

**Phase I Municipal Separate Storm Sewer System (MS4)**  
**Stormwater Management Program**

**General Information**

**A. Name of Permittee:**

Gwinnett County

**B. NPDES Permit Number: GAS000118**

**C. Mailing Address**

75 Langley Drive  
Lawrenceville, GA 30046

**D. Name of Responsible Official:**

Glenn Stephens  
County Administrator  
75 Langley Drive  
Lawrenceville, GA 30046  
770.822.7008  
[Glenn.Stephens@gwinnettcounty.com](mailto:Glenn.Stephens@gwinnettcounty.com)

**E. Designated Stormwater Management Program Contact:**

Barbara Seal  
Planning Manager  
684 Winder Highway  
Lawrenceville, GA 30045  
678.376.6826  
[Barbara.seal@gwinnettcounty.com](mailto:Barbara.seal@gwinnettcounty.com)

**F. Provide the river basin(s) to which your MS4 Discharges:**

Chattahoochee River Basin  
Alcovy River Basin  
Ocmulgee River Basin

**G. Provide the latitude and longitude of the MS4 center (e.g. City Hall, County offices, MS4 mailing address) using Global Positioning System (GPS) – WG 84:**

Latitude: 83° 57' 44.28  
Longitude: 33° 58' 13.64

**Sharing Responsibility**

A. Has another entity agreed to implement a SWMP Component on your behalf? No

**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 on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:  \_\_\_\_\_

Printed Name: Glenn Stephens

Title: County Administrator, Gwinnett County

Date: 12/2/19

**Structural and Source Control Measures**  
**Table 3.3.1 of the MS4 Permit**  
**Element A1**  
**MS4 Control Structure Inventory and Map**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.1:

1. MS4 Control Structure Inventory and Map
  - a. Each reporting period, update the inventory and map of MS4 control structures. At a minimum, the inventory and map must include catch basins, ditches (miles or linear feet), detention/retention ponds, and storm drain lines (miles or linear feet).
  - b. Provide the updated inventory and map, the number of MS4 structures added during the reporting period, and the total number of structures in the inventory, in each annual report.

CFR 122.26(d)(2)(iv)(A)(1): A description of maintenance activities and a maintenance schedule for structural controls to reduce pollutants (including floatables) in discharges from municipal separate storm sewers;

**Description of SWMP Component**

The Gwinnett County Stormwater Management Division currently owns or maintains a large and varied stormwater system including approximately 1445 miles of Stormwater pipe ranging in size from 12 inches to 108 inches. Generally this includes pipes that are allocated in the Right-of-Way (ROW) of County maintained roads, or pipes in residential areas that are connected to the ROW. The median year of installation for the pipes is 1998 and the average pipe age is 25 years.

DWR continually updates the GIS inventory; correcting errors, noting changes due to repairs, and mapping new projects into the database. This information comes from a both DWR staff and other County Departments; Planning and Development and Department of Transportation.

The vast majority of the storm water infrastructure in the County was installed by private developers, some of which has been donated to, and accepted by, the County for maintenance.

**Measurable Goals**

- 1a. Gwinnett County will add to the inventory all new catch basins, stormwater pipes, ditches, and BMPs that pass the QA/QC review during the reporting year. We will also continue to update the GIS based on reported errors, and repairs to the inventory.
- 1b. Gwinnett County will provide the updated inventory and map, the number of MS4 structures added during the reporting period, and the total number of structures in the inventory, in each annual report.

**Documentation to be submitted with each Annual Report**

- 1a. Documentation will be in the form of a listing of the new MS4 inventory and a map of the MS4 structures submitted with each annual report.

1b. The updated inventory, number of MS4 structures added, and the total number of MS4 structures in the inventory will be in a list format. The map of the MS4 structures will be in pdf format.

**Associated Appendices:** See Appendix A1 for the most recent list of MS4 structures in the inventory and maps of the MS4 structures and the County owned BMPs.

**Structural and Source Control Measures**  
**Table 3.3.1 of the Permit**  
**Element A2**  
**MS4 Inspection and Maintenance Program**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.1:

2. MS4 Inspection and Maintenance Program
  - a. Conduct inspections of the MS4 structures so that 100% of the structures are inspected within the 5-year period. At a minimum, the permittee must conduct inspections on 5% of the total structures so that some inspections are performed during each reporting period, or if inspections are done by geographical area, then one entire area or sector must be inspected each reporting period. If a low percentage of inspections is conducted during one reporting period than the permittee must increase the inspection frequency in subsequent reporting periods to ensure that 100% of the structures are inspected within a 5-year permit term. The MS4 inspections shall be executed in accordance with the schedule contained in the SWMP. Provide the number and percentage of the total structures inspected during the reporting period and documentation in each annual report.
  - b. Conduct maintenance on the MS4 structures as needed. Provide the number of total structures maintained during the reporting period and documentation of the maintenance performed in each annual report.

CFR 122.26(d)(2)(iv)(A)(1): A description of maintenance activities and a maintenance schedule for structural controls to reduce pollutants (including floatables) in discharges from municipal separate storm sewers;

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

MS4 Structure Inspection Program

Gwinnett County implemented a stormwater utility (SWU) in 2006. This utility provides support for major stormwater activities such as replacing stormwater pipes, reducing flooding, fulfilling regulatory requirements, and reducing pollution carried by stormwater to our waterways. In general the Gwinnett County Stormwater Utility (SWU) will maintain the drainage system within the Gwinnett County Right of Way (ROW) and systems in recorded drainage easements dedicated to the County that are attached to the ROW. The (SWU) will also maintain systems and facilities within a SWU easement. Drainage systems located on commercial property will be maintained by the commercial property owner. The final decision of maintenance responsibility will be based on the location of the structure, ownership of the parcel, associated easements, and other applicable documentation. The County does not accept maintenance responsibility for private structural controls, i.e. detention ponds, as these facilities are privately owned and not part of the MS4.

As mentioned previously, the vast majority of the storm water infrastructure in the County was installed by private developers, some of which has been donated to, and accepted by, the County for maintenance. Gwinnett County does not take responsibility for any stormwater structure or pipe until the Final Plat is recorded and approved, the structure/pipe has passed an inspection by County staff, and the maintenance bond is released. Gwinnett County will arrange

for inspection of the County owned MS4 on a rotating five year schedule, providing for at least one inspection of each County owned structure and pipe within five years. These inspections may be performed by County staff, or by a contracted entity, depending on resources and needs. Gwinnett County will maintain records of these inspections for Annual Report needs.

The County has decided to limit the amount of paper used in the inspection process. All of the inspection crews are issued a county-provided field computer to collect this information. The data fields collected for Catch Basins, Ditches, and Stormwater Pipes will be from the following list, depending on the applicability to the structure:

- Facility ID #
- Date Inspected
- Time Inspected
- Crew
- Surface Condition
- Ring Condition
- Top Condition
- Wall Condition
- Cover Condition
- Wall Infiltration
- Weather
- Color
- Odor
- Floatables
- Repair?
- Clean?
- IDIC?
- Length
- Overall Condition

#### MS4 Structure Maintenance Program

The results of the inspections will be reviewed and maintenance activities will be determined based on the severity of the damage and the potential impact on the functionality of the County owned MS4. Resulting maintenance Work Orders (WO) will be directed to the appropriate personnel for assignment to internal crews or a contracted entity depending on the extent of the maintenance activities. Potential illegal taps, or illicit discharges, will be directed to the PARS Water Quality Group to investigate and address. Maintenance of private facilities is the responsibility of the owner. County inspections that result in the identification of deficiencies in private facilities will be communicated to the owner. Thus the inspections will direct the O&M activities and the IDIC activities.

#### BMP Structural Control Inspection Program

The county does a limited inspection of BMP's, or water quality structural controls, as they have the potential to adversely impact the public drainage system if they malfunction. Limited services include periodic inspections and owner notification if the BMP requires maintenance. These BMPs may include the following structures:

Bioretention Basin  
Bioslopes  
Dry Detention Basin  
Dry Extended Detention Basin  
Enhanced Dry Swale  
Enhanced Wet Swale  
Grass Channel  
Gravity (Oil-Grit) Separators  
Green Roofs  
Infiltration Trench  
Permeable Paver System  
Pervious Concrete  
Porous Asphalt  
Sand Filters  
Stormwater Planters/Tree Boxes  
Stormwater Pond  
Stormwater Wetlands  
Submerged Gravel Wetlands  
Vegetated Filter Strips & Flow Spreader

BMPs that are owned and maintained by the County will be inspected by DWR, or a contracted entity, at a rate of 100% within 5 years. Inspection forms are developed to document issues specific to that BMP type.

#### BMP Structural Control Maintenance Program

Each County department is responsible to maintain the BMP located on their property. The level of maintenance must be such that the structural BMP operates as originally designed. Common maintenance activities would include repair of outlet control structures and removal of debris surrounding the structure to maintain structure performance. Other activities may be necessary as determined by the inspection.

#### **Measurable Goals**

##### 2a. Inspection Goals:

1. Stormwater Pipes/Catch Basins/Ditches: Gwinnett County will arrange for inspection of the County owned MS4 structure (pipes, catch basins, and ditches) on a rotating five year schedule, providing for at least one inspection of each County owned catch basin, stormwater pipe, and ditch within five years. The annual goal will be at least 5% of the total structure inspections to be performed each year.
2. BMPs: Gwinnett County will arrange for inspections of the County owned BMPs on a rotating five year schedule, providing for at least one inspection of each County owned BMP within five years. The annual goal will be at least 5% of these inspections to be performed each year.

##### 2b. Maintenance Goals:

1. Stormwater Pipes/Catch Basins/Ditches: All the MS4 inspection results will be reviewed and maintenance activities will be determined based on the severity of the damage, the potential impact on the functionality of the County owned MS4, and the impacts to the

water quality. The Annual Report will provide the number of Catch Basins maintained during the reporting period, and the distance of the Pipes and Ditches maintained during the reporting period.

2. BMPs: All the inspection results of the County owned BMP inspections will be reviewed and maintenance activities will be determined based on the ability of the structures to continue to operate as they were originally designed. The owner of the BMP will be informed of the maintenance needs and required to arrange for the maintenance tasks. The Annual Report will provide the number of BMPs that were maintained by the Departmental owner during the reporting period.

### **Documentation to be submitted with each Annual Report:**

#### **2a. Inspection Documentation:**

1. Stormwater Pipes/Catch Basins/Ditches: The documentation in the Annual Report will provide the number and percentage of Catch Basins inspected during the reporting period, the distance and percentage of the Stormwater Pipes and Ditches inspected during the reporting period, along with a summary list of the data collected during the inspection. This data will be different depending on the structure type, and will consist of:
  - Pipes: Facility ID, Length, Date, Time, Crew, Weather, Odor, Color, Floatables, Repair?, Clean?, Total number of pipes inspected, and total miles of pipe inspected.
  - Ditches: Facility ID, Length, Date, Time, Crew, Weather, Odor, Color, Floatables, Repair?, Clean?, Total number of ditches inspected, and total miles of ditches inspected.
  - Structures (CB): Structure Type, Fac ID, Date, Time, Crew, Weather, Surf Cond, Cvr Cd, Wall Cd, Wall Cd, Ring Cd, Top Cd, Overall, Odor, Color, Floatables, Repr, Cln?, IDIC?, and total number of structures (CB) inspected.
2. BMPs: Documentation in the Annual Report will provide the number of BMPs inspected during the reporting period, and copies of the completed inspection forms.

#### **2b. Maintenance Documentation:**

1. Stormwater Pipes/Catch Basins/Ditches: The documentation in the Annual Report will provide a the number of Catch Basins maintained during the reporting period, and the distance of the Pipes and Ditches maintained during the reporting period. This will consist of a summary list of the data stored in our Work Tracking database. This data will be different depending on the structure type, and will consist of:
  - Stormwater Pipes: FID, Work Task End Date, , Work Order, Structure Type, Work Task, Length, Total number of stormwater pipes/ditches maintained, total length of stormwater pipes/ditches maintained in feet and miles.
  - Ditches: SR #, Date Completed, Location/address, Footage (LF), and Task Completed.
  - Structures (CB): FID, Structure Type, Work Task, Work Tracking end date, Work Order number, and total number of structures maintained.



2. BMPs: Documentation in the Annual Report will provide the number of BMPs that were maintained by the Departmental owner during the reporting period, and the “passed” inspection report.

**Associated Appendices:** See Appendix A1 for:

- Sample BMP inspection forms for the BMPs that may be found in Gwinnett County.

**Structural and Source Control Measures**  
**Table 3.3.1 of the MS4 Permit**  
**Element A3**  
**Planning Procedures**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.1:

3. Planning Procedures

- a. Develop or update, as needed, a comprehensive planning document which addresses, in part, areas of new development and redevelopment to reduce pollutants in discharges from the MS4. Describe any changes made to the stormwater portion of the document during the reporting period in each annual report.

CFR 122.26(d)(2)(iv)(A)(2): A description of planning procedures including a comprehensive master plan to develop, implement and enforce controls to reduce the discharge of pollutants from municipal separate storm sewers which receive discharges from areas of new development and significant redevelopment. Such plan shall address controls to reduce pollutants in discharges from municipal separate storm sewers after construction is completed;

**Description of SWMP Component**

The Gwinnett County Unified Plan

Gwinnett County finalized the 2040 Unified Plan through the Board of Commissioners approval process in February of 2019. This Unified Plan calls for actions and policies that will enhance the public use of the land, and protect the environment, along with keeping the County a “Preferred Place” to live. These policies include:

- Institute a Variety of Redevelopment Incentives and Bonuses, Policy 2.1
- Improve the Walkability of Gwinnett’s Activity Centers and Neighborhoods, Policy 5.1
- Provide Incentives for Enhanced Open Space/Trails, Policy 5.7
- Create Trail Connections between existing Parks, Schools, Libraries, and other Community Facilities, Policy 5.8
- Ensure Protection of Gwinnett’s Environment, Policy 5.9

Gwinnett County Department of Planning and Development coordinate the development of Long-Range Plans for Gwinnett County with the other Departments. They will continue to manage the implementation of the 2040 Unified Plan, in coordination with the Department of Water Resources when necessary. As such, they will track any changes to the Unified Plan, and acquire any appropriate approvals from the Board of Commissioners (BOC).

**Measurable Goals**

3a. Any changes to the 2040 Unified Plan policies noted in the SWMP will be tracked by the Gwinnett County Department of Planning and Development.

**Documentation to be submitted with each Annual Report**

3a. Documentation of changes to the 2040 Unified Plan policies listed in the SWMP, will be noted in the associated Annual Report, and include a copy of the BOC approval document, along with the associated approved change.

**Associated Appendices:** See Appendix A3 for a copy of the following documents:

- Overview of the 2040 Unified Plan
- 2040 Unified Plan Theme 2 Policies
- 2040 Unified Plan Theme 5 Policies

**Structural and Source Control Measures**  
**Table 3.3.1 of the MS4 Permit**  
**Element A4**  
**Street Maintenance**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.1:

4. Street Maintenance – Conduct street cleaning using either of the following methods:
  - a. Conduct street maintenance and cleaning at a frequency of at least one mile per reporting period. Develop procedures and include the procedures in the SWMP. Provide documentation of any street sweeping activities conducted during the reporting period in each annual report.
  - b. If the permittee does not engage in street sweeping, then implement an alternate method of street cleaning, such as trash/litter removal. This activity must be conducted at least once each reporting period. Describe the procedures in the SWMP. Provide documentation of the litter removal activities conducted during the reporting period in each annual report.

CFR 122.26(d)(2)(iv)(A)(3): A description of practices for operating and maintaining public streets, roads and highways and procedures for reducing the impact on receiving waters of discharges from municipal storm sewer systems, including pollutants discharged as a result of deicing activities;

**Description of SWMP Component**

Street Sweeping

Gwinnett County currently conducts street sweeping of County maintained streets and intersections each year. These are streets and intersection located primarily in the commercial corridors that would have a greater sediment loading to the receiving streams. We will sweep 1,130 miles of roads per year.

Procedures for Street Sweeping relating to Water Quality

The following procedures to protect water quality are utilized in implementing the Street Sweeping Program:

- The contractor will not sweep streets during rain events.
- The debris collected is to be taken to a transfer station and then to a local for disposal.
- If the contractor comes upon a dead animal(s) in the road, they will dispatch Animal Control to remove the dead animal(s), and sweep around the animal(s). Once the animal is removed, they come back to sweep the area.
- The contractor generally uses a dry vacuum sweeper.

**Measurable Goals**

4 a. Gwinnett County will sweep 1,130 miles of County maintained streets each permit year.

**Documentation to be submitted with each Annual Report**

4a. Documentation will consist of a excel spreadsheet that includes the following fields: Date completed, Type of street sweeping (C for Centerline), Name of street, From, To, and miles.

**Structural and Source Control Measures**  
**Table 3.3.1 of the MS4 Permit**  
**Element A5**  
**Flood Management Projects**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.1:

5. Flood Management Projects
  - a. Ensure proposed flood management projects (e.g., detention and retention ponds) are assessed for water quality impacts during the design phase. Provide the number of plans reviewed where flood management projects are assessed for water quality impacts during the reporting period in each annual report.
  - b. Conduct an assessment, using the procedures described in the SWMP, of existing permittee-owned flood management projects (e.g., detention and retention ponds) for potential retrofitting to address water quality impacts and conduct any feasible retrofitting activities. If the permittee has more than five structures, then assess 100% within a 5-year permit term, with at least one structure assessed annually. If the permittee has fewer than five structures, then assess 100% within a 5-year permit term. Provide information on any assessment and/or retrofitting activities conducted during the reporting period in each annual report.

CFR 122.26(d)(2)(iv)(A)(4): A description of procedures to assure that flood management projects assess the impacts on the water quality of receiving water bodies and that existing structural flood control devices have been evaluated to determine if retrofitting the device to provide additional pollutant removal from storm water is feasible;

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

New Flood Management Projects

By January 2001, the county required that storm water management structures/facilities planned as a part of new development, or redevelopment, be designed to include Water Quality Benefits, Downstream Channel Protection, Overbank Protection, and Extreme Flood Protection. These changes were incorporated into the County's Unified Development Ordinance, which requires that an engineer assess the existing and post construction site conditions, and incorporate BMP's that meet stormwater performance standards into the design plans. See Appendix A5 for a copy of the form used to review these BMPs (Flood Study REV 03012015). A list of these BMP's is included within the Gwinnett County Stormwater Management Manual (GCSMM). The regulations require that BMP's be used to ensure post construction runoff reduces the Total Suspended Solids (TSS) loading by 80%. The GCSMM has assigned removal efficiencies for each of the BMP's provided in the manual. The County has accepted the State's Site Development Review Tool that provides developers a convenient tool to assess which BMP's may be used to achieve the 80% TSS reduction goal.

All development projects are entered into the Plan Review Tracking Database (Acella) which tracks the plan review status of the project. Reports can be developed that list all plans reviewed, and their status, within a reporting period.

In summary, all new development, or redevelopment, in Gwinnett County is required to evaluate site conditions to incorporate BMP's that meet stormwater performance standards into that development so as to improve the quality of post construction runoff from that development.

#### Existing Permittee-owned Flood Management Projects

Existing detention/retention basin reviews are incorporated into the Watershed Improvement Plan (WIP) Program. This program systematically assesses individual drainage basins/watersheds within Gwinnett County to determine conditions within the watershed and the health of the streams within these basins. The goal of this assessment is to develop a plan to improve or repair any damage to habitat and/or water quality that may have been caused by past or current conditions within the watershed. This is being achieved through the development of basin specific Watershed Improvement Plans (WIP's).

The goal of each WIP is to complete an assessment of streams and structural BMP's within the specific basin and identify retrofit opportunities that if implemented would have a positive effect on water quality and habitat within that basin's waterways. The major outcomes of each WIP are the development of conceptual plans and a Capital Improvement Program with cost estimates for implementation of suggested retrofits. Once retrofit opportunities have been identified they can be implemented on a priority basis as resources are made available. Criteria to prioritize implementation may include potential for water quality improvements, habitat improvements, hydrologic controls, property protection, ease of access to land, funding, and benefit/cost ratios for both Total Suspended Solids (TSS) removal and habitat improvement.

#### **Measurable Goals**

- 5a. New Flood Management Projects: Continue to ensure new flood management projects (e.g. detention and retention basins) are assessed for water quality impacts, as part of the stormwater performance standards.
  
- 5b. Existing Permittee-owned Flood Management Projects: Continue to perform reviews of County-owned detention/retention ponds to assess feasible retrofit activities which would incorporate water quality benefits to the BMPs. Gwinnett County will assess 100% of the County-owned detention/retention ponds within the 5-year permit term, with at least one structure assessed annually.

#### **Documentation to be submitted with each Annual Report**

- 5a. New Flood Management Projects: Documentation will consist of a report from the Plan Review Tracking Database that includes the number of assessments performed on new projects, and lists those projects.
  
- 5b. Existing Permittee-owned Flood Management Projects: Documentation will consist of the Assessment Sheets and the status of any retrofit activities conducted within the reporting period.

**Associated Appendices:** See Appendix A5 for the Flood Management Project Assessment Form, dated Dec 2019.

**Structural and Source Control Measures**  
**Table 3.3.1 of the MS4 Permit**  
**Element A6**  
**Municipal Facilities Excluding Any Facilities Addressed in Section 3.3.3**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.1:

6. Municipal Facilities Excluding Any Facilities Addressed in Section 3.3.3
  - a. Each reporting period, update the inventory of municipal facilities with the potential to cause pollution (e.g. drinking water treatment plants, wastewater plants <1.0 MGD, recycling facilities, waste transfer facilities, materials recovery facilities (MRFs)) and provide in each annual report.
  - b. Implement the program to control runoff from municipal facilities with the potential to cause pollution. The program shall include the facility inspection prioritization, inspection frequency, and inspection documentation protocol as described in the SWMP. Conduct an inspection on 100% of the inventoried facilities within the 5-year period. For permittees with five or more municipal facilities included on the inventory, at a minimum, the permittee must conduct inspections on 5% of the municipal facilities each reporting period, or if inspections are done by geographical area, then one entire area or sector must be inspected in each reporting period. If a low percentage of inspections is conducted during one reporting period, then the permittee must increase the inspection frequency in subsequent reporting periods to ensure that that 100% of the municipal facilities are inspected within the 5-year permit term. Provide documentation of inspection and documentation of follow-up actions taken to address noncompliance issues in each annual report.

CFR 122.26(d)(2)(iv)(A): No requirements.

**Description of SWMP Component** (Ensure the text addresses both the inventory and the inspection of the facilities):

Inventory

Gwinnett County will develop, and annually update, an inventory of municipal facilities with the potential to cause pollution. This inventory will be provided in the annual report due June 15, 2015. Per EPD's request, this inventory will not include any facilities that are subject to the Industrial General Permit (IGP).

Inspection Program

Gwinnett County will inspect all municipal facilities listed on the most recent municipal facility inventory at least once within the five year permit period. At least one municipal facility, with the potential to cause pollution, will be inspected each year.

At a minimum an inspection will consist of:

- Review of the file history for the facility prior to inspection.
- Contacting the Facility Management to arrange for the inspection.
- A site visit, which includes a site tour, both inside and outside all buildings. This site tour will concentrate on;



- educating the facility manager (or appointee)
- identifying actual or potential pollutant sources(s)
- discussing potential pollutant source containment and control practices,
- addressing identifiable discharges, i.e. illicit discharges or illegal connections
- discussions concerning good housekeeping, secondary containment, etc.
- Developing a written report which will include; a completed inspection form, an aerial drawing, appropriate pictures, enforcement documents, and notes on any other issues of concern.
- Appropriate educational materials will be provided at the time of the inspection, or as soon as possible thereafter.

Issues of concern will be discussed with the management contact at the time of the inspection. The written report will be provided to the contact after report compilation is completed. Any illicit discharges will be addressed and appropriate enforcement actions taken. Re-inspections will be completed as appropriate to ensure compliance with the Illicit Discharge and Illegal Connection Ordinance.

### **Measurable Goals**

- 7a. Inventory of Municipal Facilities excluding any facilities addressed in Section 3.3.3: This inventory list will be updated each year.
- 7b. Municipal Facility Inspection Program: All municipal facilities located on the most recent municipal facility inventory will be inspected at least once within the five year permit period. Inspections on at least 5% of the municipal facilities located on the most recent municipal facility inventory will be performed each reporting period.

### **Documentation to be submitted with each Annual Report**

- 7a. Inventory of Municipal Facilities excluding any facilities addressed in Section 3.3.3: This inventory list will be updated each year and added to the annual report.
- 7b. Municipal Facility Inspection Program: The annual report will contain all Municipal Inspections performed during the reporting year.

### **Associated Appendices:**

- 7a. Inventory of Municipal Facilities excluding any facilities addressed in Section 3.3.3: See Appendix A6 for a copy of the most recent Municipal Facilities, excluding any facilities addressed in Section 3.3.3
- 7b. Municipal Facility Inspection Program: See Appendix A6 for a copy of the most recent Inspection Form. Note that this form is used for all business inspections, with a field at the top of the form identifies which type of inspection it is; municipal, industrial or HVPS.

**Structural and Source Control Measures**  
**Table 3.3.1 of the MS4 Permit**  
**Element A7**  
**Pesticide, Fertilizer and Herbicide Application**

**Requirements:**

7. Pesticide, Fertilizer and Herbicide Application
  - a. Utilize a program to reduce pollution by the application of pesticides, fertilizer, and herbicides by commercial applicators and distributors in accordance with the Georgia Department of Agriculture requirements.
  - b. Implement the program to reduce pollution caused by the municipal use of pesticides, fertilizers, and herbicides, as described in the SWMP. If municipal staff performs the application of pesticides, fertilizers, and herbicides, ensure that they are certified by the Georgia Department of Agriculture. Provide documentation of program activities in each annual report.

CFR 122.26(d)(2)(iv)(A)(6): A description of a program to reduce to the maximum extent practicable, pollutants in discharges from municipal separate storm sewers associated with the application of pesticides, herbicides and fertilizer which will include, as appropriate, controls such as educational activities, permits, certifications and other measures for commercial applicators and distributors, and controls for application in public right-of-ways and at municipal facilities.

**Description of SWMP Component**

Commercial Applicators

The county relies heavily on the State Department of Agriculture (DoA) and Gwinnett's Cooperative Extension Service (CES) for assistance in addressing requirements for this part of the program. The State DoA requires commercial applicators of pesticides (herbicides and insecticides) to obtain and retain a "Certified Commercial Pesticide Applicators License".

Education for Commercial Pesticide Applicators is offered through the Gwinnett County Cooperative Extension Service (CES). Each of these educational programs contains a component that addresses the potential impacts on water quality associated with the misuse of pesticides. The Landscaping Professionals training also contains information on the proper use of fertilizers and their potential for water quality impacts. CEU's are provided to licensees who participate in each of these training programs.

Along with these State requirements, prior to issuing a business license, the County's Business Licensing division requires applicants who are likely to require a commercial pesticide applicators license to provide proof that they hold the appropriate State license.

Municipal Applicators

There are several county Departments that are involved in the use of pesticides, herbicides and fertilizers. These departments are as follows:

- Parks and Recreation Department
- Department of Water Resources
- Department of Transportation
- Department of Support Services

The training offered through the CES and described in the Commercial Applicators section above is also available to municipal employees. The County will help appropriate employees obtain and maintain their Commercial Applicator's license, if applicable.

#### Inventory of Products

A complete inventory of pesticides, herbicides and fertilizers used by the County Departments that are involved in these activities will be provided in the annual reports.

#### **Measurable Goals**

##### 7a. Commercial Applicators:

- Gwinnett County will report classes run by the Cooperative Extension Service covering the Commercial Pesticide Applicators License.
- The County will continue to require business license applicants who are likely to require a commercial pesticide applicators license, to provide proof that they hold the appropriate State license.

##### 7b. Municipal Applicators:

- Gwinnett County will provide an inventory of pesticides, fertilizers, and herbicides.
- Gwinnett County will provide scanned copies of the most recent pesticide applicator license certification cards for each County employee that is required to be certified.

#### **Documentation to be submitted with each Annual Report**

##### 7a. Commercial Applicators:

- The County's Annual Report will include the dates, class titles, attendees, and number of participants for the appropriate classes offered by the CES. This data will be tracked by CES and reported to Gwinnett County for inclusion into the MS4 Annual Report. Documentation will be in a table format.
- Scanned copies of the Commercial Pesticide Applicators License Certification Cards for the owners of applicable businesses that apply for a business license within Gwinnett County.

##### 7b. Municipal Use of Pesticides, Fertilizers, and Herbicides: The County's Annual Report will include

- The inventory of pesticides, fertilizers, and herbicides, in table format.
- Scanned copies of the most recent pesticide applicator license certification cards for each County employee that is required to be certified.

#### **Associated Appendices:** See Appendix A7 for

- Inventory of PFH
- County Employee Pesticide Certification Cards
- Commercial Pesticide Certification Cards for the owners of applicable businesses that apply for a business license within Gwinnett County.

**Illicit Discharge Detection and Elimination Program**  
**Table 3.3.2 of the MS4 Permit**  
**Element B1**  
**Legal Authority**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.2:

1. Legal Authority
  - a. Re-evaluate and modify the existing IDDE ordinance when necessary for compliance with this permit. The permittee must ensure that the ordinance provides the authority to conduct inspections and monitoring, control illicit discharges and connections, and control illegal dumping and spills into the MS4. The ordinance must include the permittee’s authority to take legal action to eliminate illicit discharges or connections. If the ordinance is revised during the reporting period, submit a copy of the adopted ordinance with the annual report.

CFR 122.26(d)(2)(iv)(B)(1): A description of a program, including a schedule, to detect and remove (or require the discharger to the municipal separate storm sewer to obtain a separate NPDES permit for) illicit discharges and improper disposal into the storm sewer. The proposed program shall include a description of a program, including inspections, to implement and enforce an ordinance, orders or similar means to prevent illicit discharges to the municipal separate storm sewer system; this program description shall address all types of illicit discharges, however the following category of non-storm water discharges or flows shall be addressed where such discharges are identified by the municipality as sources of pollutants to waters of the United States: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)) to separate storm sewers, uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, and street wash water (program descriptions shall address discharges or flows from firefighting only where such discharges or flows are identified as significant sources of pollutants to waters of the United States);

**Description of the SWMP Component**

**The County’s Storm Water Management Ordinance and Enforcement Procedures**

The County adopted their first Storm Water Management Ordinance in 1996, with various updates as required by EPD. The present Illicit Discharge and Illegal Connection (IDIC) ordinance is comparable to the Model Ordinance from the North Georgia Metropolitan Water Planning District, and can be found in Appendix B1.

**Measurable Goals**

1. Update the IDIC ordinance, if it is required during the reporting period, by EPD or the Metropolitan North Georgia Water Planning District.

**Documentation to be submitted with each Annual Report**

1. If the IDIC ordinance is revised during the reporting period, Gwinnett County will submit a copy of the revised adopted ordinance with the annual report.

**Associated Appendices:** The present Illicit Discharge and Illegal Connection (IDIC) ordinance can be found in Appendix B1.

**Illicit Discharge Detection and Elimination Program**  
**Table 3.3.2 of the MS4 Permit**  
**Element B2**  
**Outfall Inventory and Map**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.2:

2. Outfall Inventory and Map

- a. Each reporting period, update the inventory and map showing the location of all outfalls from the MS4 and the names and location of all waters of the State that receive discharges from those outfalls with each annual report.
- b. Provide the number of outfalls added during the reporting period, and the total number of outfalls in the inventory, in each annual report.

CFR 122.26(d)(2)(iv)(B)(1): A description of a program, including a schedule, to detect and remove (or require the discharger to the municipal separate storm sewer to obtain a separate NPDES permit for) illicit discharges and improper disposal into the storm sewer.

**Description of SWMP Component**

Gwinnett County continually updates the GIS inventory; correcting errors, noting changes due to repairs, and mapping new projects into the database. This information comes from a both DWR staff and other County Departments; Planning and Development and Department of Transportation.

A copy of the outfall inventory and maps can be found in Appendix B2. All outfalls have been geolocated and are readily available to staff through ArcMap.

**Measurable Goals**

2. Gwinnett County will continue to update the GIS inventory; correcting errors, noting changes due to repairs, and mapping new projects into the database.

**Documentation to be submitted with each Annual Report**

2. Gwinnett County will provide in Annual Reports:
  - a. The number of outfalls added during the reporting period;
  - b. A list of the outfalls added during the reporting period;
  - c. The total number of outfalls in the inventory;
  - d. A list of all the outfalls in the inventory;
  - e. An updated map showing the location of all outfalls from the MS4 and the names and location of all waters of the State that receive discharges from those outfalls.

**Associated Appendices:** See Appendix B2 for the following data:

- The total number of outfalls in the inventory;
- A list of all the outfalls in the inventory;
- A series of maps showing the location of all the outfalls from the MS4 and the names and location of all waters of the State that receive discharges from those outfalls.

**Illicit Discharge Detection and Elimination Program**  
**Table 3.3.2 of the MS4 Permit**  
**Element B3**  
**IDDE Plan**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.2:

3. Implement the IDDE Plan below, following procedures described in the SWMP, to detect and address non-storm water discharges to the MS4. The components of the Plan are as follows:
  - a. Conduct dry weather screening (DWS) inspections on 100% of total outfalls within the 5-year permit term, or use an alternate method approved by EPD. At a minimum, the permittee must conduct DWS or approved alternate method inspections on 5% of the outfalls in each reporting period, or if inspections are done by a geographical area, then one area or sector must be inspected each reporting period so that some inspections are performed each reporting period. If a low percentage of inspections is conducted during one reporting period, then the permittee must increase the inspection frequency in subsequent reporting periods to ensure that 100% of the outfalls are inspected within a 5-year permit term.

If the permittee conducts stream walks of intermittent and perennial streams in conjunction with the DWS inspection, then 100% of the stream miles containing or downstream of an MS4 outfall must be inspected within the 5-year permit term. At a minimum, the permittee must conduct stream walks on 5% of the outfalls in each reporting period, or if walks are done by a geographical area, then streams within one area or sector must be walked each reporting period so that some stream miles are walked each reporting period. If the permittee conducts stream walks for a reason other than DWS, then the permittee does not need to walk a specific number of miles. The permittee must document and report the number of stream miles walked, as well as the number of outfalls screened using each method (i.e., DWS, stream walks, approved alternate method).

In addition, the permittee may conduct both standard DWS of its outfalls and perform DWS of outfalls during stream walks. Provide the number and percentage of outfall inspections conducted during the reporting period and documentation of the inspections in each annual report.

- b. Implement investigative and follow-up procedures when the results of the screening indicate a potential illicit discharge, including the sampling and/or inspection procedures described in the SWMP. If the source of the illicit discharge is identified as deriving from an adjacent MS4, the permittee must notify that MS4. Provide information on illicit discharge detection activities performed to eliminate any illicit discharges identified during the reporting period in each annual report.

- c. Ensure any identified illicit discharges are eliminated. If necessary, implement the enforcement procedures described in the SWMP and in accordance with the Enforcement Response Plans (ERP) in Part 3.3.6 of this permit. Provide information, using a spreadsheet or table, on any enforcement actions taken for illicit discharges during the reporting period in each annual report.

CFR 122.26(d)(2)(iv)(B)(3): A description of procedures to be followed to investigate portions of the separate storm sewer system that, based on the results of the field screen, or other appropriate information, indicate a reasonable potential of containing illicit discharges or other sources of non-storm water (such procedures may include: sampling procedures for constituents such as fecal coliform, fecal streptococcus, surfactants (MBAS), residual chlorine, fluorides and potassium; testing with fluorometric dyes; or conducting in storm sewer inspections where safety and other considerations allow. Such description shall include the location of storm sewers that have been identified for such evaluation);

**Description of SWMP Component**

**Dry Weather Screening Field Activities**

The county’s field screening program consists of our dry weather screening (DWS) program. This program focuses on screening for illicit discharges at outfalls during dry weather conditions (less than 0.1” of rainfall per 24 hours for the preceding 72 hours) to increase the chances that any observed flow is more likely to be associated with an illicit discharge. The goal of the program is to identify and eliminate any un-permitted illicit discharges to the MS4.

Each outfall will be inspected for flow. If there is flow:

- Visual/Olfactory inspections will be recorded for color, turbidity, oil sheen, and odor.
- Field samples using probes or a field test kit will be run for pH, conductivity, fluoride, detergent/surfactants, and temperature.
- If conductivity is greater than 300 µmho/cm, a sample will be taken for fecal coliform.
- If the field samples show higher than baseline levels (see chart below) for pH, conductivity, fluoride, detergent/surfactants, temperature, or if there is the distinctive odor of sanitary wastewater/septic waste, or if there is flow during dry weather, the discharge will be tracked to the source and appropriate enforcement action taken.

If there is not flow it will be recorded as “dry”.

**Baseline Levels**

Parameter	Baseline Limit	Explanation
pH	6.0 < X > 8.5	The normal pH range for stormwater varies from 6-8.5, with a few excursions down to 5.5. (GC Sewer Use Ordinance (Sec. 5-2002(3) lower limit is 5.5; State Rules (391-3-6-.03 (6) (a) (iii)) set an upper limit at 8.5.)
Temperature	< 32° C/90° F	The normal temperature should be ambient (not exceed 32°C/90°F). (Based on State Rules 391-3-6-.03 (6) (a) (v).)
Conductivity	< 300 umho/cm	Good quality stormwater should have a low conductivity (less than 300 µmho/cm). A high conductivity indicates high dissolved solids content in the water, perhaps from an illicit connection or cross contamination with sanitary wastewater.
Total Fluoride	< 0.2 mg	Fluoride is a better indication of potable water than chlorine, since chlorine will rapidly dissipate.



Parameter	Baseline Limit	Explanation
Detergent/ Surfactant	< 0.2 mg	There should be no traces of surfactants in stormwater. The parameter is associated with cleaning and washing operations and may indicate contamination by domestic wastewater. (EPD NonPoint Source Program has requested a baseline limit of no more than 0.2 mg/L.)
Fecal Coliform	Apr – Oct 200 col/100 ml Nov – Mar 1,000 col/ml	If a dry weather flow has an odor, high conductivity (>300 µmho/cm), or surfactants, a sample will be collected for fecal coliform testing. Fecal coliform is an indicator of fecal bacteria from warm-blooded animals. (Per 391-3-6-.03 (6) (a) (i) Water Use Classifications and Water Quality Standards.)

The following table provides the field test kit and model numbers presently used for the DWS. Gwinnett County will continue to use these field test kits, or an equivalent version.

Parameter	Model Name	Model Number
pH	HANNA Instruments Waterproof Tester pH/EC/TDS/ Temperature	HI 98129
Temperature	HANNA Instruments Waterproof Tester pH/EC/TDS/ Temperature	HI 98129
Conductivity	HANNA Instruments Waterproof Tester pH/EC/TDS/ Temperature	HI 98129
Total Fluoride	HANNA Instruments ISE Meter Fluoride	HI 98402
Detergent/ Surfactant	CHEMetrics – CHEMets Kit Detergents	K-9400

The data will be placed in our Work Order system so that all employees in the Permitting and Regulatory Services (PARS) group can acquire it as needed. All data fields required by EPD reside in the Work Order system so that reports may be generated to meet permit requirements.

Each year Gwinnett County will perform Dry Weather Screening (DWS) at a portion of the outfalls in the MS4, based on current inventory as noted in the most recent version of the annual report. We will aim to perform DWS activities at 20% of the MS4 outfalls on an annual basis, but the end goal will be to meet the permit requirement to perform DWS at 100% of the outfalls in the MS4 system within the 5 year permit term.

### Investigative and Follow-up Procedures

If the field samples show higher than baseline levels for pH, conductivity, fluoride, detergent/surfactants, temperature, or if there is the distinctive odor of sanitary wastewater/septic waste, or if there is flow during dry weather, the discharge will be tracked to the source and appropriate enforcement action taken. Tracking can consist of any combination of the following activities, the choice made based on the field conditions at the time:

- Hiking upstream and pulling catch basin lids to inspect for flow.
- Sampling upstream using probes or a field test kits.
- Dye tests
- Smoke tests
- Sandbagging to capture flow.
- Lamping to identify illegal taps.

- Fluorometry
- Other optional activities that we learn are available.

If DWS indicates groundwater the investigative methods provided by EPD will be initiated:

- Initial tracing of the flow up the line until a dry section of pipe is found without any potential sources identified, such as a nearby residence, commercial business, or industry;
- If necessary, Gwinnett County will establish a groundwater fingerprint using the method referenced in the Center for Watershed Protection's document, Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments by Robert Pitt et. all.

The method used to make this determination (tracing of flow or comparison to a groundwater fingerprint) will be noted in the Work Order system. Also, the outfall will be identified in the GIS system as having a higher propensity for groundwater flow. This information will be readily available to the PARS employee when performing DWS in the future.

### **Elimination of Identified Illicit Discharges**

Gwinnett County will implement the ERP for IDDE Violations to eliminate any identified illicit discharges, and to educate the customers involved in the investigation, as to how they can change their behaviors to better protect the water quality in our streams. In order to eliminate illicit discharges we need to both educate the public and hold them accountable for their actions. Education plays a key role in this area, for a well-educated public will carry the message to their friends and family, and thus better spread the message.

Identified illicit discharges from a sanitary sewer or leaking water line will be referred to the appropriate work group through the Work Order system. This will allow an immediate response to the problem and complete transfer of all related information.

### **Measurable Goals**

3. Implement the IDDE Plan to detect and address non-storm water discharges to the MS4 as described in the SWMP. The measurable goals of the Plan are as follows:
  - a. Gwinnett County will conduct dry weather screening (DWS) inspections on 100% of total outfalls within the 5-year period. We will aim for an annual goal of 20%, but be accountable to the goal of 100% of total outfalls within the 5-year period.
  - b. If the field samples show higher than baseline levels for pH, conductivity, fluoride, detergent/surfactants, temperature, or if there is the distinctive odor of sanitary wastewater/septic waste, or if there is flow during dry weather, the discharge will be tracked.
  - c. Gwinnett County will implement the ERP for IDDE Violations to eliminate any identified illicit discharges, and to educate the customers involved in the investigation, as to how they can change their behaviors to better protect the water quality in our streams.

### **Documentation to be submitted with each Annual Report**

3. The data will be placed in our Work Order system so that all employees in the PARS group can acquire it as needed. Documentation of the IDDE Plan are as follows:

- a. All data fields generated during DWS and required by EPD reside in the Work Order system so that reports may be generated to meet permit requirements.
- b. All tracking information will be noted in the Work Order system so that DWS events may be archived for reference in future years. This data will be utilized to generate reports may be required by the MS4 Permit.
- c. All enforcement actions will be noted in the Work Order system so that DWS events may be archived for reference in future years. This data will be utilized to generate reports may be required by the MS4 Permit.

**Associated Appendices:** See the following Appendices for documentation required by this Element:

- Appendix B3
  - A listing of the data to be collected during a DWS;
  - The DWS Date Entry Screenshots;
- Appendix J1
  - The ERP for IDDE Violations

**Illicit Discharge Detection and Elimination Program**  
**Table 3.3.2 of the MS4 Permit**  
**Element B4**  
**Spill Response Procedures**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.2:

4. Spill Response Program
  - a. Implement the procedures described in the SWMP to prevent, contain, and respond to spills that may discharge to the MS4. Provide documentation on spill occurrences during the reporting period in each annual report.

CFR 122.26(d)(2)(iv)(B)(4): A description of procedures to prevent, contain, and respond to spills that may discharge into the municipal separate storm sewer;

**Description of SWMP Component**

For planning and reporting purposes spills have been broken up into actions from one of two County Departments. The Fire Department and the Department of Water Resources (DWR) are the two Departments that would respond to the most common types of spills that are likely to occur and enter the MS4:

- **Fire Department:** The Fire Department responds to spills of hazardous materials, tanker accidents resulting in spills, spills from bulk storage containers, vehicular accidents, etc.
- **DWR:** DWR responds to reports of Sanitary Sewer Overflow's (SSO's) from the sanitary sewer system including ruptured sanitary sewer lines.

For planning purposes each category of spill will be addressed separately.

**Fire Department**

**Spill Containment Procedure**

Gwinnett County HazMat is responsible for containment of released hazardous materials where they are associated with an incident to which they have responded. The HazMat team members are highly trained individuals who have each completed appropriate training in the field of Hazmat Response. This extensive training provides HazMat team member's with the ability to assess all variables associated with a hazardous materials incident and make an appropriate selection of containment devices, tools and procedures based on all factors surrounding the incident. One of the HazMat teams stated priorities with respect to incident control is protection of the environment.

**Spill Response Procedure**

It should be noted that Gwinnett HazMat does not accept responsibility for cleanup. The team does assist in facilitating cleanup in that the Hazmat Team or Incident Commander may provide a list of recommended cleaning companies from which the responsible party may choose. EPD emergency response is notified at any time any hazardous materials enter any drainage structure or waterway.

**Record Keeping**

Records of all spills attended by Gwinnett County HazMat are held by the Gwinnett County Fire Department.

## **Department of Water Resources (DWR)**

### **Spill Prevention, Containment and Response Procedures**

The County will respond to and mitigate spills that occur within the county-owned and maintained sewer system. However, the County is not responsible for mitigating, and reporting on, SSO's that are not associated with a part of the County-owned and maintained sanitary sewer system. Cities located within Gwinnett County that operate their own sanitary sewer system will respond to and report on any SSO's that occur within their system.

The Field Operations Division of the Department of Water Resources has developed a procedure to address these SSOs which is regularly updated utilizing knowledge learned from site conditions and coordination with EPD.

### **Record Keeping**

Records of all sanitary sewer spills are maintained by Gwinnett County Department of Water Resources.

### **Measurable Goals**

4. Continue implementation of programs and procedures as described above.
  - a. **Fire Department:** The County Haz Mat teams will respond to spills within the County, as they are notified, and as appropriate.
  - b. **DWR:** The County will respond to and mitigate spills that occur within the county-owned and maintained sewer system.

### **Documentation to be submitted with each Annual Report**

4. Document implementation of programs and procedures as described above.
  - a. **Fire Department:** The County will report spills that occur to the MS4 as they are provided by the Fire Department, with the data required by the State: Spill Date, Spill Location, Party Responsible for Spill, Substance Spilled, and Amount Spilled.
  - b. **DWR:** The County will report SSOs, as defined above, in the MS4 Annual Report, with the data required by the State: Spill Date, Spill Location, Party Responsible for Spill, Substance Spilled, and Amount Spilled.

**Illicit Discharge Detection and Elimination Program**  
**Table 3.3.2 of the MS4 Permit**  
**Element B5**  
**Public Reporting Procedures**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.2:

5. Public Reporting Procedures

- a. Implement the procedures described in the SWMP to promote, publicize, and facilitate public reporting of illicit discharges. The permittee must perform at least one formal notification to the public of methods available to report an observed illicit discharge (e.g. website posting, newsletter, bill insert) at least once each reporting period. Provide documentation on any activities during the reporting period in each annual report.
- b. Implement the procedures for receiving and responding to complaints related to illicit discharges described in the SWMP. Provide information on each complaint related to IDDE that was received and investigated during the reporting period in each annual report, including its status.

CFR 122.26(d)(2)(iv)(B)(5): A description of a program to promote, publicize, and facilitate public reporting of the presence of illicit discharges or water quality impacts associated with discharges from municipal separate storm sewers;

**Description of SWMP Component**

The county has many well-established programs aimed at encouraging residents to report instances of illicit discharges and activities that may lead to such discharges; and programs that raise awareness about non-point source water pollution issues. While all of these programs and activities encourage county residents to change their own behavior, many also encourage residents to report instances of illicit discharge and activities that may lead to such discharges. The educational programs are covered in more depth in another element of this SWMP.

Citizen Complaint Program

The DWR maintains a 24hour/7day a week, call center (dispatch) with a well-advertised phone number (770-863-7000), along with a Stormwater mainline phone number (770-367-7193). Residents are advised to call either number for a stormwater problem; the Stormwater mainline complaints roll to dispatch during evening and weekend hours. Stormwater illicit discharge complaints are entered into the Work Order system and directed to the IDDE investigatory staff. These staff members are trained in how to identify illicit discharges and the appropriate enforcement actions. Education and awareness is always a part of any investigation, with the aim towards a change in behavior so that the activities do not continue.

County Connections

The County developed a newsletter that is sent with each monthly water bill to each water customer; residents, commercial enterprises, churches, and other nonprofit organizations. At least once a year there is included in the newsletter an article describing ways for our citizens to report suspected illicit discharges, or any concerns with stream water quality.

### IDDE Investigations

All complaints from any source: citizens, residents, fellow employees, EPD, EPA, other departments, etc., are entered into DWR's Work Order (WO) system. This system is available to all DWR employees, which allows for proper tracking, review and final closure of all WOs. All WOs are reviewed by the immediate supervisor, which helps with consistency and full documentation of the WO activities.

### **Measurable Goals**

#### 5. Public Reporting Procedures

- a. Gwinnett County will provide one article per year in the monthly County Connections that describes ways for our citizens to report suspected illicit discharges, or any concerns with stream water quality.
- b. Gwinnett County will provide information on each complaint related to IDDE that was received and investigated during the reporting period in each annual report, including its status. The complaints will be reported in a tabular format, summarizing the major issues of the complaint, i.e. the location, the problem, the resolution, etc.

### **Documentation to be submitted with each Annual Report**

#### 5. Public Reporting Procedures

- a. Gwinnett County will provide one article per year from the monthly County Connections that describes ways for our citizens to report suspected illicit discharges, or any concerns with stream water quality.
- b. Gwinnett County will provide information on each complaint related to IDDE in a table format, as a report from the WO system. The complaints will be reported in a tabular format, summarizing the major issues of the complaint, i.e. the location, the problem, the resolution, etc.

**Illicit Discharge Detection and Elimination Program**  
**Table 3.3.2 of the MS4 Permit**  
**Element B6**  
**Proper Management of Used Oil and Toxic Materials**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.2:

6. Proper Management of Used Oil and Toxics
  - a. Implement the activities to facilitate the proper management and disposal of used oil and toxic materials, including educational activities, household waste collection programs, etc., described in the SWMP. The permittee must perform at least one activity to facilitate the proper management and disposal of used oil and toxic materials at least once each reporting period. Provide details on any activities performed during the reporting period in each annual report.

CFR 122.26(d)(2)(iv)(B)(6): A description of educational activities, public information activities, and other appropriate activities to facilitate the proper management and disposal of used oil and toxic materials;

**Description of SWMP Component**

Education & Outreach

The County has, through its partnerships, developed a workshop concentrating on Household Hazardous Waste (HHW) activities. The topics include management of gardening chemicals and management of household cleaning materials, with the target audience being homeowners. This workshop will be presented on an annual basis. Data for the workshops will be entered into our Task Database (presently Lucity), and the digital network, after each event. This will include date of event, event location, and number of attendees.

Gwinnett County will also provide an article each year on the topic of HHW, to be included in the County Connections. This newsletter is sent to all water customers; residents, business owners, churches, and other nonprofit organizations that utilize the County for their water supply.

HHW Collection

Gwinnett County hosts HHW Collection event at least once every three years, inviting citizens to bring items that are not collected curbside so they can be recycled, or processed for disposal. These events include educational messaging along with the collection activities.

Data for the HHW Collection Day will be entered into our Task Database (presently Lucity), and the digital network, after each event. Reporting data will include date of event, event location, and number of attendees.

**Measurable Goals**

Education & Outreach

1. Gwinnett County will continue presenting the Household Hazardous Waste (HHW) workshop on an annual basis.
2. Gwinnett County will continue publishing an article concerning HHW in the County Connections on an annual basis.



### HHW Collection

Gwinnett County will continue hosting the Household Hazardous Waste (HHW) Collection event at least once every three years.

### **Documentation**

#### Education & Outreach

1. Documentation will include listing on the Workshop Calendar, and various data about the actual Workshop: the date, Workshop title, and number of participants. This information will be included in the Public Education section of the Annual Report.
2. Documentation will include a copy of the County Connections newsletter where the HHW article is published. This information will be included in the Public Education section of the Annual Report.

### HHW Collection

Documentation will include a copy of the advertisement, and number of attendees.

**Illicit Discharge Detection and Elimination Program**  
**Table 3.3.2 of the MS4 Permit**  
**Element B7**  
**Sanitary Sewer Infiltration Controls**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.2:

7. Sanitary Sewer Infiltration Controls

- a. If the permittee owns or operates the sanitary sewer system within its jurisdiction, implement the activities to detect and eliminate seepage and spillage from municipal sanitary sewer to the MS4 described in the SWMP. The permittee must perform at least one activity to detect and eliminate seepage and spillage from municipal sanitary sewers to the MS4 at least once each reporting period. Provide details on any activities performed during the reporting period in each annual report.

CFR 122.26(d)(2)(iv)(B)(5): A description of a program to promote, publicize, and facilitate public reporting of the presence of illicit discharges or water quality impacts associated with discharges from municipal separate storm sewers;

**Description of SWMP Component**

The County maintains the sanitary sewer system by performing a multitude of activities designed to maintain the integrity of the sanitary sewer system. These activities consist of, but are not limited to; manhole inspections, line walks, easement clearing, sanitary sewer line evaluation via use of TV cameras, pipe and manhole maintenance and rehabilitation, service stub replacements, and mechanical/chemical root control. The amount of any particular aspect of these maintenance and rehabilitation activities performed varies greatly during any specific time period and from year to year. However, all of them are typically conducted to some extent annually. For instance, CCTV is used continuously through the year but chemical root control is most effective if applied at a particular time of the year, and is not applied during most months. Further, the amount of root control applied each year is based on the CCTV program findings

**Measurable Goals**

7. Sanitary Sewer Infiltration Controls

- a. Gwinnett County will perform at least one of the following activities during a reporting period.
  1. CCTV inspections of the sanitary sewer lines
  2. Inspection of the sanitary sewer manholes
  3. Point repairs made to a sanitary sewer assets
  4. Sanitary sewer lining projects
  5. Sanitary sewer main cleaning
  6. Root control application; mechanical and/or chemical
  7. Easements clearing

**Documentation to be submitted with each Annual Report**

7. Sanitary Sewer Infiltration Controls

- a. For those activities that Gwinnett County performed, the following data will be provided in the MS4 Annual Report
  1. Linear feet of CCTV inspections

2. Number of sanitary sewer manholes inspected
3. Number of point repairs made to a sanitary sewer asset
4. Linear feet of sanitary sewer lining projects
5. Linear feet of sewer main cleaned
6. Linear feet of root control applied; mechanical and chemical
7. Linear feet of easements cleared

**Industrial Facility Stormwater Discharge Control**  
**Table 3.3.3 of the MS4 Permit**  
**Element C1**  
**Industrial Facility Inventory**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.3:

1. Industrial Facility Inventory
  - a. Each reporting period, update the inventory of facilities with industrial activities that potentially discharge to the MS4. At a minimum, this shall include facilities listed on EPD's Industrial Storm Water General Permit (IGP) Notice of Intent (NOI) and No Exposure Exclusion (NEE) online listings. Provide an updated inventory in each annual report.

CFR 122.26(d)(2)(iv)(C): A description of a program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), and industrial facilities that the municipal permit applicant determines are contributing a substantial pollutant loading to the municipal storm sewer system.

**Description of SWMP Component**

The county has a well-established program to monitor and control pollutants in storm water discharges to municipal systems from industries as labeled in the MS4 Permit. This includes municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), and industrial facilities covered in the State's Industrial Storm Water General Permit (IGP). This Program has four parts:

- Industrial Inventory
- Industrial Inspection Program
- Enforcement Procedures
- Educational Activities

Gwinnett County defines an industry as a business that engages in one of the following activities:

- Municipal waste landfills
- Hazardous waste treatment, disposal and recovery facilities
- Industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA)
- Active businesses that are on the State's list of businesses that either have coverage, or exclusion from the General Permit for Stormwater Discharges Associated with Industrial Activity (IGP)

Gwinnett County will continue to annually review all accurate and available data sources in developing the Industrial Facility Inventory. These sources may include Gwinnett County's business license list, the State Industrial Stormwater Permittee List, and any other accurate and reliable lists available. All industries that submit a Notice of Intent (NOI) to apply for coverage under the State's IGP are required to submit a copy of the NOI to the MS4 Permittee. Gwinnett

keeps these NOIs on file and uses the information during industrial inspections and IDDE investigations.

**Measurable Goals**

1. Gwinnett County will continue to update the Industrial Facility Inventory on an annual basis.

**Documentation to be submitted with each Annual Report**

1. An updated inventory will be submitted with each annual report.

**Associated Appendices:** See Appendix C1 for the most recent Industrial Facility Inventory.

**Industrial Facility Stormwater Discharge Control**  
**Table 3.3.3 of the MS4 Permit**  
**Element C2**  
**Industrial Inspection Program**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.3:

2. Industrial Inspection Program

- a. Implement the industrial facility inspection program which includes the facility inspection prioritization, inspection frequency, and inspection documentation protocol described in the SWMP. Conduct inspections on 100% of the inventoried facilities that discharge to the MS4 within the 5-year period. For permittees with five or more industrial facilities included on the inventory, at a minimum, the permittee must conduct inspections on 5% of the industrial facilities on the inventory each reporting period, or if inspections are done by geographical area, then one area or sector must be inspected each reporting period so that some inspections are performed during each reporting period. If a low percentage of inspections is conducted during one reporting period, then the permittee must increase the inspection frequency in subsequent reporting periods to ensure that 100% of the facilities are inspected within the 5-year permit term. Provide the total number of facilities and the number and percentage of inspections conducted during the reporting period and documentation of the inspections in each annual report.
- b. Implement a monitoring program for stormwater runoff from industrial facilities, waste facilities and hazardous waste treatment, storage and disposal facilities, as defined the SWMP. Provide the results of any monitoring conducted during the reporting period in each annual report. The permittee may use monitoring results provided by the industrial facility. This shall include all facilities that the permittee determines are contributing a substantial pollutant loading to the MS4.

CFR 122.26(d)(2)(iv)(C)(1): A description of a program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), and industrial facilities that the municipal permit applicant determines are contributing a substantial pollutant loading to the municipal storm sewer system. The program shall: (1) Identify priorities and procedures for inspections and establishing and implementing control measures for such discharges; (2) Describe a monitoring program for storm water discharges associated with the industrial facilities identified in paragraph (d)(2)(iv)(C) of this section, to be implemented during the term of the permit, including the submission of quantitative data on the following constituents: any pollutants limited in effluent guidelines subcategories, where applicable; any pollutant listed in an existing NPDES permit for a facility; oil and grease, COD, pH, BOD<sub>5</sub>, TSS, total phosphorus, total Kjeldahl nitrogen, nitrate plus nitrite nitrogen, and any information on discharges required under §122.21(g)(7) (vi) and (vii).

### **Description of SWMP Component**

The County has a well-established Industrial Inspection Program, which includes an Industrial Monitoring Program. This Program provides for inspections of businesses and industry types that have the potential to contaminate stormwater runoff that discharge's from those sites to the MS4.

Gwinnett County defines an industry as a business that engages in one of the following activities:

- Municipal waste landfills
- Hazardous waste treatment, disposal and recovery facilities
- Industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA)
- Businesses that are subject to the State's General Permit for Stormwater Discharges Associated with Industrial Activity (IGP)

There are six primary steps that should be followed each time an investigation is to be performed:

- A. Communication & Initiation – communicating and initiating an inspection, i.e. make an appointment. This allows the business to provide the appropriate staff level during the inspection, thus being more efficient for both the County and the business. In some cases an appointment may not be necessary.
- B. Desktop Survey – research and review of reported concerns and enforcement history, using the available various data sources and tools. Prior to performing an industrial inspection the Inspector will review the historical record in the files, any NOI or NEE submitted for the facility, any SWPPP submitted for the facility, the businesses IGP status through the GA EPD website, the EPD and Gwinnett County complaint history, and any other relevant information. They will note any significant issues that need to be addressed during the inspection process. In preparation they may also review the 303(d) list for streams that may be affected by runoff from this facility, and may review the past inspection results for potential pollutants that may be in the runoff from this facility.
- C. Field Assessment – identify illicit discharges and illegal connections to County maintained stormwater structures; perform public outreach with an emphasis on non-point source pollution, pollution prevention, and IDIC ordinance issues. These inspections will include, but are not limited to; Storage and Containment, Disposal Systems, and Stormwater Structures and Drainage Systems. If the business is required to sample their stormwater discharge due to the IGP requirements, they will be asked to provide the last 12 months of data. Lastly, if there is evidence that activities on-site could be causing a water quality problem in the MS4 structures, or in the local streams, a sample may be taken and analyzed for the pollutant of concern. Gwinnett County will take into consideration the following information when determining the pollutant(s) of concern:
  - a. Applicable effluent guidelines subcategories noted in the IGP.
  - b. Existing NPDES permits for the facility.
- D. Resolution – follow-up activities such as Guidance Notice, Notice of Violation, Citation, referrals, and data entry, and other post-processing related tasks.
- E. Site reassessment – if necessary, return to site to identify and document corrective actions taken.

- F. Tracking & Reporting – completion of data entry and proper documentation of activities. Each inspection report will include an aerial map of the industry with indications of photo locations, a contact sheet with associated pictures, and a copy of any Guidance Notices or enforcement actions. Inspection reports are made available to the industry if requested.

All inspection reports and monitoring data will be provided to the business.

**Measurable Goals**

- 2a. Conduct inspections on 100% of the inventoried facilities that discharge to the MS4 within the 5-year permit period. At least 5% of the inventoried facilities will be inspected each year.
- 2b. If there is evidence that activities on-site could be causing a water quality problem in the MS4 structures, or in the local streams, a sample may be taken and analyzed for the pollutant of concern. Additionally, if the business discharges to the Gwinnett County MS4, and should be permitted under the State IGP, the business will be asked to provide the results of the IGP required monitoring.

**Documentation to be submitted with each Annual Report**

- 2a. Gwinnett County will provide the total number of facilities and the number and percentage of inspections conducted during the reporting period in each annual report. The County will also provide copies of each industrial business inspection report for each industrial business inspection conducted during the reporting period.
- 2b. Gwinnett County will provide the results of any stormwater industrial monitoring conducted during the reporting period in each annual report. This shall include all facilities that the permittee determines are contributing a substantial pollutant loading to the MS4.

**Associated Appendices:** A blank inspection form can be found in Appendix A6. Note that this form is used for all business inspections, and a field at the top of the form identifies which type of inspection it is; municipal, industrial or HVPS.



**Industrial Facility Storm Water Discharge Control**  
**Table 3.3.3 of the MS4 Permit**  
**Element C3**  
**Enforcement Procedures**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.3:

3. Implement enforcement procedures described in the SWMP and in accordance with the ERP in Part 3.3.6 of this permit if a stormwater violation is noted at an industrial facility that discharges to the MS4. Provide documentation on any enforcement actions taken during the reporting period in each annual report.

CFR 122.26(d)(2)(iv)(C): A description of a program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), and industrial facilities that the municipal permit applicant determines are contributing a substantial pollutant loading to the municipal storm sewer system.

**Description of SWMP Component**

The Department of Water Resources manages the inspection and subsequent enforcement activities concerning the stormwater discharges to the MS4 from industrial facilities. This includes preparing for and conducting inspections, addressing complaints, and managing any related enforcement activities. DWR conducts these activities under the authority of the County's Illicit Discharge and Illegal Connection Ordinance (IDIC). If a facility is found to be in violation of the IDIC ordinance the DWR inspector will undertake appropriate enforcement actions, utilizing the most recent Enforcement Response Plan (ERP) for IDDE Violations as guidance. These actions may include Guidance Notices, Notices to Comply, Notices of Violation, Citations and/or monetary penalties.

**Measurable Goals**

3. When an industrial facility that discharges to the Gwinnett County MS4 is found to be in violation of the IDIC ordinance Gwinnett County will continue to undertake appropriate enforcement actions, utilizing the most recent Enforcement Response Plan (ERP) for IDDE Violations as guidance.

**Documentation to be submitted with each Annual Report**

3. Gwinnett County will continue to provide, in each annual report, data concerning enforcement actions, taken during the reporting period and associated with stormwater discharges to the MS4 from industrial facilities.

**Associated Appendices:** See Appendix J1 for a copy of the most recent ERP for IDDE Violations.

**Industrial Facility Storm Water Discharge Control**  
**Table 3.3.3 of the MS4 Permit**  
**Element C4**  
**Educational Activities**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.4:

4. Implement educational activities for industrial facilities (e.g., brochure distribution, website posting) during the reporting period. Conduct an educational activity related to industrial facilities at least once each reporting period. Provide documentation of any educational activities performed during the reporting period in each annual report.

**Description of SWMP Component**

Gwinnett County will use multiple methods of educating the industries within our jurisdiction. See below:

- Direct Communication: The most efficient way to educate the industries is at the time of the inspection. We use any accurate and available sources for this education material. This may include materials from Volume Three of the Georgia Stormwater Management Manual, materials from other public agencies, or materials we have developed ourselves. Educating the business representative, on site, during the business inspection, allows the business representative to ask questions and acquire clarity about the subject matter before we leave the site. We will also provide the same educational material with the Inspection Report that we mail to the business after the inspection.
- Facebook Posts: In an attempt to educate multiple businesses at the same time, the County will provide educational posts to our Facebook Page four times a year. These posts will cover topics such as: IDDE, Good Housekeeping, Watersheds and Pollutants of Concern, etc.

**Measurable Goals**

4. Gwinnett County will report on the multiple methods of educating the industries within our jurisdiction.
  - Direct Communication: Gwinnett County will continue to provide, during each inspection, educational materials and clarification on any stormwater related questions the business representative may be concerned about.
  - Facebook Posts: The County will provide educational posts to our Facebook Page four times a year. These posts will cover topics such as: IDDE, Good Housekeeping, Watersheds and Pollutants of Concern, etc.

**Documentation to be submitted with each Annual Report**

4. Gwinnett County will document the multiple methods of educating the industries within our jurisdiction.
  - Direct Communication: Gwinnett County will include in the inspection report, the educational materials provided to the business during each inspection.
  - Facebook Posts: The County will provide Screen Shots of the educational posts to our Facebook Page. These posts will occur four times a year.

**Construction Site Management  
Table 3.3.4 of the MS4 Permit  
Element D1  
Legal Authority**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.4:

1. Legal Authority

Re-evaluate and modify the existing Erosion and Sedimentation (E&S) ordinance when necessary for compliance with this permit. The permittee must ensure that the E&S ordinance provides the authority to issue land disturbing activity permits; requires best management practices to prevent and minimize E&S; requires erosion, sedimentation and pollution control plan submission and review prior to commencing construction, conduct inspections and enforcement, including stop work orders, bond forfeiture, and monetary penalties; and require education and certification for persons involved in land development, design, review permitting, construction, monitoring, inspection and other land disturbing activities. If the E&S ordinance is revised during the reporting period, submit a copy of the adopted ordinance in the annual report.

CFR 122.26(d)(2)(iv)(D): A description of a program to implement and maintain structural and non-structural best management practices to reduce pollutants in storm water runoff from construction sites to the municipal storm sewer system.

**Description of SWMP Component**

The Gwinnett County Department of Planning & Development (P&D) administers the Plan Review activities, Land Disturbance Permit, and Erosion and Sedimentation Control activities in accordance with the current soil erosion and sedimentation requirements as defined in the Unified Development Ordinance (UDO). The soil erosion and sedimentation requirements were incorporated into the UDO which was adopted February 25, 2014, and updated on March 19, 2019.

A Memorandum of Agreement (MOA) with the Georgia Soil and Water Conservation District (GSWCD) provides Gwinnett County with the authority to perform erosion and sedimentation control plan reviews of construction related documents, and defines Gwinnett County as a Local Issuing Authority (LIA) for Land Disturbance Permits (LDP). Gwinnett County has continuously been in compliance with the Georgia Erosion and Sedimentation Act (GESA) since 1981.

**Measurable Goals**

1. Gwinnett County will continue to maintain the soil erosion and sedimentation requirements of the Unified Development Ordinance in compliance with the most recent version of the State's model E&SC rule.

**Documentation to be submitted with each Annual Report**

1. Any revisions to the soil erosion and sedimentation requirements of the Unified Development Ordinance will be included in the associated MS4 Annual Report.

**Associated Appendices:** See Appendix D1 for the following documents:

- A copy of the signed resolution adopting the most recent Erosion and Sedimentation Ordinance, signed March 19, 2019. These changes to the UDO and others are being compiled into a new edition of the UDO. Expected delivery date is sometime in the first quarter of 2020.
- A copy of the most recent version of the MOA between the Gwinnett County Soil and Water Conservation District and Gwinnett County, providing Gwinnett County the authority to review and enforce E&S Plans, signed 1982.

**Construction Site Management  
Element D2  
Table 3.3.4 of the MS4 Permit  
Site Plan Review Procedures**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.4:

2. Site Plan Review Procedures

- a. Ensure that 100% of the site plans are reviewed in accordance with the site plan review procedures described in the SWMP.
- b. Provide a list of the site plans received and the number of plans reviewed, approved, or denied during the reporting period in each annual report.
- c. Provide the number of Land Disturbance Activity (LDA) permits issued during the reporting period in each annual report.

CFR 122.26(d)(2)(iv)(D)(1): A description of procedures for site planning which incorporate consideration of potential water quality impacts.

CFR 122.26(d)(2)(iv)(D)(2): A description of requirements for nonstructural and structural best management practices.

**Description of SWMP Component**

Protection of the streams from construction related pollutants is overseen by the Department of Planning and Development (P&D). All Construction Projects, both new developments and redevelopments; commercial and residential, are required to submit Erosion and Sedimentation Control Plans (E&SC Plans) for P&D review. The review of these plans includes a comment and resubmittal process, allowing developers to adjust their submittals in order to achieve approval from P&D, along with managing the Land Disturbance Activity Permits (LDP). Gwinnett County has been delegated responsibility by the State to issue LDPs, and has also entered into a Memorandum of Agreement (MOA) with the Georgia Soil and Water Conservation District that allows the county to conduct technical plan reviews of all E&SC Plans under their jurisdiction. All construction projects, unless specifically exempted, are required to install at least minimum measures to control E&S runoff.

Developers use both structural controls and non-structural controls to protect the water quality of the receiving streams. A complete listing of structural and non-structural BMPs can be found in the Manual for Erosion and Sedimentation Control (Green Book), which is produced by the Georgia Soil and Water Conservation Commission. The structural controls typically used by developers include silt barriers, inlet protection, temporary sediment ponds, riprap, check dams, and other BMPs noted in the Green Book. Non-structural controls may include buffers, site planning procedures and good housekeeping, also listed in the Green Book.

P&D has developed procedures to ensure water quality issues are addressed at the design and permitting stage. Generally this is achieved through plan review and site inspections to ensure that job sites comply with these plans. The procedures are as follows:

### **Site Review Procedure**

- 1) Site plans are submitted to P&D by developers or engineers.
- 2) Sediment and Erosion Control plans are required for any development that will disturb areas larger than 5,000 square feet and that is not exempted by the Soil Erosion, Sedimentation and Pollution Control Chapter of the County's Unified Development Ordinance (UDO), section 400-20.
- 3) E&SC Plans are reviewed by a GSWCC E&S Level 2 Certified County staff trained in sediment and erosion control.
- 4) Plans are reviewed by P&D staff familiar with the County's erosion and sedimentation control requirements and the Green Book. Professional judgment is employed by these staff to determine whether a submitted E&SC Plan is adequate for the proposed development.
- 5) Once an E&S Plan has been reviewed and approved, an LDA permit is issued by P&D.

### **Measurable Goals**

2. Site Plan Review Procedure Goals
  - a. Gwinnett County will continue to review all site plans for compliance with the County's Soil Erosion, Sedimentation and Pollution Control Chapter of the County's Unified Development Ordinance (UDO), Title 3, Section 400-20.
  - b. Gwinnett County will continue to compile a list of the site plans received and the number of plans reviewed, approved, or denied during the reporting period.
  - c. Gwinnett County will continue to compile a list of the Land Disturbance Activity (LDA) permits issued during the reporting period.

### **Documentation to be submitted with each Annual Report**

2. Site Plan Review Procedure Documentation
  - a. Gwinnett County will provide a list of all Site Plans received, noting their site plan review status, in each annual report.
  - b. Gwinnett County will provide a list of the Site Plans received and the number of plans reviewed, approved, or denied during the reporting period in each annual report.
  - c. Gwinnett County will provide a listing of the Land Disturbance Activity (LDA) permits issued during the reporting period in each annual report.

### **Associated Appendices:** See Appendix D2 for the following documents:

- A copy of the signed resolution adopting the most recent Erosion and Sedimentation Ordinance, signed March 19, 2019. These changes to the UDO and others are being compiled into a new edition of the UDO. Expected delivery date is sometime in the first quarter of 2020.
- A copy of the flowchart that details the Development and Permitting process.
- A copy of the blank site plan review checklist.

**Construction Site Management  
Element D3  
Table 3.3.4 of the MS4 Permit  
Construction Site Management Inspection Program**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.4:

3. Inspection Procedures

- a. Implement the construction site inspection program. The purpose of the inspections is to ensure that the structural and non-structural BMPs at construction sites are properly designed and maintained as specified in the Construction General Permits (CGPs).
- b. The construction site inspection program shall include the facility inspection prioritization, inspection frequency, and inspection documentation protocol described in the SWMP or in accordance with the Manual for Erosion and Sediment Control in Georgia. At a minimum, the permittee must conduct at least one inspection at each active construction site during the reporting period.
- c. Provide the number of active sites and the number of inspections conducted by the permittee during the previous reporting period in each annual report.

CFR 122.26(d)(2)(iv)(D)(3): A description of procedures for identifying priorities for inspecting sites and enforcing control measures which consider the nature of the construction activity, topography, and the characteristics of soils and receiving water quality.

**Description of SWMP Component**

The Department of Planning & Development (DPD) manages the inspection and subsequent enforcement activities concerning Erosion, Sediment, and Pollution Control (ESPC) Plans and associated land disturbance activity LDA Permits. This includes residential, commercial and county projects that have gone through the site plan review activities. DPD conducts these activities under the authority of the County's Unified Development Ordinance (UDO). If a site is found to be in non-compliance with the approved site plans, the LDA Permit, or the UDO, DPD inspectors will undertake appropriate enforcement actions. These actions may include Notice of Violations, Citations, Stop Work Orders, and/or court imposed penalties.

Inspection of each construction site to ensure the required erosion and sediment control measures are in place includes the following:

- Verification that the construction entrance pad is properly installed upon arrival.
- Review of the National Pollutant Discharge Elimination System (NPDES) log book for construction sites greater than one (1) acre of disturbed area to verify erosion sediment control compliance oversight is maintained.
- Traversing the entire perimeter of the construction site to inspect silt fencing and all other BMP's specified on the plans authorized for permit.
- Traversing the entire interior of the construction site to inspect temporary sediment basins, catch basin structures, and silt fencing along curb and gutter in critical areas.
- Documenting all deficiencies observed and submitting to the site erosion and sediment control superintendent in writing with a target date for correction.

- Notifying the construction site superintendent in writing regarding additional required BMP's which must be addressed by revisions to the approved plans by the site design engineer-of-record and reviewed for compliance prior to implementation.
- Recording erosion and sediment control inspections using the department permit database management software including date of inspection, inspection result, and supplemental descriptive documentation as applicable.

Frequency of ESPC inspections is based on the following:

- Gwinnett County Development Inspections thoroughly reviews the plans authorized for issuance of each development permit to determine anticipated frequency of inspections required.
- Active construction sites are inspected weekly on a routine basis.
- Additional inspections may be required to investigate citizen complaints and to subsequently monitor noncompliance issues to ensure remedial action is promptly taken.
- The number of required erosion and sediment control inspections is dependent upon the proximity of the developed site to environmentally sensitive areas, anticipated duration of site construction, size of site development area, and previous experience with the property owner and/or contractor.

All erosion and sediment control inspections are documented in the department permit database management software including date of inspection, inspection result, and supplemental descriptive documentation as applicable.

### **Measurable Goals**

3. Gwinnett County will continue to inspect permitted construction sites following the SWMP. For the purpose of this permit, Gwinnett County will conduct at least one inspection at each active, permitted, construction site during the reporting period, May 1 thru April 30, each year.

### **Documentation to be submitted with each Annual Report**

The Annual Report will include:

- The number of active sites,
- The number of inspections conducted during the reporting period, and
- A list of active sites and the number and dates of inspections conducted.

**Associated Appendices:** See Appendix D3 for the following documents:

- The SOP for Erosion Inspections. (SOP ESPC Insp\_Development Inspections\_2019)
- The Erosion Control Inspection Form Screen shot.



**Construction Site Management  
Element D4  
Table 3.3.4 of the MS4 Permit  
Enforcement Procedures**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.4:

4. Implement enforcement procedures for 100% of the ESPC violations documented at construction sites as described in the SWMP and in accordance with the ERP in Part 3.3.6 of the MS4 Permit. Provide documentation on any enforcement actions taken by the permittee during the reporting period in each annual report, including the number and type (Notice of Violation, Stop Work Order, etc.).

CFR 122.26(d)(2)(iv)(D)(3): A description of procedures for identifying priorities for inspecting sites and enforcing control measures which consider the nature of the construction activity, topography, and the characteristics of soils and receiving water quality.

**Program Details**

The Department of Planning and Development (P&D) regulates, reviews plans for, permits, and inspects land disturbance activity (LDA) under the authority of the Gwinnett County Unified Development Ordinance (UDO). Sites found in non-compliance to approved plans, issued permits, and/or the UDO are subject to enforcement actions by the Development Inspections Section.

Enforcement mechanisms may include:

- Notice to Comply (NTC)
- Notice of Violation (NOV)
- Stop Work Order (SWO)
- Citations (CIT)
- Penalties by the Record's Court of Gwinnett County which may include monetary fines and/or personal confinement in the Gwinnett County Jail
- Suspension of LDA permit
- Denial of future LDA permit application

Factors used to determine appropriate enforcement action are: magnitude of the problem, duration of the problem, compliance history, and good faith of the violator. Gwinnett County's Enforcement Response Plan (ERP) for ESPC Violations received acceptance from the EPD/MS4 Unit.

**Measurable Goals**

4. Gwinnett County will continue to implement the ERP associated with ESPC , for 100% of the ESPC violations documented at construction sites.

**Documentation to be submitted with each Annual Report**

4. Gwinnett County will continue to provide data concerning enforcement actions taken by Gwinnett County during the reporting period in each annual report, including the number and type (Notice of Violation, Stop Work Order, etc.).

**Associated Appendices:** See Appendix J2 for the Enforcement Response Plan associated with ESPC issues.

**Construction Site Management  
Element D5  
Table 3.3.4 of the MS4 Permit  
Certification**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.4:

5. Education and Training

- a. All builders, developers, contractors, and other entities involved in construction activities subject to the CGPs shall comply with the certification requirements of the Georgia Erosion and Sedimentation Act and the rules adopted by the Georgia Soil and Water Conservation Commission.
- b. Ensure that MS4 staff involved in construction activities subject to the CGPs are trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission. Provide the number and type of current certifications in each annual report.

CFR 122.26(d)(2)(iv)(D)(4): A description of appropriate educational and training measures for construction site operators.

**Description of SWMP Component**

County staff

All County staff associated with sediment and erosion control issues are required to be certified at the appropriate level through a Georgia Soil and Water Conservation Commission (GSWCC) approved training class. The County provides the opportunity for these employees to obtain and maintain the appropriate certifications throughout their work day.

Contractors and other related personnel

The County requires all builders, developers, contractors, and other entities involved in construction related activities to submit proof of the appropriate level of training as required by the GESA. This requirement is at various levels of the construction process:

- Pre-construction meetings
- Plan submittals
- Construction site inspections

Appropriate enforcement actions can be initiated if the entity cannot provide the appropriate level of E&SC certification.

**Measurable Goals**

5. Gwinnett County will continue to provide opportunities for County staff associated with sediment and erosion control issues to obtain and maintain the appropriate certifications throughout their work day.

**Documentation to be submitted with each Annual Report**

5. Gwinnett County will provide a table noting the employees associated sediment and erosion control issues, and their sediment and erosion control certification status, in each annual report.

**Associated Appendices:** See Appendix D5 for a recent listing of staff certification levels.

**Highly Visible Pollutant Source  
Table 3.3.5 of the MS4 Permit  
Element E1  
HVPS Facility Inventory**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.5:

1. HVPS Facility Inventory
  - a. Each reporting period, update the inventory of HVPS facilities that discharge to the MS4. Provide an updated inventory in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component**

The county has a well-established HVPS Facility Inspection Program. The program provides for inspections of businesses and industry types that have the potential to contaminate stormwater runoff that discharge's from those sites to the MS4.

Gwinnett County defines an HVPS Facility as a business that engages in one of the following activities:

- Used Automobile Dealers (NAICS 441120)
- General Automotive Repair and Maintenance (NAICS 811111)
- Automotive Transmission Repair (NAICS 811113)
- Other Automotive Mechanical & Electric Repair and Maintenance (NAICS 811118)
- Automotive Body, Paint, and Interior Repair & Maintenance (NAICS 811121)
- Automotive Oil Change & Lubrication Shops (NAICS 811191)
- Car Washes (NAICS 811192)
- All Other Automotive Repair & Maintenance (NAICS 811198)
- Passenger Car Rental (NAICS 532111)
- Truck, Utility Trailer, and RV Rental & Leasing (NAICS 532120)
- Veterinary Services (NAICS 541940)
- Pet Care and Pet Supplies Stores (NAICS 812910, 453910)
- Fur-Bearing Animal and Rabbit Production (NAICS 112930)
- Floriculture Production (NAICS 111422)
- Nursery, Garden Center, and Farm Supply Stores (444220)
- Outdoor Power Equipment Retail (NAICS 444210)
- Septic Tank and Related Services (NAICS 562991)
- Businesses whose primary industrial activity is noted in the facilities covered by the NPDES Permit for Stormwater Discharges associated with Industrial Activity (IGP), but have not, as of yet, filed a Notice of Intent (NOI).

Gwinnett County will continue to annually review all accurate and available data sources in developing the HVPS Facility Inventory. These sources may include Gwinnett County's business

license list and any other accurate and reliable lists available. The most recent HVPS Business Inventory can be found in Appendix E1.

**Measurable Goals**

1. Continue to update the HVPS Facility Inventory on an annual basis.

**Documentation to be submitted with each Annual Report**

1. Continue to submit an updated HVPS Facility Inventory on an annual basis.

**Associated Appendices:** See Appendix E1 for the most recent HVPS Facility Inventory.

**Highly Visible Pollutant Source  
Table 3.3.5 of the MS4 Permit  
Element E2  
HVPS Facility Inspection Program**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.5:

2. HVPS Facility Inspection Program

- a. Implement the HVPS facility inspection program which includes the facility inspection prioritizations, inspection frequency, and inspection documentation protocol described in the SWMP. Conduct inspections on 100% of the inventoried facilities that discharge to the MS4 within the 5-year period. For permittees with five or more HVPS facilities included on the inventory, at a minimum, the permittee must conduct inspections on 5% of the facilities each reporting period, or if inspections are done by geographical area, then one area or sector must be inspected each reporting period so that some HVPS facilities are inspected during each reporting period. If a low percentage of inspections is conducted during one reporting period, then the permittee must increase the inspection frequency in subsequent reporting periods to ensure that 100% of the HVPS facilities are inspected within the 5-year permit term. Provide the total number of facilities, the number and percentage of inspections conducted during the reporting period, and documentation in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Program Details**

The county has a well-established HVPS Facility inspection program. The program provides for inspections of businesses and industry types that have the potential to contaminate stormwater runoff that discharge's from those sites to the MS4.

Gwinnett County defines an HVPS Facility as a business that engages in one of the following activities:

- Commercial car washing and detailing operations (SIC 7542)
- Garden nurseries (SIC 0181 and 5261)
- Home Improvement stores (SIC 5211 and 5261)
- Businesses that have the potential to carry pollutant loading to the streams
  - Auto service and repair businesses (SIC 7532, 7538, 7539 and 7549)
- Businesses that have the potential to carry a fecal loading to the streams
  - Veterinary services (SIC 0741 and 0742)
  - Animal Specialty Services (SIC 0752)
  - Fur-bearing animals and rabbits (SIC 0271)
  - Plumbing, Heating and Air-conditioning (SIC 1711) This SIC is meant to target septic haulers, and non-residential HVAC businesses.

There are six primary steps that should be followed each time an investigation is to be performed:

- A. Communication & Initiation – communicating and initiating an inspection, i.e. make an appointment. This allows the business to provide the appropriate staff level during the

inspection, thus being more efficient for both the County and the business. In some cases an appointment may not be necessary.

- B. Desktop Survey – research and review of reported concerns and enforcement history, using the available various data sources and tools. Prior to performing an HVPS inspection the Inspector will review the historical record in the files, the complaint history, and any other relevant information. He will note any significant issues that need to be addressed during the inspection process. In preparation he may also review the 303(d) list for streams that may be affected by runoff from this facility, and may review the past inspection results for potential pollutants that may be in the runoff from this facility.
- C. Field Assessment – identify illicit discharges and illegal connections to County maintained stormwater structures; perform public outreach with an emphasis on non-point source pollution, pollution prevention, and IDIC ordinance issues. These inspections will include, but are not limited to; Storage and Containment, Disposal Systems, Stormwater Structures and Drainage Systems, or Public Education. If, during the site inspection, there is evidence that activities on-site could be causing a water quality problem in the MS4 structures, or in the local streams, a sample may be taken and analyzed for the pollutant of concern.
- D. Resolution – follow-up activities such as Guidance Notice, Notice of Violation, Citation, referrals, and data entry, and other post-processing related tasks.
- E. Site reassessment – if necessary, return to site to identify and document corrective actions taken.
- F. Tracking & Reporting – completion of data entry and proper documentation of activities. Each inspection report will include an aerial map of the business with indications of photo locations, a contact sheet with associated pictures, and a copy of any Guidance Notices or enforcement actions. Inspection reports are made available to the business if requested. A blank inspection form can be found in Appendix A6. Note that this form is used for all business inspections, and a field at the top of the form identifies which type of inspection it is; municipal, industrial or HVPS.

All inspection reports and monitoring data will be provided to the business.

### **Measurable Goals**

- 2. Conduct inspections on 100% of the inventoried facilities that discharge to the MS4 within the 5-year period. At least 5% of the inventoried facilities will be inspected each year.

### **Measurable Goals**

- 2. Gwinnett County will provide the total number of facilities and the number and percentage of inspections conducted during the reporting period in each annual report. The County will also provide copies of each HVPS inspection report for each HVPS inspection conducted during the reporting period.

**Associated Appendices:** A blank inspection form can be found in Appendix A6. Note that this form is used for all business inspections, and a field at the top of the form identifies which type of inspection it is; municipal, industrial or HVPS.

**Highly Visible Pollutant Source  
Table 3.3.5 of the MS4 Permit  
Element E3  
Enforcement Procedures**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.5:

3. Implement enforcement procedures to be utilized if a stormwater violation is noted at an HVPS facility that discharges to the MS4 as described in the SWMP and in accordance with the ERP in Part 3.3.6 of this permit. Provide documentation on any enforcement actions taken during the reporting period in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component**

The Department of Water Resources manages the inspection and subsequent enforcement activities concerning the stormwater discharges to the MS4 from HVPS facilities. This includes preparing for and conducting inspections, addressing complaints, and managing any related enforcement activities. DWR conducts these activities under the authority of the County's Illicit Discharge and Illegal Connection Ordinance (IDIC). If a facility is found to be in violation of the IDIC ordinance the DWR inspector will undertake appropriate enforcement actions, and record these actions in the enforcement database. These actions may include Guidance Notices, Notices to Comply, Notices of Violation, Citations and/or monetary penalties.

**Measurable Goals**

3. When an industrial facility that discharges to the Gwinnett County MS4 is found to be in violation of the IDIC ordinance Gwinnett County will continue to undertake appropriate enforcement actions, utilizing the most recent Enforcement Response Plan (ERP) for IDDE Violations as guidance.

**Measurable Goals**

3. Gwinnett County will continue to provide, in each annual report, data concerning enforcement actions, taken during the reporting period and associated with stormwater discharges to the MS4 from HVPS facilities.

**Associated Appendices:** See Appendix J1 for a copy of the most recent ERP for IDDE Violations.



**Highly Visible Pollutant Source  
Table 3.3.5 of the MS4 Permit  
Element E4  
Educational Activities**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Table 3.3.5:

4. Implement educational activities for HVPS facilities (e.g., brochure distribution, website posting) during the reporting period. Conduct an educational activity related to HVPS facilities at least once each reporting period. Provide documentation of any educational activities performed during the reporting period in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component**

Gwinnett County will use multiple methods of educating the HVPS businesses within our jurisdiction. See below:

- Direct Communication: The most efficient way to educate the HVPS businesses is at the time of the inspection. We use any accurate and available sources for this education material. This may include materials from Volume Three of the Georgia Stormwater Management Manual, materials from other public agencies, or materials we have developed ourselves. Educating the business representative, on site, during the business inspection, allows the business representative to ask questions and acquire clarity about the subject matter before we leave the site. We will also provide the same educational material with the Inspection Report that we mail to the business after the inspection.
- Facebook Posts: In an attempt to educate multiple businesses at the same time, the County will provide educational posts to our Facebook Page four times a year. These posts will cover topics such as: IDDE, Good Housekeeping, Watersheds and Pollutants of Concern, etc.

**Measurable Goals**

4. Gwinnett County will report on the multiple methods of educating the HVPS businesses within our jurisdiction.
  - Direct Communication: Gwinnett County will continue to provide, during each inspection, educational materials and clarification on any stormwater related questions the business representative may be concerned about.
  - Facebook Posts: The County will provide educational posts to our Facebook Page four times a year. These posts will cover topics such as: IDDE, Good Housekeeping, Watersheds and Pollutants of Concern, etc.

**Documentation to be submitted with each Annual Report**

4. Gwinnett County will document the multiple methods of educating the industries within our jurisdiction.
  - Direct Communication: Gwinnett County will include in the inspection report, the educational materials provided to the business during each inspection.
  - Facebook Posts: The County will provide Screen Shots of the educational posts to our Facebook Page. These posts will occur four times a year.

**Public Education**  
**Table 3.3.9 of the MS4 Permit**  
**Element F1**  
**Educational Activity #1**  
**Public Education Materials**

**Requirements:**

Phase I MS4 NPDES Permit GAS000118, Section 3.3.8

Conduct a public education program that addresses water quality issues and the protection of water resources and encourages the use of GI/LID. The program should consider such things as litter control, illicit discharges, household hazardous waste disposal, and residential pesticide, fertilizer, and herbicide application, pet waste, fats, oils and grease, and GI/LID techniques. If the permittee participates in an existing regional program in addition to its own program, then the annual report must summarize specific activities performed during the reporting period.

Evaluate your existing program to ensure that it meets the needs of your community. Implement, and revise, if necessary, the stormwater education program described in the SWMP. The Public Education Program must include activities chosen from the following list, or other activities proposed for EPD approval:

- School presentations;
- Brochures placed in public places;
- Municipal website;
- Presentations to government officials;
- Newsletter;
- Utility bill insert;
- Ongoing social media program;
- Promotional items/giveaways;
- Booth at community event;
- Local access channel educational postings

The measurable goal must be specified for each type of activity. Each type of activity must be executed at least once during the reporting period.

Details and documentation of each type of activity implementation must be provided in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component:**

Educational Materials

Gwinnett County Department of Water Resources utilizes multiple sources of educational materials. In some cases, we have developed our own brochures and fact sheets. In other instances, we use materials issued by regional programs, such as the Metropolitan North Georgia Water Planning District. Subsets of these materials are kept on display at various County facilities and periodically checked for restocking needs. Educational materials are also put on display at events, festivals, expos, etc. for general public consumption. The educational materials utilized by Gwinnett County are also issued during IDDE activities, as well as industrial, HVPS and municipal facility inspections. Occasionally, educational materials will be delivered by

mail to a geographical region, i.e. a neighborhood, to address the needs of an IDDE investigation.

Gwinnett County will evaluate the topics covered by the educational materials on an annual basis to determine if the County's needs are being met. Based on the review the following activities may occur:

- Updating of educational materials and reprinting
- Development of new educational materials
- Elimination of old educational materials that no longer meet the County's needs.

**Measurable Goals:**

Perform an evaluation of the topics covered by the educational materials on an annual basis to determine if the County's needs are being met. Provide the results of the evaluation in the MS4 Annual Report.

**Documentation to be submitted with each Annual Report**

Documentation of the annual evaluation will include:

- Action items, i.e. updating specific brochures, new topics to address, old materials that are to be deleted. Any new educational materials developed during a reporting period will be included in that year's annual report.

**Public Education**  
**Table 3.3.9 of the MS4 Permit**  
**Element F2**  
**Educational Activity #2**  
**Public Workshops**

**Requirements:**

Phase I MS4 NPDES Permit GAS000118, Section 3.3.8

Conduct a public education program that addresses water quality issues and the protection of water resources and encourages the use of GI/LID. The program should consider such things as litter control, illicit discharges, household hazardous waste disposal, and residential pesticide, fertilizer, and herbicide application, pet waste, fats, oils and grease, and GI/LID techniques. If the permittee participates in an existing regional program in addition to its own program, then the annual report must summarize specific activities performed during the reporting period.

Evaluate your existing program to ensure that it meets the needs of your community. Implement, and revise, if necessary, the stormwater education program described in the SWMP. The Public Education Program must include activities chosen from the following list, or other activities proposed for EPD approval:

- School presentations;
- Brochures placed in public places;
- Municipal website;
- Presentations to government officials;
- Newsletter;
- Utility bill insert;
- Ongoing social media program;
- Promotional items/giveaways;
- Booth at community event;
- Local access channel educational postings

The measurable goal must be specified for each type of activity. Each type of activity must be executed at least once during the reporting period.

Details and documentation of each type of activity implementation must be provided in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component:**

Public Workshops

Gwinnett County Department of Water Resources offers multiple Water Quality Workshops for free throughout the year. Topics vary annually including, but are not limited to:

- Septic Tank Maintenance
- Detention Pond Maintenance
- Rain Gardens
- Lawn Care for Water Quality
- Composting for Water Quality
- Spring Cleaning and Household Hazardous Waste Management

- Cooking to Protect Water Quality (FOG)
- Backyard Stream Restoration

Expansion into new topics is a goal of the education program, as the need arises. Note that new workshops may take some time to develop and implement.

Workshops are held at least six (6) times per year. Each workshop may include a lecture , a presentation, and/or a hands-on activity led by a qualified professional. This means that multiple partnerships are utilized to ensure the most qualified representative available is presenting at each workshop. New topics could result in new partnerships. Partnerships include, but are not limited to:

- the Gwinnett Extension Service
- Gwinnett Environmental Health
- Gwinnett County Solid Waste and Recovered Materials Division
- the Gwinnett Environmental and Heritage Center
- the Fats, Oils, and Grease Program within Gwinnett DWR

Workshops are usually advertised in the County Connections newsletter, or through other methods including, but not limited to media releases, email blasts, and advertising at County facilities.

**Measurable Goals:**

Gwinnett County will present six workshops per year, each concentrating on a different topic. A

**Documentation to be submitted with each Annual Report**

1. A Water Quality Workshop schedule will be developed for each calendar year, and included in each annual report.
1. Information concerning Workshops will be included in each Annual Report. Data will include:
  - Workshop Topic
  - Event location
  - Event date
  - Number of participants

**Associated Appendices:** See Appendix F2 for copies of the 2019 and 2020 Public Workshop Schedules.

**Public Education**  
**Table 3.3.9 of the MS4 Permit**  
**Element F3**  
**Educational Activity #3**  
**Articles**

**Requirements:**

Phase I MS4 NPDES Permit GAS000118, Section 3.3.8

Conduct a public education program that addresses water quality issues and the protection of water resources and encourages the use of GI/LID. The program should consider such things as litter control, illicit discharges, household hazardous waste disposal, and residential pesticide, fertilizer, and herbicide application, pet waste, fats, oils and grease, and GI/LID techniques. If the permittee participates in an existing regional program in addition to its own program, then the annual report must summarize specific activities performed during the reporting period.

Evaluate your existing program to ensure that it meets the needs of your community. Implement, and revise, if necessary, the stormwater education program described in the SWMP. The Public Education Program must include activities chosen from the following list, or other activities proposed for EPD approval:

- School presentations;
- Brochures placed in public places;
- Municipal website;
- Presentations to government officials;
- Newsletter;
- Utility bill insert;
- Ongoing social media program;
- Promotional items/giveaways;
- Booth at community event;
- Local access channel educational postings

The measurable goal must be specified for each type of activity. Each type of activity must be executed at least once during the reporting period.

Details and documentation of each type of activity implementation must be provided in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component:**

Educational Articles

*County Connections*: This is a monthly newsletter published by Gwinnett County and included in every water bill mailed to water customers, thus the target audience is the general public. Each issue contains a section titled “Protecting Our Water Resources”, which incorporates an article about water related topics. A minimum of four (4) articles per year, pertaining to topics relative to the MS4 permit, will appear in this publication. Article topics vary from year to year with new topics being constantly developed. Examples of article topics include, but are not limited to:

- Septic Tank Maintenance
- Detention Pond Maintenance

- Lawn Care
  - Composting
  - Fertilizer, Pesticide, and Herbicide Application
- Rain Gardens
- Rain Barrels
- Household Hazardous Waste Management
- Stormwater Project Highlights
- Adopt-A-Road Program

*GC Insider News*: This is a weekly email newsletter published by Gwinnett County and sent via email to all County employees with an email account, thus the target audience is County staff, management, and elected/appointed officials. The *GC Insider News* email contains links to additional information and articles referenced in the email. A minimum of four (4) articles per year will appear in this publication. Article topics vary from year to year with new topics being constantly developed. Examples of article topics will be similar to those included in the County Connections, but will be tailored to County staff and relative to the tasks some of the employees of the County engage in each day as part of their jobs.

**Measurable Goals:**

1. Each publication, *County Connections* & *GC Insider*, will include an educational article related to stormwater, NPS, or IDDE will be included in each annual report.
  - a. At least four (4) articles per year will be reported from the *County Connections* newsletter.
  - b. At least four (4) articles per year will be reported from the *GC Insider* employee newsletter.

**Documentation to be submitted with each Annual Report**

1. Copies of each publication that includes an educational article related to stormwater, NPS, or IDDE will be included in each annual report.
  - a. At least four (4) articles will be reported from the *County Connections* newsletter.
  - b. At least four (4) articles will be reported from the *GC Insider* employee newsletter.

**Public Education**  
**Table 3.3.9 of the MS4 Permit**  
**Element F4**  
**Educational Activity #4**  
**Gwinnett County Website**

**Requirements:**

Phase I MS4 NPDES Permit GAS000118, Section 3.3.8

Conduct a public education program that addresses water quality issues and the protection of water resources and encourages the use of GI/LID. The program should consider such things as litter control, illicit discharges, household hazardous waste disposal, and residential pesticide, fertilizer, and herbicide application, pet waste, fats, oils and grease, and GI/LID techniques. If the permittee participates in an existing regional program in addition to its own program, then the annual report must summarize specific activities performed during the reporting period.

Evaluate your existing program to ensure that it meets the needs of your community. Implement, and revise, if necessary, the stormwater education program described in the SWMP. The Public Education Program must include activities chosen from the following list, or other activities proposed for EPD approval:

- School presentations;
- Brochures placed in public places;
- Municipal website;
- Presentations to government officials;
- Newsletter;
- Utility bill insert;
- Ongoing social media program;
- Promotional items/giveaways;
- Booth at community event;
- Local access channel educational postings

The measurable goal must be specified for each type of activity. Each type of activity must be executed at least once during the reporting period.

Details and documentation of each type of activity implementation must be provided in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component:**

Gwinnett County Website

Gwinnett County operates a website at [www.gwinnettcountry.com](http://www.gwinnettcountry.com) that includes multiple pages containing different information about the County and its practices. Topics include the following:

- Preventing Illicit Discharge Violations
- Septic Systems
- Lawn Care
- Protecting Water Quality



Gwinnett County will evaluate Stormwater information on the website on an annual basis to determine if the County's needs are being met. Based on the review the following activities may occur:

- Updating of Stormwater information on the website
- Development of new Stormwater information on the website
- Elimination of old Stormwater information on the website that no longer meets the County's needs.

**Measurable Goals:**

Perform an evaluation of the Stormwater information on the website on an annual basis to determine if the County's needs are being met. Provide the results of the evaluation in the MS4 Annual Report.

**Documentation to be submitted with each Annual Report**

Documentation of the annual evaluation will include:

- Action items, i.e. updating Stormwater information, new topics to address, old materials that are to be deleted. Any new Stormwater information developed during a reporting period will be included in that year's annual report.

**Associated Appendices:** See Appendix F4 for screen shots of some pages on the Gwinnett County DWR website.

**Public Involvement**  
**Table 3.3.10 of the MS4 Permit**  
**Element G1**  
**Public Involvement Activity #1**  
**Stream Cleanup Event**

**Requirements:**

Phase I MS4 NPDES Permit GAS000118, Section 3.3.9

Conduct a public involvement program that creates opportunities for citizens to participate in the SWMP. This can include involving the public in planning and implementation of activities.

Evaluate your existing program to ensure that it meets the needs of your community. Implement, and revise, if necessary, the stormwater public involvement program described in the SWMP. The Public Involvement Program must include activities chosen from the following list, or other activities proposed for EP.D approval:

- Stream cleanup (e.g. Rivers Alive);
- Citizen hotline;
- Citizen science/volunteer monitoring (e.g. Adopt-a-Stream);
- Adopt-a-Road;
- Storm Drain Marking;
- Household hazardous waste disposal event;
- Recycling event;
- Local stormwater management panel;
- Comprehensive planning committees;
- Stakeholder Advisory committees;
- Pet waste stations

The measurable goal must be specified for each type of activity. Each type of activity must be executed at least once during the reporting period.

Details and documentation of each type of activity implementation must be provided in each annual report.

**CFR 122.26(d)(2)(iv):** No requirements.

**Description of SWMP Component:**

Stream Cleanup Event

This type of event involves volunteers working within one stream segment or on multiple stream segments on the same day, to remove trash and litter from the waterway, associated floodplain, and sometimes the conveyance leading to the stream (road shoulder or ditch). Gwinnett County DWR may partner with Gwinnett County Adopt-a-Stream Program to facilitate this SWMP component. The Gwinnet County Adopt-a-Stream Program has been operating in Gwinnett County since 1991. The main focus of the program is to educate the public on water quality issues through facilitation of multiple activities.

**Measurable Goal:**

Data for each event will be tracked in the online data management system and will include the following information:

- Date and location of event
- Number of volunteers
- Amount of trash collected

**Documentation to be submitted with each Annual Report**

The data reported shall be in an excel spreadsheet, with the following data fields:

- Date and location of event
- Number of volunteers
- Amount of trash collected

**Public Involvement**  
**Table 3.3.10 of the MS4 Permit**  
**Element G2**  
**Public Involvement Activity #2**  
**Gwinnett Citizen Science**

**Requirements:**

Phase I MS4 NPDES Permit GAS000118, Section 3.3.9

Conduct a public involvement program that creates opportunities for citizens to participate in the SWMP. This can include involving the public in planning and implementation of activities.

Evaluate your existing program to ensure that it meets the needs of your community. Implement, and revise, if necessary, the stormwater public involvement program described in the SWMP. The Public Involvement Program must include activities chosen from the following list, or other activities proposed for EP.D approval:

- Stream cleanup (e.g. Rivers Alive);
- Citizen hotline;
- Citizen science/volunteer monitoring (e.g. Adopt-a-Stream);
- Adopt-a-Road;
- Storm Drain Marking;
- Household hazardous waste disposal event;
- Recycling event;
- Local stormwater management panel;
- Comprehensive planning committees;
- Stakeholder Advisory committees;
- Pet waste stations

The measurable goal must be specified for each type of activity. Each type of activity must be executed at least once during the reporting period.

Details and documentation of each type of activity implementation must be provided in each annual report.

**CFR 122.26(d)(2)(iv):** No requirements.

**Description of SWMP Component:**

Gwinnett Citizen Science

This program offers volunteers the opportunity to be trained in stream monitoring methods such as chemical, biological, and bacterial monitoring in Gwinnett County. The program offers training for volunteers, as well as supplies to help facilitate volunteer monitoring. The program also tracks the locations of volunteer monitoring sites. If possible, monitoring sites will be chosen to target volunteers in sensitive areas of the County. Gwinnett County DWR may partner with Gwinnett County Adopt-a-Stream Program to facilitate this SWMP component. The Gwinnett County Adopt-a-Stream program has been operating in Gwinnet County since 1991. The main focus of the program is to educate the public on water quality issues through facilitation of multiple activities.

**Measurable Goals:**

The Gwinnett Citizen Science monitoring program will annually track the following information:

- Number of active volunteer monitoring groups
- Number of active monitoring sites

**Documentation to be submitted with each Annual Report**

The data reported shall be in an excel spreadsheet, with the following data fields:

- Number of active volunteer monitoring groups
- Number of active monitoring sites

**Public Involvement**  
**Table 3.3.10 of the MS4 Permit**  
**Element G3**  
**Public Involvement Activity #3**  
**Gwinnett Adopt-A-Road**

**Requirements:**

Phase I MS4 NPDES Permit GAS000118, Section 3.3.9

Conduct a public involvement program that creates opportunities for citizens to participate in the SWMP. This can include involving the public in planning and implementation of activities.

Evaluate your existing program to ensure that it meets the needs of your community. Implement, and revise, if necessary, the stormwater public involvement program described in the SWMP. The Public Involvement Program must include activities chosen from the following list, or other activities proposed for EP.D approval:

- Stream cleanup (e.g. Rivers Alive);
- Citizen hotline;
- Citizen science/volunteer monitoring (e.g. Adopt-a-Stream);
- Adopt-a-Road;
- Storm Drain Marking;
- Household hazardous waste disposal event;
- Recycling event;
- Local stormwater management panel;
- Comprehensive planning committees;
- Stakeholder Advisory committees;
- Pet waste stations

The measurable goal must be specified for each type of activity. Each type of activity must be executed at least once during the reporting period.

Details and documentation of each type of activity implementation must be provided in each annual report.

**CFR 122.26(d)(2)(iv):** No requirements.

**Description of SWMP Component:**

Gwinnett Adopt-a-Road

The Adopt-a-Road program allows citizens and citizen groups to adopt a section of road. Volunteers commit to completing periodic litter cleanups along their adopted section of road. Collected litter is bagged and either properly disposed of by the group or left at designated collection points where Gwinnett DOT can collect the waste and have it disposed of appropriately.

**Measurable Goals:**

The Gwinnett Adopt-a-Road program will annually track the following information:

- Miles of roadside that had litter pick-up
- Amount of trash bags of litter collected

**Documentation to be submitted with each Annual Report**

The data reported shall be in an excel spreadsheet, with the following data fields:

- Miles of roadside that had litter pick-up
- Amount of trash bags of litter collected

**Public Involvement**  
**Table 3.3.10 of the MS4 Permit**  
**Element G4**  
**Public Involvement Activity #4**  
**Storm Drain Marking**

**Requirements:**

Phase I MS4 NPDES Permit GAS000118, Section 3.3.9

Conduct a public involvement program that creates opportunities for citizens to participate in the SWMP. This can include involving the public in planning and implementation of activities.

Evaluate your existing program to ensure that it meets the needs of your community. Implement, and revise, if necessary, the stormwater public involvement program described in the SWMP. The Public Involvement Program must include activities chosen from the following list, or other activities proposed for EP.D approval:

- Stream cleanup (e.g. Rivers Alive);
- Citizen hotline;
- Citizen science/volunteer monitoring (e.g. Adopt-a-Stream);
- Adopt-a-Road;
- Storm Drain Marking;
- Household hazardous waste disposal event;
- Recycling event;
- Local stormwater management panel;
- Comprehensive planning committees;
- Stakeholder Advisory committees;
- Pet waste stations

The measurable goal must be specified for each type of activity. Each type of activity must be executed at least once during the reporting period.

Details and documentation of each type of activity implementation must be provided in each annual report.

**CFR 122.26(d)(2)(iv):** No requirements.

**Description of SWMP Component:**

Gwinnett Adopt-a-Stream

This program offers volunteers the opportunity to educate the public about nonpoint source pollution and the Stormwater drainage system by marking the storm drains with the message “No Dumping – Only Rain in the Drain” in residential and commercial areas of the County. Educational door hangers are also utilized to help deliver the message to residents and businesses. Gwinnett County DWR may partner with Gwinnett County Adopt-a-Stream Program to facilitate this SWMP component. The Gwinnett County Adopt-a-Stream program has been operating in Gwinnet County since 1991. The main focus of the program is to educate the public on water quality issues through facilitation of multiple activities.



**Measurable Goals:**

Storm Drain Marking activities shall be tracked annually. Data tracked shall include:

- Number of stenciling activity requests per year
- Number of storm drains stenciled and door hangers distributed each year

**Documentation to be submitted with each Annual Report**

The data reported shall be in an excel spreadsheet, with the following data fields:

- Number of stenciling activity requests per year
- Number of storm drains stenciled and door hangers distributed each year

**Post-Construction  
Section 3.3.11 of the MS4 Permit  
Element H  
Ordinance Review and Linear Transportation Projects**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Section 3.3.10 (a):

1. Ordinance Review – The permittee must adopt ordinances, or update existing ordinances, when necessary for compliance with this permit, to address development and redevelopment, and enforcement of post-construction controls. The ordinance must provide the authority to conduct plan reviews, conduct inspections, enter into inspection and maintenance agreements, and pursue enforcement. If the ordinance is revised during the reporting period, submit a copy of the adopted ordinance with the annual report.

The ordinance revisions must include the adoption and implementation of the appropriate parts of either the latest edition of the Georgia Stormwater Management Manual (GSMM) or an equivalent or more stringent local design manual, which must meet or exceed the performance standards listed in the GSMM. All permittees must implement the GSMM to the MEP.

CFR 122.26(d)(2)(iv): No requirements.

**1. Ordinance Review (Section 3.3.11(a)(1) of the MS4 Permit)**

- a. Provide the date of the adoption of the Post-Construction Ordinance: March 19, 2019.
- b. Provide the date of the adoption of the Georgia Stormwater Management Manual: Gwinnett County adopted an equivalent local design manual (the Gwinnett County Stormwater Management Manual (GCSMM) on December 5, 2017.
- c. Ensure a copy of the Post-Construction ordinance is attached to the SWMP. The new Post-Construction ordinance is only available as a Board of Commissioner’s agenda item at this time. See Appendix H for a copy of the signed resolution (GCID 2019-0295) adopting the most recent Post-Construction ordinance, i.e. Section 800 of the UDO, signed March 19, 2019. These changes to the UDO and others are being compiled into a new edition of the UDO. Expected delivery date is sometime in the first quarter of 2020.
- d. Describe the status of implementing the stormwater runoff quality/reduction performance standard (Section 3.3.11(a)(2) of the MS4 Permit), including the implementation of Option (a) by the deadline date of December 10, 2020: Gwinnett County is reviewing the GCSMM, the UDO, the Draft Model Ordinance for Post-Construction Stormwater Management for New Development and Redevelopment by the Metropolitan North Georgia Water Planning District (Metro District) and related forms in order to meet the deadline date of December 10, 2020.

**2. Linear Transportation Project**

- a. The linear transportation feasibility program is voluntary. Have you developed or are you planning to develop a linear transportation feasibility program? Gwinnett County plans to develop a linear transportation feasibility program.

- b. If yes, is the linear transportation feasibility program attached to the SWMP? No, the linear transportation feasibility program is not yet developed, so it is not attached to the SWMP.
  - c. If you plan to develop a linear transportation feasibility program, provide the schedule for submitting the program. Gwinnett County plans to submit a linear transportation feasibility program to EPD sometime during the 2020 calendar year. This program will set reasonable criteria for determining when implementing the performance standards in linear protects in infeasible. Once submitted to EPD, Gwinnet County will begin implementation of this feasibility program only for linear transportation projects being constructed by Gwinnett County.
- **Associated Appendices:** See Appendix H for a copy of the signed resolution (GCID 2019-0295) adopting the most recent Post-Construction ordinance, i.e. Section 800 of the UDO, signed March 19, 2019. These changes to the UDO and others are being compiled into a new edition of the UDO. Expected delivery date is sometime in the first quarter of 2020.

**Green Infrastructure/Low Impact Development (GI/LID)**  
**Table 3.3.11(b)(2) of the MS4 Permit**  
**Element I1**  
**Legal Authority**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Section 3.3.11 (b):

1. Legal Authority
  - a. The permittee shall continue to review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration. At a minimum, the permittee shall assess those regulations governing residential and commercial development, road design, land use, and parking requirements. During the regulatory review, the permittee should consider the inclusion of incentives for use of GI/LID practices into the ordinance. Evaluate, and if necessary, modify existing ordinance(s). If the ordinance(s) are revised during the reporting period, submit a copy of the adopted ordinance(s) with the annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component**

In 2011, Gwinnett County reviewed and revised the Gwinnett building codes, ordinances, SSFISS, and Unified Development Ordinance (UDO) to ensure that they did not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration. This included the regulations governing residential and commercial development, road design and parking requirements.

Since then there have been some major changes in the field of Green Infrastructure, along with the requirements placed upon MS4 Permittees in the Atlanta Metro Area. The Georgia Stormwater Management Manual (GSMM) has been rewritten, and it is now a requirement to adopt the GSMM, or an equivalent design manual. Gwinnett County decided to adopt an equivalent manual to the GSMM; the Gwinnett County Stormwater Management Manual (GCSMM). Also, Gwinnett County consolidated all the Development Regulations, Erosion and Sedimentation Ordinances, Tree Ordinances, etc. into one document; The Unified Development Ordinance (UDO). Now the Metropolitan North Georgia Water Planning District (Metro District) is in the final stages of developing a Draft Model Ordinance for Post-Construction Stormwater Management for New Development and Redevelopment. Gwinnett County will have to adopt this ordinance within a yet to be determined time period. Lastly, EPD has expanded the minimum list of regulations that must be reviewed in order to remain in compliance with this section.

In 2018 Gwinnett County started a review of the Gwinnett Ordinances, but decided to wait until all the regulated changes had been finalized by EPD and the Metro District before the review was completed in order to ensure all the required changes were included in the review process.

Gwinnett County will start another full review of the building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration. At a minimum we will review the regulations that

govern residential and commercial development, road design, land use, and parking requirements, and we will consider the inclusion of incentives for use of GI/LID practices into the ordinance.

Then, at least once in every MS4 Permit cycle, we will institute another review to ensure the regulations do not prohibit or impede the use of GI/LID practices. This will allow for changes in the regulations to address new technology and new advances in the field of GI/LID.

### **Measurable Goals**

1. Gwinnett County will submit the results of a full review of the building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration once every MS4 Permit cycle. At a minimum we will review the regulations that govern residential and commercial development, road design, land use, and parking requirements, and we will consider the inclusion of incentives for use of GI/LID practices into the ordinance.

### **Documentation to be submitted with each Annual Report**

1. The Final Checklist that shows the results of reviewing the building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices. This Checklist will be submitted only once during the five year permit cycle, but will be referenced in each Annual Report.

**Associated Appendices:** See Appendix I1 for a copy of the most recent review of the building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices.

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

**Green Infrastructure/Low Impact Development (GI/LID)  
Table 3.3.11(b)(2) of the MS4 Permit  
Element I2  
GI/LID Program**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Section 3.3.11 (b):

1. Implement the GI/LID Program approved by EPD. The GI/LID Program shall include procedures for evaluating the feasibility and site applicability of different GI/LID techniques and practices, and various structures and practices to be considered. If the GI/LID Program is revised during the reporting period, submit the revised program to EPD for review with the annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component**

In June of 2017 Gwinnett County submitted a GI/LID Program to EPD and after one revision received approval to implement the Program. It included procedures for evaluating the feasibility and site applicability of different GI/LID techniques and practices, and various structures and practices to be considered within Gwinnett County. The approved GI/LID Program is attached to the Appendices of this SWMP.

**Measurable Goals**

1. Gwinnett County will evaluate the GI/LID Program on minimum frequency of once every Permit cycle, to ensure it still meets the needs of Gwinnett County, protects the watersheds in Gwinnett County, and meets the MS4 Permit requirements, at that time.

**Documentation to be submitted with each Annual Report**

1. Whenever a review of the GI/LID Program indicates a substantive revision is necessary, a new version of the GI/LID Program shall be drafted and submitted to EPD for review, with the associated MS4 Annual Report, or earlier if necessary. Implementation of the revised GI/LID Program will be delayed until Gwinnett County receives EPD approval.

**Associated Appendices:** See Appendix I2 for a copy of the EPD approved GI/LID Program.

**Green Infrastructure/Low Impact Development (GI/LID)  
Table 3.3.11(b)(2) of the MS4 Permit  
Element I3  
GI/LID Structure Inventory**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Section 3.3.11 (b):

1. GI/LID Structure Inventory
  - a. Each reporting period, update the inventory of water quality-related GI/LID structures located within the permittee's jurisdiction and at a minimum, constructed after June 11, 2014, (e.g., bioswales, pervious pavement, rain gardens, cisterns, and green roofs). The inventory must, at a minimum, include permittee-owned GI/LID structures, those publicly-owned GI/LID structures owned by other entities, and privately owned non-residential GI/LID structures. Track the addition of new water quality related GI/LID structures through the plan review process and ensure that the structures are added to the inventory.
  - b. Provide an updated inventory, including the type and total number of structures, in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Program Details**

Gwinnett County will track all new water quality GI/LID structures owned by Gwinnett County, other public entities (i.e. Gwinnett County Public Schools), and non-residential privately owned new water quality GI/LID structures, through the plan review process. They will be added to the GI/LID inventory for Long-Term inspection and maintenance oversight.

**Measurable Goals**

1. Update the inventory of privately owned non-residential and publicly owned water quality-related GI/LID structures, including those publicly-owned GI/LID structures owned by other entities (e.g. Gwinnett County Public School), constructed after June 11, 2014.
2. Include with the updated inventory the type and total number of structures.

**Documentation to be submitted with each Annual Report**

1. The updated inventory will be provided in pdf format, from an excel file. It will include Permit number, Development Name, Facility ID, and BMP Type.
2. The updated inventory will include totals of the number of BMPs, organized by type of BMP.

**Associated Appendices:** As of June 2019 there were no water quality-related GI/LID structures located within Gwinnett County and constructed after June 11, 2014.

**Green Infrastructure/Low Impact Development (GI/LID)  
Table 3.3.11(b)(2) of the MS4 Permit  
Element I4  
GI/LID Inspection and Maintenance Program**

**Requirements:**

Phase I MS4 NPDES Permit GAS 000118, Section 3.3.11 (b):

1. Inspection and Maintenance Program
  - a. Conduct inspections on 100% of the total privately owned non-residential (e.g., mixed use development, commercial, etc.) and permittee-owned GI/LID structures, included in the GI/LID inventory, within the 5-year permit term. For permittees with five or more GI/LID structures included on the inventory, at a minimum, the permittee must conduct inspections on 5% of the structures each reporting period, or if inspections are done by geographical area, then one entire area or sector must be inspected each reporting period. If a low percentage of inspections is conducted during one reporting period, then the permittee must increase the inspection frequency in subsequent reporting periods to ensure that 100% of the GI/LID structures are inspected within the 5-year permit term. Provide the number and/or percentage of the total structures inspected and documentation of the inspections during the reporting period in each annual report.
  - b. Conduct maintenance on the permittee owned GI/LID structures, as needed. Provide the number of the total structures maintained and documentation of the maintenance performed during the reporting period in each annual report.
  - c. Implement procedures for ensuring privately-owned non-residential GI/LID structures are maintained as needed. Provide documentation of these activities in each annual report.

CFR 122.26(d)(2)(iv): No requirements.

**Description of SWMP Component**

Gwinnett County will conduct inspections and/or ensure that inspections are conducted on 100% of the total privately owned non-residential (e.g., mixed use development, commercial, etc.) and County-owned GI/LID structures within a 5-year period. The number and/or percentage of the total structures inspected, along with documentation of each inspection, during the reporting period will be provided in each annual report.

Gwinnett County will also conduct maintenance on the County owned GI/LID structures, as needed. The number of the total structures maintained, along with documentation of the maintenance, during the reporting period will be provided in each annual report.

Lastly, Gwinnett County will inspect all privately-owned non-residential GI/LID structures to ensure that they are maintained as needed. If a BMP owner does not maintain their BMP, we will notify them of the lack of maintenance and require that the BMP is maintained as designed. If the BMP owner still does not maintain their BMP we will investigate the issue to find out what is limiting the owner from performing the maintenance, with the last resort being enforcement action. We consider enforcement action to be the last choice and prefer to work with our citizens to achieve compliance via a solution that works for all parties.



**Measurable Goals**

1. Gwinnett County will conduct inspections and/or ensure that inspections are conducted on 100% of the total privately owned non-residential and County owned GI/LID structures within a 5-year period. The number and/or percentage of the total structures inspected during the reporting period will be provided in each annual report.
2. Gwinnett County will also conduct maintenance on the County owned GI/LID structures, as needed.
3. Gwinnett County will also ensure that maintenance is performed on privately-owned non-residential GI/LID structures through inspections and enforcement actions, as needed..

**Documentation to be submitted with each Annual Report**

1. The number and/or percentage of the total structures inspected and documentation of the inspections, during the reporting period will be provided in each annual report.
2. The number of the total County owned GI/LID structures maintained and documentation of the maintenance performed during the reporting period will be provided in each annual report.
3. The number of the total privately-owned non-residential GI/LID structures maintained and documentation of the maintenance performed during the reporting period will be provided in each annual report.

**Associated Appendices:** See Appendix A2 for a copy of the BMP Inspections Forms, including the GI/LID BMPs.