Phase 1 NPDES Permit
Municipal Separate Storm Sewer System (MS4)

Stormwater Management Program
City of Union City, Georgia

December 15, 2003

Rev. May 13, 2013

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A. Name of Permittee: City of Union City

B. Mailing Address: 5047 Union Street
Union City, GA 30291-1497

C. Responsible Official: Ralph Moore Title: Mayor
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E. Existing NPDES Phase 1 MSA Permit Number: GAS000136

Part II. Certification Statement:

I certify under penalty of law that this document and all attachments were prepared with direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on 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.

Signature: _____

Printed Name: Ralph Moore

Title: Mayor Date: _____

Stormwater Management Program
City of Union City, Georgia

Part III. Introduction:

The City of Union City has operated its Stormwater Management Program for a number of years. Through the Stormwater Management Program, the City monitors, inspects, and maintains stormwater features, inspects and enforces industrial and municipal facilities, construction sites, and highly visible pollutant sources, monitors for illicit discharges, manages impaired streams, conducts stormwater education and training, conducts litter removals, provides street cleanings and maintenance, reviews permit applications, and oversees City-wide land use planning. Over the years, the City has made great strides to improve its stormwater program to address new EPD mandates. Due to the recent economic downturn, there has been a lack of financial resources to fund the stormwater management plan. As a result, the City has recently created a Stormwater Utility Program to aid in funding and overseeing all management, protection, control, regulation, use and enhancement of stormwater systems and facilities. The program was adopted in 2012 and is still in the early stages of implementation. However, it is expected that the utility program will fully cover all EPD stormwater related compliance in the near future.

Part IV. Structural and Source Control Measures:

A. Structural Controls

Within the incorporated limits of Union City, there are approximately 1,817 catch basins, 381 area drains, 278 drop inlets, 274 junction boxes, 24,887 linear feet of ditch/channels/flumes, 300,102 linear feet of storm piping, 389 headwalls/flared-end sections (end treatment), and 58 detention/retention ponds (stormwater ponds). Maps and inventories of these stormwater features are attached in Figure 2 of the Appendix.

The City is responsible for inspecting all stormwater features within the City, whether publicly or privately owned. However, the City is only responsible for cleaning and maintaining facilities located on City-owned lands, rights-of-way, and easements. Cleaning and maintenance of facilities located along State and County routes are the responsibility of those governmental entities. Maintenance and cleaning of privately-owned features is solely the responsibility of the individual property owner. However, should deficiencies be reported for privately-owned structures, through regularly scheduled inspections or by citizen complaint; the City shall enforce private property owner maintenance, repair and cleaning of said structures through the use of notices of violation, citations, fines, and other legal actions.

When problems are noted on privately-owned structures, City inspectors will notify the owners in writing of those controls that require corrective action, and the inspectors will establish a time frame for the owner to rectify the issue. The time frame for compliance will be based on the severity of the noted deficiency. City inspectors will return and reinspect the structures after the established time frame to determine if the owner has addressed the noted issue. If issues persist, a citation will be issued, followed by a court summons, which can result in an abatement action. Should the owner fail to abate within a reasonable amount of time and the issue is declared a public nuisance, City officials have the right to enter upon the property and cause such work as is reasonably necessary to be performed, with the actual cost thereof charged to the owner in the same manner as a stormwater service charge. The City may then apply a lien or tax levy on the property to receive payment for services rendered. The extent of the City's stormwater authority and responsibilities is

described in detail in the Stormwater Utility Ordinance, included in Figure 8 of the Appendix.

All work on stormwater structural controls has historically been the responsibility of the Department of Public Services, in conjunction with Code Enforcement. However, with the recent establishment of the Stormwater Utility, it is expected that an official Stormwater Program Manager will be appointed to oversee all stormwater related items and a Stormwater Department may be formed in the near future.

All stormwater structures within the City limits are inspected on a 5-year rotation, with at least 20% of each group of facilities inspected each reporting period from May 1st through April 30th the following year. This ensures that every stormwater structure is inspected at least once every 5 years. Based on the current inventory of stormwater features, this rotation requires the inspection of approximately 364 catch basins, 77 area drains, 56 drop inlets, 55 junction boxes, 4,978 linear feet of ditches/channels/flumes, 60,021 linear feet of storm piping, 78 headwalls/flared-end sections (end treatment), and 12 detention/retention ponds (stormwater ponds) every year. The City maintains a Storm Sewer Structures Poster at Public Services, provided in Figure 3 of the Appendix, defining each storm structure and listing inspection frequencies, cleaning requirements, and maintenance information.

The City typically accomplishes inspection activities through the use of City-appointed contractors, supplemented by Public Services employees as necessary, depending on the workloads and task complexity. Historically, the inspection results have been recorded on inspection forms, and kept on file at the Public Services Department. Copies of these forms are provided in Figure 1 of the Appendix. However, since the City began utilizing City-appointed contractors for inspections, the inspection results are now recorded within the City's inventory/database, where they are kept on file for the information of Public Service crews and inspectors. When privately-owned structures are noted to require cleaning, maintenance, or repair, the property owner is notified in writing and procedures are followed as listed previously. When publicly-owned structures are noted to require cleaning, maintenance, or repair, City officials are notified and Public Service crews are dispatched to immediately clean, repair, and/or replace the subject structure. Any resulting invoices are provided as part of the stormwater annual reports, and the work completed is recorded in the inventory/database, which is kept at the Public Services Department.

When large blockages are removed from structures, the City may inspect the connecting stormwater pipes with a camera to confirm that the obstructions are fully removed. When structures are deemed inaccessible (e.g. welded shut), City crews will break welds with cutting equipment and uncover structures as necessary to gain

access. Overall, this is typically not an issue, and is usually only encountered in newly annexed areas of the City. Additionally, it is standard procedure of the Department of Public Services to inspect all City roads and drainage systems after each significant rainfall event. Should any problems be detected, requiring cleaning, repairing, or maintaining, they are immediately noted and corrected promptly. Notwithstanding, this system has served the City well and has assured that its stormwater system is maintained and functions to a level acceptable to local officials and citizens.

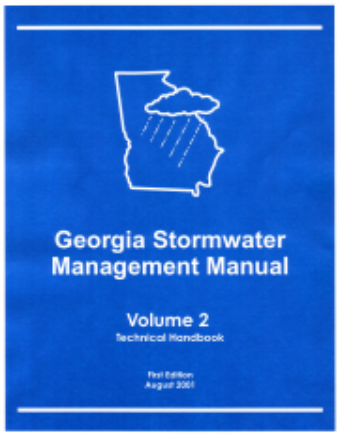
All City-owned ditches and vegetated channels are mowed approximately once every month. This frequency varies, based on rainfall and the rate of vegetative growth. City-maintained, grassed areas are kept at a height of 12-inches or less. Ditches, channels, stormwater piping, and structures are typically cleaned when they are inspected as part of the 5-year inspection rotation cycle. Cleaning operations are expedited for features that are noted to be full of sediment and/or debris to approximately 1/3 of their flow depth, or to a level that is notably resulting in ponding, overflows, or otherwise hindering stormwater collection and conveyance. Repairs and maintenance are conducted when a citizen complaint is received and/or, when upon inspection said facilities demonstrate evidence of notable cracks, damage, or other impairment that may result in a failure or lack of functionality that may endanger the public or state waterways.

B. Planning Procedures

Over the past several years, the mandated ordinances from the Metropolitan North Georgia Water Planning District were examined and incorporated into the City's planning procedures. The Post-Development Stormwater Management Ordinance was developed on April 20, 2004, Floodplain Management Ordinance on May 18, 2004, Conservation Subdivision and Open Space Development Ordinance on March 16, 2004, Illicit Discharge and Illegal Connection Ordinance on April 20, 2004, Litter Control Ordinance on January 16, 2007, and Stream Buffer Protection Ordinance on March 15, 2004. Planning procedures to develop, implement and enforce post-construction controls in areas of new development and redevelopment are covered in these Ordinances, provided in Figure 8 of the Appendix.

The City of Union City has an adopted a 2010-2030 Comprehensive Land Use Plan and Comprehensive Future Development Map. The Plan is available on the City's website, and the Map is attached in Figure 4 of the Appendix. The Plan protects water quality throughout the City by discouraging development in environmentally sensitive areas, requiring open space (green space) areas and tree densities on sites, utilizing conservation easements, buffers, and other land preservation tools to preserve land near state waters, and encouraging green infrastructure installations, tree planting, and preservation. The Map, in conjunction with the Plan, identifies critical natural resource areas for protection and preservation, such as steep slopes, wildlife habitats, forests, flood plains, wetlands, and water resources. These critical

areas are also protected within the City's Conservation Subdivision and Open Space Development Ordinance and Development Regulations.



City Development Regulations and Ordinances enforce requirements of the Georgia Stormwater Management Manual (GSMM), by reference, for all new developments and re-developments. As part of the development permitting process, each new development is checked to determine if it contains wetlands, State Waters, flood plains, and other critical areas. If any of these environmentally sensitive areas are determined to be present, petitioners must describe the measures they are taking to comply with state and Federal requirements and demonstrate all necessary permits have been secured before City permits are issued.

C. Street Maintenance

The City conducts street sweeping operations through outsourced street sweeping contractors. The City is responsible for approximately 44.4 miles of streets. Every City street is typically swept once a month, and no less than once quarterly. Debris and trash removed from the streets are properly disposed of in a designated landfill. City representatives monitor street sweeping activities to verify operations are conducted effectively and thoroughly.

Every City street is visually inspected after each significant rainfall event. Any problems detected are noted with corrective action following as soon as is practical. All of this effort is the responsibility of the Department of Public Services. Procedures for cleaning inlets and catch basins are described in the previous Structural Controls section.

Litter removal is another responsibility of the Department of Public Services. It is done continuously, every week day, with priorities assigned by the Director of Public Services. When the City Court assigns individuals to community service duty, these individuals are utilized to remove litter and other debris from street rights-of-way and from creeks and streams. All litter collected is taken to a permitted landfill. The use of community service workers for litter control and removal is planned to continue.

Street maintenance procedures have been developed through the years and are the result of a collective effort to find what "works" in Union City and what "does not work" in Union City. While not developed with specific water quality criteria as a primary component, the City's procedures do, nonetheless, incorporate features that protect water quality. Street maintenance is performed during dry weather, as it much more difficult to accomplish the tasks when it is raining. Only minimum areas are disturbed, as to disturb larger areas cost more in both time and money. As work

is performed, crew superintendents stay apprised of forecast weather conditions so that temporary measures can be placed should the need arise.

Deicing is a responsibility of the Georgia Department of Transportation on all state routes within the City. The City conducts deicing operations along City-owned streets during emergency weather situations. Sand, salt, and environmentally friendly deicing chemicals are utilized to perform all deicing operations. The deicing mixes are spread out along City-owned streets prior to or concurrent with the severe weather. City street sweeping crews, or City contractors, remove the applied mixes from City-owned streets with street sweeping equipment within weeks after dry weather conditions return, following each snow and ice event. The sand, salt, and deicing chemicals are stored and safely contained at the Public Services Facility.

D. Flood Management Projects

There are no known flood structural control devices in the City, other than retention/detention ponds. City crews regularly inspect existing and new control devices as part of site inspections and 5-year rotation inspections of stormwater structures. Although there is no official Memorandum of Agreement (MOA) for public crew inspections of privately-owned structures, the City has the authority to inspect said structures and enforce property owner maintenance and cleanings, as described in the City's Stormwater Utility Ordinance.

Union City's efforts to ensure that future flood management projects (including detention/retention ponds) do not cause water quality impacts will be consistent with the proposals of the Metropolitan North Georgia Water Planning District for stormwater management. The City has adopted all related ordinances. All new development plans are reviewed in accordance with City development regulations, standards, ordinances, and codes. Construction sites are regularly inspected to ensure flood management features are installed correctly and maintained to control stormwater, prevent sedimentation from leaving the site, and maintain water quality.

The City understands it is important to examine existing flood control devices to determine if the devices can be retrofitted for additional pollutant removal. The City's procedure for analyzing flood control devices for potential retrofits is provided in Figure 7 of the Appendix. When Code Enforcement or Public Service crews inspect ponds as part of regular inspection cycles, the inlet and outlet controls are examined for condition and retrofit potential. If a particular pond is identified as an ideal applicant for retrofit, the property owner is notified of the potential upgrade opportunity. Union City is limited in the enforcement of any retrofit implementation on privately-owned structures based on City, MNGWPD, and GSMM standards. If property-owners have met the requirements of the standards, or they were grandfathered in or constructed prior to adoption of the standards and ordinances, they are considered compliant, and the City cannot legally force structure retrofitting. To date, the City has not identified any detention/retention pond flood control devices within City limits that require additional retrofitting.

E. Municipal Waste Facilities

There are no municipal landfills, solid waste treatment facilities, solid waste storage facilities or other solid waste disposal facilities located within the corporate limits of Union City.

There are no closed municipal landfills within Union City's city limits. The City does not own or operate any incinerators, municipal solid waste transfer stations, land applications sites, uncontrolled sanitary landfills or other treatment, storage, or disposal facilities for municipal waste.

With no landfills, there is no program to monitor runoff from landfills. City-owned municipal facilities with the potential for causing stormwater pollution are provided in Table E-1 below. See Figure 1 of the Appendix for example inspection report forms used by Public Service crews for inspecting these facilities.

Table E-1
Municipal Facilities

Facility Name	Facility Location
Public Services Building	6524 Ware Street
Public Services Storage Facility	Lower Dixie Lake Road
Sewer Lift Station	Cottage Grove Place
Sewer Lift Station	Lakeside Drive
Sewer Lift Station	Valley Lakes
Sewer Lift Station	Dodson Woods

The City-owned facilities listed are inspected on a 5-year rotation continuing basis, with each facility inspected once every 5 years. When a problem is detected, the appropriate City personnel are notified and the problem corrected promptly. Reports of visual inspections are recorded and filed at the Public Services Department. Depending on the nature of the problem, written reports are sometimes made to the department head of the group correcting the problem. Runoff monitoring will be provided for facilities found to produce illicit discharges or having frequently poor inspection reports. Runoff control practices will be installed and maintained at any monitored facilities as needed to help correct any violations. Currently, no inspections of municipal facilities have resulted in the need for monitoring or the installation of runoff control practices.

The City has implemented a training program for City employees on stormwater related issues, including illicit discharges, monitoring, and controlling runoff from facilities. A copy of the City's training program materials is provided in Figure 9 of the Appendix. Additionally, City personnel are given hands-on experience through "on the job" training.

The City works in conjunction with Georgia EPD and the State in monitoring and tracking industrial facilities within the City limits to ensure those facilities have filed Notices of Intent (NOI) and adhere to the requirements of the NPDES General Permit for Stormwater Discharges Associated with Industrial Activities. The City has reviewed the list of municipal facilities, and compared it with the new NPDES General Industrial Permit listings, and has determined that there are currently no municipal facilities with industrial activities within the City limits.

Because there are no industrial municipal facilities, there are also no outfalls inspected and monitored for industrial municipal facilities. All outfalls within the City limits are inspected on a regular 5-year rotation. This includes inspecting outfalls associated with all municipal facilities and industrial facilities.

F. Pesticide, Fertilizer and Herbicide

The City provides information on pesticides, fertilizers, and herbicides to City employees, commercial applicators, and citizens through a variety of means. Information is provided on the City's website and within the City's newsletters describing appropriate storage, handling, application for chemicals, and other stormwater related issues. Additionally, the City provides brochures and pamphlets on fertilizers, pesticides, and herbicides at City Hall and the Public Services Department. Copies of this information are provided in Figure 17 of the Appendix. The ARC Public Education Program provides additional information.

The City uses pesticides, fertilizers, and herbicides sparingly throughout the City. These chemicals are stored indoors on pallets at the City's Public Services Storage Facility. An inventory of the current stored chemicals is provided in Figure 10 of the Appendix.

The City has begun an employee training program to inform City employees on proper handling and storage of herbicides, pesticides, and fertilizers. Citizens and commercial applicators are invited and encouraged to attend these training meetings to learn about chemical handling and storage. Copies of the training program materials are provided in Figure 9 of the Appendix.

The City does not regularly utilize native or low-maintenance vegetation on City properties or along ditches. Native plants and low-maintenance vegetation have a tendency to grow large in diameter and height, which often makes it difficult for City employees to access City-owned facilities located on right-of-ways and City properties. An example would be allowing native trees, long grass, or shrubs to grow along a sewer right-of-way; which would make it difficult to access with City equipment and vehicles, difficult to locate existing manholes and sewer features, and could result in possible root intrusion of buried utilities. Additionally, such vegetation cannot be provided within road right-of-ways because they could potentially reduce shoulder accessibility for vehicular traffic and could obstruct pedestrian and bicycle paths and trails. Therefore, there are no programs offered to increase the municipal

use of native or low-maintenance vegetation, other than information provided in the City's brochures and pamphlets for private property owners.

Part V. Illicit Discharge Detection & Elimination Program:

The Illicit Discharge and Illegal Connection Ordinance (Ordinance No. 2004-07) was adopted by Union City on May 18, 2004. Prior to its adoption, the City's existing ordinance code proved adequate for all matters relating to the MS4 NPDES.

The City's illicit discharge detection program is based on the staff knowledge of facilities and conditions existing within the corporate limits. Union City's size is an asset to the illicit discharge detection portion of its stormwater program in that the Public Services staff maintains an up-to-date working knowledge of who is connected to the stormwater system. A continuation of that arrangement is planned. Although televising and dye and smoke testing of sanitary drain systems are commonly used, these techniques are not typically utilized for storm drain systems in locating the sources of illicit discharges. Typically, a stream clean-up event is held every year to remove debris, such as tires and batteries, from aselected stream. The stream selected for cleanup is based on the drainage basin feeding the stream. Stream walks are performed in an attempt to provide cleanups for different streams whenever possible, and are photographically documented. Streams with specifically identified trash and debris problems are given priority.

The field screening program is conducted by the Department of Public Services. There are approximately 259 outfalls located within the City, although this number is updated every year as mapping efforts continue. Maps and an inventory of outfalls within the City is provided in Figure 11 of the Appendix. The City's IDDE dry weather screening of outfalls procedures is based on the MNGWPD's Standards and Methodologies for Surface Water Quality Monitoring (Standards and Methodologies). Outfalls are screened on a 5-year rotation, with each outfall inspected once every 5 years. City crews inspect and screen no less than 52 outfalls each year as part of annual stormwater reporting process. Outfall screenings are recorded on inspection forms, provided in Figure 1 of the Appendix, and recorded in the Public Services outfall inventory/database. By recording each outfall inspection in the database, the City can keep track of previously screened outfalls to schedule inspections and give priority to outfalls that either have no inspection record or were screened 5 years ago. In this way, City crews are able to track each outfall and prevent overlapping of outfall screenings during the 5-year rotation cycle. Additionally, outfalls exhibiting specifically identified problems and/or illicit discharges, or having a history of illicit discharge activity, are also given priority for screenings.

Outfalls associated with industrial facilities, municipal facilities, HVPS facilities, and other entities are included in the outfall inventory and maps provided, and are inspected and screened as part of the regular 5-year outfall dry weather screening cycle. Priority screenings are not provided for outfalls associated with said facilities, unless the outfalls fall into the priority groups previously described.

Outfalls are a point source defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges to waters of the United States and does not include open

conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other waters of the United States and are used to convey waters of the United States. Outfalls are the most downstream point (i.e. the final discharge point) on an MS4 where it discharges to the waters of the State. An outfall is not a culvert under a road, a headwall leading to a ditch, or an intermediate drainage structure. Only the point of discharge to the waters of the State is considered an outfall. These definitions are utilized by City crews when identifying outfalls in the field.

The vast majority of outfalls within the City limits have been identified. However, the exact number of outfalls is still unknown at this time. The 259 outfalls inventoried and shown were field located, inspected previously, located by aerial imagery, or GPS-located by City mapping contractors. The City is continually inspecting, locating, and recording outfalls as part of regular system 5-year rotation inspections, using the outfall definition criteria listed above. When a new outfall, or previously unidentified outfall, is discovered, it is recorded in the City's outfall inventory/database, along with associated information such as receiving waters and connecting structure ID, and it is added to the outfall screening schedule and maps.

Outfalls are screened during dry weather conditions, which are defined as rainfall of less than 0.1 inch per day for at least 72 hours. During inspections, crews record basic information, including: location, identification number, type, material, and size, receiving water, date and time, weather conditions, and who conducts the screening. If no flow is detected from the outfall, the inspection form is noted as "no flow" and the inspection is completed. However, if flow is detected, and noted as "yes, flow detected", the City begins an additional inspection process to determine if the flow represents an illicit discharge, and where the discharge may originate from. Should flow be observed at a screening site, it is examined by several crew members for noticeable and foul odors, intensity and pigment of color exhibited by the flow and receiving waters, turbidity (cloudiness) of the flow, and floatables like sewage, oil, film and suds. Flows are then measured for temperature, pH, and specific conductivity (either in-situ or using a sample bottle). The City has a standard Hach test kit (model no. 24813-00) on hand to conduct screenings of any detected flows. The City calibrates this equipment, including the pH and conductivity meters, at Public Services prior to conducting field samples, in accordance with the MNGWPD District-Wide Water Management Plan Standards and Methodologies Quality Assurance/Quality Control (QA/QC) Procedures, to guarantee accurate samples will be taken and accurate information collected if dry weather flows are detected. All probes are washed with distilled water before and after any reading is taken. Field inspectors (screeners) are trained in accordance with these procedures for the aforementioned testing, and for all sampling procedures listed below.

If any of the aforementioned criteria is exceeded (i.e. visible sewage and sewage odor, high concentration of color, odor, turbidity, and floatables, pH outside a range of 6.5 to 7.5, or a conductivity greater than 300 µmho/cm), field crews will take a grab sample of the flow for laboratory analysis. Using gloves and protective gear, trained City crews will collect a sample in a plastic or glass container from the vertical and horizontal center of flow; making sure the existing surroundings and sediments are not disturbed and the sample is not

corrupted. The container is rinsed twice in the outfall flow, and a sample is then taken from the flow. The trained crews will then transfer the sample to a closed, sterile sample container, which is kept in a resealable bag in an iced cooler of less than or equal to 4°C, and transported to a testing laboratory within 6 hours to be tested for fluoride, surfactants (detergents), and fecal coliform. A waterproof label is attached to each sample taken, including location, sample number, analysis performed, date and time, preservation used, and field crew initials. Before or current to the time a grab sample is taken, the laboratory is informed of the sample testing priority, to guarantee the sample is analyzed within its holding time. Laboratory testing results are kept on record with the Public Services Department. Currently, the City utilizes a qualified testing agency, Environmental Labs & Services, Inc. at 103 Carroll Circle, P.O. Box 1408, Carrollton, Georgia, to conduct all sample testing. All containers used in sampling are rinsed with distilled water after analysis is concluded, and all waste material is properly disposed of. If any of the field measured values exceed the limits listed, field crews will conduct an additional re-screening of the site within 24 hours after the sample is taken, at least 4 hours after the initial screening. If the second screening continues to reveal values outside of acceptable ranges, the flow is considered an illicit discharge, and the City will begin source tracing procedures.

During source tracing procedures, the City's Department of Public Services will follow upstream drainage systems and structures containing the illicit flow, and will trace the flow to its source contributor. The source of the illicit discharge is determined as soon as possible by inspectors; often the same day the discharge is discovered. When the discharger is identified, they are notified of the violation and requested to correct the violation within a specified time frame, typically five days. City personnel then follow up to see that the corrections are made as have been agreed to. Should the corrections not be made within the established time limits, the City may issue a citation for the contributor to appear in City court, and the noted party could face potential fines until such time as the situation is resolved. To date no illicit discharges have been detected.

The City's water quality monitoring program is a joint effort of the City and the ARC Stormwater Task Force. When the stormwater program was started, the City opted to participate with the Task Force for the water quality monitoring portion of its stormwater program. A continuation of that arrangement is planned. All sampling and analysis of samples, except illicit discharge screening and sampling of impaired streams within the City, is performed by various members of the Task Force and reported by the Task Force. The seven sites selected for illicit discharge screening by the City were picked to get coverage of the major water courses in the City and to cover a variety of land use categories. Should a problem be detected, further screening would be preformed to locate the source of the problem. Illicit discharge sampling points used in the most recent sampling round are depicted on the accompanying, Land Use Map included in Figure 4 of the Appendix.

Within Union City, the Union City Fire Department has responsibility for responding to hazardous spills to the storm drain system.

Should the Fire Department request the Public Service Department's assistance in responding to a spill, the Department will provide its resources as promptly as they can be marshaled, however, to date this has not been required. At the present time the Fire Department relies on its Mutual Aid Agreement with Fulton County for guidance and assistance should a hazardous spill response be required. At present, the Union City Fire Department has a level 4 Haz-Mat trailer. All Fire Department personnel are trained in Hazardous Material Operations at a minimum with 8 trained to Technician level. Current policy and procedures are to provide damming and diking as required to protect storm drains and sewers.

In order to have every available City employee looking for potential illicit discharges or water quality problems, the City has posted a notice on employee bulletin boards at the Public Service office and City Hall asking all employees to report any suspicious activities to the Public Services Department. An Overflow Emergency Response Program Document is also posted at Public Services and City Hall for additional spill response information. A log is maintained of all illicit discharge complaint calls received, and the disposition of each call. A copy of the notices and a blank copy of the complaint log are included in Figure 12 of the Appendix.

The City has begun a training program to train City employees on illicit discharges and stormwater related issues. Citizens and businesses are encouraged and invited to participate in the training programs. Copies of the program materials are provided in Figure 9 of the Appendix. The City provides additional illicit discharge information for citizens and businesses on the City's website, City newsletters, and on information brochures provided at Public Services and City Hall. Copies are provided in Figure 17 of the Appendix. A Storm Sewer Features Poster, provided in Figure 3 of the Appendix, is also maintained at Public Services and City Hall to inform individuals on illicit discharges.

Within Union City, Pep Boys and Jiffy Lube accept oils and other potential pollutants from citizens for a nominal fee. Citizens may contact Pep Boys at (770) 964-0071 and 5000 Jonesboro Road, Union City, Georgia 30291. Pep Boys accepts used motor oil, batteries, and scrap metal. Citizens may also contact Jiffy Lube at (770) 964-5869 and 4620 Jonesboro Road, Union City, Georgia 30291. Jiffy Lube accepts used motor oil only. When a citizen requests assistance with disposal of these materials, City employees inform them of the two available disposal contacts. The contact information is updated every year.

Efforts to eliminate infiltration from the sanitary sewer system to the storm drain system are a responsibility of the City's Department of Public Services. Personnel in that Department have been instructed to report any "sewer odors" to the Department. When a report is received, either from City personnel or from the general public, personnel are sent to the reported location to investigate. If an infiltration problem is found, corrective action is begun immediately. All sewers under the City's maintenance program, which are not in public streets, are walked every 3 months to detect any problems. Any problems found are corrected immediately. The City has not experienced an excessive inflow/infiltration problems.

Sanitary sewer overflows are the responsibility of the Public Services Department. Standard procedures for addressing sanitary sewers overflows are outlined in the Overflow Emergency Response Program, provided in Figure 12 of the Appendix.

Part VI. Industrial Facility Stormwater Runoff Control:

The City's industrial facility stormwater runoff control program is an effort of the Department of Public Services. Annually the City reviews a listing of businesses holding occupational tax certificates in the City, along with the business SIC codes and the latest list of businesses filing NOIs with EPD. New and renewed businesses listing SIC codes covered under EPD's General NPDES Permit for Storm Water Discharges From Industrial Facilities (GAR050000) are considered Industrial Facilities and are added to the City's industrial facilities inventory, provided in Figure 13 of the Appendix. This list is updated every year, removing closed businesses and adding new businesses. If a facility is identified as industrial, but has no recorded NOI filing with EPD, the business owner is notified and instructed to submit the NOI to EPD, and copy the City, within a designated time frame to guarantee the facilities stormwater compliance.

Inspections of all industrial facilities within the City limits are conducted by Public Services inspectors on a 5-year cycle rotation, with each facility inspected at least once every 5 years. With 7 facilities currently listed in the industrial inventory, the City inspects 1 to 2 industries every year as part of this rotation cycle. A copy of the inspection form used by inspectors is provided in Figure 1 of the Appendix. Reports of these inspections are kept at the Public Services Department and included with the Stormwater Annual Report. Industries are typically not prioritized, other than by the regular 5-year rotation cycle. However, should an industry demonstrate an illicit discharge, improper storage of waste, chemicals, and other materials, or other stormwater related issue, the City will re-inspect the facility until the noted issues are resolved. As mentioned previously, outfalls associated with industrial facilities are not given priority, but are included as part of the 5-year rotation outfall inspection cycle.

If an illicit discharge or other stormwater related problem is noted upon inspection of an industrial facility, Public Service Department crews will monitor runoff from the industrial facility. Monitoring frequency, sample location and parameters to be analyzed are decided on a case-by-case basis, dependent on the severity of the noted deficiency. Parameters for analysis of illicit discharges will conform to sampling and monitoring parameters listed in the Standards and Methodologies of the MNGWPD District-Wide Watershed Management Plan. To date, no monitoring of industrial facilities has been necessary.

To help educate industrial facility owners and employees on stormwater topics, the City maintains informational brochures at City Hall and Public Services. When inspections of industrial facilities are conducted, Public Services inspectors provide industry owners with associated informational brochures. The City provides additional information relating to stormwater in City newsletters and on the City website, including links to other informational sites. Copies of this information are provided in Figure 17 of the Appendix. The City has begun a stormwater training program, as illustrated in Figure 9 of the

Appendix, to inform City employees on stormwater issues. Industrial facility owners and employees are encourage and invited to attend these training programs. The public is provided additional information through partnering organizations, such as the ARC Public Education Program.

Should the City identify a stormwater problem from an industrial facility, the City will confirm the problem and take appropriate action. The Department of Public Services is the entity responsible for enforcement procedures. When a problem is identified and verified, the first step is to contact the industry involved, describe the problem and request a solution and time frame for correcting the problem. The second step is to agree with the industry on the proposed solution and time frame to implement the correction; typically five days. Monitoring the progress of the proposed solution is the third step in the process. If the correction is satisfactorily completed, then the final step is to conduct a final review and close out of the process. Should the industry not accomplish the agreed corrections or fail to propose a solution, the next step is to issue a citation beginning court action and potential fines.

Every site plan, including industrial facilities, is reviewed by the City Engineer, in conjunction with the Community Development Department, for conformance with the City Codes, Ordinances, Standards, and Development Regulations. Clearing, Grading, Timber Harvesting, Building, Land Disturbance, or Site Development permits are not issued until all comments noted in the review are satisfactorily addressed, including stormwater controls. All site plan reviews for new industries are conducted in a similar fashion to all new development or redevelopment reviews, as described in the following section, to ensure adequate stormwater controls are included.

Part VII. Construction Site Management Program:

The City of Union City Soil Erosion and Sedimentation Control Ordinance was last updated on October 18, 2011, to incorporate changes to the state law. A copy of the Ordinance is provided in Figure 8 of the Appendix.

Every site plan for a new or expanded facility in the City is reviewed by the City Engineer, in conjunction with the Community Development Department, for conformance with the City Codes, Ordinances, Standards, and Development Regulations, including best management practices. Under the City's Development Regulations, there are two categories of permits, land disturbing permits and building permits. Both primary categories are issued by the City. Subcategories of land disturbing permits include clearing, clearing and grubbing, timber harvesting and site development. In addition to review by City staff, site plans for projects one acre or larger are reviewed for erosion and sediment control by the District Office of the Georgia Soil and Water Conservation Commission (GSWCC). Approval of those plans by GSWCC is required before land disturbing permits are issued. The City follows the GSWCC "Green Book" and Georgia Stormwater Management Manual (GSMM) for erosion and sediment control practices. A blank copy of the permit application forms is provided, along with a copy of the Construction Guidelines, in Figure 5 of the Appendix. These, and other development documents, are available on the City's website.

After permits are issued, Code Enforcement has responsibility for monitoring permitted land disturbance sites through the construction period. Sites are inspected on an as needed basis depending on the condition and activities occurring at each location. While an absolute frequency of inspection is impossible to state, the usual frequency during construction is at least weekly. Sites in the clearing and grubbing and grading phases of construction are often given higher priority for inspection over sites in the final site stabilization phase, due to the increased potential of erosion and sedimentation during the earlier phases. At the present time, four certified inspectors are employed by Code Enforcement, with approximately 0.2 Full-time Equivalents (FTEs) dedicated solely to construction site inspections. Those individuals are augmented by other Department of Public Services employees and the City Engineer where appropriate.

There are three basic enforcement actions used to address erosion and sediment control issues. The first of those is a written or verbal warning. It is issued to advise a land disturbing permittee that some aspect of their site activities is not functioning as it should. The warning identifies what the issues are and provides a suitable time frame for the permittee to correct the problems identified. The next action is issuance of a citation giving specific violations to the Soil Erosion and Sedimentation Control Ordinance, required minimum corrective actions and a maximum time for the permittee to correct the identified violations. During this enforcement action, the permittee may continue to perform other construction activities at the site. Typically, the time frame for remedying less severe infractions is approximately five days after the notice of violation. At the end of the compliance period, Code Enforcement shall revisit the site to determine if the issues have been resolved. The final and most severe enforcement action is a stop work order. When issued, all work at a site must be immediately ceased except for identified corrective action and remain stopped until corrective action is satisfactorily completed. If accomplished, the stop work order may be lifted and work allowed to continue. If it is not accomplished, the permittee must appear in City Court.

City site inspectors are trained, educated and certified by the GSWCC for Level 1B certifications to perform site inspections. Additionally, some employees are also certified for Level 1A and Level II. Copies of employee certifications are provided in Figure 14 of the Appendix. Additionally, the City maintains informational brochures at City Hall and Public Services, and provides information on the City's website and newsletters to further educate employees on stormwater related issues. The City has also begun a training program to inform City employees and inspectors of stormwater related issues, such as erosion control measures. Copies of the training program information are provided in Figures 9 and 17 of the Appendix. City partnering groups, such as ARC Public Education Program, also provide additional education information.

VIII. Staffing & Equipment:

There are currently no staff positions assigned solely to the City's Stormwater Management Program. Individuals on City staff who have some duties relating to the Stormwater Program include the City Administrator, City Planner, City Engineer, Street Department Supervisor, Public Services Director, Code Enforcement Officer and other staff members. None of these individuals maintains a separate accounting of their hours devoted to the Stormwater Management Program. However, it is estimated that there are approximately 2.5 Full-time Equivalents (FTEs) dedicated to stormwater management, inspection, maintenance, repairs, and reporting. Currently, no equipment is specifically designated for exclusive use with the Stormwater Management Program, other than the outfall screening equipment previously noted. Resources are shared between departments on an as needed basis.

With the recent City Council approval of the Stormwater Utility Ordinance and the additional funds anticipated to result from stormwater utility fees, more opportunities for Stormwater Management will likely become available in the near future. Although there are no specific plans as of yet, it is anticipated that the City may create a separate Stormwater Department and/or hire a full-time employee(s) to be in charge of all stormwater-related items within the next few years.

IX. SWMP Activities Within 305(b)/303(d) Listed Areas:

The City has reviewed the latest 305(b)/303(d) listing of rivers and streams not supporting designated uses, listed on EPD's website, and has determined only one of the listed waters are within the boundaries of Union City. The single stream is Whitewater Creek, listed for poor fish population and fecal coliform as caused by sediment and urban runoff/urban effects. However, it is important to note that less than 6% of the Whitewater Creek Basin is within City jurisdiction. Only the very upper portion of the basin is within Union City because the City is on the ridge line between the Flint and Chattahoochee Rivers. In 2003 EPD, completed a *Total Maximum Daily Load Evaluation for Twenty-eight Stream Segments in the Flint River Basin For Sediment* and submitted that evaluation to EPA. Whitewater Creek was included in that evaluation. The evaluation identified seven management practices that may be used to help reduce and/or maintain the average annual sediment loads. Those practices are:

1. Comply with the requirements of the NPDES permit program.
2. Implement Georgia Forestry Commission (GFC) Best Management Practices for forestry.
3. Adopt Natural Resources Conservation Service (NRCS) Conservation Practices.
4. Adhere to the Mined Land Use Plan prepared as part of the Surface Mining Permit Application.

5. Adopt proper unpaved road maintenance practices.
6. Implement Erosion and Sediment Control Plans for land disturbing activities.
7. Mitigate and prevent stream bank erosion due to increased streamflow velocities caused by urban runoff.

In looking at each of the recommended practices as it does or can apply within Union City, many of the practices are already being implemented. For the NPDES permit program, the City has no wastewater discharges into the creek. Further, the City requires all new developments demonstrate compliance with the State General Stormwater NPDES Permit process. All forestry related activities such as timber harvesting and land clearing not involving land disturbing activities are required by City Ordinances to conduct operations using the GFC's Best Management Practices. The Surface Mining Permit is a State program and not a jurisdictional activity of the City. It is assumed the State is performing its duties required by the program. The City has no unpaved roads in the Whitewater Creek basin. For a number of years the City has had an active Erosion and Sedimention Control Program. Because Whitewater Creek is impaired because of sediment, the City will stress all land disturbing permits in the basin paying particular attention to the application of best management practices. Any permits issued in the basin will be flagged for more frequent inspection throughout the construction period until final practices become effective. To assist with prevention of streambank erosion, the City has adopted the more stringent Stream Buffer Protection Ordinance proposed by the Metropolitan North Georgia Water Planning District. The Stream Buffer Protection Ordinance (Ordinance No. 05-03) was adopted by Union City on March 15, 2004.

The City is not currently aware of any construction activities that are planned in the Whitewater Creek Basin within Union City limits. However, to meet the TMDL requirements, Union City has developed a list of measureable milestones that EPD can use to assess the City's adherence to these management practices.

The City has previously submitted an inventory of outfalls discharging to Whitewater Creek within the City's limits to EPD with the 2007-2008 Annual Stormwater Report. The outfall inventory, maps, and TMDL Plan are attached as Figures 11 and 15 in the Appendix. The City continues outfall screening at these locations on a 5-year rotation, and continues to note and correct any erosion concerns. Several stormwater and erosion control related ordinances, included in Figure 8 of the Appendix, have been adopted and are continually enforced. Regular construction site inspections and BMP enforcement are conducted. The City will continue its public outreach, education, and participation programs and will continue to participate in the CWC, with regional education efforts addressing water quality issues. EPD issued Union City a "Good Faith Compliance" letter in February 2009 for its completed Audit Checklist, which the City will continue to implement in accordance with District goals. The City will continue to train inspectors in erosion and sedimentation control measures, and inspectors will continue to maintain Level 1B and other erosion control certifications. The City will continue to coordinate with GSWCC for erosion and sedimentation control plan reviews.

The 2003 TMDL Plan developed by Georgia EPD shows that 0% reduction in sediment loads is needed to achieve water quality standards in the Whitewater Creek basin. As described in EPD's 2004 "Revised TMDL Implementation Plan for the Flint River Basin", it is anticipated that, if sediment loads are maintained at current levels, then the stream will repair itself over time. Thus, to meet the TMDL requirements, the City shall continue monitoring Whitewater Creek within the City limits per the TMDL Implementation Plan, attached as Figure 15 in the Appendix. The City has developed a Watershed Management Plan, including water quality monitoring and biological monitoring, which was approved by EPD on April 24, 2009. The City made the effort to coordinate with the Watershed Monitoring Plan sampling with the TMDL sampling, but EPD was not able to provide information on what sample was required for the TMDL. Therefore the City is sampling as required for the Watershed Monitoring Plan; which began in April 2009 as described by the Plan. A copy of the approved TMDL Plan, revised per EPD comments, is attached in Figure 15 of the Appendix. The City will monitor Whitewater Creek and provide monitoring results and an assessment of the effectiveness of the City's BMPs as part of the stormwater annual reporting process. The City will continue the current erosion control activities to prevent any increase in erosion and sedimentation, and shall record any change in water quality. If the City is able to maintain or improve the basin water quality through these measures, the 0% sediment reduction shall be achieved.

X. Highly Visible Pollutant Sources:

Inventorying and inspecting highly visible pollutant sources (HVPS) including commercial car washes, mobile pressure washing operations, nurseries, auto parts stores and repair shops, and others, is a responsibility of the Department of Public Services. As with industries, every year the City reviews a listing of businesses holding occupational tax certificates in the City to remove any previous HVPS businesses that have closed and to add new HVPS businesses to the City's inventory. The latest, updated HVPS inventory and inspection schedule is provided as Figure 16 in the Appendix. Through a visual inspection process, the Department constantly is on the lookout for highly visible sources of pollutants.

Relying on its constant visual inspection process, the City has not found highly visible pollutant sources to be a large problem within the corporate limits. The City conducts inspections of HVPS facilities on a 5-year rotation, with each facility inspected at least once every 5 years. In previous annual reports, the City had considered restaurants and other sites with grease traps to be potential entities for inspection. However, at the request of EPD, the City removed those businesses from the list, narrowing it down to the 55 businesses currently listed. Based on the 5-year rotation and in the inspection schedule provided, the City inspects 11 HVPS facilities a year. When Public Service crews conduct inspections, they are recorded on a written report, provided in Figure 1 of the Appendix, and kept on file at the Public Services Department. Copies of the inspection reports, and any resulting re-

inspections, are provided to EPD as part of the annual stormwater reporting process. Although no facilities are typically given priority outside of the 5-year rotation cycle, crews will often provide additional inspections of facilities with identified histories of illicit discharges, improper waste disposals, improper storage of chemicals, and other items of concern.

If a deficiency is noted during a HVPS inspection, the item is noted on the report and the owner/manager of the facility is notified either through a verbal or written notice. The problem is described to the owner/manager and Public Service crews will propose a solution and time frame for the owner/manager to rectify the problem. Once the solution and time frame are agreed upon, the City crews will return to conduct a re-inspection; typically 5 days after the initial inspection. If it is determined the correction is satisfactorily achieved, then the City will conduct a final review, note findings in a report, and close out the process. If the HVPS owner/manager has not accomplished the agreed corrections within the agreed upon time frame, the owner/manager will be issued a citation, which will begin court action and could potentially lead to fines.

HVPS facility representatives are educated on stormwater related items through informational brochures provided at City Hall and Public Services, information provided in City newsletters, and information posted on the City's website, including links to other stormwater organization sites. When Public Service crews perform HVPS inspections, they provide informational brochures to the owner/manager for education purposes. The City has also begun a training program to train City employees on stormwater related issues. HVPS owners, managers, employees, and other curious parties are invited and encouraged to attend these training programs. Copies of these informational items are provided as part of Figure 9 and 17 of the Appendix. Additional education information is provided through partnering organizations, such as the ARC Public Education program.

XI. Increased Public Education Efforts:

As mentioned in previous sections, the City strives to educate citizens and businesses by providing free educational brochures, displayed at City Hall and Public Services, including material from the Clean Water Campaign. These brochures are placed in a location where all persons coming to the main business counter can see the materials. Since they are free, interested individuals may take those they wish. When HVPS and industrial inspections are conducted, City crews provide owners, managers, and operators with applicable informational brochures. The accompanying pictures show the locations where the materials are displayed. Additionally, the City provides stormwater educational materials in the City newsletters, provided to citizens, and the City has updated there website to include stormwater information, links to other stormwater education sites, and previous stormwater annual reports for viewing. The City also encourages citizens and businesses to

attend the City's stormwater training events for City employees. Examples of this information are provided in the Appendix.

Additionally, the City makes an effort to involve citizens through programs like the Spring and Fall Cleanup Campaigns. During these annual activities, citizens are encouraged to dispose of all sorts of debris by bringing the materials to the Public Services site where they are placed in dumpsters without charge to citizens. The City also conducts stream walk cleanups of local tributaries each year. Since offering these special disposal opportunities to citizens, the number of illegal dump sites in the City has notably decreased. These events are advertised through the City's website and newsletters. Copies of the flyers are provided in Figure 6 of the Appendix.

XII. Green Infrastructure and Low Impact Development (GI/LID):

As required by EPD, the City conducted an evaluation of City Codes, Ordinances, Standards, and Development Regulations to ensure they do no prohibit the use of green infrastructure (GI) and low impact development (LID). This evaluation was conducted as part of the 2011-2012 annual reporting period. The review was recorded on the published EPA Water Quality Scorecard: Incorporating Green Infrastructure Practices at the Municipal, Neighborhood, and Site Scales; as recommended by EPD. Regulations, Codes, Ordinances, and Standards were evaluated on the scorecard and given points if they met the requirements for GI/LID items listed. Areas that did not meet requirements listed were left with a 0 point value. Areas that could "potentially" be improved upon to increase the overall score were noted in the comments portion of the scorecard. These areas of improvement were further analyzed for implementation by City officials. A copy of the GI/LID worksheet is provided in Figure 18 of the Appendix.

To improve the overall GI/LID compliance, the City revised the City's Construction Guidelines, attached in Figure 5 of the Appendix and provided on the City's website. The revision incentivizes developers to use GI/LID practices by making it standard practice to expedite plan reviews if developers are constructing on brownfield, greyfield, or green tape sites, and the developer attends a pre-application meeting with City officials. Brochures have been added at City Hall and Public Services and links have been added to the City's website to direct curious parties to organizations providing information on tree protection, maintenance, and replanting, to inform the public on the use of green infrastructure practices to manage stormwater runoff on their private property, and to instruct homeowners on acceptable rainwater harvesting techniques. Additionally, City officials have pledged to make additional efforts to secure state and federal funds to pay for green infrastructure elements on future projects, through CDBG, Rural Development, and other project requests on streetscape retrofits with green spaces, trees, and other items.

By incorporating these revisions, the City has actively encouraged green infrastructure and low impact developments within the City.

XIII. Conclusions:

The City strives to meet all requirements of EPD and other governing agencies to provide the best stormwater quality and control possible. With the advent of the Stormwater Utility, Union City has positioned itself to provide a proactive approach to addressing any new stormwater issues and requirements that may arise in the future.

Phase 1 NPDES Permit
Municipal Separate Storm Sewer System (MS4)

Stormwater Management Program
City of Union City, Georgia

Appendix

December 15, 2003

Rev. May 13, 2013