

**2023 Douglasville-Douglas County
Water and Sewer Authority
Phase II MS4
Stormwater Management Program**

June 2, 2023

General Information for Submitting a SWMP

- Your Stormwater Management Program (SWMP) must be a comprehensive document containing all the necessary components. The SWMP must include the most recent version of all of the required supporting documents. These supporting documents must be submitted on a flash drive or CD. Ensure that the files can be opened and read by EPD. In rare cases, EPD will accept hard copies of documents. Ensure that you submit all of the necessary components, including copies of the latest versions of the following:
 - 1) Adopted stormwater ordinances (Illicit Discharge, Erosion and Sedimentation, and Post-Construction). If you are located within the Metropolitan North Georgia Planning District, then your SWMP must also include District ordinances (Floodplain, Litter, Stream Buffer);
 - 2) Standard Operating Procedures (e.g. dry weather screening procedures, construction site inspection procedures, street sweeping procedures);
 - 3) Blank copies of forms to be used to implement the SWMP, including inspection forms;
 - 4) Signed Memorandum of Agreements; and
 - 5) Maps and inventories.

A bulleted list of the documents to be attached to the SWMP is included on each BMP page. This list is only to assist the permittee as a reminder and is not a definitive list. The permittee may determine some of the listed documents do not apply or that additional documents should be provided.

- For some BMPs, the NPDES Permit requires the submittal of procedures. These procedures may be described in the “Description of BMP” section of each BMP page, if they are not lengthy, or included as a separate attachment to the SWMP.
- The NPDES Permit contains tables listing the various BMPs. The MS4 is required to set a measurable goal for each BMP. In some cases, the Permit establishes the goal (e.g. inspect 100% of the structures within a 5-year period), while in other cases the MS4 must set a specific measurable goal. Ensure that each measurable goal is numeric and trackable.
- The NPDES Permit specifies that the MS4 must provide documentation of each activity implemented. Each BMP must specify the documentation to be submitted with each annual report (e.g. completed inspection forms, work orders, etc.). In some cases, the Permit specifies the documentation to be submitted (e.g. maps and inventories). In other cases, the MS4 will have to establish the documentation to be submitted. Ensure that each BMP spells out the specific documentation to be submitted with each annual report in the section titled “Documentation to be submitted with each Annual Report”.

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

Stormwater Management Program (SWMP)

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

1. General Information

- A. Name of small MS4: Douglasville-Douglas County Water and Sewer Authority
- B. Name of responsible official: Gilbert B. Shearouse
Title: Executive Director
Mailing Address: P.O. Box 1157
City: Douglasville State: Georgia Zip Code: 30133
Telephone Number: 770-949-7617
- C. Designated stormwater management program contact:
Name: Stephen Ingle
Title: Project Engineer
Mailing Address: P.O. Box 1157
City: Douglasville State: Georgia Zip Code: 30133
Telephone Number: 770-949-7617
Email Address: single@ddcwsa.com
- D. Provide the river basin(s) to which your MS4 discharges: Chattahoochee

- E. Provide the latitude and longitude of the MS4 center (e.g. City Hall, County offices, MS4 mailing address) using Global Positioning System (GPS) –WG 84:
Latitude: 33.743322 Longitude: -84.734261

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:

1. Name of entity City of Douglasville, Douglas County
2. Control measure or component of control measure to be implemented by entity on your behalf:
The City of Douglasville and Douglas County perform street
and parking lot cleaning within their respective jurisdictions.

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

3. Minimum Control Measures* and Appendices

- A. Public Education and Outreach
- B. Public Involvement/Participation
- C. Illicit Discharge Detection and Elimination
- D. Construction Site Stormwater Runoff Control
- E. Post-Construction Stormwater Management in New Development and Redevelopment
- F. Pollution Prevention/Good Housekeeping

- G. Appendix A – Enforcement Response Plan
- H. Appendix B – Impaired Waters Monitoring and Implementation Plan
- I. Appendix C – Illicit Discharge Detection and Elimination Plan
- J. Appendix D – Complaint Response Procedures
- K. Appendix E – Development Review and Construction Inspection Procedures
- L. Appendix F – Storm System Inspection Procedures
- M. Appendix G – Feasibility Program for Linear Transportation Projects
- N. Appendix H – Green Infrastructure/Low Impact Development Program

4. Certification Statement

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

Printed Name: Gilbert B. Shearouse _____ Date: 06/02/23

Signature: Gilbert B. Shearouse _____ Title: Executive Director

WSA Organizational Structure and MS4 Responsibilities

The Douglasville-Douglas County Water and Sewer Authority (WSA) is an independent authority that was created by an act of the General Assembly of Georgia on March 7, 1985. WSA is governed by a seven-member Board of Directors whose members include the Mayor of the City of Douglasville and the Chairman of the Board of Commissioners of Douglas County. WSA is not part of the governments of the City of Douglasville or Douglas County.

WSA executed Inter-Governmental Agreements (IGAs) with the City and County to transfer ownership and maintenance responsibility of the public stormwater infrastructure within these jurisdictions to WSA, effective January 1, 2003 within the City and effective January 1, 2004 within unincorporated Douglas County. The IGAs also gave WSA responsibility for plan review, approval, inspection, and enforcement of all construction activity within these jurisdictions that are subject to the Georgia Erosion and Sedimentation Act. Although the City and County are recognized by EPD as the Local Issuing Authorities within their respective jurisdictions, WSA performs many of the responsibilities of the LIA under these agreements. After the IGAs were executed, WSA's enabling legislation was revised by the Georgia Legislature to include authority over stormwater management.

The IGAs define the stormwater infrastructure over which WSA is responsible to include ditches, pipes, manholes, catch basins, junction boxes, inlet structures, headwalls, and other "hard" infrastructure. The IGAs limit the spatial extents of WSA's responsibility to be infrastructure located within the public road right-of-way of City and County roads or on easements or fee-simple property dedicated to the City and County for drainage purposes. These agreements maintain City or County ownership and maintenance responsibility over stormwater infrastructure and detention ponds on City and County property. Driveway pipes, roads, and curb and gutter are also not part of the responsibility given to WSA under these agreements. Under these agreements WSA's responsibility begins at the back of the curb and ends at private property.

The IGAs gave WSA the responsibility to meet the requirements of the Georgia NPDES permit for the Municipal Separate Storm Sewer System (MS4) within the City and County. The permitted MS4 is defined as that portion of the public stormwater system located within the limits of the City of Douglasville and the Urbanized Area (UA) of Douglas County, as defined by the most recent Decennial Census by the Bureau of the Census. Although WSA provides stormwater service to the entirety of the City of Douglasville and Douglas County, this Stormwater Management Program covers the permitted area only. To codify WSA's jurisdiction and authority over the Municipal Separate Storm Sewer System (MS4) and construction activities, WSA's Board of Directors has adopted a set of Rules and Regulations. WSA's Rules and Regulations are enforced by WSA just as other jurisdictions enforce their ordinances. Ordinances referenced within the MS4 Permit and this Stormwater Management Program are incorporated as chapters within WSA's Rules and Regulations and are provided as referenced herein.

Stormwater Management Program

Public Education and Outreach on Stormwater Impacts

Table 4.2.1 (a) of the Permit

A. Best Management Practice (BMP) #1 – Public Education Program

1. Target audience: General Public Exhibit Booth Attendee Traffic
2. Description of BMP: WSA will display, at a public event that is free and open for anyone to attend, informational items such as brochures, flyers, and booklets pertaining to stormwater pollution and its prevention.
3. Measurable goal(s): WSA will set up at least one public display per year.
4. Documentation to be submitted with each annual report: In the annual report, WSA will provide documentation of the public display and include a name, description, and count of the number of brochures distributed, as well as photos of the event if available.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
6. Person (position) responsible for overall management and implementation of the BMP: WSA Communications Coordinator
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: It is WSA's intention that participants will share their experience and knowledge with friends and family, thus further increasing awareness of stormwater pollution.

B. BMP #2 – Stormwater Newsletter

1. Target audience: Residents, business owners, and other stakeholders in Douglas County.
2. Description of BMP: Each year, WSA will devote one edition of their monthly digital newsletter, The Waterline, to stormwater education and issues such as illicit discharges, pollution prevention, and community stewardship.
3. Measurable goal(s): An edition of The Waterline that is focused on stormwater will be produced annually and distributed digitally on WSA’s website. Additionally, physical copies of the newsletter will be distributed in WSA’s lobby as well as sent to other public outlets such as the county courthouse and city hall.
4. Documentation to be submitted with each annual report: In the annual report, WSA will include a copy of the newsletter and a list of distribution locations.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
6. Person (position) responsible for overall management and implementation of the BMP: WSA Communications Coordinator
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: By producing this newsletter each year, WSA will have an educational resource on stormwater circulating in the Douglas County community.

C. **BMP #3 – Stormwater Seminar**

1. Target audience: Douglas County Residents and Business Owners
2. Description of BMP: WSA will conduct an educational “Stormwater Seminar” for the general public at least once a year. The community will be invited to an informational one-hour long presentation that covers a variety of stormwater topics and issues including: the history of stormwater in Douglas County, how WSA funds and manages it, and how to be a good stormwater steward at your own home or business. Attendees may receive credit on the non-residential stormwater bill of their choice in return for their participation in the seminar.
3. Measurable goal(s): At least one stormwater seminar will be held for the Douglas County community each year.
4. Documentation to be submitted with each annual report: In the annual report, WSA will include a copy of the presentation given, a scan of the attendance forms, and pictures.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
6. Person (position) responsible for overall management and implementation of the BMP: WSA Communications Coordinator
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Attendance is voluntary so those choosing to participate have a vested interest in water resources and protecting the community’s local waterways. They will spread the information learned in the seminar to their friends, family, neighbors, coworkers, etc.

D. BMP #4 – Educational Materials Displayed in WSA Lobby

1. Target audience: General Public
2. Description of BMP: WSA will display at least one educational piece of literature relating to stormwater topics in their lobby at all times for the general public to access as they please. WSA will also provide this literature to entities where the public may go to receive community information.
3. Measurable goal(s): Each year, WSA will provide educational stormwater brochures/pamphlets/information in their lobby and at other public entities such as local libraries, county courthouse, city hall, and the Chamber of Commerce.
4. Documentation to be submitted with each annual report: In the annual report, WSA will provide a spreadsheet of tracking data, including brochure titles, the locations of brochures, the numbers of materials provided, and numbers of materials taken.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
6. Person (position) responsible for overall management and implementation of the BMP: WSA Communications Coordinator
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Providing literature that the general public can access and take with them into the community will help disseminate important stormwater messages and information in Douglas County.

Public Involvement/Participation
Table 4.2.2 (a) of the Permit

A. Best Management Practice (BMP) #1 – Recycling/HHW Disposal Event

1. Target audience/stakeholder group: Douglas County residents
2. Description of BMP: WSA will partner with an educational or community improvement group, such as Keep Douglasville Beautiful or Keep Douglas County Beautiful, for an annual recycling and/or household hazardous waste disposal event.
3. Measurable goal(s): To participate in a minimum of one recycling and/or household hazardous waste disposal event with a community partner annually. WSA will work with the community partner to make sure all collected materials are disposed of in an environmentally responsible manner.
4. Documentation to be submitted with each annual report: In the annual report, WSA will provide documentation of the event advertising, pictures, and data on the amount of materials collected during the event.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
6. Person (position) responsible for overall management and implementation of the BMP: WSA Communications Coordinator.
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Effectiveness will be measured by the amount of public participation and the amount of waste collected. Data will be tracked year by year.

B. BMP #2 – Spring Stream Clean-Up

1. Target audience/stakeholder group: General Public
2. Description of BMP: Each spring, WSA will partner with a community group (such as Chattahoochee Riverkeepers or a Boy Scout/Girl Scout Troop) to perform a local river or stream clean-up. Location will be chosen based on the accessibility of the waterway and the need to have the area cleaned. WSA or the partner organization will provide cleanup materials including bags, gloves, vests, etc. Waste will be documented and disposed of by WSA.
3. Measurable goal(s): WSA will partner with a local group to sponsor at least one spring river or stream clean-up per year in an effort to help them become a solution to the pollution. The WSA will track the number of volunteers, the number of bags of debris removed, and/or weight of debris removed.
4. Documentation to be submitted with each annual report: In the annual report, WSA will provide documentation of the event, including flyers/materials soliciting volunteers, sign-in sheets, and photographs of the event.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
6. Person (position) responsible for overall management and implementation of the BMP: WSA Communications Coordinator.
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: By involving citizens in an effort to undo the effects of stormwater pollution, they will see firsthand the impacts of pollution on our water resources. It is WSA's intention that the participants will share their experience and knowledge with friends and family.

C. **BMP #3 – Community Clean-Up**

1. Target audience/stakeholder group: General Public
2. Description of BMP: WSA will partner with a community group (such as Keep Douglas County Beautiful or a Boy Scout/Girl Scout Troop) to perform a community litter cleanup. Location will be chosen based on the accessibility and the need to have the area cleaned. WSA or the partner organization will provide cleanup materials including bags, gloves, vests, etc. Waste will be documented and disposed of by WSA. If possible, the cleanup will be a part of a larger initiative such as the Great American Cleanup or Earth Day.
3. Measurable goal(s): WSA will partner with a local group to sponsor at least one community clean-up per year in an effort to help them become a solution to the pollution. The WSA will track the number of volunteers, the number of bags of debris removed, and/or weight of debris removed.
4. Documentation to be submitted with each annual report: In the annual report, WSA will provide documentation of the event, including solicitation of volunteers, sign-in sheet, photographs, and the amount of trash collected.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
6. Person (position) responsible for overall management and implementation of the BMP: WSA Communications Coordinator
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: By involving citizens in an effort to undo the effects of stormwater pollution, they will see firsthand the impacts of pollution on our water resources. It is WSA's intention that the participants will share their experience and knowledge with friends and family.

D. BMP #4 –Storm Drain Marking

1. Target audience/stakeholder group: General Public
2. Description of BMP: WSA will partner with a community group (such as Keep Douglasville Beautiful or a Boy Scout/Girl Scout Troop) to perform storm drain marking in a public area. Materials for storm drain marking will be provided by WSA. Volunteers will be responsible for prepping the area and adhering the markers. WSA employees may be present during the event or may have given instructions and information to group before the event.
3. Measurable goal(s): WSA will partner with a local group at least once a year to perform a storm drain marking activity.
4. Documentation to be submitted with each annual report: In the annual report, WSA will submit documentation in the form of a spreadsheet on giving the location of storm drain marking, the number of storm drains marked, and the number of volunteers that participated, as well as photographs of the event when possible.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
6. Person (position) responsible for overall management and implementation of the BMP: WSA Communications Coordinator
7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Citizen participation will help drive the dissemination of educational stormwater messaging and make the community more conscious of the different ways pollutants get into our waterways.

Illicit Discharge Detection and Elimination
Table 4.2.3 (a) of the Permit

A. Best Management Practice (BMP) #1 – Legal Authority

1. Description of BMP: WSA will evaluate, and if necessary, modify the Illicit Discharge and Illegal Connection Ordinance (Chapter 10 of WSA’s Rules and Regulations). WSA Rules and Regulations are on the attached thumb drive.
2. Measurable goal(s): WSA will evaluate this ordinance at least once per year.
3. Documentation to be submitted with each annual report: WSA will include a copy of any revised ordinance in the annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 12/28/04
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will evaluate the effectiveness of the ordinance in enforcing all identified illicit discharges.

B. BMP #2 – Outfall Map and Inventory

1. Description of BMP: WSA will update a GIS map and inventory of MS4 outfalls within the permitted area, which will include the names and locations of all waters of the State that receive discharges from those outfalls. A PDF of the map, as well as a spreadsheet of the inventory, are located on the attached thumb drive.
2. Measurable goal(s): WSA will review and update the map and inventory, showing any outfalls and their receiving streams, at least once per year.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide an updated inventory and map of outfalls and will state the total number of outfalls in the inventory and the number that were added during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2013
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will cross-check the accuracy and completeness of the map and inventory with data collected in the field during outfall inspections.

C. BMP #3 – Illicit Discharge Detection and Elimination (IDDE) Plan

1. Description of BMP: WSA will implement the Illicit Discharge Detection and Elimination Plan (which is enclosed as Appendix C of this SWMP). The plan includes dry-weather outfall screening procedures, source tracing procedures, and discharge elimination procedures. WSA will take enforcement action when appropriate, in accordance with the Enforcement Response Plan (ERP), enclosed as Appendix A of this SWMP), or work with the State in instances where State enforcement is appropriate, to eliminate identified illicit discharges and illegal dumping.
2. Measurable goal(s): WSA will conduct dry-weather screening inspections of outfalls within the permitted area at a rate such that 100% of outfalls are inspected within the 5-year permit term, with a minimum of 5% to be screened each year. WSA will source trace and investigate all identified possible illicit discharges according to the IDDE plan. WSA will eliminate any identified illicit discharges, with enforcement action if necessary, according to the IDDE plan and ERP.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide logs of screening inspections, including the number of outfall screenings completed, and documentation of any investigation, source tracing, compliance and enforcement actions. WSA will provide a copy of the completed outfall inspection reports and revised IDDE plan, when necessary.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Wastewater Operations Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The inspection results will be compared to previous years to determine if there has been a change in the number of illicit discharges detected.

D. BMP #4 – Education

1. Description of BMP: Each year WSA will dedicate an edition of their digital newsletter, The Waterline, to stormwater issues and education. The newsletter will discuss illicit discharge/dumping, its environmental impacts, and ways to prevent and report it. This newsletter will be available for the public on our website. WSA will also provide physical copies to public information centers such as local libraries, governmental facilities, and other entities the community may use to seek our community information.
2. Measurable goal(s): WSA will dedicate one edition of The Waterline to stormwater issues and education per year. This newsletter will be distributed to the public, businesses, and governmental employees of Douglas County to enhance their knowledge of stormwater and the effects of illicit discharge.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide a copy of The Waterline as well as a list of distribution locations.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Communications Coordinator
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: By producing this newsletter each year, WSA will have an educational resource on stormwater circulating in the Douglas County community.

E. BMP #5 – Complaint Response

1. Description of BMP: WSA has implemented illicit discharge and illegal connection complaint receipt, investigation, response, and tracking procedures. WSA customers can submit illicit discharge complaints in person at our Administrative Office, by calling 770-949-7617, or by emailing askwsa@ddcwsa.com. WSA will investigate and respond to illicit discharge complaints and track the status of complaints through resolution per WSA's Complaint Response Procedures, located in Appendix D of this SWMP.
2. Measurable goal(s): WSA will track complaints and their investigations in a database (including complaint date, complaint type, and complaint status). WSA will investigate each illicit discharge complaint received within the next business day of receiving the complaint. Investigations will be conducted by the WSA Stormwater Inspector or WSA Outfall Sampling Technician in accordance with the Illicit Discharge Detection and Elimination Plan in Appendix C. Enforcement against any violations discovered will be done in accordance with the Enforcement Response Plan in Appendix A.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide a table (including complaint date, complaint type, and complaint status) of illicit discharge complaints and their resolution, including enforcement actions. WSA will provide documentation of any enforcement actions, resulting from enforcement activities or complaints.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The number of complaints received will be compared to previous years to determine if there has been a change in the number of illicit discharges detected.

Construction Site Stormwater Runoff Control
Table 4.2.4 (a) of the Permit

A. Best Management Practice (BMP) #1 – Legal Authority

1. Description of BMP: WSA will evaluate, and if necessary, modify the Erosion and Sedimentation Control Ordinance (Chapter 7 of WSA’s Rules and Regulations) so that it remains in compliance with the current requirements of the permit. The most recent version of WSA’s Rules and Regulations are included on the attached thumb drive.
2. Measurable goal(s): WSA will review this ordinance annually and revise it, if necessary.
3. Documentation to be submitted with each annual report: WSA will include a copy of any revised ordinance in the annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 12/28/04
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be determined to be effective if the WSA maintains an E&SC ordinance in accordance with permit requirements throughout the duration of this permit.

B. BMP #2 – Site Plan Review Procedures

1. Description of BMP: WSA will review site plans for new development and redevelopment that require a land disturbance permit in accordance with WSA’s Development Review and Construction Inspections Procedures, located in Appendix E of the SWMP, and the GSWCC Manual for Erosion and Sediment Control in Georgia (“Green Book”) and approve only those plans that adhere to the requirements of ordinances adopted by WSA, which reflect the requirements of the Georgia Soil and Water Conservation Commission (GSWCC).
2. Measurable goal(s): WSA will review 100% of site plans submitted for approval against the ordinances adopted by the WSA and track all projects in a WSA Engineering Private Project Tracking database.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide a list of site plans received and the number of site plans reviewed, approved, or denied during the reporting period, as well as the total number of land disturbance permits issued.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): As Plans Are Received
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be deemed effective if no land disturbance project is initiated without first having an approved plan to keep the construction site from causing stormwater runoff pollution.

C. **BMP #3 – Inspection Program**

1. Description of BMP: WSA will conduct site inspections on all active permitted construction sites in accordance with WSA’s Development Review and Construction Inspections Procedures, located in Appendix E of the SWMP, and in accordance with the GSWCC Manual for Erosion and Sediment Control in Georgia (“Green Book”).
2. Measurable goal(s): WSA will inspect 100% of active permitted construction sites following installation of initial BMPs, during active construction, and after final site stabilization. WSA will maintain records of all inspections conducted, in the form of written BMP inspection forms.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide a list of active construction sites, a list of any inspections conducted during the reporting period, and a sample BMP inspection form. The BMP inspection form is included on the attached thumb drive.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will maintain records of all inspections performed.

D. BMP #4 – Enforcement Procedures

1. Description of BMP: WSA will implement enforcement procedures for E&S violations documented at construction sites in accordance with WSA's Enforcement Response Plan, located in Appendix A of this SWMP.
2. Measurable goal(s): WSA will take enforcement action on 100% of violations identified during construction site inspections and maintain records of all enforcement actions taken.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide documentation of any enforcement actions resulting from inspection activities or complaints taken during the reporting period, including the number, type, and status of violations.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will maintain records of all enforcement actions taken.

E. BMP #5 – Complaint Response

1. Description of BMP: WSA has implemented E&S complaint receipt, investigation, response, and tracking procedures. WSA customers can submit complaints regarding erosion and sedimentation from construction sites in person at our Administrative Office, by calling 770-949-7617, or by emailing askwsa@ddcwsa.com. WSA will investigate and respond to complaints regarding erosion and sedimentation from construction sites and track the status of complaints through resolution per WSA's Complaint Response Procedures, located in Appendix D of this SWMP.
2. Measurable goal(s): WSA will track complaints and their investigations in a database (including complaint date, complaint type, and complaint status) and their resolution, including enforcement action, in the annual report. Complaints that appear critical will be investigated within one business day; all complaints will be investigated within 5 business days.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide a table of construction site complaints (including complaint date, complaint type, and complaint status) and their resolution, including enforcement actions, along with copies of any enforcement actions that result from complaints.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The number of complaints received will be compared to previous years to determine if there has been a change in the number of problems noted by the public.

F. BMP #6 – Certification

1. Description of BMP: WSA will ensure that any staff involved in construction activities subject to the Construction General Permits (CGPs) are trained and certified in accordance with the rules adopted by the GSWCC.
2. Measurable goal(s): WSA will ensure that all staff members involved in construction activities subject to the CGPs have current GSWCC certifications appropriate to their role. WSA will maintain records of all staff certifications from GSWCC.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide the number and type of current certifications held by MS4 staff, as well as confirmation of current licensure from the GSWCC website.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will track certifications of all personnel involved in construction activities subject to the CGPs and keep them current through recertification courses. WSA will also train new employees involved in construction activities subject to the CGPs to certify them.

**Post-Construction Stormwater Management in
New Development and Redevelopment**
Table 4.2.5 (a) of the Permit

A. Best Management Practice (BMP) #1 – Legal Authority

1. Description of BMP: WSA will evaluate, and if necessary, modify the Stormwater Management Ordinance (Chapter 8 of WSA’s Rules and Regulations) and the WSA Design and Construction Standards that relate to the post-construction stormwater management requirements of the permit. The ordinance and standards incorporate the requirements of the Georgia Stormwater Management Manual (GSMM), most recent revision. Provisions for a Feasibility Program for Linear Transportation Projects are included (see Appendix G for a description of the program). Section 1 of the Design and Construction Standards establishes WSA’s authority to require a “Consent to Authority Regulations” form to be submitted as part of the plan approval process, Section 4 contains the design criteria for post-construction stormwater management, and Section 8 contains the construction standards for stormwater structures and BMPs. The latest version of WSA’s Rules and Regulations and WSA’s Design and Construction Standards can be found on the attached thumb drive.
2. Measurable goal(s): WSA will evaluate the ordinance and standards at least once per year.
3. Documentation to be submitted with each annual report: WSA will include a copy of the most up-to-date version of the ordinance and standards in the annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 12/28/04
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be determined to be effective if the WSA maintains a Post Construction Stormwater Management Ordinance and post-construction stormwater design and construction standards throughout the duration of this permit.

B. BMP #2 – Inventory

1. Description of BMP: WSA maintains an inventory of all publicly-owned and privately-owned post-construction stormwater management structures, which includes the following:
 - All public detention ponds, retention ponds, and water quality vaults within the permitted area, and
 - All privately-owned detention ponds, retention ponds, and water quality vaults within the permitted area that were designed after December 9, 2008.

WSA requires the submittal of a signed and notarized “Consent to Authority Regulations” form by the owner or developer of every project that includes construction of new post-construction stormwater management structures or modifications to existing structures. The language of the form obligates the owner/developer to provide perpetual maintenance of their private stormwater facilities in strict compliance with the approved plans and stormwater management report, as well as WSA’s Rules and Regulations and Design and Construction Standards.

2. Measurable goal(s): The inventory will be updated annually to include all structures newly constructed or discovered.
3. Documentation to be submitted with each annual report: A spreadsheet containing the updated inventory.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2020
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be determined to be effective if the WSA receives as-built drawings on all newly-built public and private post-construction stormwater management structures, and those structures are added to the inventory.

C. **BMP #3 – Inspection Program**

1. Description of BMP: WSA will conduct inspections of all post-construction stormwater management structures included on the inventory required in BMP #2 of this MCM in accordance with procedures outlined in WSA’s Storm System Inspection Procedures, located in Appendix F, and the GSMM. Inspections will be documented using online forms in WSA’s Cityworks platform. A sample inspection form, on which the online forms are based, is included on the attached thumb drive.

In response to comments received from the EPD on WSA’s previous SWMP, WSA recently updated the post-construction structures inventory to include water quality vaults and made plans to include inspection of these structures within Cityworks (which we began using in mid-2021). However, the ability to enter inspections of these structures is not yet operational. WSA will begin to log inspections for water quality vaults when this becomes functional, which is expected later in 2023, and will complete inspections of all vaults in the inventory within the permit term.

2. Measurable goal(s): WSA will conduct these inspections at a rate such that 100% of the above-named structures are inspected within the 5-year permit term, with a minimum of 5% to be inspected each year.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide the number and percentage of the total structures inspected during the reporting period, a spreadsheet summarizing the inspections, and electronic printouts of the inspection forms completed.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): December 6, 2017.
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will track all inspections performed in a database.

D. BMP #4 – Maintenance Program

1. Description of BMP: For structures inspected under BMP #3 above that require maintenance, WSA will communicate maintenance needs to the structure owner or perform maintenance, as appropriate, per the description below. The maintenance will be conducted in accordance with procedures outlined in WSA’s Storm System Inspection Procedures, located in Appendix F, and the GSMM, to the Maximum Extent Practicable (MEP).

For structures owned by the City of Douglasville, Douglas County, or other public entities that require maintenance, WSA will inform the appropriate entity of maintenance needs. For structures owned by WSA that require maintenance, WSA will perform the maintenance. For all privately-owned structures with construction completed after December 6, 2012, WSA will inform owners of maintenance needs.

2. Measurable goal(s): Ensure that 100% of WSA-owned structures are maintained as needed. All other public owners and private owners of will be notified of maintenance needs on their structures within 45 days.

WSA was made aware in April 2022 that the EPD expected a “summary list of maintenance agreements” to be submitted with the annual report. As mentioned in BMP #1 above, WSA requires a signed and notarized Consent to Authority Regulations form for each new development or redevelopment project. Near the end of 2021, WSA completed compiling a list of all post-construction structures owned by other public entities and all privately-owned structures that were constructed after December 6, 2012. Since then, WSA has been gradually gathering the forms for those projects, but has not yet begun to compile the list. WSA intends to complete the list in 2023 and submit the completed list with the annual report early next year.

3. Documentation to be submitted with each annual report: In the annual report, WSA will submit a spreadsheet documenting maintenance activities completed on WSA-owned structures, including type of maintenance performed, as well as copies of all work orders associated with such maintenance work. WSA will also submit copies of any letters sent to other public owners and private owners notifying them of maintenance needs, and a spreadsheet documenting any enforcement actions taken. Once it has been completed, WSA will submit the summary list of all executed “Consent to Authority Regulations” forms for all structures owned by other public entities and all privately-owned structures constructed after December 6, 2012, in the annual report.

4. Schedule:

- a. Interim milestone dates (if applicable): N/A
- b. Implementation date (if applicable): December 6, 2017
- c. Frequency of actions (if applicable): N/A

- d. Month/Year of each action (if applicable): N/A
- 5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
- 6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will track all maintenance needs identified in a database.

E. BMP #5 – GI/LID Program

1. Description of BMP: WSA has developed a program describing the Green Infrastructure/Low Impact Development (GI/LID) practices to be implemented in the permitted area. The program includes procedures for evaluating the feasibility and site applicability of different GI/LID techniques and practices, the GI/LID structures allowed to be constructed, and the procedures for inspection and maintenance of GI/LID structures. The program can be found in Appendix H of this SWMP.

WSA will continue to review building codes, ordinances, and other regulations to ensure that they do not prohibit or impede the use of GI/LID practices. At a minimum, those regulations that govern road design and parking requirements will be reviewed. The inclusion of incentives for the use of GI/LID practices will be considered in the review.

2. Measurable goal(s): During the first year of this permit term, review the GI/LID program that was prepared during the previous permit iteration (2017-2022) to determine if revisions are necessary. For each year during the remaining four years of the permit term, reference the first-year evaluation and recertify that additional revisions are not needed.
3. Documentation to be submitted with each annual report: In the first annual report during the permit term, the evaluation mentioned above will be submitted, along with any changes made as a result of the evaluation. The annual reports for years two through five of the permit period will include either the recertification or any changes that were made to the program, ordinance, and regulations.
4. Schedule:
 - a. Interim milestone dates (if applicable): NA
 - b. Implementation date (if applicable): February 15, 2020
 - c. Frequency of actions (if applicable): NA
 - d. Month/Year of each action (if applicable): NA
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: If WSA implements the requirements of the GI/LID program.

F. BMP #6 – GI/LID Structure Inventory

1. Description of BMP: WSA will annually update an inventory of water quality-related GI/LID structures constructed after December 6, 2012, including, but not limited to, bioswales, pervious pavement, rain gardens, cisterns, and green roofs, located within the permitted area. The inventory must include permittee-owned structures, those publicly-owned structures owned by other entities (e.g. Board of Education) and privately-owned non-residential structures. Any new structures identified through the plan review process will be added to the inventory and Consent to Authority Regulations forms will be required for each project. The current inventory is included on the attached thumb drive.
2. Measurable goal(s): The inventory and the summary list of consent forms will be updated annually.
3. Documentation to be submitted with each annual report: In the annual report, WSA will submit a spreadsheet containing the inventory, which will include (at a minimum) the structure number, type, construction date, and owner.
4. Schedule:
 - a. Interim milestone dates: N/A
 - b. Implementation date (if applicable): December 6, 2017
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will enter GI/LID structures into the inventory when as-built drawings are received and inspections demonstrate the structures were built per the approved plans.

G. BMP #7 – GI/LID Structure Inspection Program

1. Description of BMP: WSA will conduct inspections of the GI/LID structures included in the inventory described in BMP #6 above. The inspection program will be carried out in accordance with the GI/LID Program, which can be found in Appendix H of this SWMP.
2. Measurable goal(s): WSA will conduct inspections such that 100% of the GI/LID structures in the inventory are inspected within the 5-year permit term, with a minimum of 5% of the structures inspected each year. WSA will begin the inspections during the 2023 reporting period, once the ability to enter these inspections is functional in Cityworks, after which all the structures within the inventory will be inspected within the 5-year permit term.
3. Documentation to be submitted with each annual report: In the annual report, WSA will submit the number and percentage of the structures inspected during the reporting period, along with documentation of the inspections conducted.
4. Schedule:
 - a. Interim milestone dates: N/A
 - b. Implementation date (if applicable): 2023
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will inspect all GI/LID structures in the inventory during the permit term.

H. BMP #8 – GI/LID Structure Maintenance Program

1. Description of BMP: WSA will perform maintenance on WSA-owned structures and implement procedures to ensure the maintenance of structures owned by other public or private entities to the extent practicable. The maintenance program will be carried out in accordance with the GI/LID Program, which can be found in Appendix H of this SWMP.
2. Measurable goal(s): WSA will ensure that 100% of WSA-owned structures are maintained as needed. Once the functionality to enter inspections of GI/LID structures in the Cityworks platform has been made functional during the 2023 reporting period, WSA will notify all other public owners and private owners of maintenance needs identified on their structures, and follow up with enforcement measures, as appropriate.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide the number of permittee-owned structures maintained during the reporting period, along with documentation of maintenance performed by WSA and of any activities taken to ensure maintenance of non-permittee-owned structures.
4. Schedule:
 - a. Interim milestone dates: N/A
 - b. Implementation date (if applicable): 2023
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will seek to ensure proper maintenance of GI/LID structures.

Pollution Prevention/Good Housekeeping for Municipal Operations
See Table 4.2.6 (a) of the Permit

A. BMP #1 – MS4 Structure Inventory and Map

1. Description of BMP: WSA will update a GIS map and inventory of MS4 structures, including catch basins, ditches, detention/retention ponds, underground detention, and storm drain lines that are located within the permitted area and are owned and operated by WSA, the City of Douglasville or Douglas County, as new structures are constructed or identified. The inventory will include lengths for linear features such as ditches and pipes. A PDF of the map, as well as a spreadsheet of the inventory, are included on the attached thumb drive.
2. Measurable goal(s): The inventory and map will be updated annually to include any new structures that are constructed or identified. WSA will ensure the inventory and map include all MS4 structures within the permitted area.
3. Documentation to be submitted with each annual report: In the annual report, WSA will report the number of each type of structure added during the reporting period and the total number of each type of structure, as well as submit a copy of the revised map and inventory.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Initial submittal date to EPD: February 11, 2014
 - c. Frequency of actions (if applicable): Annual
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA personnel will check the accuracy and completeness of the inventory and map while conducting inspections of the MS4 and while reviewing plans for new development, and will update the inventory and map as appropriate.

B. BMP #2 – MS4 Inspection Program

1. Description of BMP: WSA will inspect the MS4 structures that have been entered into the MS4 inventory defined in BMP #1 above, as outlined in the WSA’s Storm System Inspection Procedures, located in Appendix F. Detention/retention ponds will be inspected under BMP #3 in Post-Construction Storm Water Management in New Development and Redevelopment. Inspections will be entered into WSA’s Cityworks platform using online forms. Copies of the online forms are included on the attached thumb drive.
2. Measurable goal(s): WSA will inspect MS4 structures in the inventory at a rate such that 100% of the structures are inspected within the 5-year permit term. WSA will begin the inspections of ditches during the 2023 reporting period, once the ability to enter these inspections is functional in Cityworks, after which all ditches will be inspected within the 5-year permit term.
3. Documentation to be submitted with each annual report: WSA will report the number of MS4 structural control inspections, including the number and percentage of each type of structure inspected, during the reporting period in the annual report. WSA will provide a copy of the revised or current Storm System Inspection Procedures and a spreadsheet documenting the inspections performed during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will maintain inspection records of each MS4 structure inspected.

C. **BMP #3 – MS4 Maintenance Program**

1. Description of BMP: Based on the inspections conducted in BMP #2 above, WSA will generate work orders and perform maintenance as needed on MS4 structures. WSA will maintain the MS4 control structures according to the procedures in WSA's Storm System Inspection Procedures (Appendix F), and the GSMM, to the MEP. Detention/retention ponds will be maintained under BMP #4 in Post-Construction Storm Water Management in New Development and Redevelopment.
2. Measurable goal(s): WSA will perform maintenance on 100% of structures identified in BMP #2 as having deficiencies. Within one week of notification of a problem, WSA maintenance personnel will assess the situation, determine a possible solution, and prioritize the work to be performed.
3. Documentation to be submitted with each annual report: In the annual report, WSA will submit PDF work orders for maintenance work performed during the reporting period, as well as a summary reporting the number and type of each structure maintained.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Stormwater Superintendent
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Work orders will be generated for those structures requiring maintenance. WSA will maintain records of how and when each work order is completed.

D. BMP #4 – Street and Parking Lot Cleaning

1. Description of BMP: WSA does not conduct street sweeping or parking lot cleaning. Under the terms of WSA’s intergovernmental agreements with the City and County, WSA’s MS4 responsibility begins at the back of the curb and does not include streets, parking lots, or gutters.

The cleaning of roads in the City and County is done through an inmate work program administered by the Douglas County Sheriff’s Office (DCSO). DCSO receives complaints about trash needing to be picked up in County rights-of-way from the Douglas County Department of Transportation, from complaints received from citizens by the County government that are forward to DCSO, from citizens contacting DCSO directly and from DCSO personnel calling in reports. Complaints are responded to within the week in most cases. In the absence of specific complaints, the DCSO focuses the trash pickup operations in major transportation arteries in the City and County. No log of miles is kept, only the number of roads cleaned each month, the number of bags of trash collected, the tonnage of trash delivered to the landfill, and the landfill fees paid.

2. Measurable goal(s): Street cleaning will be conducted such that at least one (1) mile per year is cleaned.
3. Documentation to be submitted with each annual report: In the annual report, WSA will submit documentation of street and parking lot cleaning activities completed in the City and County during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: This BMP will be determined to be effective if WSA receives the quantity of debris collected during street cleaning activities in the City of Douglasville and Douglas County.

E. BMP #5 – Employee Training

1. Description of BMP: WSA will conduct employee training with the goal of preventing or reducing pollutant runoff from municipal operations. Target employees may include inspectors, plan review personnel, maintenance personnel, and plant operators. Training may be performed in-house or employees may be sent to outside classes or seminars.
2. Measurable goal(s): WSA will conduct at least one employee training session per year.
3. Documentation to be submitted with each annual report: WSA will provide documentation of the educational activity(ies) conducted during the reporting period, including sign-in-sheets, date, and subject matter.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will maintain records of each training session and the employees that attend.

F. BMP #6 – Waste Disposal

1. Description of BMP: WSA will transport all trash and debris removed from the MS4 from the City of Douglasville and Douglas County to the Douglas County Landfill for proper disposal in accordance with WSA's Storm System Inspection Procedures, located in Appendix F.
2. Measurable goal(s): 100% of waste generated by MS4 maintenance activities will be transported to the Douglas County Landfill for proper disposal.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide documentation of waste disposal from MS4 maintenance activities at the Douglas County Landfill during the reporting period, including landfill manifests and a summary of tonnage disposed of and landfill fees paid.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Stormwater Superintendent
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will keep records of the total tonnage of waste material disposed of at Douglas County Landfill as a result of MS4 maintenance activities.

G. BMP #7 – New Flood Management Projects

1. Description of BMP: WSA will conduct an assessment of water quality impacts for all proposed flood management projects, in accordance with the latest version of the GSMM. Activities include a) use of the Site Development Review Tool during the plan review process to ensure all new developments meet the runoff reduction and water quality treatment standards of the GSMM, which are as follows:
 - Demonstrating retention of the post-construction runoff from the first 1.0 inch of rainfall on the site, to the MEP. To the extent that it is infeasible to meet this requirement, the remaining runoff from a 1.2 inch rainfall event must be treated to remove at least 80% TSS.
2. Measurable goal(s): WSA will review 100% of plans that involve new flood management projects for compliance with the GSMM requirements.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide a list of plans reviewed during the reporting period where flood management projects were assessed for water quality impacts.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2003
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will withhold the land disturbance permit for each new flood management project until the project design meets the required water quality standards.

H. BMP #8 – Existing Flood Management Projects

1. Description of BMP: WSA will conduct assessments of all existing permittee-owned flood management projects for potential retrofitting to address water quality impacts and conduct any feasible retrofitting activity. The assessments and any resulting retrofitting will be performed in accordance with the requirements of the 2016 GSMM.
2. Measurable goal(s): 100% of permittee-owned flood management projects will be assessed for potential water quality retrofitting within the 5-year permit term, with a minimum of 1 assessment per year.
3. Documentation to be submitted with each annual report: WSA will provide copies of the assessments performed during the reporting period, as well as documentation of any retrofitting activity conducted.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): January 1, 2018
 - c. Frequency of actions (if applicable): N/A
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will evaluate any retrofitted flood management projects using the Site Development Review Tool from the GSMM to determine the effectiveness of this BMP.

I. BMP #9 – Municipal Facilities

1. Description of BMP: WSA maintains an inventory of municipal facilities in the City of Douglasville and Douglas County that have the potential to cause pollution and will update the inventory as new structures are added. The inventory is on the attached thumb drive. WSA will inspect these facilities with the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
2. Measurable goal(s): WSA will update the inventory annually and inspect the facilities listed on the inventory at a rate such that 100% of the facilities in the inventory are inspected within the 5-year permit term, with a minimum of one inspection per year.
3. Documentation to be submitted with each annual report: In the annual report, WSA will provide the inventory and documentation of the inspections conducted during the reporting period.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: WSA Engineering Manager
6. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: WSA will document facility inspections and communicate observed potential pollutant sources to the facility owner or manager.

Appendix A

Enforcement Response Plan

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program during a previous permit iteration.
 - A. Provide the date the ERP was approved by EPD: The most recent ERP was approved on October, 19, 2020
 - B. If the ERP has not yet been approved, provide the date submitted to EPD: _____
2. The ERP is to be evaluated annually and revised as needed. Provide the most recent version of the ERP as an attachment to this Appendix.

Enforcement Response Plan

1. Introduction

This document comprises the actions to be taken to enforce the requirements of WSA's ordinances as they relate to stormwater. These ordinances are separate chapters in WSA's Rules and Regulations, and are identified as follows:

- Soil Erosion, Sedimentation and Pollution Control (Chapter 7)
- Stormwater Management Regulations (Chapter 8)
- Illicit Discharge and Illegal Connection Regulations (Chapter 10)

2. Personnel

The WSA Engineering Department shall provide enforcement as required. The WSA Engineering Manager shall decide how personnel are assigned to the tasks described herein (full-time, part-time, or by temporary assignment). Personnel who may be involved in enforcement actions may be among the following:

- MS4 Inspector
- BMP Inspector
- Outfall Sampling Technician
- Enforcement Officer - Each enforcement officer shall be a sworn constable of the courts in the City of Douglasville and Douglas County and shall be assigned to the WSA Engineering Department. Responsibilities include enforcement actions as described herein.
- Engineer

If any of the personnel described above encounter evidence of a violation, the Enforcement Officer shall be notified immediately.

3. Illicit Discharge Detection and Elimination

Chapter 10 of WSA's Rules and Regulations provides the legal authority and framework for enforcement against illicit discharges and illegal connections to the stormwater system. This chapter defines illicit discharge as "any direct or indirect non-stormwater discharge into stormwater, [WSA's] separate storm sewer system, State Waters, or Waters of the U.S., except as exempted in Section 10-5." Section 10-5 includes the following exemptions:

- Water line flushing performed by WSA or any other governmental entity, other potable water sources, landscape irrigation or lawn watering, diverted stream flows, rising groundwater, groundwater infiltration to storm drains, uncontaminated pumped groundwater, foundation or footing drains (not including active groundwater dewatering systems), crawl space pumps, air conditioning condensation, springs, natural riparian habitat or wetland flows, and any other water source not containing pollutants;
- Discharges or flows from fire fighting and other discharges specified in writing by WSA as being necessary to protect public health and safety;
- Any non-stormwater discharge permitted under an NPDES permit or order issued to the discharger and administered under the authority of the Georgia Environmental Protection Division (EPD) and/or the United States Environmental Protection Agency, provided that the discharger is in full compliance with all requirements of the permit, waiver, or order and other applicable laws and regulations, and provided that written approval has been granted for any discharge to WSA's separate storm sewer system.

Illicit discharges of sediment or other pollutants from permitted construction sites, or sites that require permitting under GESA but have not obtained such permitting, are enforced under section 4 below. For other land disturbance or construction where no permit under GESA is required, illicit discharges are enforced under this section.

An illegal connection means an unauthorized connection to WSA's public stormwater system. The definition also includes a connection to the stormwater system on private property through which an illicit discharge into the public stormwater system may occur (i.e., the connection of a sanitary sewer discharge pipe to a stormwater pipe).

3.1 Enforcement

The steps of enforcement are as follows.

- A. Illicit discharges directly to State Waters, as well as discharges on sites that are covered under an NPDES industrial stormwater permit, may be handed over to the EPD for enforcement.
- B. In the event a violation constitutes an immediate danger to public health or public safety, WSA is authorized to enter upon the subject private property, without giving prior notice, to take any and all measures necessary to abate the violation and/or restore the property. WSA is authorized to seek costs of the abatement as outlined in Section 10-10, F. of WSA's Rules and Regulations.
- C. Stop Work Order

If an ongoing violation is the result of land disturbing activities (whether permitted or not), WSA may issue a stop work order which requires work to cease until the remedial measures set forth on the stop work order have been completed.

D. Notice of violation

Whenever WSA finds that a violation of Chapter 10 has occurred, WSA may order compliance by written notice of violation.

The notice of violation shall contain:

1. The name and address of the alleged violator;
2. The address when available or a description of the building, structure, or land upon which the violation is occurring or has occurred;
3. A statement specifying the nature of the violation;
4. A description of the remedial measures necessary to restore compliance with Chapter 10 and a time schedule for the completion of such remedial action, as follows:
 - a. For an ongoing illicit discharge – 24 hours,
 - b. For conditions that are known to have contributed to an illicit discharge, but where no such discharge is occurring at present – 5 days, or
 - c. For illegal connections to the stormwater system where no discharge into the system is occurring at present – 5 days;
5. A statement of the penalty or penalties that shall or may be assessed against the person to whom the notice of violation is directed; and,
6. A statement that the determination of violation may be appealed to WSA by filing a written notice of appeal within thirty (30) days after the notice of violation.

The notice of violation may require, without limitation, one or more of the following:

- The performance of monitoring, analyses, and reporting;
- The elimination of illicit discharges and illegal connections;
- That violating discharges, practices, or operations shall cease and desist;
- The abatement or remediation of stormwater pollution or contamination hazards and the restoration of any affected property;
- Payment of costs to cover administrative and abatement costs; and,
- The implementation of pollution prevention practices.

In the event the remedial measures described in the notice of violation have not been completed by the date set forth for such completion in the notice of violation, the following steps are to be taken, in order, against the person to whom the notice of violation was directed.

D. Assessment of Civil Penalties

In the event the property owner, contractor, or other responsible person fails to take the remedial measures set forth in the notice of violation or otherwise fails to cure the violations described therein within ten (10) days, or such greater period as WSA shall deem appropriate (except, that in the event the violation constitutes an immediate danger to public health or public safety, 24 hours notice shall be sufficient) after WSA has taken one or more of the actions described above, WSA may administratively impose a monetary penalty not to exceed \$1,000.00 (depending upon the severity of the violation) for each day the violation remains unremedied after receipt of the notice of violation. Each act of violation and each day upon which any violation shall occur shall constitute a separate offense.

E. Termination of water service and/or request to withhold Certificate of Occupancy

WSA may terminate water service to the property and/or request that the City or the County refuse to issue a certificate of occupancy for the building or other improvements constructed or being constructed on the site until the property owner, contractor, or other responsible person has taken the remedial measures set forth in the notice of violation or has otherwise cured the violations described therein.

Table 3-1 summarizes the steps involved in enforcement against violations involving illicit discharges and illegal connections.

Table 3-1: Enforcement Guide for Illicit Discharges and Illegal Connections

<p>Potential Violations and Required Remediation</p> <ul style="list-style-type: none"> • Illicit discharge into public stormwater system or state waters Note: Where an illicit discharge occurs on a private property directly to state waters, WSA may send the issue to the Georgia EPD for enforcement. Remediation: Remove/cease illicit discharge • Illegal connection to WSA’s public stormwater system, including connection to the stormwater system on private property through which an illicit discharge into the public stormwater system may occur (i.e., the connection of a sanitary sewer discharge pipe to a stormwater pipe). Remediation: Remove illegal connection
<p>Steps of Enforcement Escalation</p>
<p>A. Illicit discharges directly to State Waters, as well as discharges that are covered under and NPDES industrial stormwater permit, may be handed over to the EPD for enforcement.</p>
<p>B. In the event a violation constitutes an immediate danger to public health or public safety, WSA may choose to enter the subject private property, without giving prior notice, to take any and all measures necessary to abate the violation and/or restore the property.</p>
<p>C. <u>Stop Work Order</u></p> <ul style="list-style-type: none"> • For an ongoing illicit discharge that is the result of land disturbance
<p>D. <u>Notice of Violation (NOV)</u></p> <p>The NOV should include the one of the following time schedules for remediation of the violation:</p> <ul style="list-style-type: none"> • For an ongoing illicit discharge – 24 hours • For conditions that are known to have contributed to an illicit discharge, but where no such discharge is occurring at present – 5 days • For illegal connections to the stormwater system where no discharge into the system is occurring at present – 5 days
<p>E. <u>Assessment of Civil Penalties</u> – up to \$1,000 per day per violation may be assessed</p> <ul style="list-style-type: none"> • To be issued when violator has not remediated the violation within the required time frame
<p>F. <u>Termination of Water Service</u> –</p> <ul style="list-style-type: none"> • To be carried out if violator has not responded to civil penalties by remediating the site, or if the violator has refused to pay civil penalties
<p>G. <u>Request that City or County Withhold Certificate of Occupancy</u></p> <ul style="list-style-type: none"> • To be carried out if the violator requests a certificate of occupancy while the site remains in violation or the civil penalties have not been paid

4. Construction Site Erosion, Sedimentation and Pollution Control

Chapter 7 of WSA's Rules and Regulations provides the legal authority and framework regarding soil erosion, sedimentation and pollution control for all properties and land disturbing activities lying within the jurisdictional limits of the permitted area. This chapter includes rules regarding enforcement against violations of the requirements of the chapter.

Potential violations include, but are not limited to the following:

- conducting land disturbing activities without a permit,
- failure to install best management practices (BMPs);
- failure to maintain BMPs;
- failure to comply with an approved plan;
- failure to comply with permit conditions; and
- Stream buffer violations
 - Land disturbance or removal of vegetation within the local stream buffer without first having obtained a variance from the City or County. When WSA is determined to be the lead agency in enforcement of such violations, the procedures of this section are followed.
 - Land disturbance or removal of vegetation within the 25-foot state stream buffer without first having obtained a variance from the EPD. Coordination of enforcement will be done with the EPD.

4.1 Inspection

WSA will periodically inspect the sites of land-disturbing activities for which permits have been issued to determine if the activities are being conducted in accordance with the plan and if the measures required in the plan are effective in controlling erosion and sedimentation. WSA shall regulate primary, secondary and tertiary permittees as such terms are defined in the State General Permit. Primary permittees shall be responsible for installation and maintenance of BMPs where the primary permittee is conducting land-disturbing activities. Secondary permittees shall be responsible for installation and maintenance of BMPs where the secondary permittee is conducting land-disturbing activities. Tertiary permittees shall be responsible for installation and maintenance of BMPs where the tertiary permittee is conducting land-disturbing activities. WSA will also inspect sites in response to complaints received from the public, whether or not a land disturbance permit has been issued for the site.

If, through inspection, it is deemed that a person engaged in permitted land-

disturbing activity has failed to comply with the approved plan, with permit conditions, or with the provisions of WSA's Rules and Regulations, a written Notice of Inspection shall be served upon that person. The notice shall set forth the measures necessary to achieve compliance and shall state the time within which such measures must be completed. If the person engaged in the land-disturbing activity fails to comply within the time specified, he shall be deemed in violation of WSA's Rules and Regulations, and a Notice of Violation will be issued.

4.2 Enforcement

The steps of enforcement are as follows.

A. Immediate Stop Work Order

An immediate stop work order shall be issued for the following violations:

- Conducting land disturbance activities that require a permit without first having obtained a permit;
- Conducting land disturbance or removal of vegetation within the state or local stream buffer without first having obtained a buffer variance;
- Conducting land disturbing activities without installation of BMPs; or
- An ongoing illicit discharge on a permitted construction site that results from failure to install or maintain BMPs.

The stop work order shall remain in effect until more of the following remedial actions occur, depending on the situation:

- A land disturbance permit and/or buffer variance has been obtained; and/or
- BMPs have been installed or maintained; and/or
- The illicit discharge has ceased. The owner shall have 24 hours from the date of the stop work order to remove the illicit discharge before civil penalties may be assessed.

Whenever WSA finds that a violation of Chapter 7 has occurred that does not warrant an immediate stop work order, enforcement shall be through the following steps.

B. Notice of Inspection

When through inspection WSA finds a violation of Chapter 7 that does not warrant an immediate stop work order, a written notice of inspection shall be issued.

The notice of inspection shall contain:

1. The name and address of the alleged violator;
2. The name of the project and the address or a description of the building, structure, or land upon which the violation is occurring or has occurred;
3. A statement specifying the nature of the violation; and,
4. A description of the remedial measures necessary to restore compliance with Chapter 7 and a statement that the remedial action must be performed within five (5) days.
5. A statement that the determination of violation may be appealed to WSA by filing a written notice of appeal within thirty (30) days after the notice of violation

The notice of inspection may require, without limitation, one or more of the following:

- The installation, maintenance or modification of best management practices;
- The restoration of stream buffers;
- The performance of monitoring, analyses, and reporting;
- The elimination of pollutant discharges from the construction site;
- That violating discharges, practices, or operations shall cease and desist;
- The abatement or remediation of stormwater pollution or contamination hazards and the restoration of any affected property.

Failure of the violator to remediate the violation within the specified time frame will be considered a reason to issue a warning.

C. Warning

Whenever a violator has not responded appropriately and in a timely manner to a notice of inspection, WSA may order compliance by written warning.

The warning shall contain:

1. The name and address of the alleged violator;
2. The address when available or a description of the building, structure, or land upon which the violation is occurring or has occurred;
3. A statement specifying the nature of the violation;

4. A description of the remedial measures necessary to restore compliance with Chapter 7 and a statement that the remedial action must be performed within five (5) days, except that in the event the violation has caused an ongoing illicit discharge into the public stormwater system or state waters, such discharge shall be removed within 24 hours; and,
5. A statement of the penalty or penalties that shall or may be assessed against the person to whom the notice of violation is directed.

In the event the remedial measures described in the warning have not been completed by the date set forth for such completion, enforcement will proceed through the following steps.

D. Final Warning

Whenever a violator has begun to respond to a written warning appropriately, but has not fully completed the remedial measures within the specified timeframe, WSA may choose to issue a final warning.

Please note that if the violator is non-responsive, this step shall be skipped and enforcement shall proceed to step E below.

The final warning shall contain:

1. The name and address of the alleged violator;
2. The address when available or a description of the building, structure, or land upon which the violation is occurring or has occurred;
3. A statement specifying the nature of the violation;
4. A description of the remedial measures necessary to restore compliance with Chapter 7 and a statement that the remedial action must be performed within five (5) days, except that in the event the violation has caused an ongoing illicit discharge into the public stormwater system or state waters, such discharge shall be removed within 24 hours; and,
5. A statement of the penalty or penalties that shall or may be assessed against the person to whom the notice of violation is directed.

In the event the remedial measures described in the final warning have not been completed by the date set forth for such completion, enforcement will proceed through the following steps.

E. Stop Work Order

WSA will issue a stop work order, which shall be served on the property owner, contractor, or other responsible person. The stop work order shall remain in effect until the property owner, contractor, or other responsible person has taken the remedial measures set forth in the notice of violation or has otherwise cured the violation or violations described therein. The stop work order prohibits any construction work or land disturbance on the property except that required to carry out the necessary remedial measures to cure such violations (i.e., removal of potential pollutants, installation of BMPs, temporary or permanent stabilization of the site).

F. Assessment of Civil Penalties

In the event that the violator fails to take the remedial measures set forth in the notice of violation after a stop work order has been issued, WSA may administratively impose a monetary penalty not to exceed \$2,500.00 per day (depending on the severity of the violation) for each day that the violation remains unremedied after receipt of the notice of violation. Each act of violation and each day upon which any violation shall occur shall constitute a separate offense.

G. Bond Forfeiture

For any project requiring an erosion control performance bond, WSA may call the bond or any part thereof to be forfeited and may use the proceeds to hire a contractor or use WSA's own forces to stabilize the site of the land-disturbing activity and bring it into compliance.

H. Suspension, revocation, or modification of permit

WSA may request the City or County to suspend, revoke, or modify the permit authorizing the land development project. A suspended, revoked, or modified permit may be reinstated after the applicant or other responsible person has taken the remedial measures set forth in the notice of violation or has otherwise cured the violations described therein, provided such permit may be reinstated (upon such conditions as WSA may deem necessary) to enable the applicant or other responsible person to take the necessary remedial measures to cure such violations.

Table 4-1 summarizes the steps involved in enforcement against violations involving construction site erosion, sedimentation and pollution control.

Table 4-1: Enforcement Guide for Construction Site Erosion, Sedimentation and Pollution Control

Potential Violations and Required Remediation

- conducting land disturbing activities without a permit
Remediation: Obtain permit or cease work and stabilize site
- failure to install best management practices (BMPs)
Remediation: Install BMPs
- failure to maintain BMPs
Remediation: Maintain BMPs
- failure to comply with an approved plan
Remediation: Modify BMPs to match plan
- failure to comply with permit conditions
Remediation: Modify BMPs to meet permit conditions
- conducting land disturbing activities or vegetation removal within the state or local stream buffer without a buffer variance
Remediation: Obtain variance or cease work and restore buffer vegetation

Steps of Enforcement Escalation

A. Immediate Stop Work Order

An immediate stop work order should be issued on a construction site that has one or more of the following:

- Land disturbance activities that require a permit but with no permit posted
- Land disturbance or removal of vegetation within the state or local stream buffer without a buffer variance
- Land disturbing activities without installation of BMPs
- Ongoing illicit discharge on a permitted construction site that results from failure to install or maintain BMPs.

The stop work order shall remain in effect until more of the following remedial actions occur, depending on the situation:

- A land disturbance permit and/or buffer variance has been obtained; and/or
- BMPs have been installed or maintained; and/or
- The illicit discharge has ceased. The owner shall have 24 hours from the date of the stop work order to remove the illicit discharge before civil penalties may be assessed.

B. Notice of Inspection

For violations that do not warrant an immediate stop work order.

- Violator shall have 5 days to correct the violation

C. Warning

When a violator has not responded appropriately to a notice of inspection within 5 days after the Notice of Inspection.

- Violator shall have 5 days to correct the violation

D. Final Warning

When a violator has begun to respond but has not completed remediation within 5 days after the warning.

- Violator shall have 5 days to correct the violation

E. Stop Work Order

- To be issued when violator has not responded to the Final Warning within 5 days

F. Assessment of Civil Penalties – up to \$2,500 per day per violation may be assessed

- To be issued when violator has not remediated the violation, even after a stop work order

G. Bond Forfeiture

- If the violator does not respond to civil penalties by remediating the violation, WSA may call the bond to be forfeited and use the proceeds to hire a contractor or use WSA's own forces to stabilize the site of the land-disturbing activity and bring it into compliance.

H. Request that City or County Suspend, Revoke, or Modify Land Disturbance Permit

- May be done as an alternative to bond forfeiture

5. Post-Construction Stormwater Management

Chapter 8 of WSA's Rules and Regulations provides the legal authority and framework to protect, maintain, and enhance the public health, safety, environment, and general welfare by establishing minimum requirements and procedures to control the adverse effects of increased post-development stormwater runoff and nonpoint source pollution associated with new development and redevelopment.

Potential violations include, but are not limited to the following:

- failure to construct stormwater management facilities in accordance with the approved stormwater management plan and the requirements of Chapter 8 of WSA's Rules and Regulations and Chapter 4 of WSA's Design and Construction Standards;
- failure to submit as-built drawings and stormwater management report to WSA that show the stormwater management facilities to have been constructed in accordance with the approved stormwater management plan and the requirements of Chapter 8 of WSA's Rules and Regulations and Chapter 4 of WSA's Design and Construction Standards; and
- failure to maintain stormwater management facilities.

1.1 Inspections to ensure plan compliance during construction.

Periodic inspections of the stormwater management system construction shall be conducted by WSA staff. If any violations are found, the applicant shall be notified in writing of the nature of the violation and the required corrective actions. All violations shall be corrected before WSA will issue an acceptance of the project.

If a developer or contractor demobilizes from a construction site or otherwise shuts down construction in such a way that the site development appears to be complete, and has refused to submit as-built drawings to WSA that show the stormwater management facilities to have been constructed in accordance with the approved stormwater management plan and the requirements of Chapter 8 of WSA's Rules and Regulations and Chapter 4 of WSA's Design and Construction Standards, the site will be considered as in violation of Chapter 8 of WSA's Rules and Regulations and enforcement action will be taken as outlined in section 5.3 below.

1.2 Long-term maintenance inspection of stormwater facilities and practices

Stormwater management facilities and practices included in a stormwater management plan must undergo ongoing inspections to document maintenance and repair needs and ensure compliance with the requirements of the plan and this Section.

A stormwater management facility or practice shall be inspected on a periodic basis by the responsible person. WSA will also periodically inspect all stormwater

management facilities required by the permit. In the event that the stormwater management facility has not been maintained and/or becomes a danger to public safety or public health, WSA shall notify the person responsible for carrying out the maintenance plan. The notice shall specify the measures needed to comply with the plan and shall specify the time within which such measures shall be completed. If the responsible person fails or refuses to meet the requirements of the plan and the ongoing inspection and maintenance requirements set forth in Chapter 8 of WSA's Rules and Regulations, WSA shall proceed to enforcement as specified in section 5.3 below.

A. Right-of-entry for inspection

As provided in WSA's Rules and Regulations, WSA shall have the right to enter the property at reasonable times and in a reasonable manner for the purpose of inspection. This includes the right to enter a property when WSA has a reasonable basis to believe that a violation of this Section is occurring or has occurred and to enter when necessary for abatement of a public nuisance or correction of a violation of this Section.

B. Records of maintenance activities.

Parties responsible for the operation and maintenance of a stormwater management facility shall provide records of all maintenance and repairs to WSA upon request.

1.3 Enforcement shall be as follows

Any action or inaction which violates the provisions of Chapter 8 of WSA's Rules and Regulations or the requirements of an approved stormwater management plan or permit may be subject to the enforcement actions outlined in this section.

A. Letter or Notice of Inspection

Except for egregious violations, WSA may begin enforcement by sending a letter or issuing a notice of inspection to the owner of the property or stormwater management facility. This should be the first step of enforcement for failure to maintain a stormwater management facility, such as a detention pond. Such letter or notice should state the nature of the violations discovered, the proposed remedy, and call for remediation of the violation within 30 calendar days. WSA may extend this period by verbal agreement if the violator needs more time to complete the remediation.

B. Notice of Violation

If WSA determines that an applicant or other responsible person has failed to comply with the terms and conditions of a permit, an approved stormwater management plan, the provisions of Chapter 8, or a letter or notice of inspection, WSA shall issue a written notice of violation to such applicant or other responsible

person. Where a person is engaged in activity covered by this Section without having first secured a permit therefore, the notice of violation shall be served on the owner or the responsible person in charge of the activity being conducted on the site.

The notice of violation shall contain:

1. The name and address of the owner or the applicant or the responsible person;
2. The address or other description of the site upon which the violation is occurring;
3. A statement specifying the nature of the violation;
4. A description of the remedial measures necessary to bring the action or inaction into compliance with the permit, the stormwater management plan, or this Section and the required schedule for the completion of such remedial action (30 calendar days);
5. A statement of the penalty or penalties that may be assessed against the person to whom the notice of violation is directed; and,
6. A statement that the determination of violation may be appealed to WSA by filing a written notice of appeal within thirty (30) days after the notice of violation.

In the event the remedial measures described in the notice of violation have not been completed by the date set forth for such completion in the notice of violation, the following steps are to be taken, in order, against the person to whom the notice of violation was directed.

C. Stop Work Order

If the owner of a project still under construction has not complied with a notice of violation within the specified time frame, WSA may issue a stop work order which shall be served on the applicant or other responsible person. The stop work order shall remain in effect until the applicant or other responsible person has taken the remedial measures set forth in the notice of violation or has otherwise cured the violation or violations described therein. The stop work order prohibits any construction work or land disturbance on the property except that required to carry out the necessary remedial measures to cure such violations.

D. Civil penalties

In the event the applicant or other responsible person fails to take the remedial measures set forth in the notice of violation after the issuance of a stop work order (when applicable), WSA may administratively impose a monetary penalty not to exceed \$1,000.00 (depending upon the severity of the violation) for each day the violation remains unremedied after receipt of the notice of violation. Each act of

violation and each day upon which any violation shall occur shall constitute a separate offense.

E. Termination of water service and/or request to withhold Certificate of Occupancy

WSA may terminate water service and/or request that the City refuse to issue a certificate of occupancy for the building or other improvements constructed or being constructed on the site until the applicant or other responsible person has taken the remedial measures set forth in the notice of violation or has otherwise cured the violations described therein.

Table 5-1 summarizes the steps involved in enforcement against violations involving post-construction stormwater management.

Table 5-1: Enforcement Guide for Post-Construction Stormwater Management

<p>Potential Violations and Required Remediation</p> <ul style="list-style-type: none"> • Failure to construct stormwater management facilities in accordance with the approved stormwater management plan and the requirements of Chapter 8 of WSA’s Rules and Regulations and Chapter 4 of WSA’s Design and Construction Standards Remediation: Construct stormwater management facilities according to the approved plan or submit a revised stormwater management plan to WSA for review and approval • Failure to submit as-built plans and report that show conformance with WSA requirements Remediation: Submit as-built plans and report as required • Failure to maintain stormwater management facilities Remediation: Maintain stormwater management facilities
<p>Steps of Enforcement Escalation</p>
<p>A. <u>Letter or Notice of Inspection</u></p> <p>For violations less egregious violations (such as the general need to maintain a pond)</p> <ul style="list-style-type: none"> • Violator shall have 30 calendar days to correct the violation
<p>B. <u>Notice of Violation (NOV)</u></p> <p>For egregious violations or for failure to respond in a timely manner to letter or notice of inspection.</p> <ul style="list-style-type: none"> • Violator shall have 30 calendar days to correct the violation
<p>C. <u>Stop Work Order</u></p> <p>For project currently under construction</p> <ul style="list-style-type: none"> • To be issued when violator has not responded to the NOV within 30 calendar days
<p>D. <u>Assessment of Civil Penalties</u> - up to \$1,000 per day per violation may be assessed</p> <ul style="list-style-type: none"> • To be carried out when violator has not remediated a violation within 30 calendar days after issuance of an NOV or Stop Work Order
<p>E. <u>Termination of Water Service</u></p> <ul style="list-style-type: none"> • To be carried out if violator has not responded to civil penalties by remediating the site, or if the violator has refused to pay civil penalties
<p>F. <u>Request that City or County Withhold Certificate of Occupancy</u></p> <ul style="list-style-type: none"> • To be carried out if the violator requests a certificate of occupancy while the site remains in violation or the civil penalties have not been paid

Appendix B

Impaired Waters

1. Population based on the latest U.S. Census: 144,227

Date of the latest U.S. Census used: 2020

If the population is less than 10,000, then see item #2 below.

If the population exceeds 10,000, then see items #3 below.
2. If the population is less than 10,000, then the MS4 must develop an Impaired Waters Plan (IWP) (see Part 4.4.1 of the NPDES Permit) including:
 - A list of impaired waters and the pollutant(s) of concern;
 - A map showing the location of the impaired waters and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters;
 - BMPs that will be implemented to address each pollutant of concern; and
 - A schedule for implementing the BMPs.
3. If the population exceeds 10,000, then the MS4 must develop an Impaired Waters Plan/Monitoring and Implementation Plan (MIP) (see Part 4.4.2 of the NPDES Permit) including:
 - A list of impaired waters and the pollutant(s) of concern, including the date of the 303(d) list used;
 - A map showing the location of the impaired waters, the monitoring location(s), and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters;
 - The sample location (instream or at the outfalls);
 - Information on the sample type, frequency, and any seasonal considerations;
 - Schedule for starting monitoring for any newly identified pollutants;
 - BMPs that will be implemented to address each pollutant of concern;
 - A schedule for implementing the BMPs; and
 - The information to be included in each annual report, including the monitoring data, as assessment of data trends, and an assessment of the effectiveness of the BMPs.
4. The IWP and MIP must be evaluated annually and revised as needed. The most recent version of the IWP or MIP must be submitted as an attachment to this appendix.

Impaired Waters Monitoring and Implementation Plan

1. Impaired Waters Inventory

WSA will maintain an inventory of impaired waters within the permitted area. At least annually, WSA will check whether any new impaired waters have been added to, or removed from, the 305(b)/303(d) list maintained by the Georgia EPD. If changes have been made, the inventory will be updated, and this appendix will be revised as necessary. The most current inventory, consisting of a map with a chart containing the impairment data, will be included in each annual report.

2. Monitoring of Impaired Streams

2.1 Pollutants of Concern

Impaired streams and associated pollutants within the permitted area are as follows:

Stream Name	Pollutant of Concern	TMDL Year	Reduction % Reqd.
Anneewakee Creek	Sediment	2004	0%
Anneewakee Creek	Fecal coliform	NA*	NA*
Cracker Creek	Fecal coliform	2008	66%
Sweetwater Creek	Fecal coliform	2008	16%

*Anneewakee Creek from Lake Monroe to the Chattahoochee River was listed as Not Supporting for fecal coliform in 2020. This segment has not yet been added to a TMDL Implementation Plan.

According to the EPD's September 2022 "Bacteria Equivalency Strategy for Using the Optimal Indicator Organisms for WQS and NPDES Permitting" ("Strategy"), the EPD replaced fecal coliform as the pathogen indicator for bacteriological impairments with *E. coli* or enterococci. EPD implemented this change in pathogen indicators by amending existing TMDL's bacteria allocations to provide *E. coli* or enterococci-based allocations in addition to the original fecal coliform-based allocations. WSA understands the language of the "Strategy" to require Phase II MS4 permittees to begin monitoring for the new pathogen indicator(s) under the permit issued December 2022.

2.2 Sampling

WSA will conduct sampling for each of the streams listed above to monitor the pollutant of concern for that stream. The WSA Wastewater Laboratory will provide an Outfall Sampling Technician to conduct samplings as indicated below. Grab sampling techniques will be used. Analytical samples will be collected in containers appropriate to the parameter that will be analyzed. Samples will be preserved in accordance with the requirements of the specific analytical methodology (e.g. stored in a cooler) and delivered to the laboratory for analysis. Sample locations have been added to the Impaired Streams Map provided on the attached thumb drive.

Samples for *E. coli* are required to be taken instream. Samples will be collected following sample collection, preservation, and hold times according to 40 CFR part 136. Standard Methods 9223-B-2016 will be the method for analyses. Sample incubation will be started no later than 8 hours from time of collection in accordance with requirements.

Sampling for Total Suspended Solids (TSS) will be performed for monitoring of sediment levels. Samples will be collected following sample collection, preservation, and hold times according to 40 CFR part 136. USGS I-3765-85 will be the method for analyses. Samples will be taken instream.

Each annual report will include the monitoring data collected during the reporting period.

2.3 Sampling Frequency

For *E. coli* or enterococci, samples will be collected in the impaired segments of Anneewakee Creek, Cracker Creek and Sweetwater Creek four times within a month to obtain a geometric mean. Four geometric means will be obtained per year. For the sediment impairment in Anneewakee Creek, one sample will be taken per year to evaluate TSS.

3. Implementation Plan

Best Management Practices (BMPs) will be implemented as part of this Impaired Waters Monitoring and Implementation Plan in an effort to reduce *E. coli* and sediment (TSS) levels in impaired streams within the permitted area. The BMPs are outlined below. They will be immediately implemented and evaluated for effectiveness each year in the Annual Report starting with the 2020 Annual Report.

3.1 *E. coli* or enterococci BMPs

3.1.1 Web Resources

WSA will provide links on the WSA website to educational materials to increase awareness on topics that contribute to increased *E. coli* levels in streams. Topics will include pet waste, septic tank maintenance, and FOG (Fats, Oils & Grease).

3.1.2 Septic Tank Education and Replacement Initiative

WSA will have information about septic tank maintenance available in the front lobby. The topic will also be included in the Stormwater Seminar held once per year. In addition, WSA will continue to require failing septic systems to be connected to public sewer when public sewer is available.

3.1.3 Public Awareness to Reduce FOG

WSA will have information about reducing FOG available in the front lobby. The topic will also be included in the Stormwater Seminar held once per year. Brochures will also be

dropped off at a minimum of one apartment complex per year in areas where FOG issues have been identified.

3.2 Sediment BMPs

3.2.1 Site Plan Review

WSA will review all Erosion, Sedimentation and Pollution Control Plans for development projects requiring a Land Disturbance Permit. This review ensures that proper construction BMPs will be installed to reduce the discharge of sediment into streams when it rains.

3.2.2 Erosion & Sedimentation (E&S) Inspections

WSA will periodically inspect all sites that have a Land Disturbance Permit after construction starts. Inspectors will have the Georgia Soil and Water Conservation Commission (GSWCC) Level 1B certification. Inspections will focus on ensuring BMPs have been installed in accordance with the Manual for Erosion and Sediment Control in Georgia (“Green Book”) and approved plans.

3.2.3 E&S Enforcement

If, through inspection, it is found that a person engaged in land-disturbing activities failed to comply with E&S requirements, enforcement action will be taken in accordance with the Douglasville-Douglas County Water and Sewer Authority Rules and Regulations along with approved the Enforcement Response Plan (ERP).

3.2.4 Additional Inspection and Enforcement

If, through customer complaint or other means, WSA becomes aware of land disturbance that is occurring outside of the permitting process, WSA will inspect the site and will take enforcement action as appropriate, in accordance with the ERP.

4. Data Analysis

Annual assessments of data trends will be performed for each pollutant of concern and each impaired stream segment. The annual report will include documentation of the assessments completed during the reporting period. Samples taken during 2020 will be used as a baseline for the assessments. At least two years of data are required after the baseline is established to effectively evaluate data trends.

Assessments will consist of a line graph for each sample location that will show pollutant levels over time. A narrative will also be provided that discusses if levels are increasing, decreasing, or staying the same.

As data trends are assessed, the effectiveness of the BMPs in removing the pollutants of concern will also be assessed. The effectiveness of the BMPs will be based on the data analysis. If the pollutant levels are decreasing, that would demonstrate the BMPs are

effective. If pollutant levels are increasing, the BMPs will be evaluated to determine if revisions or additions are warranted. If revisions are warranted, the revised plan will be submitted to the EPD for review.

Each annual report will include the monitoring data, the data trend assessment, and the assessment of BMP effectiveness. Potential anomalies that could affect the data trend will also be noted in the annual report.

Appendix C

Illicit Discharge Detection and Elimination Plan

1. Introduction

WSA will actively seek to prohibit illegal discharges into the MS4. Chapter 10 of the WSA Rules and Regulations effectively prohibits any discharge to the MS4 other than uncontaminated stormwater and ground water.

1.1 Personnel

Personnel who may be involved in this plan may be among the following:

- MS4 Inspector
- Outfall Sampling Technician
- Enforcement Officer – as described in Appendix A – Enforcement Response Plan
- Engineer

If any of the personnel described above encounter evidence of a violation, the Enforcement Officer shall be notified immediately.

2. Dry Weather Screening of Outfalls

For the purpose of this document, “dry weather flow” is defined as any flow without a significant rain or snow event (< 0.1”/day) in the previous 72 hours. WSA will conduct dry weather screening of 100% outfalls within the permitted area within the five-year permit term, with a minimum of 5% inspected each year.

The WSA Wastewater Laboratory will provide an Outfall Sampling Technician to conduct dry weather screening of outfalls according to the schedule mentioned above. If dry weather flow is encountered, the Technician shall immediately seek to trace the flow up the conveyance system to its source. If the Technician is unable to determine the source after tracing the flow as far upstream as is possible (or if the source is unclear, such as water seeping out of the ground or into a pipe), the Technician will conduct field tests and/or laboratory tests for the following parameters using the indicated testing equipment on any outfall with dry weather flow, in order to verify the source of the flow and whether it constitutes an illicit discharge.

- A. pH – Hach HQ40d portable meter
- B. Fluoride – Accumet Model 50/Fluoride electrode
- C. Conductivity – Hach HQ40d portable meter
- D. Surfactants / Detergents – Hach DR 2800
- E. Turbidity – Hach 2100P portable turbidimeter

Any flow observed during the inspection will also be evaluated for color, odor and floatables.

Dry weather screening samples will be taken from the outfall flow itself, not from the receiving stream. If there is not enough flow from the outfall for an adequate sample, then a container or bucket will be used to collect a sample to take readings. The bucket, if possible (some discharges are too small), will be rinsed twice with flow from outfall and readings taken on the third fill. All probes will be washed with distilled water before and after a reading is taken. Containers used to test samples will be rinsed twice with sample water before a sample is analyzed.

If color and/or odor indicate a potential sewage spill, or if the conductivity exceeds 300 micro ohms, a sample will be collected for fecal coliform testing. Fecal coliform samples will be stored in a cooler with ice and delivered to the laboratory within six hours of sampling.

If color indicates turbid waters, a sample will be collected for turbidity test.

Any finding of an illicit discharge will be reported to the WSA Enforcement Officer in the Engineering Department immediately.

3. Quality Assurance/Quality Control Procedures

The laboratory routinely performs quality control checks during laboratory analysis, including equipment calibrations, calibration standards, and blanks. Meters for testing pH, fluoride and conductivity will be calibrated at the beginning of each field-testing event.

Quality control of precision and accuracy is required with each sample required by a regulatory agency. The control test should include a blank on the distilled water or reagents, a standard and a set of duplicate analyses. EPA recommends that 10% to 20% of daily analyses be for quality control testing with 5% dedicated to quality control in sample collection.

Manufacturer's directions should be followed for any reagents used in measurements. After a sample has been analyzed, the container will be rinsed with distilled water. All reagent waste will be disposed of properly. Reagents should be checked and replaced as necessary.

4. Allowable Limits

Table 1 shows the allowable limits for the various parameters to be evaluated during dry weather screening. If any of the results fall outside the allowable range, the discharge will be considered to be illicit and the WSA Outfall Sampling Technician will notify the WSA Enforcement Officer at once.

TABLE 1 ALLOWABLE LIMITS

Parameter	Type of Evaluation	Allowable Range
Color	Field Evaluation	None
Odor	Field Evaluation	None
Floatables	Field Evaluation	Natural Debris Only
pH	Field Test	Between 6 and 9
Fluoride	Lab Test	Less than 0.2 ppm
Conductivity	Field Test	Less than 300 µmho/cm
Surfactants/Detergents	Lab Test	Less than 0.2 ppm
Turbidity	Lab Test	Less than 40 NTU
Temperature	Field Test	Near or below ambient conditions

5. Investigative and Follow-Up Procedures

If the first testing is inconclusive as to the source of the dry weather flow, additional investigations and/or testing will be performed by the WSA Engineering Department and the WSA Wastewater Laboratory until one of the following occurs:

- The source of the illicit discharge is determined,
- The flow is determined not to be an illicit discharge, or
- The flow stops

Once an illicit discharge is identified, the Enforcement Officer shall proceed with enforcement in accordance with the Enforcement Response Plan (see Appendix A).

All investigative findings, test results, enforcement actions, and resolutions of the issue (by the elimination of the illicit discharge) will be documented.

Appendix D

Complaint Response Procedures

1. Complaints are received at WSA by telephone, email, walk-ins or through the company website at askwsa@ddcwsa.com.
2. For each complaint, a service request is entered into Cityworks and issued as follows:
 - A. Complaints about illicit discharge, erosion and sedimentation on non-permitted sites, or stormwater runoff are issued to the Stormwater Engineer in the Engineering Department, after which they are handled as indicated beginning in number 3 below.
 - B. Complaints about erosion on permitted construction sites are issued to the Project Superintendent in the Engineering Department, after which they are handled according to the construction site inspection and enforcement procedures found in Appendices E and A, respectively, in this SWMP.
 - C. Complaints about existing stormwater infrastructure within the MS4 are issued to the Stormwater Superintendent in the Maintenance Department, after which they are handled according to the inspection and maintenance procedures found in Appendix F in this SWMP.
3. For complaints regarding possible illicit discharges or construction site erosion control violations, the Engineering Department investigates by the end of the next business day.
4. For other complaints deemed to be less critical, the Engineering Department Stormwater Inspector or the Stormwater Engineer contacts the complainant within five (5) business days to respond to concerns. A site visit is scheduled to investigate the complaint and meet with the complainant.
5. After contacting the complainant, the Stormwater Inspector may contact the Stormwater Engineer for assistance if needed.
6. Complainant is informed by WSA in person, telephonically, by email or by letter of the resolution of their concern.
7. The service request is closed when all the required actions have been completed.
8. Cityworks is used to prepare a chart of the complaints that includes complainant contact information, complaint type, response personnel, initial response date, and resolution.

Appendix E

Development Review and Construction Inspection Procedures

PROJECT CONCEPT MEETING

A Project Concept Meeting with WSA's Engineering Department is recommended early in the design process. The Project Concept Meeting is used to explain WSA's requirements relative to construction site erosion and sediment control and post-construction stormwater management.

CONSTRUCTION DRAWING SUBMITTAL PACKAGE

Erosion, sedimentation and pollution control plans are required where construction is proposed that will result in land disturbance of one acre or greater, construction is within 200 feet of state waters, or any proposed land disturbance of less than one acre located within a larger common development that would be disturbed one acre or more. The erosion control plans are required to include all items on the appropriate review checklist prepared by the Georgia Soil and Water Conservation Commission (GSWCC). If the checklist is not included in the plan submittal, the plans are sent back without review.

Stormwater management plans and a stormwater management report that show compliance with the requirements of the Georgia Stormwater Management Manual (GSMM) WSA's Stormwater Management Regulations are required for all proposed projects that will add or replace 5,000 square feet or more of impervious surface or will disturb one acre or more of land. In addition to hydrologic and hydraulic calculations for detention, the stormwater management report is required to include an analysis of post-construction runoff reduction and/or stormwater quality using the Site Development Review Tool spreadsheet provided by the Metropolitan North Georgia Water Planning District. Beginning December 6, 2020, the report will be required to show compliance with the runoff reduction requirement of the GSMM to the maximum extent practicable.

DESIGN REVIEW AND TRACKING

Design plans that are submitted are logged into a database and assigned to an engineer to review. WSA strives to review design plans and provide comments within two weeks of submittal. The WSA engineer reviews the site design and construction drawings and the stormwater management plan and identifies required changes. Review comments are returned to the designer.

The designer must address WSA's comments and resubmit the plans and stormwater management plan, if necessary. WSA reviews the additional submittals and provides additional comments, if needed. The process continues until the plans are approved.

Plan review fees are applied as stipulated in the WSA's Rules and Regulations, latest edition.

DESIGN APPROVAL

When the drawings and plans are corrected to reflect all WSA comments, six (6) sets of design and construction drawings are stamped approved as well as two (2) sets of the Stormwater Management Report.

WSA retains two (2) sets of approved design drawings and one (1) set of the Stormwater Management Report. Four (4) sets of approved plans are returned to the project engineer. One set of approved drawings is to remain on site throughout development construction.

Plan approval is valid for a period of one year. If construction is not substantially underway within one year after the approval date, a re-submittal of the plans may be required.

Where construction is proposed that will result in land disturbance of one acre or greater, within 200 feet of state waters, or any proposed land disturbance of less than one acre located within a larger common development that would be disturbed one acre or more, the developer must obtain a land disturbance permit (LDP). Once all WSA, and City or County requirements have been met, the City or the County sends the LDP to WSA. Once WSA has received erosion control bonding, the LDP fee, proof of submission of the Notice of Intent, and an executed "Consent to Authority Regulations" form, WSA issues the LDP to the owner/developer at the pre-construction meeting.

CONSTRUCTION

Construction may begin after WSA approval and applicable permits are issued to the developer. At least a 72-hour notice is required to be given to WSA to allow sufficient time for the developer to schedule a pre-construction meeting with WSA and for an inspector to be assigned to the project.

The first activities that are to occur on site are the installation of the construction exit, sediment barriers, and sediment storage. Once these are properly installed, the developer contacts WSA for an inspection. Construction activities including clearing, grading and demolition may not commence until the initial erosion control measures are inspected and approved by WSA's inspector.

WSA inspects erosion and sediment control measures during the first week of the project following installation of initial Best Management Practices (BMPs), during active construction, and after final site stabilization. WSA maintains records of all inspections conducted. Inspections are also performed after rainfall events of 0.5 inches or greater. In the event that problems are observed, the inspector is to follow procedures outlined in WSA's Enforcement Response Plan and notify the 24-hour contact listed on the erosion control plan.

If implementation of an erosion control BMP with a hydraulic component must vary from approved plans, the designer is to submit revised plans for approval prior to the installation of the BMP.

WSA inspectors also inspect new stormwater infrastructure during construction to ensure that all WSA standards are met and the project is constructed in accordance with the approved plans.

PROJECT ACCEPTANCE

WSA issues an acceptance letter for the project when:

- All stormwater structures and best management practices have been installed per the approved design plans.
- Maintenance bonding for any new public stormwater infrastructure is paid.
- As-Built drawings are prepared and have been approved by WSA.
- All final erosion control BMPs have been installed on the site.

Nine months after the letter of acceptance is issued, the project is re-inspected to ensure system acceptability.

One year after the project is accepted, after the bonding period has been fulfilled, and after all final punch-list items have been resolved, the maintenance bond is released and the project is closed.

Appendix F

Storm System Inspection Procedures

As the stormwater utility for Douglas County and the City of Douglasville, WSA has the duty to monitor the design, operation, maintenance, inspection, construction, and use of all stormwater systems within the jurisdictional boundaries of the City and unincorporated County, as well as to design, construct, inspect, operate and maintain public stormwater facilities owned by WSA—the Municipal Separate Storm Sewer System (MS4). WSA carries out an inspection program for the MS4, all public stormwater management structures and all privately-owned stormwater management structures with construction completed after December 9, 2008, to ensure that stormwater infrastructure is properly maintained.

WSA personnel shall inspect the above stormwater infrastructure (public and private). The following procedures provide for an effective inspection program intended to locate potential maintenance problems and assess the associated hazards to the public health, the public roadway and the environment. The inspection program outlined herein is a critical part of system maintenance.

1. Purpose

The purpose of this SOP is to establish standard procedures that, when followed, will provide for effective inspection of the MS4 so as to identify needed repairs and eliminate pollutant discharges.

2. Personnel

This program is based on having the following personnel as indicated. The WSA Engineering Manager shall decide how personnel are assigned to the tasks described herein (full-time, part-time, or by temporary assignment).

2.1 MS4 Inspector

Each MS4 Inspector shall be equipped with a vehicle, cellular phone, laptop computer and/or tablet with remote network connectivity, spot light, tape measure, and digital camera. Responsibilities include all MS4 inspections activities described herein.

2.2 BMP Inspector

Each BMP Inspector shall be equipped with a vehicle, cellular phone, laptop computer and/or tablet with remote network connectivity, spot light, tape measure, and digital camera. Responsibilities include BMP inspections as described herein.

2.3 Enforcement Officer

Each enforcement officer shall be a sworn constable of the courts in the City of Douglasville and Douglas County and shall be assigned to the WSA Engineering Department. Responsibilities include enforcement actions as described herein.

2.4 Engineer

At least one civil engineer shall be assigned to evaluate design alternatives for repair and improvements to the MS4. This person will be assigned to the WSA Engineering Department and may also investigate drainage complaints. WSA may also contract with an independent consulting engineer for any of the work described herein.

2.5 GIS Technician

A GIS Technician will be assigned to maintain the system map and database and provide updated maps as needed. The GIS Technician will also develop electronic forms to capture inspection data for inclusion in Cityworks.

2.6 Stormwater Superintendent

The WSA Maintenance Department will maintain a Stormwater Superintendent to oversee the works of all activities conducted by stormwater crews. Service requests for maintenance of MS4 components are routed to him for execution and he issues work orders to the maintenance crews for the specific tasks to be performed.

3. Inspections

WSA will provide qualified personnel to perform the following inspections:

3.1 MS4 Inspections

Infrastructure within the right-of-way of public streets will be inspected by WSA MS4 Inspectors. Using online inspection forms linked to WSA's Cityworks platform, inspectors will document all inspections. The database shall store all inspection records so as to enable monthly and annual reports to be generated. The following system components shall be inspected:

- A. Roadside ditches
- B. Pipes
- C. Inlets
- D. Ponds

If a problem is observed, the MS4 Inspector shall issue a service request to the Stormwater Superintendent to address the problem.

3.1.1 Levels of MS4 Inspections

Level 1 - includes lifting manhole covers and viewing structures and pipe ends from street level. This is the preferred inspection method and is adequate for inspecting MS4 components. The MS4 Inspector may, at his discretion, proceed to a higher level inspection.

Level 2 - involves inspections conducted below street level such as entering a manhole or tracing the pipe to the downstream end. A pole mounted camera could also be used to allow the inspector to remain at street level and still view inside pipes and inlets.

Level 3 - means the use of closed circuit television to view inside MS4 components. CCTV inspections are performed by the WSA maintenance department but can be requested by the MS4 Inspector, who must be present to view the results.

3.1.2 Debris Removal for MS4 Inspections

If the structure to be inspected is obstructed by vegetation, trash, or other debris, the MS4 Inspector shall issue a service request to have the obstruction removed. Once the structure has been cleared, an inspection shall be performed as described in Section 3.1.1.

All trash, sediment, debris and any other material removed from pipes and structures must be properly disposed of at the Douglas County Landfill. Small quantities of material may be brought to the WSA facilities in bags or bucket to wait for the next load that will be taken to the landfill.

3.1.3 Inspection Frequency

The storm system inventory and system map shall be referenced when planning inspection activities for the MS4. A minimum of 5% of the inventory is required to be inspected each year; however, a typical year will involve inspection of approximately 20% of the system, such that the entire system is inspected during each 5-year MS4 permit term.

The primary focus of detailed inspections will be pipe condition. When a section of pipe is inspected, all associated inlets and junction boxes will be inspected as well.

3.1.4 Inspection Results

The MS4 inspector should use the "Photo Guide to MS4 Inspections" as a guide to determining the condition of the structures being inspected. The MS4 Inspector should answer the following regarding each system component inspected:

- Is maintenance needed?
- What is the condition of the component?

3.1.4.1 Determining If Maintenance is Needed

The MS4 inspector shall consider the following conditions as requiring maintenance.

Catch Basins

- Lid missing
- Top of catch basin broken or displaced
- Catch basin clogged at inlet
- Invert of catch basin missing or broken
- Pipes separated from catch basin or ground missing at pipe inlet/outlet
- Cracks or holes found in catch basin walls
- Outlet pipe is clogged by 25% or more by sediment or debris
- Ground sinking around catch basin

Ditches

- Soil is being eroded in invert or on slopes
- Invert and/or slopes are not stabilized to prevent erosion
- Pipe at upstream or downstream end of ditch is clogged by more than 25%
- Soil has filled more than 25% of the ditch

Pipes

- Sediment or debris is settling in pipe.
- A small portion of the pipe invert has rusted through at a catch basin
- A pipe shows signs of separation from the headwall

Pipes shall also be assessed based on their expected remaining useful life, as discussed further in section 3.1.4.2 below.

Ponds inspections are discussed in section 3.2 below.

If maintenance of a component is determined to be needed, the MS4 Inspector will issue a service request to the Stormwater Superintendent to address the problem.

3.1.4.2 Determining the Condition of MS4 Components

The condition of each MS4 component shall be evaluated in terms of estimated useful life before the component will need to be rehabilitated or replaced. Condition categories are defined in Table 3.1:

TABLE 3.1 COMPONENT CONDITION DESCRIPTION

Condition	Description
0-2 years	Repair needed to prevent infrastructure from becoming possible threat to public health or property. These pipes should be high priority for next year's budget.
2-5 years	Repairs needed and should be scheduled within the next 2-5 years. Problems are minor and should not pose any threats to public health or property.
5-10 years	No repairs needed. Materials show some signs of aging, rusting, settling, undermining or deterioration.
10+ years	No repairs needed. Materials show no signs of aging, rusting, settling, undermining or deterioration.
Unknown	Inspector not able to view component

3.1.5 Inaccessible Components

In the event that a component is full of standing water, debris, sediment or vegetation such that it cannot be inspected, the MS4 Inspector will issue a service request to have the component cleaned. A follow-up inspection will be needed to determine the condition of the component. Only the follow-up inspection is to be entered into Cityworks.

In the event that a component is sealed (like a buried junction box) or otherwise inaccessible, condition will not be assessed. A service request to provide access to the component is not needed unless there is reason to suspect that the component is in need of maintenance (i.e. surcharging). At the discretion of the WSA Stormwater Superintendent, a Level 3 inspection may be requested prior to performing maintenance.

3.1.6 Complaints

When a complaint related to a component of the stormwater system is submitted to WSA it shall be directed to the dispatcher who will issue a service request to the Stormwater Superintendent for an inspection of the component. If needed, an Engineer can be asked to look at the problem.

If the complaint reveals a problem with the MS4 that requires maintenance, the Stormwater Superintendent will issue work orders to maintenance crews as needed to have maintenance activities performed as described in Section 4.0.

3.1.7 Extreme Event Inspections

When an extreme flood event occurs, all infrastructure in impacted areas will be inspected as soon as possible.

3.2 BMP Inspections

Stormwater detention facilities and water quality facilities will be inspected by the WSA BMP Inspector. This includes all BMPs that are publicly-owned (owned by WSA, Douglas County, the City of Douglasville, or some other public entity, such as the Board of Education) and all privately-owned BMPs with construction completed after December 9, 2008. Using the online BMP inspection form, the inspector will document periodic inspections.

3.2.1 Publicly-Owned BMPs

Publicly-owned stormwater management facilities (those owned by WSA, Douglas County, the City of Douglasville, or some other public entity, such as the Board of Education) will be inspected at a rate such that 100% will be completed within the 5-year MS4 permit term.

3.2.2 Privately-Owned BMPs

Privately owned stormwater management facilities with construction completed after December 9, 2008, including detention ponds, retention ponds and water quality structures will be inspected at a rate such that 100% of the mentioned structures will be completed within the 5-year MS4 permit term.

WSA may choose to inspect privately-owned BMPs constructed before December 9, 2008, based on complaints received or for other purposes. The inspections will be carried out and documented in accordance with the same procedures that are used for other BMPs.

3.2.3 BMP Inspection Records

Inspection records will be maintained in WSA's Cityworks platform so as to enable monthly and annual reports to be generated. The following shall be included in the inspection:

- A. Detention ponds shall be stabilized with permanent vegetation.
- B. Outlet structures shall be fitted with a trash rack or lid on top of the structures.
- C. Retrofit devices should be removed from outlet structures if the drainage area to the pond is fully stabilized.
- D. Ponds and forebays shall be free of excessive sedimentation.

- E. Dams shall be stabilized with permanent vegetation, but with no trees growing on the dam. Trees should not be growing on the interior side slopes or bottom of the pond either.
- F. Outlet pipe through dams shall show no evidence of seepage (e.g., sinkage along pipe, discharge under headwall, seepage).
- G. Outlets shall be stabilized with rock so as to prevent downstream erosion.
- H. Any sources of pollutants shall be noted. Where evidence of pollutants is observed in a pond, check upstream for potential sources and downstream for evidence of impacts to state waters.
- I. Drains, inlets, and catch basins shall be intact and free of excessive sediment and debris. Manhole covers shall be in place.
- J. Pipes shall be intact and in good condition. If CMP, look for rusted inverts and sagging at joints.
- K. Headwalls shall be intact with suitable stabilization to prevent downstream erosion.
- L. Permanent pools, where required by the design, should be maintained in years of normal rainfall.

All BMP inspections shall be documented using the online BMP inspection form.

If the BMP inspection reveals that maintenance is needed, the owner of the facility will be notified by WSA in writing by the Engineering Department regarding the inspection results and will be directed to undertake maintenance activities as needed (remove sediment, trim vegetation, repair erosion, etc.).

4. MS4 Maintenance

When the MS4 Inspector, the Stormwater Superintendent, or the Engineer identifies a problem with the MS4 that requires maintenance, the Stormwater Superintendent will issue work orders to maintenance crews for one of the following as appropriate:

- Build Catch Basin Lid/Cover
- Set Catch Basin Lid/Cover
- Clean Out Beaver Dam
- Check for Problems
- Clean Ditch of Dirt & Debris
- General Work Order
- Grout Storm Drain
- Haul Material or Equipment
- Inspect or Clean Stormwater System
- Jet Storm Drain

- Repair or Replace Stormwater System
- Replace/Reset Storm Drain Lid
- Clean Out Retention Pond
- Repair Road
- Stormwater Special Project
- TV Storm Drain
- Wash Down Road/Parking Lot

Once a work order has been generated in Cityworks, the platform allows tracking of work orders. On a daily basis, work orders are given to work crews as available. Weekly and monthly tracking reports help identify work orders that have not been completed.

4.1 Major Repairs

Major repairs may be selected to be performed by a private contractor. In such cases, WSA may solicit bids from contractors.

Where upsizing is needed, the project shall be referred to the WSA Engineering Department who will either perform in-house design or engage a professional engineering firm. Once the design is complete, WSA will prepare a bid package and solicit bids.

All bids will be received through the WSA Purchasing Department and funding for all major projects will be assigned by the WSA Board of Directors.

4.2 Proper Disposal

All solid waste removed from pipes, ditches and inlets must be properly disposed of at the Douglas County Landfill. Furthermore, any waste generated during maintenance activities (such as concrete, stumps, old pipes, etc.) must also be properly disposed of. Stormwater crews shall ensure that all such material is transported to the Douglas County Landfill for proper disposal.

4.3 Private Infrastructure Maintenance

If any maintenance is needed for privately owned infrastructure, the facility owner shall be contacted in writing within 45 days regarding the inspection results and problems observed. Photo documentation may also be supplied to the owner. If the problem presents a public hazard or impacts to state waters, the owner will be ordered to correct the problem immediately. Otherwise, the owner will be given 90 days to correct the problem.

If the owner is unwilling or unable to correct the problem, the WSA Civil Engineer shall assess impacts of failure to repair. If the problem presents a potential threat to public health and safety or a potential threat to surface waters and/or adjacent habitat, WSA may elect to make the repairs and seek compensation from the owner.

4.4 City/County/State/Other Public Entity Infrastructure Maintenance

If any maintenance is needed for City, County, State, or other public entity's infrastructure, the owner agency shall be contacted within 45 days and notified of the problem. Photo documentation may also be supplied to the agency. If the problem presents a public hazard or impacts to state waters, the owner agency will be ordered to correct the problem immediately. Otherwise, the agency will be given 90 days to correct the problem.

If the agency is unwilling or unable to provide the required maintenance, the WSA Board of Directors shall decide on whether or not WSA funds can be used to fix the problem.

Appendix G

Feasibility Program for Linear Transportation Projects

WSA's Stormwater Management Regulations (Chapter 8 of WSA's Rules and Regulations) contains a provision for determining the feasibility of post-construction stormwater management on linear transportation projects (i.e., roads). Paragraph 5 under "Exemptions" in Section 8-4 Applicability states that the following are exempted from the stormwater management regulations:

Linear construction projects, or portions thereof, for which the local government or authority determines that post-construction stormwater management is infeasible for the project in accordance with Georgia Department of Transportation standards. In such case, an infeasibility determination report must be submitted to WSA that contains adequate documentation to support the determination that post-construction stormwater management is infeasible for the project.

Section 4 of WSA's Design and Construction Standards contains wording to the same effect in the section on applicability of the stormwater standards.

The infeasibility determination report mentioned in the regulation will be required with any plans for a road project submitted to WSA for review. WSA's review of the infeasibility determination report will be based on the applicable requirements found in the most current versions of the Georgia Department of Transportation (GDOT) MS4 permit and the GDOT Drainage Manual. Only after the review has demonstrated compliance with the GDOT requirements will a project be exempted from stormwater management requirements for the project that are determined to be infeasible.

Appendix H

Green Infrastructure/Low Impact Development Program

The following constitutes WSA's Green Infrastructure/Low Impact (GI/LID) Development Program, which is required in BMP #6 of Post-Construction Stormwater Management. The Program sets the parameters for the GI/LID practices that will be allowed to be used within the permitted area, including types of GI/LID practices that are acceptable, procedures for evaluating the feasibility and site applicability of GI/LID practices (including review of design criteria in the site plan approval process), and the procedures for inspection and maintenance of GI/LID structures once they are constructed.

1. Introduction

The permitted area lies completely within the boundaries of Douglas County, a county of just over 200 square miles located in the piedmont region of northwest Georgia. Douglas County lies on the northwest side of the Chattahoochee River downstream of the majority of metro Atlanta (and across the river from southern Fulton County). The topography of Douglas County consists mostly of rolling hills and narrow valleys, with some flatlands in the floodplain along the Chattahoochee. A ridge runs east to west across the northern half of the county. The area to the south of the ridge drains southward toward the Chattahoochee. The area northward drains northward into Sweetwater Creek in Paulding and Cobb Counties. Sweetwater Creek ultimately enters Douglas County and empties into the Chattahoochee River.

The soils of Douglas County consist of large amounts of "Georgia red clay" overlying shallow granite bedrock. The granite comes to the surface in numerous locations, giving rise to several quarries. The underlying granite also contributes to a considerable number of natural springs and streams, many of them originating in the higher portions of the county. Soil maps indicate that there is a large portion of the county in hydrologic soil group B, with smaller scattered sections of A, C, and D.

2. Definition of GI/LID

The Georgia Stormwater Management Manual (GSMM) points out that the terms GI and LID are used interchangeably and have no real difference in meaning. It also points out that the U. S. Environmental Protection Agency defines "green infrastructure" on the scale of a neighborhood or a site as "stormwater management systems that mimic nature by soaking up and storing water." The MS4 permit defines GI/LID as "management approaches, such as better site design or conservation design, or systems and practices that use or mimic natural processes to reduce runoff and pollutant loading, that result in infiltration, evapotranspiration, or the harvesting and use of stormwater..." The prior permit distinguished them from water quality vaults, which merely treat stormwater runoff

to remove pollutants before allowing the runoff to discharge into a nearby stream or piped stormwater system. Since water quality vaults are not mentioned in the new permit as being considered GI/LID structures, WSA will continue to consider them “post-construction stormwater management structures” and include them in that inventory as opposed to the GI/LID inventory. According to the MS4 permit, GI/LID structures include, but are not limited to, “bioswales, pervious pavement, rain gardens, cisterns and green roofs.”

3. GI/LID Structures Allowed

The GSMM implemented, and the current MS4 permit includes, runoff reduction performance standards that went into effect on December 6, 2020. GI/LID structures are one means to address the runoff reduction and water quality requirements. Table 4.1.3-1 in Volume 2 of the GSMM provides a list of GI/LID BMPs that can be used to address runoff reduction requirements along with runoff reduction and pollutant removal efficiencies for each BMP. The table also makes it clear that not all GI/LID structures are considered appropriate for runoff reduction, while other non-GI/LID structures are appropriate for that purpose.

WSA does not maintain a list of GI/LID structure types that are allowed to be used in the permitted area. WSA’s current inventory of GI/LID structures within the permitted area (mentioned in section 5 below) includes four types – bioretention areas, infiltration trenches, sand filters, and enhanced swales. In addition to these structure types, any GI/LID structures found in Volume 2, Section 4 of the GSMM are allowed to be used to the extent that they meet the design requirements of the GSMM. WSA will also consider allowing, on a case-by-case basis, other GI/LID structures that are approved in other jurisdictions and found within GD-LID manuals and other guidance documents published by those jurisdictions. Approval of GI/LID structures shall be based on section 4 below.

4. Procedures for Evaluating and Approving the Use of GI/LID Structures

All GI/LID structures proposed for use in development and public works projects shall be evaluated based on the design criteria and guidelines found in the GSMM to the extent that they apply. Structures not found in the GSMM shall be evaluated on a case-by-case basis using criteria found within GI/LID manuals and other guidance documents published by other jurisdictions. Determination of the evaluation criteria that will apply to each type of such structure shall be the prerogative of WSA alone. For any development project where GI/LID structures are proposed, the current version of the Stormwater Quality Site Development Review Tool, a supplement to the GSMM, is to be used in reviewing and approving the runoff reduction/water quality treatment portion of the stormwater management system proposed for that project. Operation and maintenance requirements for each proposed GI/LID structure or practice will also be reviewed and approved in accordance with the GSMM or other applicable published standards.

5. Inspection and Maintenance of GI/LID Structures

All GI/LID structures will be added to the GI/LID inventory that is required in BMP #5 of Post-Construction Stormwater Management and found on the attached thumb drive. WSA will inspect all GI/LID structures within the inventory as required in BMP #7 of Post-Construction Stormwater Management. Criteria for inspection will vary depending on the type of structure, with the goal being to verify that each structure is functioning as designed. The inspections will be performed such that the entire inventory is inspected within a 5-year period.

All inspections will be performed in accordance with WSA's Storm System Inspection Procedures found in Appendix F, by an MS4 inspector, a BMP inspector, or an Engineer. Inspections will be logged using online inspection forms linked to WSA's GIS database. The inspection form for each structure will note any maintenance that is required.

WSA will perform maintenance required on any WSA-owned GI/LID structures. For all-other GI/LID structures requiring maintenance, whether owned by the City of Douglasville, Douglas County, some other public entity, or a private party, WSA will notify the owner of each structure in writing of the maintenance that is required. WSA will document compliance with the notification and will take appropriate enforcement action against owners that do not comply, in accordance with the Enforcement Response Plan in Appendix A. All enforcement actions will be documented.