source reduction, recycling, and proper handling procedures for these materials. The City will maintain a link on the City's Stormwater Management webpage to the GCB website and the hazardous material disposal information.
2. **Measurable goal(s):** Maintain a link on the City's website to the GCB website each reporting period.
3. **Documentation to be submitted with each Annual Report:** Screenshots of the City's website showing the GCB link and the GCB website.

7. **Sanitary Sewer Infiltration Controls**

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

Industrial Facility Stormwater Discharge Control
Table 3.3.3 of the Permit

1. Industrial Facility Inventory

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

SWMP Attachment

- Industrial Facility Inventory

2. Inspection Program

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

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

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

SWMP Attachment

- Industrial Facility Inspection Checklist

3. **Enforcement Procedures**

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

4. **Educational Activities**

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

Construction Site Management
Table 3.3.4 of the Permit

1. Legal Authority

1. **Description of SWMP Component:** The City adopted an updated Soil Erosion and Sedimentation (E&S) Control ordinance on March 30, 2017. This ordinance meets the requirements of the NPDES Phase I Large MS4 permit as well as the requirements of the Georgia Erosion & Sedimentation Act (GESA). If the requirements of these programs conflict, then the most stringent requirement will be enacted.
2. **Measurable goal(s):** Evaluate the E&S ordinance once each reporting period and revise the ordinance if necessary.
3. **Documentation to be submitted with each Annual Report:** If the E&S ordinance is revised during the reporting period, a copy of the adopted ordinance.

SWMP Attachment

- Soil Erosion and Sedimentation Control Ordinance

2. Site Plan Review Procedures

1. **Description of SWMP Component:** The City is certified as a Local Issuing Authority and remains in compliance with the Georgia Erosion and Sedimentation Control Act (GESA) of 1975, as amended. Accordingly, all developers are required to comply with the local Soil E&S Control ordinance and obtain a land disturbance permit prior to the start of any land disturbing activities that will disturb one (1.0) or more acres of land within the City limits.

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

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

3. **Inspection Program**

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

SWMP Attachment

- Site Inspection Report Checklist

4. Enforcement Procedures

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

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

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

5. **Certification**

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

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

1. HVPS Facility Inventory

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

- Auto Repair/Maintenance Facilities
- Gas Stations
- Landscape and Garden related businesses (not homeowner businesses)
- Car Washes

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

2. **Measurable goal(s):** Update the HVPS facility inventory one time each reporting period.

3. **Documentation to be submitted with each Annual Report:** Updated inventory of HVPS facilities.

SWMP Attachment

- HVPS Facility Inventory

2. Inspection Program

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

SWMP Attachment

- HVPS Facility Inspection Checklist

3. **Enforcement Procedures**

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

4. **Educational Activities**

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

Public Education
Table 3.3.9 of the Permit

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

1. Public Education - Educational Activity #1 - Website

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

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

1. **Description of SWMP Component:** The City will stock educational brochures with stormwater related information at City Hall. The brochures will be obtained from the Clean Water Campaign and other sources. The City will count the number of brochures and replenish copies as needed. The City will track the number of brochures stocked, distributed, and replaced using a log.
3. **Measurable goal(s):** Supply 50 copies of educational brochures at City Hall. Track the number of brochures distributed during the reporting period.
4. **Documentation to be submitted with each annual report:** Tracking log showing the number of copies of the brochure stocked, picked up, and restocked.

3. Public Education - Educational Activity #3 – HOA Education

1. **Description of SWMP Component:** Annually, the City emails educational information to Homeowner’s Associations (HOAs) regarding stormwater related topics, including such things as maintaining and cleaning subdivision detention ponds. In the email to the distribution list, the City requests that the educational material be shared with the neighborhood residents.
2. **Measurable goal(s):** Email educational material to a HOA distribution list at least once during the reporting period.
3. **Documentation to be submitted with each Annual Report:** Copy of the email and the educational material transmitted to the HOA distribution list.

4. **Public Education - Educational Activity #4 – Facebook Page**

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

Public Involvement
Table 3.3.10 of the Permit

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

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

1. **Description of SWMP Component:** Beginning the day after Christmas, the City participates in the “Bring One for the Chipper Program”. This program is an annual tradition which is held in partnership between Gwinnett Clean & Beautiful, 13 local governments, Georgia Power and Jackson EMC. The goal is to reduce illegal dumping of trees on roadsides. Residents are encouraged to give back to nature and bring their Christmas tree to one of approximately 30 local drop-off locations between December 26 and approximately January 18. Once the trees are collected from the drop-off location, community volunteers chip them into mulch.
2. **Measurable goal(s):** Hold one Bring One for the Chipper event during the reporting period.
3. **Documentation to be submitted with each Annual Report:** Copies of advertisements for the event. Photos or other forms of documentation showing the collection of trees.

2. **Public Involvement - Activity #2 – Report an Issue**

1. **Description of SWMP Component:** The City receives complaints from citizens through numerous avenues, including phone calls and emails. The City’s website includes a “Report an Issue” portal that allows the resident to complete an online form reporting the issue. The complaint portal can be accessed at: <https://www.suwanee.com/services/report-an-issue>. Complaints are received by City staff, who will forward the relevant complaints to the Public Works Department. The City investigates all complaints within 5 business days of receipt. If necessary, the City will take enforcement against the responsible party.
2. **Measurable goal(s):** Investigate 100% of all stormwater related complaints within 5 business days of receipt.
3. **Documentation to be submitted with each Annual Report:** A screenshot of the City’s website showing notification to the public on how to report illicit discharges. A database of stormwater related complaint calls received and listing specifics regarding the investigation and resolution of each complaint.

3. **Public Involvement - Activity #3 – City Council Public Participation**

1. **Description of SWMP Component:** City Council meetings are held at least once a month. During the meeting, any major stormwater maintenance activities or other stormwater related topics are discussed and approved. When a construction project related to stormwater needs to be approved, it is first put on the Council agenda. This agenda is available online for citizens to download and review. At the Council meeting, citizens can voice their opinion on stormwater related topics in the comment portion of the meeting.
2. **Measurable goal(s):** Hold at least one City Council meeting that includes a stormwater related topic.
3. **Documentation to be submitted with each Annual Report:** Copy of the Council agenda and minutes.

4. **Public Involvement - Activity #4 – Pet Waste Stations**

1. **Description of SWMP Component:** The City maintains multiple Pet Waste Stations at City parks. The stations consist of a waste receptacle, dog waste bags and signage. The City will supply the Pet Waste Stations with waste bags and empty the waste receptacles on a scheduled basis, usually weekly. When the waste receptacles are emptied, the City checks to see if additional bags need to be replaced in the station.
2. **Measurable goal(s):** The City will maintain at least one Pet Waste Station during the reporting period.
3. **Documentation to be submitted with each annual report:** Pictures and maps showing the locations of the pet waste stations. Invoices for the purchase of pet waste bags.

Post-Construction
Section 3.3.11 of the Permit

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

- A. Provide the date of the adoption of the Post-Construction ordinance: November 19, 2002, amended March 16, 2004
- B. Provide the date of the adoption of the Georgia Stormwater Management Manual:
March 16, 2004
- C. Ensure a copy of the Post-Construction ordinance is attached to the SWMP.
- D. Describe the status of implementing the stormwater runoff quality/reduction performance standard (Section 3.3.11(a)(2) of the Permit), including the implementation of Option (a) by the deadline date of December 10, 2020: The City adopted the Gwinnett County Stormwater Management Manual through the City's Post-Construction ordinance, which ensures consistency throughout the County. The County's manual is equivalent to the Georgia Stormwater Management Manual. The City Planning and Inspections Department ensures that plan reviews for all proposed projects are conducted using the Gwinnett County Stormwater Management Manual to evaluate water quality impacts and to institute runoff reduction standards. The City is in the process of adopting the 2019 Metropolitan North Georgia Water Planning District model ordinance. The City requires time to evaluate the resources needed to implement the new District requirements. The adoption will be finalized by December 31, 2025 and the adopted ordinance will be included with the 2025-2026 annual report.

2. Linear Transportation Project

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

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

1. Legal Authority

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

SWMP Attachments

- Post-Construction Ordinance
- CWP Code and Ordinance Worksheet

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

2. GI/LID Program

1. **Description of SWMP Component:** The GI/LID program was approved by EPD during the 2018-2019 reporting period. The program was updated in August 2024 to address the requirements of the 2024 NPDES Permit. The GI/LID program was developed to encourage and track the use of GI/LID structures and provide procedures for evaluating the feasibility and site applicability of different GI/LID structures. The program describes the GI/LID structures the City most often approves, but clarifies that additional structure types may be proposed and utilized. The GI/LID program details how the City will inspect and maintain publicly-owned, publicly-owned by other entities, and privately-owned non-residential GI/LID structures. During the permit period, the City will continue to implement the GI/LID program. If the program is revised during the reporting period, the City will submit the revised program to EPD for review and approval with each annual report.
2. **Measurable goal(s):** Evaluate the GI/LID program once each reporting period.
3. **Documentation to be submitted with each Annual Report:** Either a statement that the GI/LID program was evaluated and no revisions were warranted, or a revised GI/LID program.

SWMP Attachment

- GI/LID Program

3. **GI/LID Structure Inventory**

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

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

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

SWMP Attachment

- GI/LID Structure Inventory

4. Inspection and Maintenance Program

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

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

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

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

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

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

SWMP Attachment

- GI/LID inspection forms

Appendix G

Enforcement Response Plan (ERP)

Section 3.3.6 of the Permit

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program.
 - A. Provide the date the ERP was approved by EPD: January 13, 2016
 - B. If the ERP has not yet been approved, provide the date submitted to EPD: N/A
2. A copy of the ERP must be attached to this Appendix.

SWMP Attachment

- Appendix G – Enforcement Response Plan

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

Appendix H

Impaired Waters Section 3.3.7 of the Permit

1. Population at the time of permit issuance: 22,477
2. The Impaired Waters Plan (see Part 3.3.7 of the NPDES Permit) must, at a minimum, include:
 - A list of impaired waters and the pollutant(s) of concern, including the date of the 303(d) list used;
 - A map showing the location of the impaired waters, the monitoring location, and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters and within the same watershed;
 - The sample location (instream or at the outfalls);
 - Information on the sample type, frequency and any seasonal considerations;
 - Schedule for starting monitoring for any newly identified pollutants
 - BMPs that will be implemented to address each pollutant of concern; and
 - A schedule for implementing the BMPs;
 - The information to be included in each annual report, including the monitoring data, an assessment of data trends, and an assessment of the effectiveness of the BMPs.
3. If the population exceeds 10,000, and a water is impaired for bacteria, then the MS4 must also address the following in the Impaired Water Plan:
 - Sample frequency for bacteria
 - A description of the development of a Sampling Quality and Assurance Plan if the bacteria data is below water quality standards for two years.

SWMP Attachment

- Appendix H – Impaired Waters Monitoring and Implementation Plans – Revised November 2024 to reference the approved 305(b)/303(d) list.

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

Appendix I

Municipal Employee Training Section 3.3.8 of the Permit

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

SWMP Attachments:

- Sign-in Sheet
- Good Housekeeping PowerPoint presentation