



**City of Dalton
Phase II MS4**

Storm Water Management Program

May 29, 2018

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

Storm Water Management Program (SWMP)

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

1. General Information

- A. Name of small MS4: City of Dalton

- B. Name of responsible official: Dennis Mock
Title: Mayor
Mailing Address: PO Box 1205
City: Dalton State: GA Zip Code: 30722
Telephone Number: 706-278-9500

- C. Designated stormwater management program contact:
Name: Andrew Parker
Title: Assistant Public Works Director
Mailing Address: PO Box 1205
City: Dalton State: GA Zip Code: 30722
Telephone Number: 706-278-7077
Email Address: aparker@cityofdalton-ga.gov

2. Sharing Responsibility

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

Control Measure or BMP: Public Involvement/Participation MCM

- 1. Name of entity: Dalton-Whitfield Regional Solid Waste Management Authority

- 2. Control measure or component of control measure to be implemented by entity on your behalf:
 - a. Public Involvement/Participation BMP#3 – Household Hazardous Waste Disposal (See Appendix B2 for MOU)

Control Measure or BMP: Public Involvement/Participation MCM

- 1. Name of entity: Keep Dalton-Whitfield Beautiful, Inc

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

Public Involvement/Participation BMP #4 – Adopt-A-Mile (See Appendix B3 for MOU)

Control Measure or BMP: Public Education and Outreach, Public Involvement/Participation, Illicit Discharge Detection and Elimination, Construction Stormwater Management in New Development and Redevelopment, and Pollution Prevention/Good Housekeeping MCM's

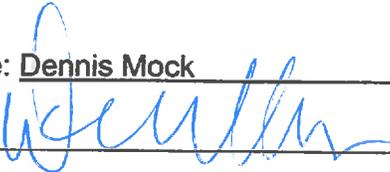
1. Name of entity: Whitfield County Engineer
2. Control measure or component of control measure to be implemented by entity on your behalf: Refer to list of BMP's in 'Exhibit A' City of Dalton MS4 Permit - Responsibility Table located in Appendix A0.1, which is a part of the Service Delivery Agreement Amendment between the City of Dalton and Whitfield County.

Minimum Control Measures (4.2)

- 4.2.1 Public Education and Outreach
- 4.2.2 Public Involvement/Participation
- 4.2.3 Illicit Discharge Detection and Elimination
- 4.2.4 Construction Site Stormwater Runoff Control
- 4.2.5 Post-Construction Stormwater Management in New Development and Redevelopment
- 4.2.6 Pollution Prevention/Good Housekeeping

Certification Statement (6.10)

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: Dennis Mock Date: 5/30/18
Signature:  Title: Mayor

Storm Water Management Program

4.2.1 Public Education and Outreach on Storm Water Impacts

40 CFR Part 122.34(b)(1) Requirement: The permittee must implement a public education program to distribute educational materials to the community and/or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

See Table 4.2.1(a) of the Permit

BMP #1 – Educational Library - Permit Table 4.2.1(a) (1.a.)

1. Target audience: General Public / Citizen of City of Dalton
2. Description of BMP: The City has a program to circulate educational materials to the population base over the five-year period of this permit. The program will utilize materials currently assembled by the county staff and new materials published by the State of Georgia Department of Community Affairs, the Georgia's Water Resources Toolkit for Local Governments, Clean Water Campaign and other water resources protection organizations / campaigns. These brochures/pamphlets will address topics such as the impacts of stormwater discharges on water bodies; the steps that the public can take to reduce pollutants in stormwater runoff; lawn and garden activities; water conservation; proper disposal of household wastes; sources of water quality violations; hazards of illegal discharge and dumping; etc. The educational materials will be bilingual where available to ensure that the Hispanic population in the community is accommodated. One brochure will be chosen each year, and will be made available to the public at the public library and the Dalton-Whitfield Inspections and Enforcement Office (City and County Building Inspection and Code Enforcement).
3. Measurable goal(s):
 - a. Select one brochure each year, and list in the annual report
4. Documentation to be submitted with each Annual Report:
 - a. A copy of the brochure
 - b. Number of brochures picked up by the public
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): Jan 2018
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
6. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater coordinator)
7. Rationale for choosing BMP and setting measurable goal(s): The city has a centralized location for all city and county building permits which receives a large volume of property owners, contractors, etc. daily, such that this BMP will highly visible to citizens. Placing the information at the library adds another level of availability to the citizens of Dalton. Also, the amount of readily available information from the agencies listed above in the BMP description should make this BMP very cost effective to implement.
8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The city will track the

number of materials distributed and compare it to the prior year's distribution count.

BMP #2 - Website - Permit Table 4.2.1(a) (1.a.)

1. Target audience: General Public / Citizens of City of Dalton
2. Description of BMP: The city utilizes the Whitfield County Engineering Department to maintain a website for publicizing stormwater information for the public. The stormwater webpage consists of a main page and four subpages. One subpage entitled, "What Can I do?" has been dedicated solely to what citizens can do to reduce pollution and prevent stormwater problems. Informational tips on reducing pollutants in stormwater are listed on this subpage to provide citizens an overview of common things they can do to reduce pollution in runoff. A second page focuses on explaining land disturbance and what is required if the land disturbance is regulated by Whitfield County. The general public and development community can learn about stormwater management plans and permit requirements on a third page dedicated to Stormwater Management Plans. On the stormwater learning center webpage citizens can find electronic publications with detailed information on why stormwater needs managed and further links to websites with dedicated information and tips related to stormwater. The City of Dalton website URL is www.cityofdalton-ga.gov and the stormwater page can be found by selecting Departments then Public Works. The link for the Whitfield County stormwater website is located near the bottom of the page: <http://www.whitfieldcountyga.com/eng/stormwater.htm>
3. Measurable goal(s):
 - a. Semi-Annual update to webpage
 - b. Report statistics/analytics on number of visitors to the webpage annually
4. Documentation to be submitted with each annual report:
 - a. Screen shot of webpage with updates
 - b. Copy of analytics report showing webpage use statistics
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): Jan 2018
 - c. Frequency of actions (if applicable):
 - i) Update webpage - semiannually
 - ii) Report statistics- annually
 - d. Month/Year of each action (if applicable): ongoing
6. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator) and IT Department
7. Rationale for choosing BMP and setting measurable goal(s): It is believed that a large portion of county citizens have access to the internet. Also key words, "Dalton, GA" and "Stormwater" can be searched with an internet search engine and the stormwater site can be found 24 hours a day. Many of the citizens have

different work hours and the website provides information to people who work at night. The webpage statistics allows for the number of visitors to be counted.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The webpage usage statistics can be compared to the prior year's results.

BMP #3 – Watershed & Tributary Signage – Permit Table 4.2.1(a) (1.a.)

1. Target audience: General Public / Citizens of City of Dalton
2. Description of BMP: The city has worked to identify significant watershed boundaries and tributaries that exist along major roads within the City of Dalton. The Public Works Department sign shop has created and installed ten signs throughout the city. Public Works also maintains the watershed signage throughout the city. The signs serve to educate the public about significant drainage features (rivers, creeks, streams, lakes, etc.) as well as major watershed boundaries. With locations along roads, the signs are very visible to the traveling public which increases the general public's awareness about water features. The city plans to develop an online watershed map illustrating each sign location and allowing the user to read more information about the individual watersheds. A Watershed Sign Map and Inventory can be found in Appendix A3.
3. Measurable goal(s):
 - a. Inspect 100% of watershed signs annually
 - b. Repair and maintain 100% of watershed signs annually
 - c. Track number of visitors to watershed map website annually.
4. Schedule:
 - a. Interim milestone dates (if applicable):
 - i) Develop watershed map and information December 2018
 - b. Implementation date (if applicable):
 - i) Go live with watershed map on website June 2019
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
5. Documentation to be submitted with each annual report:
 - a. Watershed sign map
 - b. Sign inspection report
 - c. Copy of analytics report of watershed map webpage use statistics.
6. Rationale for choosing BMP and setting measurable goal(s): The city has a high percentage of its population commuting to work which provides an educational opportunity to the city's residents and general public that cross several significant waterways or watershed boundaries. The combination of these two factors should enable the city to implement a BMP that will have the greatest impact on the traveling citizens of the city from a public awareness perspective.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Without inspection and maintenance watershed signs will become damaged or missing, which would decrease the public awareness. Therefore, by inspecting and maintaining the existing signs the traveling public's awareness of watershed boundaries will

continue. Tracking the number of visits to the online watershed map better defines the actual number of citizens which become aware of the watershed and the watershed sign locations.

BMP #4 – School Presentation – Permit Table 4.2.1(a) (1.a.)

1. Target audience: School Children
2. Description of BMP: The County Engineer will educate students on the importance of stormwater management and water resources. A curriculum will be developed based on different stormwater topics appropriate to different grade levels. Such topics include: erosion and sedimentation control, pollution prevention, water quality, watersheds, and water resources.
3. Measurable goal(s):
 - a. Track number of presentations/lessons given
 - b. Track number of students in attendance
4. Schedule:
 - a. Interim milestone dates (if applicable):
 - i) Contact local educators to identify classes August of permit year
 - ii) Develop presentation/lesson September of permit year
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
5. Documentation to be submitted with each annual report:

A copy of the lesson or presentation and a log of each teacher's class with number of participants in attendance.¹
6. Rationale for choosing BMP and setting measurable goal(s): Local educators often request presentations on stormwater topics to add to their science or water resources curriculum. Presenting water quality/stormwater management lessons will allow stormwater staff to share information regarding stormwater management relevant to our county.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Comparing the number of presentations and number of students in attendance each year will determine the amount of the outreach of the BMP.

¹Due to educational privacy laws (FERPA), the names of individual students are not allowed to be included.

4.2.2 Public Involvement/Participation

40 CFR Part 122.34(b)(2) Requirement: The permittee must, at a minimum, comply with State and local public notice requirements when implementing a public involvement/participation program.

See Table 4.2.2 (a) of the Permit

BMP #1 – Stakeholder Group - Permit Table 4.2.2(a)(1.a.)

1. Target audience/stakeholder group: Community Stakeholders of Whitfield County, Dalton, Varnell and Tunnel Hill
2. Description of BMP: Whitfield County has established a group of stakeholders who have an interest or stake in stormwater for various reasons. The advisory group at a minimum is comprised of representatives from the following organizations or groups: industry, City of Dalton, City of Tunnel Hill, City of Varnell, Whitfield County, residential/commercial contractors, local civil engineer, local architect, Conasauga River Alliance, Whitfield Environmental Health and the Dalton Whitfield Solid Waste Authority. Discussions occur to provide members of the group updates to stormwater regulations and to discuss any topics of concern.

The Stakeholder Advisory Group will continue to convene on an annual basis to review the progress of the stormwater program, opportunities for coordination between local governments for stormwater related programs, and other related watershed issues. The meetings are a good venue to provide feedback on problems local government is experiencing and possible solutions. Also if changes are proposed to the stormwater ordinance the group will be the initial sounding board to provide input and feedback before the changes are presented to the Mayor and City Council. If issues arise that require attention by the committee it can be convened on a more frequent basis.

3. Measurable goal(s):
 - a. Track number or stakeholder meetings.
 - b. Track number of attendees.
 - c. Track the actions taken as a result of the stakeholder meetings
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - i) Send notifications of meeting via email and/or telephone – annually.
 - ii) Hold meeting – annually.
 - d. Month/Year of each action (if applicable): ongoing
5. Documentation to be submitted with annual report:
 - a. A copy of the agenda, sign in sheet, meeting minutes and/or presentation.
6. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)
7. Rationale for choosing BMP and setting measurable goal(s): Input and buy-in are critical in implementing a successful SWMP. Being able to discuss and gather feedback from different individuals with varied interests will allow the stormwater program to meet water quality goals and concerns. An agenda, meeting minutes and record of attendees will be taken at each stakeholder meeting. The number

of meetings and number of attendees will be tracked along with the number of actions taken by the group.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If people are attending the meetings then discussion is taking place regarding stormwater. The more participation the better the community is involved in providing guidance for the stormwater program. The public is usually honest about how they feel government is working or not working.

BMP #2 – Household Hazardous Waste – Permit Table 4.2.2(a)(1.a.)

1. Target audience/stakeholder group: General Public / Citizens of Whitfield County
2. Description of BMP: The Dalton-Whitfield Regional Solid Waste Management Authority owns and operates a permanent household hazardous Waste (HHW) collection and storage facility. Residents of Whitfield County are able to responsibly manage their HHW on a monthly basis without incurring any expense. The facility is open the third Saturday of every month. Residents are limited to 200 pounds of HHW per visit. No commercial or business generated hazardous waste is accepted. The facility has been in continuous operation since June 1999. DWRSWMA promotes this program on its website on a continuous basis and advertises it in local newspapers at least once a year.
3. Measurable goal(s): Annually
 - a. Track the number of residents delivering HHW.
 - b. Track the quantity of HHW collected.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): annually.
 - d. Month/Year of each action (if applicable): Third Saturday of every month.
5. Documentation to be submitted with annual report:
 - a. A copy of the advertisement advertising the locations for collection
 - b. A copy of the chain of custody showing proper disposal of the collected material
 - c. Number of residents participating.
6. Person (position) responsible for overall management and implementation of the BMP: Executive Director – DWRSWMA.
7. Rationale for choosing BMP and setting measurable goal(s): Household Hazardous Waste (HHW) can be a significant source of stormwater pollution. By offering this management option it removes and reduces the potential pollution to local waterways. It also reinforces the public education aspect, increases awareness of the problem and ideally prevents this source of pollution from finding its way onto the ground and into local waterways.
8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The DWRSWMA will track the public's participation and quantities of materials collected and compare it to prior event activity.

BMP #3 – Adopt - A- Mile Program – Permit Table 4.2.2(a)(1.a.)

1. Target audience/stakeholder group: General Public / Citizens of Whitfield County
2. Description of BMP: Keep Dalton Whitfield Beautiful, Inc. (KDWB), with the support of the Dalton-Whitfield Regional Solid Waste Management Authority, currently administers an Adopt-A-Mile (AAM). The program encourages volunteer groups to “adopt” a one mile section of roadway within the community and pick-up litter along the roadway four times per year. KDWB provides roadside signage acknowledging the volunteer’s efforts, in addition to supplying safety vests, gloves, tools, and trash bags. If the volunteer groups sort the recyclables from the litter collected, the recyclables are managed separately by the DWRSWMA.
3. Measurable goal(s):
 - a. KDWB will promote the program continuously on its website continuously.
 - b. Track the number of participating volunteers and volunteer groups.
 - c. Track the number of clean up events.
 - d. Report the number of volunteers participating.
 - e. Track the number of miles of roadway adopted.
 - f. Track the amount of waste and recyclables collected either by the number of bags or the weight.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Remind volunteer groups - quarterly.
 - d. Month/Year of each action (if applicable): ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Executive Director – Keep Dalton Whitfield Beautiful, Inc.
6. Documentation to be submitted with the annual report:
 - a. Copy of the advertisements/screenshot of the webpage.
 - b. Number of clean up events
 - c. Number of volunteers participating
 - d. Number of miles of roadways adopted
 - e. Number of bags of waste and recyclables collected or bills of lading showing the weight of the waste recyclables.
7. Rationale for choosing BMP and setting measurable goal(s): Litter can be a significant source of stormwater pollution. By offering this volunteer based program it removes and reduces the potential pollution to local waterways. It also reinforces the public education aspect, increases awareness of the problem and ideally prevents this source of pollution from finding its way onto the ground and into local waterways.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: KDWB will track the public's participation and quantities of materials collected and compare it to prior event activity.

BMP #4 – Dalton Tree Board/Urban Forest - Permit Table 4.2.2(a)(1.a.)

1. Target audience/stakeholder group: General Public / Citizens of Dalton
2. Description of BMP: The Dalton Tree Board was created by the Mayor and Council to advise the city on issues related to creation and maintenance of public greenspace. Since inception, the nine-member board has worked on a variety of projects throughout the city developing substantial plantings in public spaces. The ultimate goal of the Board and City Council is to plant trees and preserve existing trees so that Dalton will eventually be 40% forested. The Board advises the Dalton City Council on matters of urban forestry and helps to formulate landscaping plans. The Board also coordinates the participation of local civic groups, including garden clubs and scout groups, and tree plantings within the city.
3. Measurable goal(s):
 - a. Track number of tree planting events held.
 - b. Track number of volunteers participating in events.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
5. Documentation to be submitted with annual report:
 - a. Copy of article or advertisement documenting annual tree planting events held.
 - b. Copy of sign-in sheet of volunteers
6. Person (position) responsible for overall management and implementation of the BMP: Tree Board Chairman (City of Dalton Tree Board)
7. Rationale for choosing BMP and setting measurable goal(s): The planting of trees decreases the amount of stormwater runoff, prevents erosion, provides habitat, and protects the quality of life for all residents of the area, and provides benefits that will last for generations. This BMP will also be held to engage citizens in local water resources protection thereby educating them about the causes and effects of water pollution.
8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by the number of requests that the Tree Board receives for tree plantings and number of volunteers.

4.2.3 Illicit Discharge Detection and Elimination (IDDE)

40 CFR Part 122.34(b)(3) Requirement: The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges (as defined in 40 CFR Part 122.26(b)(2)) into your small MS4. You must:

- 4.2.3.1 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.
- 4.2.3.2. Prohibit through ordinance, or other regulatory mechanisms, nonstormwater discharges into the MS4 and implement appropriate enforcement procedures and actions.
- 4.2.3.3 Develop and implement a plan to detect and address non-stormwater discharges including illegal dumping to the MS4.
- 4.2.3.4 Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper disposal of wastes.

See Table 4.2.3 (a) of the Permit

BMP #1 – Illicit Discharge and Illegal Connection Ordinance - Permit Table

4.2.3(a)(1.a.)

1. Description of BMP: Legal Authority is established with the City of Dalton Code of Ordinances, Chapter 96 – Stormwater Management, Article III. – Illicit Discharge and Illegal Connection Sec. 96-31 (Appendix C1) which prohibits illicit discharges and illegal connections to the MS4 from any person, property owner, site operator, etc. in order to protect the public health, safety, environment, and general welfare through the regulation of non-stormwater discharges to the MS4 to the maximum extent practicable, and in compliance with requirements of the National Pollutant Discharge Elimination System (NPDES) Phase II Stormwater General Permit. The City of Dalton Ordinance delegates the enforcement to the Whitfield County Engineer.
2. Measurable goal(s):
 - a. Evaluate, and if necessary, modify the existing IDDE Ordinance.
3. Documentation to be submitted with each annual report: Submit any revisions of the ordinance to EPD for inclusion in the SWMP.
4. Schedule:
 - a. Interim milestone dates (if applicable): 1/1/2015
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker (Assistant Director Dalton Public Works) and Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): With the ordinance in place, the county has the enforcement to respond to illicit discharges and illegal connections, and remove pollution from stormwater.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Tracking the enforcement of the Illicit Discharge and Illegal Connection Ordinance will allow the city to determine if or when any changes need made to the ordinance in order to remove or prevent illicit discharges.

BMP #2 – Outfall Map and Inventory- Permit Table 4.2.3(a)(2.a.)

1. Description of BMP: An existing Outfall Map for the City of Dalton and Outfall Inventory (Appendix C2) which lists outfall Id numbers and receiving waters. The city will update outfalls from the existing inventory and map to ensure the listed outfalls qualify as an outfall. The Outfall Map and Inventory are located in Appendix C2. Any updates to the Outfall Map and Inventory will be included in the Annual Report.
2. Measurable goal(s):
 - a. Map and inventory all existing outfalls and their receiving streams; and as discovered, existing ones not previously mapped or inventoried.
 - b. Map and inventory all new outfalls and their receiving streams
 - c. Determine number of outfalls added during the reporting period and the total number of new outfalls and their receiving waters
3. Documentation to be submitted with each annual report:
 - a. Updated inventory and map.
 - b. A list of any outfalls removed or relocated
 - c. Number of outfalls added during the reporting period and the total number of new outfalls
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): Maintaining a valid inventory of outfalls is the first step in performing outfall inspections for IDDE.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The outfall map will be used to conduct the outfall inspections. The outfall inspections identify possible pollutant sources, thereby reducing pollution when these are removed.

BMP #3 IDDE Plan - Permit Table 4.2.3(a)(3.a.)

1. Description of BMP: The City of Dalton IDDE Plan (Appendix C3) developed to find and remove illicit discharges and illegal dumping. The IDDE Plan will be followed to inspect outfalls for dry weather flows, source trace all dry weather flows found, and utilize the enforcement procedures specified in the Enforcement Response Plan (ERP, Appendix G) to remove identified illicit discharges and connections.
2. Measurable goal(s):
 - a. Develop, submit and upon approval implement IDDE Plan.
 - b. Conduct dry weather screening inspections on 100% of the total outfalls within a 5-year period but not less than 5% in any given year.
 - c. All suspected illicit discharges will be source traced and investigated according to the IDDE Plan.
 - d. All suspected illicit discharges which are found to be illicit discharges will be eliminated using enforcement actions if necessary, according to the IDDE Plan and ERP.
3. Documentation to be submitted with each annual report:
 - a. A copy of the revised or current IDDE Plan, when necessary
 - b. The number of completed outfall inspections
 - c. A copy of the completed outfalls inspection reports
 - d. A copy of any documentation of illicit discharge source tracing, compliance and enforcement activities.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable): ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): Non-Stormwater discharges will be discovered and each outfall will be screened once every permit period. BMP is also a required Phase II BMP.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: This BMP consists of locating and removing sources of illicit discharges into the City of Dalton's MS4, which reduces pollution.

BMP #4 - Education – Permit Table 4.2.3(a)(4.a.)

1. Description of BMP: The County maintains a website for publicizing stormwater information for the public. A link to this webpage can be found on the City of Dalton Public Works webpage, located in the City of Dalton website. The stormwater webpage consists of a main page and four subpages. One subpage entitled, “What Can I do?” has been dedicated solely to what citizens can do to reduce pollution and prevent stormwater problems. Informational tips on reducing pollutants in stormwater are listed on this subpage to provide citizens an overview of common things they can do to reduce pollution in runoff. On the stormwater learning center webpage citizens can find electronic publications with detailed information on why stormwater needs managed and further links to websites with dedicated information and tips related to stormwater. The City of Dalton website URL is <http://www.cityofdaltonga.gov> and the stormwater page can be found by selecting Departments then Public Works. The link for the Whitfield County stormwater website is located near the bottom of the page: <http://www.whitfieldcountygga.com/eng/stormwater.htm>
2. Measurable goal(s):
 - a. Semi-Annual update to webpage
 - b. Report statistics/analytics on number of visitors to the webpage annually
3. Documentation to be submitted with each annual report:
 - a. Screen shot of webpage with updates
 - b. Copy of analytics report showing webpage use statistics
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - i) Update webpage - semiannually
 - ii) Report statistics- annually
 - d. Month/Year of each action (if applicable): ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)and IT Department
6. Rationale for choosing BMP and setting measurable goal(s): It is believed that a large portion of county citizens have access to the internet. Also key words, “Dalton, GA” and “Stormwater” can be searched with an internet search engine and the stormwater site can be found 24 hours a day. Many of the citizens have different work hours and the website provides information to people who work at night. The webpage statistics allows for the number of visitors to be counted.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The webpage usage statistics can be compared to the prior year's results.

BMP #5 – IDDE Complaint Response – Permit Table 4.2.3(a)(5.a.)

1. Description of BMP: The County/City of Dalton has a complaint phone number 706-281-1768 and a complaint submission web form: <http://www.whitfieldcountyga.com/eng/forms/StormWater/StormWater.php> to facilitate receipt of stormwater complaints. All complaints are categorized based on their jurisdiction (Whitfield, Dalton, Tunnel Hill, Varnell), and all types of complaints (IDDE complaints/water quality, Construction Site Runoff complaints/ES& PC, and drainage complaints) are entered in a single Complaint Database with the type of complaint categorized for each complaint received. IDDE complaints are categorized as Water Quality complaints under Complaint Type. Refer to the Complaint Response Plan (Appendix C5) for specific procedures.
2. Measurable goal(s):
 - a. All IDDE complaints entered and tracked in the Complaint Database (contains IDDE complaints/water quality, Construction Site Runoff complaints/ES& PC, and drainage complaints) along with their investigations, including complaint date, complaint type, and complaint status.
 - b. Complaint investigations initiated within two business days.
 - c. Appropriate action taken for 100% of complaints received.
3. Documentation to be submitted with each annual report:
 - a. A copy of any revised procedures (Complaint Response Plan)
 - b. A copy of the complaints received and their resolution.
 - c. A copy of any compliance and enforcement activities.
4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable): January 1, 2015
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): Having a standard procedure for receiving, investigating and tracking the status of illicit discharge complaints will ensure the complaints are handled properly to eliminate future discharges. The BMP is also a requirement of the Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If the Complaint Response Procedure yields successful elimination of illicit discharges it is an effective BMP.

4.2.4 Construction Site Storm Water Runoff Control

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

- 4.2.4.1 An ordinance or other regulatory mechanism to require erosion and sediment (E&S) controls, as well as sanctions to ensure compliance, to the extent allowable, under State or local law;
- 4.2.4.2 Requirements for construction site operators to implement E&S control best management practices;
- 4.2.4.3 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;
- 4.2.4.4 Procedures for site plan review which incorporate consideration of potential water quality impacts;
- 4.2.4.5 Procedures for receipt and consideration of information submitted by the public; and
- 4.2.4.6 Procedures for site inspection and enforcement of control measures.

See Table 4.2.4 (a) of the Permit

BMP #1 –Soil Erosion, Sedimentation and Pollution Control Ordinance - Permit
Table 4.2.4(a)(1.a.)

1. Description of BMP: Legal Authority is established with the City of Dalton Code of Ordinances Chapter 50 captioned “Environment” – Article VII, – Soil Erosion, Sedimentation and Pollution Control (Sec 50-206 to 50-215) – (Appendix D1) which governs land disturbance activity greater than 1 acre and less than 1 acre but a part of a common development. The ES&PC Ordinance also ensures construction site operators control waste on construction sites.
2. Measurable goal(s):
 - a. Maintain an ordinance to control soil erosion during land disturbing activities and construction waste.
 - b. Evaluate Soil Erosion, Sedimentation and Pollution Control ordinance and, if necessary modify the existing ordinance.
3. Documentation to be submitted with each annual report: Submit any revisions of the ordinance to EPD for inclusion in the SWMP.
4. Schedule:
 - a. Implementation date (if applicable): 2018
5. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker (Assistant Director Dalton Public Works) and Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): With the ordinance in place, the city is able to enforce land disturbance activities remove pollution from stormwater.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Tracking the enforcement of the Soil Erosion, Sedimentation and Pollution Control Ordinance will allow the city to determine if or when any changes need made to the ordinance in order to minimize pollution from construction site runoff.

BMP #2 – Construction Site (ES & PC) Plan Review – Permit Table 4.2.4(a)(2.a.)

1. Description of BMP: The City of Dalton is a certified Local Issuing Authority, and subject to the Georgia Erosion and Sediment Control Act (GESA) of 1975, as amended in 2015. Accordingly, all projects are required to comply with the local Erosion, Sedimentation and Pollution Control (ES&PC) 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. Projects less than 1 acre but part of a common development are subject to a plan as well. All LIA responsibilities have been delegated to the Whitfield County Engineer. The City of Dalton has delegated the ES & PC plan review to the Whitfield County Engineer. Plan review procedures are in accordance with Georgia Soil and Water Conservation Commission requirements. The procedures in the Whitfield County Erosion, Sedimentation and Pollution Control Plan Review Standard Operating Procedure (Appendix D2) are followed to insure the plan meets the minimum requirements.
2. Measurable goal(s):
 - a. Track number of ES&PC plans received
 - b. Track number of ES&PC plans approved
 - c. Track number of ES&PC plans denied
 - d. Review all site plans for compliance with ES&PC Plan Review SOP (Appendix D2), ES&PC Ordinance (Appendix D1), and Stormwater Local Design Manual (LDM) (Appendix E1.1).
3. Documentation to be submitted with each annual report: Summary of plan review log with total approved and disapproved.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): The city is performing this effort as part of its responsibility as an Issuing Authority under the State's Erosion and Sedimentation Act. ES & PC plans are the first step to insure construction site runoff is controlled to limit stormwater pollution during construction projects.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Sites over 1 acre of disturbance will have an approved Erosion, Sedimentation and Pollution Control Plan with structural designed BMPs designed to reduce sediment from being

discharged into the MS4. The number of plans submitted, approved, and disapproved will be tracked to be compared to previous years.

BMP #3– Construction Site (ES & PC) Inspection Program – Permit Table

4.2.4(a)(3.a)

1. Description of BMP: Whitfield County Engineer inspects active construction projects within the City of Dalton. Site inspection procedures are in accordance with GSWCC requirements. All permitted construction sites are inspected according to the Erosion, Sedimentation and Pollution Inspections & Enforcement Standard Operating Procedure (Appendix D3), ES&PC Ordinance (Appendix D1), and Stormwater Local Design Manual (LDM) (Appendix E1.1). A copy of the inspection form can be found in Appendix D3.1
2. Measurable goal(s):
 - a. Inspect 100% of active construction sites following installation of initial BMPs, during active construction and after final stabilization.
3. Documentation to be submitted with each annual report: A list of active construction sites and any inspections conducted during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): Construction site activities have the potential to pollute stormwater since sediment is the number one pollutant. The BMP is also requirement of this Permit and a part of the city's responsibility as a certified Local Issuing Authority.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: An ES&PC plan that is implemented will reduce sediment from entering the MS4 and ultimately reducing stormwater pollution. Site inspections will insure the ES&PC plans are being implemented.

BMP #4 – Construction Site (ES & PC) Enforcement Procedures – Permit Table

4.2.(a)4.a.

1. Description of BMP: The Whitfield County Engineer, delegated to enforce the City of Dalton's Soil Erosion, Sedimentation and Pollution Control Ordinance will follow the Whitfield County Erosion, Sedimentation and Pollution Inspections & Enforcement Standard Operating Procedures (Appendix D3) and ERP (Appendix G) to enforce the Soil Erosion, Sedimentation and Pollution Control Ordinance for all violations found during site inspections.
2. Measurable goal(s):
 - a. Track the number and type compliance and enforcement activities
 - b. Implement compliance and enforcement activities when appropriate.
3. Documentation to be submitted with each annual report:
 - a. Copy of any compliance and enforcement activities executed from the inspections.
 - b. The number, type and status of each enforcement activity conducted during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): With consequences for non-compliance, the site operators will have an incentive to comply. The BMP is also requirement of this Permit and a part of the city's responsibility as a certified Local Issuing Authority.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The number of enforcement actions will be tracked and compared to the previous year's actions.

BMP #5 –Construction Site (ES &PC) Complaint Response - Permit Table

4.2.3(a)(5.a.)

1. Description of BMP: The County has complaint phone number 706-281-1768 and website complaint submission, <http://www.whitfieldcountyga.com/eng/forms/StormWater/StormWater.php>, for stormwater complaints. The Stormwater Complaint Database contains all stormwater complaints with each complaint categorized by complaint type (Drainage, ES&PC and Water Quality (IDDE)). Currently all construction site runoff complaints are logged in the Stormwater Complaint Database under complaint type ES&PC. The Complaint Response SOP (Appendix C5) will be followed for all construction stormwater complaints.
2. Measurable goal(s):
 - a. Complaint investigations will be initiated within 72 hours, during the normal work week.
 - b. city will take appropriate action for 100% of construction site runoff complaints.
 - c. Track complaints and their investigations in a database (including complaint date, complaint type and complaint status)
3. Documentation to be submitted with each annual report:
 - a. Copy of any revised procedures
 - b. Copy of the database containing complaints received and their resolution database (including complaint date, complaint type and complaint status)
 - c. Copy of any compliance and enforcement activities related to the complaints.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): Having a standard procedure for receiving, investigating and tracking the status of complaints will insure the complaints are handled properly to reduced pollution from construction sites. The citizen complaint program will provide a way for residents of the city to be an “auxiliary” inspection force ensuring that water quality violations are being investigated. This BMP will also be held to engage citizens in local water resources protection thereby educating them about the causes and effects of water pollution. The BMP is also requirement of Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The Complaint Response Procedure will be followed to insure each complaint is handled properly. The

number of complaints received can be compared to the number of pollutant sources removed based on valid complaints will determine if this is an effective BMP.

BMP #6 – Certifications – Permit Table 4.2.3(a)(6.a.)

1. Description of BMP: GESA requires that all local government staff involved in construction activities subject to the Construction General Permits are trained and certified in accordance with the rules adopted by GWSCC. All inspectors will have a current Level 1B certification and all site plan reviewers will have a current Level II certification. Recertification is required every three years to keep the certifications current for both Level 1B and Level II.
2. Measurable goal(s):
 - a. Ensure that all county personnel that are involved in construction and inspection are appropriately certified by GSWCC.
3. Documentation to be submitted with each annual report: Number and type of current certifications held by County Soil Erosion Inspection staff.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): Stormwater training is required to ensure inspectors and plan reviewers stay up to date with the rules and regulations they are required to enforce. The BMP is also a requirement of this Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Without the proper training, inspectors will not know what to look for at construction sites in order to prevent pollution from stormwater from those sites. Stormwater knowledge will prevent inspectors from unknowingly allowing violations to occur. Plan review education will ensure that the plan reviewers have a working knowledge of the requirements for ES & PC plans.

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

40 CFR Part 122.34(b)(5) Requirement: The permittee must develop, implement and enforce a program to address stormwater runoff into the MS4 from new development and redevelopment projects, including projects less than one acre if they are part of a larger common plan of development or sale, as described in Parts 4.2.5.1 and 4.2.5.2. The program must ensure that controls are in place that will prevent or minimize water quality impacts. At a minimum, the Post-Construction Stormwater Management in New Development and Redevelopment Program must contain the following requirements:

- Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;
- Use an ordinance or other regulatory mechanism to address post construction runoff from new development and redevelopment projects to the extent allowable under State and local law; and
- Ensure adequate long-term operation and maintenance of the BMPs.

See Table 4.2.5 (a) of the Permit

BMP #1 - Legal Authority - Permit Table 4.2.5(a)(1.a.)

1. Description of BMP: Legal Authority is established with is established with the City of Dalton Code of Ordinances Chapter 96 captioned “Stormwater Management” – Article I and II, – Stormwater Management (Sec 96-1 to 96-17) – (Appendix E1) which governs storm water runoff into the MS4 from new development and redevelopment projects. The ordinance will be reviewed annually and revised when necessary. The ordinance follows and adopts the current Georgia Stormwater Management Manual.
2. Measurable goal(s):
 - a. Implement and enforce the ordinance the ordinance to address post construction runoff from new and redevelopment projects.
 - b. Review the ordinance annually and revised when necessary
3. Documentation to be submitted with each annual report: Submit any revisions of the ordinance to EPD for inclusion in the SWMP.
4. Schedule:
Implementation date (if applicable): January 2015
5. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker (Assistant Director Dalton Public Works) and Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): With the ordinance in place, the county is able to establish a program to address runoff from new and redevelopment projects. This sets the requirements for development in order to minimize the effects of impervious surfaces.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Tracking enforcement of the Stormwater Management Ordinance will allow the city to determine if or when any changes need made to the ordinance in order to minimize pollution from new and redevelopment.

BMP #2 – Inventory - Permit Table 4.2.5(a)(2)

1. Description of BMP: The city's post construction BMP inventory consists of the following two categories: (1) "City Structures" - inventory of publically- owned post-construction stormwater management BMPs (detention ponds, retention ponds, water quality structures and infiltration devices) and (2) "Privately-Owned" – privately-owned post-construction stormwater management BMPs (detention ponds, retention ponds, water quality structures) designed after January 1, 2007 (effective date of the city's Stormwater Management Ordinance) with a legally recorded stormwater facility maintenance agreement (includes all BMPs since December 9, 2008 deadline for adoption). The Post Construction BMP Inventory (Appendix E2) consists of the following structures: detention ponds, retention ponds, water quality structures and infiltration devices. The inventory will be updated as new structures are designed and constructed. The Owner data field is categorized as either City of Dalton or private for the two categories.
2. Measurable goal(s):
 - a. Maintain an inventory of publically-owned detention ponds, retention ponds and water quality structures.
 - b. Maintain an inventory of privately-owned detention ponds, retention ponds and water quality structures designed after January 1, 2007 with a legally recorded stormwater facility maintenance agreement.
 - c. Update inventory as new structures are completed or existing structures are identified.
 - d. Inventory will include the number and type of structure.
3. Documentation to be submitted with each annual report: Inventory of structures
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually update inventory
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker (Assistant Director Dalton Public Works) and Whitfield County Engineer, Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): The city must maintain an inventory in order for the BMPs to be tracked for maintenance. The city has been requiring post construction structural BMPs since the ordinance went into effect in 2007. The BMP is also requirement of Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The inventory is critical in tracking the number of structural BMPs and how well the BMPs reduce pollution in stormwater and mitigate runoff.

BMP #3 – Inspection Program – Permit Table 4.2.5(a)3.

1. Description of BMP: The city will inspect the publicly owned and privately owned post construction stormwater management structures (detention ponds, retention ponds, water quality structures and infiltration devices), included on the inventory in BMP #2. During a five year period, 100% of the inventory will be inspected. Inspections will be conducted according to the standards in the MS4 Maintenance Procedures (Appendix F1) and Georgia Stormwater Management Manual (GSMM) using the BMP Inspection Checklist (Appendix E3.)
2. Measurable goal(s): Inspect 100% of post construction BMP inventory in a five-year permit period but not less than 5% during any given year.
3. Documentation to be submitted with each annual report:
 - a. Copy of inspection reports/checklists
 - b. Copy of all compliance or enforcement activities, resulting from the inspections, conducted during the year
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable): ongoing
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater Coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): The city sees the importance of regular BMP maintenance and believes inspection will help keep BMPs functioning properly. Properly functioning BMPs will lead to cleaner discharge to the MS4. 100 % of the structures will be completed by the end of the five year period. The BMP is also requirement of Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The number of BMPs inspected and maintained will be tracked. Each maintained BMP reduces pollution.

BMP #4 – Maintenance Program – Permit Table 4.2.5(a)4.

1. Description of BMP: The Post Construction Structure (BMP) Maintenance Program will follow the MS4 Maintenance Procedures (Appendix F1). The two types of BMPs (City of Dalton Structures and Privately-Owned) defined in BMP #2 – Post-Construction Structure (BMP) Inventory above will be maintained according to the MS4 Maintenance Procedures (Appendix F1) and the GSMM. All maintenance performed on any city structures will be documented (4.b). For privately-owned structures with construction completed after December 6, 2012, the city will either require maintenance agreements or conduct maintenance. Copies of the agreements will be retained per the Permit (4.b.1). A summary list of the maintenance agreements (Appendix E4) will be maintained. The city will continue to regulate and enforce the maintenance agreements for BMPs designed after January 1, 2007 (effective date of the city's Stormwater Management Ordinance) with a legally recorded stormwater facility maintenance agreement (includes all BMPs since December 9, 2008 deadline for adoption).
2. Measurable goal(s):
 - a. city will operate and maintain the city structures according to the maintenance schedules outlined in the MS4 Maintenance procedures (Appendix F1) and the GSMM.
 - b. County Engineer on behalf of the city will insure privately-owned structures, for which the city does not have maintenance responsibility, are maintained according to the maintenance schedules outlined in the Maintenance Procedures and the GSMM.
 - c. County Engineer on behalf of the city will obtain maintenance agreements (which outline the owner's and city's responsibilities on privately-owned structures) for privately-owned structures with construction completed after December 9, 2008
3. Documentation to be submitted with each annual report:
 - a. For publicly-owned structures, a list of post construction structures maintained or repaired and the type of maintenance performed, including documentation of maintenance activities performed during the reporting period.
 - b. For privately-owned structures where owner conducts maintenance under a maintenance agreement, a summary list of the maintenance agreements and total number of maintenance agreements.
 - c. A copy of any revised MS4 Maintenance Procedures.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):

5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater Coordinator) along with City of Dalton Public Works and City of Dalton Parks and Recreation Department
6. Rationale for choosing BMP and setting measurable goal(s): Proper maintenance of the BMPs is necessary for the BMPs to function as designed. Following a regular schedule will insure the maintenance occurs in a timely manner.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: By insuring that the structural BMPs are properly maintained, we are also ensuring that structures are adequately removing pollutants from stormwater which they were designed and built to accomplish. The city will be able to track the number of times maintenance is required and type of maintenance to compare with prior years maintenance.

BMP #5 – GI/LID Structures Inventory Permit 4.2.5(a)5.

1. Description of BMP: The city's inventory GI/LID water quality related structures constructed and built since January 1, 2007 within the City of Dalton. The GI/LID Inventory (Appendix E5) will consist of the following GI/LID water quality related structures privately owned: Bioswales/vegetated swales, bioretention, pervious pavement, infiltration trenches, green roofs and any other structure deemed appropriate by the Stormwater Coordinator. The inventory contains city owned, publicly owned by other entities and privately owned non-residential structures. The total number of each type structure will be tracked during the plan review process. Structures will be added to the inventory when as-built inspections are performed for post-construction BMPs. The GI/LID Structures locations will be shown on a GI/LID Structure Map and the inventory table will include ID number, structure type, and as-built date.
2. Measurable goal(s):
 - a. Maintain an inventory of city owned, publicly owned by other entities and privately owned non-residential structures GI/LID water quality structures listed above located within the permitted area and at a minimum, constructed after January 1, 2007.
 - b. Update inventory annually.
3. Documentation to be submitted with each annual report: An updated inventory including those structures added during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater Coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): This BMP will enable the City to specifically track GI/LID BMPs which in turn tracks how much owners/designers are moving towards implementing treatment by using vegetation and soil to treat rainwater. The BMP is also requirement of Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: An increase in the number of installed GI/LID structures should lead to an increase in the overall amount of stormwater infiltrated, evapotranspired or reused thereby removing that stormwater volume leaving sites. Less runoff should equal less polluted runoff.

BMP #6 – GI/LID Program Permit Table 4.2.5.2

1. Description of BMP: The permit requires permittee to develop a program describing the GI/LID practices (e.g. better site planning techniques, better site design techniques) to be implemented by the permittee. The program shall include:
 - procedures for evaluating the feasibility and site applicability of different GI/LID techniques and practices to be considered;
 - the GI/LID structures allowed to be constructed within the city's jurisdiction;
 - procedures for the inspection and maintenance of the GI/LID structures, including city owned structures, publicly-owned structures, owned by other entities, and privately-owned non-residential (e.g. who inspects, who maintains, inspection and maintenance schedule, method of documentation of inspection and maintenance activities).

The GI/LID program must be submitted to EPD by February 15, 2020. The program must be included in the SWMP and must be implemented by the permittee.

2. Measurable goal(s):
 - a. Develop a GI/LID Program meeting the above criteria and submit to EPD for review with the 2019 annual report, due February 15, 2020.
3. Documentation to be submitted with each annual report:
 - a. Submit initial GI/LID Program, Techniques, and Practices with the 2019 annual report, due February 15, 2020.
4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable): February 15, 2020
 - c. Frequency of actions (if applicable): ongoing
 - d. Month/Year of each action (if applicable):
 - i) February 2020 – Submit GI/LID Program, Techniques, and Practices
 - ii) December 2020 – Review GI/LID Program, Techniques, and Practices and resubmit any Changes
 - iii) December 2021 – Review GI/LID Program, Techniques, and Practices and resubmit any Changes
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater Coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): This BMP is required by the permit and the measureable goal provides time to develop the program.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: While the program is being developed, this BMP will be deemed effective if the city creates and submits a program by the February 15, 2020 deadline. Once created, the city will need to

follow the program so that all existing and future GI/LID structures are effective in their ability to reduce pollution in stormwater.

BMP #7 – GI/LID Inspection and Maintenance Program Permit Table 4.2.5.2

1. Description of BMP: The permit requires the county to conduct or ensure inspections are conducted on 100% of the GI/LID structures included in BMP 5 above within a 5-year period. The inspections will be completed in accordance with the schedule submitted in the GI/LID program submitted in BMP 6 above. Maintenance of city owned GI/LID structures will be performed as needed. The city will implement the maintenance procedures in accordance with the GI/LID program for all publicly owned structures owned by other entities and privately owned non-residential GI/LID structures to ensure maintenance is performed as needed.
2. Measurable goal(s):
 - a. Inspect 100% GI/LID structure inventory in a five-year permit period beginning in 2020.
 - b. City will operate and maintain the county GI/LID structures according to county's GI/LID Program.
 - c. City will insure publicly owned structures owned by other entities and privately owned non-residential GI/LID structures, for which the city does not have maintenance responsibility, are maintained according to the city's GI/LID Program.
3. Documentation to be submitted with each annual report:
 - a. Upon implementation of GI/LID Program, copies of inspection reports.
 - b. Upon implementation of GI/LID Program, track total number and percentage of total city owned GI/LID structures maintained during report period.
 - c. Summary list of the maintenance agreements and total number of maintenance agreements for publicly owned structures owned by other entities and privately owned non-residential GI/LID structures.
4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable): February 15, 2020
 - c. Frequency of actions (if applicable): ongoing
 - d. Month/Year of each action (if applicable):
 - i) February 2020 – Begin implementation of inspections and maintenance program per GI/LID Program
 - ii) December 2021 – Continue inspections and maintenance program per GI/LID Program
5. Person (position) responsible for overall management and implementation of the BMP: Whitfield County Engineer, Chris Hester (Stormwater Coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): This BMP is required by the permit and the measurable goals insure that GI/LID structures are being inspected and maintained by tracking each.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Inspection of structures will determine how well the structures are reducing pollution to stormwater and how well the GI/LID structures are being maintained.

4.2.6 Pollution Prevention/Good Housekeeping for Municipal Operations

40 CFR Part 122.34(b)(6) Requirement: The permittee must develop and implement an operation and maintenance program that includes a training component with the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Using training materials available from the USEPA and other organizations as guidance, the permittee must, as a part of this program, include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.

See Table 4.2.6 (a) of the Permit

BMP #1 – MS4 Control Structure Inventory and Map – Permit Table 4.2.6(a)(1a)

1. Description of BMP: The city will maintain an inventory and map catch basins, detention ponds, ditches and storm drain pipes located within the City of Dalton. Mapping and inventorying will be conducted according to the MS4 Maintenance procedures (Appendix F1) The city's inventory (Appendix F2) will be updated as new structures are completed or existing structures are identified. All detention/retention ponds inventoried will follow the Post Construction MCM BMP#2.
2. Measurable goal(s):
 - a. Update Storm Sewer Map and inventory as required
 - b. Track number of structures by type added each year
 - c. Track total number of structures
3. Documentation to be submitted with each annual report:
 - a. Updated Storm Sewer Map and Inventory with total number of each type of structure added to the inventory and the revised total number of each type of structure.
 - b. Copy of any revised MS4 Maintenance Procedures
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker, Dalton Public Works (Dalton Assistant Public Works Director) and Whitfield County Engineer, Chris Hester (Stormwater Coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): A map and inventory is the critical link to tracking inspection and maintenance of the storm sewer system.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The map and inventory do not directly reduce pollution to stormwater but it allows maintenance and inspection to be tracked in a feasible manner from which the effectiveness can be compared.

BMP #2 – MS4 Inspection Program– Permit Table 4.2.6(a)(2a)

1. Description of BMP: To ensure long-term functionality of this infrastructure, MS4 inspection program must be implemented. The city will inspect catch basins, detention ponds, ditches and storm drain pipes. Inspections will include examinations for both structural and water quality concerns. Inspections will be conducted according to the MS4 Maintenance procedures (Appendix F1) and the GSMM. Refer to Post Construction MCM BMP#3 for the detention/retention pond information.
2. Measurable goal(s):
 - a. Inspect 15% to 25% of structures (catch basins, detention ponds, ditches, and storm drain pipes) each year such that 100% of inventory is inspected within the five-year period, but not less than one per year.
3. Documentation to be submitted with each annual report:
 - a. The number (both the number and percentage of the total of each type of structure) of MS4 structural control inspections
 - b. Any documentation of compliance and enforcement activities, conducted by the County Engineer, related to the inspections during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
 - i) Jan – Dec 2018 Inspect 15% to 25% of MS4 Control Structures
 - ii) Jan – Dec 2019 Inspect 15% to 25% of MS4 Control Structures
 - iii) Jan – Dec 2020 Inspect 15% to 25% of MS4 Control Structures
 - iv) Jan – Dec 2021 Inspect 15% to 25% of MS4 Control Structures
 - v) Jan – Dec 2022 Inspect 15% to 25% of MS4 Control Structures
5. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker (Assistant Director Dalton Public Works) and Whitfield County Engineer (compliance and enforcement only), Chris Hester (Stormwater coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): This BMP will allow the county to ensure long term maintenance of the county's MS4 as well as identifying potential water quality problems and future CIP projects. Inspection of structures in the permitted area will be broken down to achieve 100% at the end of the 5-year period.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The system inspection determines the state of the system and what structures or areas need attention.

The first step to reducing pollution is having a good assessment through inspection of the system to determine what needs to be improved to reduce pollution to stormwater.

BMP #3 – MS4 Maintenance Program– Permit Table 4.2.6(a)(3a)

1. Description of BMP: From the Inspection Program, proactive maintenance and system cleaning will be performed on an as needed basis to ensure functional operation of the drainage system during future storm events. The city will maintain the MS4 control structures (catch basins, ditches, detention/retention ponds, and storm drain lines included on MS4 Control Structure Inventory and Map (Appendix F2) according to the maintenance schedules outlined in the Whitfield County MS4 Maintenance Procedures (Appendix F1) and GSMM. Refer to Post Construction MCM BMP#4 for any detention/retention pond maintenance.
2. Measurable goal(s):
 - a. Track number of each type of structure maintained
 - b. Maintain the structural controls according to the maintenance schedules outlined in the MS4 Operation and Maintenance procedures (Appendix F1) and the GSMM.
3. Documentation to be submitted with each annual report: Number of each type of structure maintained during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable):
8. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker (Dalton Assistant Public Works Director)
5. Rationale for choosing BMP and setting measurable goal(s): Maintenance of the storm drain system is required to keep the system functioning. After the structures are assessed for maintenance, maintenance can be prioritized and significant system repairs or replacements planned.
6. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Maintenance should always be reducing pollution through properly removing sediment, fixing erosion and removing debris from clogged pipes and structures. The number of structures maintained during the reporting period will allow for the MS4 to track whether the system performance and whether it is reducing pollution to stormwater.

BMP #4 –Litter Pickup– Permit Table 4.2.6(a)(4a)

1. Description of BMP: The Dalton Public Works Department sweeps all paved roads within the city (approximately 180 miles) on a routine basis in an effort to remove pollutants from the road before they enter the MS4. The city currently owns and operates two vacuum street sweeping machines. All debris and litter removed is disposed of at the local landfill (Dalton-Whitfield Regional Solid Waste Authority). The City of Dalton Public Works Department also has community service crews that pick up litter in all municipally owned parking lots and on grounds of city buildings. The litter pick-ups occur as trash becomes readily apparent in these areas. All trash removed is recycled when possible at the local recycling yard or disposed of at the local landfill. The litter cleanup activities will be performed in accordance with the City of Dalton MS4 Maintenance Procedures (Appendix F1) and MS4 Waste Disposal SOP (Appendix F3).
2. Measurable goal(s):
 - a. Clean 100% of city owned roads and parking lots at least once during the 5 year period.
 - b. Track the number of road miles covered per month by Public Works
 - c. Track the number of tons of litter/debris picked up per month by Public Works
3. Documentation to be submitted with each annual report: Copy summary sheet of litter picked up by month from Public Works
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker (Dalton Assistant Public Works Director)
6. Rationale for choosing BMP and setting measurable goal(s): Removing trash and debris from the roads and parking lots will prevent it from entering the MS4. The BMP is also requirement of Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Removing litter from roads and right of way removes pollutants from the MS4 therefore reducing stormwater pollution. The total number of pounds of litter removed can be tracked in order to measure the effectiveness of the BMP.

BMP #5 – Employee Pollution Prevention Training – Permit Table 4.2.6(a)5a.

1. Description of BMP: The city has an existing training program that provides annual stormwater training for employees that come in contact with materials such as motor oil, solvents, pesticides, etc. along with guidelines for proper handling, storage, application, and disposal of materials. The training will be updated to teach staff about other potential sources of stormwater pollution and ways to prevent and reduce pollution from municipal activities. Resources including the EPA Menu of BMPS: Municipal Employee Training and Education, “Preventing Stormwater Pollution: What We Can Do” video (North Central Texas Council of Governments) and various other training presentations will be utilized to implement the training program. The training program will be tailored to the activities the individual departments perform on a daily basis. The Dalton Public Works Department personnel will participate in the training. Employee training will occur annually.
2. Measurable goal(s):
 - a. Train 100% Public Works employees annually
3. Documentation to be submitted with each annual report: Copy of training sign in sheet and copy of training presentation
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker (Dalton Assistant Public Works Director)
6. Rationale for choosing BMP and setting measurable goal(s): Training will help educate employees to recognize potential pollution sources and reduce pollution to stormwater in their daily activities. The BMP is also requirement of Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The annual training and education will make employees aware of potential water quality impacts which will lead to steps toward reducing stormwater pollution. The number of trained employees can be tracked to determine if training is effective at reducing pollution to stormwater.

BMP #6 – Waste Disposal - Permit Table 4.2.6(a)(6.a.)

1. Description of BMP: The City Public Works Department will implement procedures for proper disposal of waste removed from the MS4 during maintenance operations and roadside litter cleanup. A standard operating procedure for waste disposal has been developed for the Public Works Department (Appendix F6)
2. Measurable goal(s):
 - a. 100% of waste removed from the MS4 is disposed of to the Dalton-Whitfield Regional Solid Waste Authority
 - b. Track amount of waste and/or recycling.
3. Documentation to be submitted with each annual report: Summary sheet of waste disposed
4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Andrew Parker (Assistant Public Works Director)
6. Rationale for choosing BMP and setting measurable goal(s): Proper disposal of waste removed during maintenance of MS4 insures waste is truly removed and does not end up back in the MS4. The BMP is also requirement of Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The total amount of waste properly removed will be a reduction in waste in stormwater.

BMP #7 – New Flood Management Projects – Permit Table 4.2.6(a)(7.a.)

1. Description of BMP: Capital improvement projects and new flood management projects located within the City of Dalton will be assessed, during the design phase, for water quality impacts. The city has a design review procedure/checklist (Appendix F7) and Water Quality Improvement Worksheet: proposed (Appendix F7.1) for use by city regarding the feasibility of incorporating water quality enhancements into the design of future flood management projects.
2. Measurable goal(s):
 - a. Assess 100% of future BMPs/capital improvement projects annually for water quality impacts
 - b. Track number of projects reviewed, during the design phase, for water quality impacts.
3. Documentation to be submitted with each annual report: List of the BMPs/Capital improvement site plans reviewed.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable):
5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): This BMP will allow the city to assess opportunities to incorporate water quality considerations into any capital improvement project design work. The BMP is also requirement of Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: All capital improvement projects that incorporate water quality BMPs will reduce the impact of the capital improvement project thereby reducing pollution.

BMP #8 – Existing Flood Management Projects – Permit Table 4.2.6(a)(8.a.)

1. Description of BMP: Existing publicly owned flood management facilities will be examined with regards to water quality issues. The existing water quality improvement checklist (Appendix F8) will be used to analyze existing municipal flood management control BMPs (including detention and retention ponds) to ascertain if there is a potential to retrofit the existing BMP to address water quality. Once improvements have been shown to be feasible, water quality improvement may be planned with the overall project.
2. Measurable goal(s): Review at least one existing flood management structure for potential retrofitting each year or if the permittee has less than 5 structures then assess 100% within a 5-year period.
3. Documentation to be submitted with each annual report: Checklist for existing flood management structure reviewed
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): This BMP is a requirement of the Permit. Considerations for water quality should be included when feasible. The city has potential flood management projects and the analysis could help prioritize existing infrastructure for upgrades in the future.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If an existing flood management BMP can be improved to help water quality, pollution can be reduced.

BMP #9 – Municipal Facilities Inventory and Inspection – Permit Table

4.2.6(a)(9.a.)

1. Description of BMP: The city has number of municipal facilities that have the potential to cause pollution. An inventory of these facilities (Appendix F9) will be maintained. Inspections of the facilities will be conducted on the inventoried facilities.
2. Measurable goal(s):
 - a. Annually update inventory of all municipal facilities with potential to cause pollution
 - b. Inspect 100% of facilities on inventory within 5-year period but no less than 5% of facilities annually.
 - c. Number of facilities on inventory inspected during report period
3. Documentation to be submitted with each annual report:
 - a. Copy of inventory of all municipal facilities with potential to cause pollution
 - b. Copy of inspections conducted during reporting period
 - c. Copy of any compliance or enforcement activities, resulting from the inspections
4. Schedule:
 - a. Interim milestone dates (if applicable):
 - b. Implementation date (if applicable):
 - c. Frequency of actions (if applicable):
 - d. Month/Year of each action (if applicable): ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Chris Hester (Stormwater Coordinator)
6. Rationale for choosing BMP and setting measurable goal(s): Municipal facilities must be inspected to insure good housekeeping measures are in place and being followed. The BMP is also requirement of the Permit.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: All good housekeeping practices that are being followed will reduce pollution. Any identified practices corrected will reduce pollution as well.

4.3 Enforcement Response Plan (ERP)

The city developed an ERP that describes the action to be taken for violations associated with the city's ordinances and other legal authorities. The ERP details the permittee's responses to any noted stormwater violations, including escalating enforcement responses to address repeat and continuing violations. The ERP is reviewed annually and revised as needed. A copy of the current ERP is located in Appendix G.

4.4.2 Impaired Waters – Permit section

The city developed a Monitoring and Implementation Plan to address impaired waters located within the City of Dalton. A copy of the current Monitoring and Implementation Plan is located in Appendix H.

APPENDICES

See attached CD ROM / Flash drive

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