

Phase I Large MS4

**Stormwater Management Program
for DeKalb County, Georgia**

Prepared by:
DeKalb County Public Works Department
Roads and Drainage Division

Submission Date:
December 5, 2024

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

Stormwater Management Program (SWMP)

1. General Information

- A. Name of MS4: DeKalb County
- B. NPDES Permit Number: GAS000111
- C. Mailing Address (if providing a post office box, also provide a street address):
1300 Commerce Drive, 6th Floor
Decatur, Georgia 30030
- D. Name of responsible official: Zachary Williams
Title: Chief Operating Officer
Mailing Address: 1300 Commerce Drive, 6th Floor
City: Decatur State: Georgia Zip Code: 30030
Telephone Number: 404-371-2174
Email Address: zllwilliams@dekalbcountyga.gov
- E. Designated stormwater management program contact:
Name: Peggy Allen
Title: Deputy Director, Public Works Department, Roads & Drainage Division
Mailing Address: 727 Camp Road
City: Decatur State: Georgia Zip Code: 30032
Telephone Number: 404-294-2878
Email Address: pvallen@dekalbcountyga.gov
- F. Provide the river basin(s) to which your MS4 discharges: Upper Chattahoochee
(HUC 03130001), Upper Ocmulgee (03070103)
- 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: 33°46'27.4"N Longitude: 84°17'57.6"W

2. Sharing Responsibility

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

SWMP Component:

1. Name of entity _____

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

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

3. **Certification Statement**

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

Printed Name: Zachary Williams

Date: 12/2/2024

Signature: Zachary L. Williams Title: Chief Operating Officer, DeKalb County

Structural and Source Control Measures
Table 3.3.1 of the Permit

1. MS4 Structure Inventory and Map

1. Description of SWMP Component: DeKalb County's (County) MS4 consists of structures and facilities that are designed to convey and/or store stormwater from source drainage areas to outlet points. Structural controls and facilities in the MS4 are designed to reduce pollutants that are discharged from the MS4.

The County uses GIS, other databases, as-builts from development, and field inspections to manage, update, and map the MS4 inventory. The County updates the MS4 map and inventory on at least an annual basis and reports any updates in its MS4 Annual Report. A baseline inventory list and maps for each type of MS4 structure are included in **Attachment 3.3.1-1.**

2. Measurable goal(s): Update inventories and maps of MS4 structures as needed, but at least once each reporting period.
3. Documentation to be submitted with each Annual Report: Provide updated inventories and maps for the County's catch basins, ditches, detention/retention ponds, underground detention, and pipes. Provide the number of MS4 structures added or deleted from the inventory during the reporting period and the total number of structures in the inventory.

2. **MS4 Inspection and Maintenance Program**

1. Description of SWMP Component: The County will inspect 100% of MS4 structures in the inventory over the 5-year permit term. Inspections shall be conducted on catch basins, detention/retention ponds, underground detention, ditches, and pipes using the MS4 inspection checklists included in **Attachment 3.3.1-2**. The County will conduct inspections on at least 5% of the total structures during each reporting period. If a low percentage of inspections is conducted during a reporting period, the County will increase the inspection frequency in the subsequent reporting periods to ensure that 100% of the structures are inspected within the 5-year permit term. The County will visually inspect the structures according to the following procedures:

- Catch basins – Assess the condition of the inlet, lid, and manhole cover. Open the manhole cover and assess the condition of the catch basin throat, including the walls and bottoms. Assess the condition of the ladder if there is one present, including the rungs. Assess the condition of inlet and outlet pipes.
- Ditches – Assess ditch to see if grass or other vegetation, trash, debris, or sediment is impeding water flow in the ditch. Assess whether the ditch profile matches the original design. Assess the ditch for erosion, undercutting, or scouring. Assess the condition of any check dams or rip-rap to determine if the check dam or rip-rap needs maintenance or repair.
- Pipes – Assess the pipe for accumulation of sediment, debris, vegetation, yard debris, or other blockages. Assess the pipe for dents, damaged joints, or rust.
- Detention/Retention ponds – Inspect the pond for vegetation or debris around the inlet and outlet structures that might impede water flow. Inspect the inlet and outlet structures for sediment. Inspect the basin for any vegetation, trash, or debris that impedes water flow. If present, check the trash rack for sediment, trash, or debris. Inspect pond for cutting of grass to between 4” and 9”.
- Underground Detention – Inspect the inlet and outlet structures to make sure they are not clogged with sediment, trash or debris that might impede water flow. Assess the condition of the inlet and outlet structures. Inspect the access opening for sediment built up inside structure. If present, check the trash rack for sediment, trash, or debris.

The County also conducts maintenance on MS4 structures as needed. Maintenance criteria for each type of structure are included in **Attachment 3.3.1-2**.

2. Measurable goal(s): Conduct inspections on 100% of MS4 structures in the inventory over the 5-year permit term. The County will conduct inspections on at least 5% of the total structures each reporting period so that some inspections are performed during each reporting period. If a low percentage of inspections is

conducted during a reporting period, the County will increase inspection frequency in subsequent reporting periods to ensure that 100% of structures are inspected within the 5-year permit term. Maintenance on MS4 structures will be conducted as needed.

3. Documentation to be submitted with each Annual Report: Provide the number and percentage of the total structures inspected during the reporting period and documentation in each annual report. The number of total MS4 structures maintained during the reporting period and documentation of the maintenance performed will also be included in each annual report.

3. Planning Procedures

1. Description of SWMP Component: The DeKalb County Comprehensive Plan for 2015–35 (Plan) (Attachment 3.3.1-3) was last updated in 2021 and provides an assessment of existing conditions and future needs for unincorporated DeKalb County. It is a policy document that includes recommendations and strategies to address anticipated growth in the County for the benefit of health, safety, and welfare of the County’s residents. The Plan establishes goals, guidelines, and policies needed to achieve sustainable growth over a twenty to thirty-year period. With respect to stormwater management, the Plan discusses the County’s approach to reducing runoff, which includes guidelines, structural controls, and best management practices to minimize runoff impacts, as well as retrofitting policies.

The Department of Planning and Sustainability serves as a liaison between the residents and County government. The Department provides research, analysis, and policy recommendations to the Chief Executive Officer, Board of Commissioners, zoning, transportation planning, historic preservation, appointed citizen’s boards, Code Compliance Board, and Planning Commission. The Department’s Long-Range Planning Division is responsible for the development of policy recommendations and services to guide the County’s growth, while preserving the County’s quality of life. These duties include preparing and maintaining the Plan, the County’s transportation system strategy, and the Service Delivery Strategy (SDS). The Department also conducts demographic research.

In addition to the Plan, DeKalb County has also adopted multiple ordinances to address new development and redevelopment requirements. These ordinances, include:

- Soil Erosion and Sedimentation Control – DeKalb County, Chapter 14, Article II, Section 14-38 (revision adopted 8/13/19)
- Stormwater Management and Water Quality Control – DeKalb County, Chapter 14, Article II, Section 14-40 (adopted 2/08/22)
- Land development requirements and allowable stream buffer encroachments – DeKalb County, Chapter 14, Article II, Section 14-44.1-14-44.6 (adopted 2/24/09)
- Floodplain Management – DeKalb County, Chapter 14, Article IV (revision adopted 8/13/19)

Additionally, land developers and engineers use County-provided checklists which incorporate local ordinances and regulations to guide sustainable development that minimizes impacts on the local community and environment through the preservation of natural features including floodplains, wetlands, and stream buffers, further protecting water resources by allowing natural stormwater attenuation.

2. Measurable goal(s): The existing Plan will be updated on an as-needed basis or at least once every 10 years to address areas of new development and redevelopment to reduce pollutants in discharges from the MS4.
3. Documentation to be submitted with each Annual Report: The County will document any changes made to the stormwater portion of the Plan during the reporting period in each annual report.

4. Street Maintenance

1. Description of SWMP Component: Litter control is supervised by the County's Beautification Unit. As an initiative of the County, the Beautification Unit monitors litter and provides community awareness by encouraging litter cleanup. Beautification Unit staff assist in efforts to collect litter along County roads. Beautification engages community workers and community groups to help collect litter in the County. Priorities are based on citizen complaints or direct observations of litter sites. Litter is removed on a continuous basis via set routes posted on the County website; further litter removal activities take place on an as needed or requested basis as further needs are identified.

The County implements an Adopt-a-Road program to engage the public in litter removal. This not only increases the personnel available for trash removal, but also provides an excellent opportunity to learn about preventing personal pollution. Access to the program is found under Adopt-a-Program on the DeKalb County website, <https://www.dekalbcountyga.gov/beautification/adopt-programs-0>.

Litter is also collected by community groups and County Sanitation Division employees. Litter is placed in plastic bags and grouped together for pickup and delivery to a permitted municipal solid waste landfill. Litter bags are collected on the first Household Collection Date following litter collection activities. Weekend and mid-week cleanup bags are collected on a weekly basis. Loaded solid waste vehicles unload the litter bags at the nearest solid waste transfer station or municipal disposal landfill. Community service workers, probation workers, community groups, and County staff participate in this program.

The Litter Control Ordinance was adopted by the Board of Commissioners in September 2004. A copy is provided in **Attachment 3.3.1-4**. The ordinance includes mandatory fines for individuals found guilty of littering.

In addition, the County performs street sweeping to clean the roads. Roads in unincorporated DeKalb County are cleaned as required or requested by the Department of Public Works. Heavy traffic intersections and frequently requested roads are cleaned quarterly. The County supplements litter removal at MARTA bus stops. County parks are cleaned weekly.

In addition, trash racks and skimmers are required for temporary construction site sedimentation basins and may also be incorporated as a design component of the permanent BMP (detention pond) outlet control structure. These devices reduce the amount of floatable material released to downstream rivers and streams. The cleaning of each permittee-owned trash rack is performed as needed.

2. Measurable goal(s): The County will conduct street sweeping on at least one mile of road each reporting period or implement trash/litter removal at least once each reporting period.

3. Documentation to be submitted with each Annual Report: The County will submit documentation of all street sweeping and litter removal activities conducted during the reporting period in each annual report.

5. **Flood Management Projects**

1. Description of SWMP Component: DeKalb County's Ordinance (Attachment 3.3.1-5) addresses stormwater management and water quality control (Section 14-40). The County has also adopted the most recent version of the Georgia Stormwater Management Manual (GSMM). Stormwater management, a combination of storage and controlled release of stormwater runoff (e.g., detention and retention ponds), is required for all projects that meet the applicability criteria described in Section 14-40.(b)((1)-(7)) of the County Ordinance. If the permittee has more than 5 structures, 100% of structures will be assessed within the 5-year permit term, with at least one structure assessed each reporting period. If the permittee has fewer than 5 structures, 100% of structures will be assessed within the 5-year permit term.

Proposed /New Flood Management Projects (Best Management Practice (BMP))

Proposed/new BMPs are assessed for water quality impacts during the design phase based on standards described in Section 14-40 of the County Ordinances (i.e., water quality, stream channel protection, overbank, flooding protection, extreme flooding protection, downstream peak flow, etc.). For all projects meeting applicability provisions in Section 14-40.(b)((1)-(7)), project applicants must apply either for a Land Development Permit (also called Land Disturbance Permit) (LDP) or a Building Permit (BP). Applicants must also provide drainage plans and a hydrology/stormwater management report, which are reviewed by the County's engineering plan review officers for compliance with County ordinances. The LDP or BP is issued only after the drainage plans and hydrology report are found to be in compliance with the County Code. BPs are issued instead of LDPs for single family residential construction projects. A Checklist (Attachment 3.3.1-5) is used during the review process to ensure compliance.

Existing Flood Management Projects (BMPs)

As the County continues to find ways to improve watershed protection and restoration, the search for new tools for controlling stormwater runoff and associated adverse impacts remains an important component. Pond retrofits are an effective tool to address water quality impacts. Retrofits help minimize accelerated channel erosion, reduce pollutant loads, promote conditions for improved aquatic habitat, and remedy past issues. Retrofits for existing ponds include, but are not limited to: outfall control structure modifications, increase pond storage by excavation or expansion of footprint, addition of a sediment forebay, etc.

The table below lists the strategy the County will follow for assessing existing (those designed prior to the April 15, 2016 GSMM publication date) County-owned BMPs (e.g., detention and retention ponds) for potential retrofitting to address

water quality impacts. If an assessment was previously performed on an existing flood management using the 2016 GSMM or latest edition, prior to the effective date of this permit, then an additional assessment does not need to be performed. The checklist used to conduct the BMP retrofit analysis is included in **Attachment 3.3.1-5.**

LEVEL 1: Field Based Evaluation		
Step	Elements	Description
1.	Existing Flood Management Project Inventory	<p>The County maintains an inventory of existing BMPs subject to requirements (designed prior to April 15, 2016). This inventory will be updated as necessary should ownership change.</p> <p>The inventory was subjected to a BMP Screening analysis in 2022 that collected screening data to assist in the prioritization of ponds for potential retrofitting. Information collected as part of this screening included ownership, offline, located in 303(d) listed watershed, known pollution sources, site visibility.</p>
2.	Field Assessment of Existing BMPs for Potential Retrofit Sites	<p>The County will perform a field assessment of its existing BMPs to assist with prioritization of potential retrofits. This field assessment process will be conducted concurrently with the structure inspection requirement of existing facilities. 100% of BMPs designed prior to April 15, 2016 in the inventory will be field assessed during this upcoming permit cycle, with approximately 20% annually. This field assessment process along with the County's earlier BMP screening analysis addresses the permit requirement in Table 3.3.1.5b to assess all existing BMPs designed prior to the 2016 GSMM.</p> <p>Field Assessment will include collection of visual data/observations on the condition of the pond, sediment forebay and associated infrastructure such as the outlet control structure (OCS) and trash rack, and needs related to maintenance and repair. This field verification will also provide ground truthing of select criteria from 2022 BMP screening exercise conducted by the County.</p> <p>Information collected during field assessment will be used to determine which BMPs (if any) should be escalated to Level 2: Feasibility Analysis and Prioritization.</p>

LEVEL 2: Feasibility Analysis and Prioritization

3.	Feasibility analysis	<p>BMPs escalated from the Level 1 assessment, those with known complaints, and/or BMPs in areas of redevelopment (e.g. County facility or park) could be evaluated further to determine whether the contemplated retrofit will work in the BMP's specified location.</p> <p>The County will move forward at least one BMP for Level 2 analysis each year.</p> <p>This step also will include desktop analysis and basic hydrologic & hydraulic (H&H) modeling. The catchment draining to the BMP would be delineated and conditions such as soils, land cover, and impervious areas would be determined. An additional field visit would be necessary to verify the drainage area and to perform more detailed measurements on the OCS and associated pipes. Time of concentrations would be modeled and stage-storage curves would be developed to determine the required water quality and channel protection volumes needed based on the current criteria. Peak flows of design storms would also be evaluated for overbank flood protection.</p> <p>Additional feasibility analysis related to visibility, accessibility, and permitting feasibility may also be performed.</p>
4.	Prioritize Sites for Retrofitting	<p>Once retrofitting has been determined to be needed and to be feasible, prioritization of the sites will be based on the following objectives:</p> <ul style="list-style-type: none"> • "Low hanging fruit" where simple modifications to the OCS would bring the BMP up to the standard. • Pollutant removal capability (storage provided and type of BMP) • Stream channel protection capability (ability to control sub-bank flow events) • Construction cost (design, construction and maintenance costs) • Ability to implement the project (land ownership, construction access, permits) • Potential for public benefit - education, location within a priority watershed, visible amenity, supports other environmental benefits (habitat, climate resilience, greenspace, etc.) • Citizen complaints received by the County. • Documented water quality or flooding issues in the BMP vicinity. • Availability of project funding. <p>The prioritization process will reduce the number of candidate BMPs to a short list of potential retrofits.</p>

LEVEL 3: Implementation		
5.	Internal Evaluation of Prioritized Sites	Evaluate the shortlist internally to address any additional issues before any public involvement process. This step will also include an evaluation of available and potential funding sources.
6.	Public Involvement Process	The County will implement a public involvement process to solicit comments and input from the public and adjacent residents if needed on the short list of candidate sites, potentially eliminating or postponing sites. Public involvement will be limited to persons living within the watershed in which the site is located. This process may also inform the level of retrofit and/or construction to take place.
7.	Retrofit Design	The concept is converted from a goal to a construction drawing. The retrofit designers will work from a set of existing conditions and constraints to arrive at an acceptable cost-effective retrofit.
8.	Permitting	The County will obtain the necessary approvals and permits for specific BMPs.
9.	Construction Inspections	The County will ensure construction inspectors are trained on the unique features that are often constructed as a part of a retrofit. The County will also maintain access to the retrofit designer or other qualified professional to answer questions, review/approve shop drawings, conduct or provide training on regular inspections, hold regular progress meetings, conduct construction testing, and maintain construction records as needed.
10.	Construction/Installation	BMPs go through construction and retrofitting process. The County will ensure that facilities are constructed properly in accordance with the design plans.
11.	Develop and Implement a Maintenance Plan	To ensure facilities are adequately maintained, the County will inspect the County-owned ponds retrofits according to the inspection and maintenance plan and perform and maintenance needed to ensure the long-term success and operation of the structure.

2. Measurable goal(s): The County will review 100% of proposed/new BMPs during the design phase to ensure potential water quality impacts are appropriately addressed.

The County will assess existing (i.e., those designed prior to the April 15, 2016 GSMM publication date) County-owned flood management projects for potential retrofitting to address water quality impacts. The County will assess at least one structure annually and 100% of the structures within the 5-year permit term utilizing the Level 1 Field Based Evaluation process described above. The County will also conduct more detailed analysis on at least one existing BMP each year.

3. Documentation to be submitted with each Annual Report: The County will provide the number of plans reviewed for water quality impacts during the reporting period.

The County will provide a copy of the evaluation forms from the field based retrofit assessments for the existing BMPs conducted that year. It will also provide a technical memorandum summarizing any feasibility analysis (Level 2) performed during the reporting period. Additionally, the County will provide an updated table listing existing flood management structures, the date of assessment(s), the results of the assessment(s), and the status of any retrofitting activities.

6. **Municipal Facilities Excluding Any Facilities Addressed in Section 3.3.3**

1. Description of SWMP Component: DeKalb County maintains an inventory of municipal facilities not subject to the Industrial General Permit (IGP) that have 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]). Attachment 3.3.1-6 lists applicable facilities inventoried to date and will serve as a baseline for future updates in annual reports. Municipal facilities that are subject to an IGP, such as the Roads and Drainage facilities located at 727 & 729 Camp Creek Rd., will be described in Section 3.3.3 of this SWMP.

The County conducts inspections to control runoff from municipal facilities with the potential to cause pollution. The schedule of inspections is prioritized based on the facility's history of previous violations, with facilities with one or more violations given a higher priority. Facilities without any previous violations will be prioritized based on their last inspection date and proximity to other municipal facilities. The County uses the Municipal Inspection Checklist provided in Attachment 3.3.1-6 for municipal facility inspections. The Municipal Inspection Checklist and inspection notes are uploaded and saved on a secure database. The County also maintains noncompliance records and related enforcement and corrective actions. If sites need improvements, the appropriate department is notified. The County then re-inspects the facility during the following quarter to ensure proper corrective action was taken to resolve noncompliance issues.

2. Measurable goal(s): Update the inventory of municipal facilities with the potential to cause pollution each reporting period and provide the inventory in each Annual Report. Conduct inspections on 100% of inventoried facilities within the 5-year permit term. At a minimum, the County will conduct inspections on 5% of these facilities each reporting period. If a low percentage of inspections is conducted during one reporting period, then the County will increase the inspection frequency in subsequent reporting periods to ensure that 100% of the facilities are inspected within the 5-year permit term.
3. Documentation to be submitted with each Annual Report: The County will provide an updated inventory and inspection reports from the inspection of municipal facilities with the potential to cause pollution. This will include a summary of follow up actions taken to address noncompliance issues.

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

1. Description of SWMP Component: To reduce pollution by the application of pesticides, fertilizer, and herbicides by commercial applicators and distributors, the DeKalb County Cooperative Extension hosts certification trainings and workshops for the public to obtain a commercial applicator license for Category 24 Ornamental and Turf. These trainings assist prospective commercial applicators with test preparation.

The DeKalb County Cooperative Extension also offers re-certification workshops for commercial applicator license Category 24 Ornamental and Turf and Category 10 re-certification workshops for arborist certification. These workshops offer continuing education credits needed for commercial applicator licenses and provide industry updates about the proper handling and application of pesticides, fertilizers, and herbicides by commercial, private, and municipal applicators.

To reduce pollution caused by municipal use of pesticides, fertilizers, and herbicides, the County uses either certified contractors or certified County employees to apply pesticides, fertilizers, and herbicides. Certified County personnel operate according to the Standard Operating Procedures related to the storage, handling, and disposal of pesticides, fertilizers, and herbicides and attend trainings and workshops the Cooperative Extension provides. The County's sustainable landscaping policy as well as copies of certified PFH applicator licenses are provided in **Attachment 3.3.1-7**.

2. Measurable goal(s): Annually host a workshop for commercial applicators and municipal employees to become State certified or recertified to apply pesticides, fertilizers, and herbicides.
3. Documentation to be submitted with each Annual Report: Documentation related to certifications and educational activities will be provided in each annual report, as well as any changes to chemical storage practices or quantities

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

1. Legal Authority

1. Description of SWMP Component: The Department of Public Works has the legal authority to administer and undertake enforcement of the Storm Sewer System Ordinance provided in Attachment 3.3.2-1. More specifically:
 - Article II, Section 22.5-12 establishes the Powers of the Department;
 - Article V provides the Investigation and Inspection authority and procedures, including:
 - Section 22.5-51 (Investigation);
 - Section 22.5-52 (Inspection and Right of Entry);
 - Section 22.5-53 (Emergency Powers); and,
 - Section 22.5-54 (Authority to Require Cooperation with Department);
 - Article VI provides the authority and procedures for Penalties and Enforcement, including:
 - Section 22.5-61 (Notice of Violation and Summons);
 - Section 22.5-62 (Submission of a Corrective Plan);
 - Section 22.5-63 (Cease and Desist Order);
 - Section 22.5-64 (Penalties);
 - Section 22.5-65 (Injunctive Proceedings); and,
 - Section 22.5-66 (Civil Damages and Violations).
2. Measurable goal(s): Re-evaluate the IDDE ordinance each reporting period and, when necessary, modify the existing IDDE ordinance to ensure compliance with the NPDES permit.
3. Documentation to be submitted with each Annual Report: A copy of the adopted ordinance if the ordinance was revised during the reporting period.

2. **Outfall Inventory and Map**

1. Description of SWMP Component: The County maintains an MS4 outfall inventory and map showing the location of all MS4 outfalls and the names and locations of all waters of the State that receive discharges from those outfalls. The outfall inventory map shows the names of the receiving streams within the County.

Because MS4 outfalls may be added because of new development or deleted due to reclassification or removal, the number and location of outfalls periodically changes. Accordingly, in each Annual Report, the County will update the inventory and map as needed to reflect these changes. As part of this update, the County will provide the number of outfalls added to and/or deleted from the inventory, as well as an updated total number of outfalls. A baseline inventory and map are included in **Attachment 3.3.2-2**.

2. Measurable goal(s): Each reporting period, update the inventory and map showing the location of all outfalls from the County's MS4 and the names and locations of all waters of the State that receive discharges from those outfalls.
3. Documentation to be submitted with each Annual Report: The County will provide the updated inventory and map, the number of outfalls added to or removed from the inventory during the reporting period and the total number of outfalls in the inventory in each annual report.

3. **IDDE Plan**

1. Description of SWMP Component: The County's IDDE Plan, which is included in Attachment 3.3.2-3, delineates procedures to detect and address illicit discharges to the MS4. The IDDE Plan's components include Dry Weather Screening (DWS), Investigative and Follow-up Procedures, and Elimination of Identified Illicit Discharges. Its components also include source tracing and elimination, sample collection, quality assurance/control, and enforcement.

The County performs DWS of its inventoried outfalls and investigates any potential illicit discharges to the MS4 in accordance with IDDE Plan procedures. The County uses the Outfall Inspection and Illicit Discharge Inspection forms to conduct the assessment (Attachment 3.3.2-3). If the County identifies any illicit discharges or illegal connections to the MS4, the County will perform enforcement activities in accordance with the Enforcement Response Plan (ERP), which is included in Appendix A, to eliminate identified illicit discharges to the MS4. If the source of the illicit discharge is identified as deriving from an adjacent MS4, the permittee must notify that MS4.

2. Measurable goal(s): Implement the IDDE Plan following procedures in the SWMP. Conduct DWS inspections on 100% of the total outfalls within the 5-year permit term. Conduct DWS inspections on at least 5% of outfalls in each reporting period. If a low percentage of inspections is conducted during a reporting period, then the permittee will increase the inspection frequency in subsequent reporting periods to ensure that 100% of outfalls are inspected within the 5-year permit term. Investigate and follow up on potential illicit discharges when screening results indicate a potential illicit discharge. Ensure 100% of identified illicit discharges are eliminated.
3. Documentation to be submitted with each Annual Report: The number and percentage of inspections conducted will be included in each annual report along with documentation of the inspections. Information related to any investigation of potential illicit discharges and subsequent elimination and/or enforcement activities will be provided using a spreadsheet or table in each annual report.

4. **Spill Response Procedures**

1. Description of SWMP Component: Spills are typically reported to DeKalb's Department of Watershed Management (DWM) Dispatch Center, the Fire Rescue Hazardous Materials Unit, or the Department of Public Works Roads and Drainage Division (R&D). Spills are primarily reported by members of the public, County employees, or a regulatory agency (e.g., Georgia EPD).

When a spill report is received, the individual receiving the report will document the following information:

- Time and date of the report
- Specific location of the possible spill
- Description of the problem
- Time and date the possible spill was observed (if known)
- The reporter's name and contact information
- The reporter's observations
- Other relevant information that will enable the County to quickly locate, assess, and prevent, contain, and/or respond to the spill.

After obtaining initial information regarding the spill, the appropriate first response crew is dispatched for immediate action. Depending on the circumstances surrounding a spill, the appropriate first response crew may be DWM personnel, R&D inspectors, or the Fire Rescue Hazardous Materials Unit.

Upon arrival at the spill scene, it is the first response crew's responsibility to protect public health and safety by mitigating the impact of the spill to the maximum extent possible. This includes initiating measures to contain the spill and recover, where possible, material that has already been discharged. If the spill involves a suspicious substance (e.g., oil sheen or foamy residue) or suspicious odor (e.g., gasoline), then the first response crew may determine it is necessary to alert the County's hazardous materials response team.

First response crews must also determine whether the spill is discharging, or may potentially discharge to the MS4. If it is ultimately determined that the spill is discharging to the MS4, then the procedures delineated in the IDDE Plan, and where necessary the ERP, should be followed.

2. Measurable goal(s): Implement the spill procedures described above for 100% of spill response activities.
3. Documentation to be submitted with each Annual Report: Documentation on spill occurrences during the reporting period will be included in each annual report.

5. Public Reporting Procedures

1. Description of SWMP Component: The County promotes and publicizes the reporting of illicit discharges and sanitary sewer spills through the County website. The public reports potential illicit discharges to R&D by phone (404-294-2007 or 404-297-3840), email (rad_customerservice@dekalbcountyga.gov), the County website, or walk-ins. This contact information is on the County website. The public reports spills to DWM through its Dispatch Center by either calling 770-270-6243 or emailing dekalbwaterops@dekalbcountyga.gov. This contact information is on the County website and is advertised on social media. The information is also included on water bills and the County's Drinking Water Quality Report sent to customers.

The County can receive notice of a potential illicit discharge in the following ways:

1. Call received by:
 - Environmental Comments line
 - Customer Service
 - Director's office
 - Stormwater section
2. Email received by:
 - Customer service
 - Director's office
 - Stormwater section
4. Service request through the R&D website
5. Citizen walk-in

Upon receiving a complaint related to a potential illicit discharge, the County employs the following procedures:

1. Documents information:
 - a. Specific location of the illicit discharge
 - b. Description of the problem
 - c. Caller's name and phone number
 - d. Caller's observations (e.g., smell, color, etc.)
 - e. Other relevant information that will allow the inspector to quickly locate and assess the illicit discharge
2. Notifies the Stormwater section
 - a. If the complaint did not come directly to the Stormwater section, an email is generated with the initial information regarding the potential illicit discharge and sent to Stormwater section for inspection.
3. Dispatch an inspector
 - a. The complaint is given to a stormwater inspector for inspection. The inspection is performed within 3 working days of receipt of the complaint.

- i. After arriving at the site of the potential illicit discharge, the inspector confirms that non-stormwater is being discharged into the MS4. Once confirmed, the inspector follows the potential illicit discharge procedures delineated in the IDDE Plan (provided separately in **Attachment 3.3.2-3** of the SWMP).
- ii. The inspector will complete an Illicit Discharge Inspection Form (included in **Attachment 3.3.2-3** of the SWMP) and take any samples to the County's lab for further analysis.
- iii. If enforcement action is warranted, the inspector will follow the enforcement procedures outlined in the County's Enforcement Response Plan (provided separately in **Appendix A** of the SWMP).

The County provides formal notification of a confirmed illicit discharge by posting the information on the County website. In addition, the County also notifies the public of the reporting methods described above at least once each reporting period through a website posting.

Upon receiving a complaint related to a sanitary sewer spill, the County employs the following procedures:

1. Document information:
 - a. Specific location of the illicit discharge
 - b. Description of the problem
 - c. Caller's name and phone number
 - d. Observations of the caller – odor, color, etc.
 - e. Other relevant information that will allow the inspector to quickly locate and assess the illicit discharge.
2. After obtaining the initial information regarding the potential illicit discharge, an email is generated and sent to the first response crew for inspection.
3. After arriving at the site of the potential illicit discharge, the inspector confirms that non-stormwater is being discharged into the MS4. Once confirmed, the inspector follows the potential illicit discharge procedures delineated in the IDDE Plan.

The County notifies the public expeditiously when the public is potentially affected by a sanitary sewer overflow. The notification form and manner are targeted to the specific situation and those members of the public reasonably likely to be affected by the sanitary sewer overflow. Notification methods include, but are not to be limited to, television, radio, newspapers, emails, and/or other electronic communications such as social media and the Department website, and signs posted at conspicuous public places. See Section 3 of the Sanitary Sewer Overflow Contingency Emergency Response Plan (CERP) provided in **Attachment 3.3.2-7** for details about reporting sanitary sewer spills to the public.

2. Measurable goal(s): On a continuous basis, but at least once each reporting period, the County website provides the public information about the methods available to report an observed illicit discharge. The County ensures on an annual basis that this information is up-to-date. The County will respond to 100% of potential illicit discharge reports within three working days of receipt of the complaint.
3. Documentation to be submitted with each Annual Report: The County will provide documentation on any activities conducted during the reporting period to promote, publicize, and facilitate public reporting of illicit discharges. The County will provide information on each complaint related to IDDE that was received and investigated during the reporting period, including its status.

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

1. Description of SWMP Component: The County assesses highly visible pollution sources including industrial facilities for proper handling of waste oil and other toxics. The County also helps educate owners and operators on proper disposal requirements. County staff distribute flyers and conduct public education and involvement activities to help manage waste oil and other toxic materials. County residents can bring these materials to specified locations during the Sanitation Division's semi-annual Household Hazardous Waste Event. The County has also installed "Do Not Dump" signs at intersections of roads and streams at previously identified litter-dumping locations. Qualified field staff check for potential pollution sources.
2. Measurable goal(s): DeKalb County convenes at least one Household Hazardous Waste Event each reporting period.
3. Documentation to be submitted with each Annual Report: The County will submit a spreadsheet showing the date, location, and number of cars that participated in the Household Hazardous Waste Event. Photographs will be submitted to document that the Household Hazardous Waste Event occurred and that citizens participated in the event.

7. Sanitary Sewer Infiltration Controls

1. Description of SWMP Component: The DeKalb County Department of Watershed Management (DWM) is responsible for sanitary sewer system inventory and inspection, infiltration and inflow identification and reduction, sewer line rehabilitation, and manhole rehabilitation as part of the preventative maintenance program. DWM maintains approximately 2,660 miles of separate sanitary sewer lines within DeKalb County.

The preventative maintenance program is a requirement of the NPDES permit for wastewater treatment plants. DWM's sanitary sewer system serves over 600,000 people. The County entered a Consent Decree with EPA and EPD to address sanitary sewer overflows from the sanitary sewer system. The Consent Decree negotiated for long-term comprehensive improvements to infrastructure as well as the development of procedures to effectively manage, mitigate, and reduce overflow events.

As part of the County's Contingency and Emergency Response Plan (CERP), cleaning and CCTV occurs at a minimum of a 1/8-mile radius of an SSO site to determine root cause. Spills are identified and mapped in GIS, evaluated for cause, and a course of corrective action is identified. The County also has a Small Diameter Sewer Cleaning contract and a Major Gravity Sewer Line Capacity Restoration contract to routinely clean the County's sanitary sewers. Work orders within these contracts address not only recent SSOs but also routing cleaning of areas known to accumulate debris to maintain full capacity of the sanitary sewer pipe.

2. Measurable goal(s): The County will inspect five hundred thousand (500,000) linear feet of sewer lines each reporting period.
3. Documentation to be submitted with each Annual Report: The County will submit a copy of the most recent Annual Report summarizing capacity, management, operations, and maintenance (CMOM) activities implemented to satisfy requirements in the Consent Decree.

Industrial Facility Stormwater Discharge Control
Table 3.3.3 of the Permit

1. Industrial Facility Inventory

1. Description of SWMP Component: The County maintains an inventory of facilities with industrial activities that potentially discharge to the MS4. It includes facilities listed on the EPD's Industrial Stormwater General Permit (IGP), Notice of Intent (NOI), and No Exposure Exclusion (NEE) online listings, including municipal facilities for the Roads and Drainage facility located at 727 & 729 Camp Creek Rd. The County annually updates its inventory of industrial facilities by checking EPD's online listing and using field-collection information on new or closed facilities. The baseline industrial facilities inventory and map are provided in Attachment 3.3.3-1.
2. Measurable goal(s): Update the inventory annually using EPD's Industrial Stormwater General Permit (IGP) Notice of Intent (NOI) and No Exposure Exclusion (NEE) online listings and field-collection information on new or closed facilities.
3. Documentation to be submitted with each Annual Report: Provide an updated inventory of industrial facilities in each annual report.

2. Inspection Program

1. Description of SWMP Component: The County maintains an inventory of facilities with industrial activities that potentially discharge to the MS4. The County inspects 100% of the inventoried industrial facilities that discharge to the MS4 within the 5-year permit term using the Industrial Facility Inspection form provided in Attachment 3.3.3-2 and following industrial facility inspection procedures described in Attachment 3.3.3-2. The County inspects at least 5% of inventoried industrial facilities that discharge to the MS4 each reporting period. If a low percentage of inspections is conducted during a reporting period, the inspection frequency in subsequent reporting periods will increase to ensure that 100% of the facilities are inspected within the 5-year permit term. The schedule of inspections is prioritized based on the facility's history of previous violations, with facilities with one or more violations given a higher priority. Facilities without any previous violations will be prioritized based on their last inspection date and proximity to other industrial facilities.

If access to a facility is not granted during the initial visit, specific follow-up measures will be put into place to ensure that the facility is inspected during the permit term. These measures include leaving an inspection notice including the inspector's name and contact information, requesting the facility contact the inspector and schedule an inspection within thirty days of the previous visit, and checking the facility's business license for contact personnel. If the facility does not follow-up with the County within thirty days, the inspector will make a second attempt at inspecting the facility and further failure to gain access will result in a violation following the same escalations described in the ERP.

After completing an inspection, the inspector scans or uploads all forms, photos, notes, and other data for storage on the County's secure database.

The County will monitor all facilities that the County has determined are contributing a substantial pollutant loading to the MS4. The County may use monitoring results provided by the industrial facility.

2. Measurable goal(s): Conduct inspections on 100% of inventoried facilities that discharge to the MS4 within the 5-year permit period. As the County has more than 5 industrial facilities, the County will Conduct inspections on 5% of inventoried facilities that discharge to the MS4 each reporting period. If a low percentage of inspections is conducted during a 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. Implement a monitoring program for all facilities that the County has determined are contributing a substantial pollutant loading to the MS4.
3. Documentation to be submitted with each Annual Report: Provide the total number of facilities in the inventory, the number and percentage of inspections conducted

during the reporting period and completed inspection forms for inspections performed during the reporting period. The County will also provide results of any monitoring conducted during the reporting period.

3. Enforcement Procedures

1. Description of SWMP Component: DeKalb County is required, as part of the NPDES Permit, to implement enforcement procedures if a stormwater violation is noted at an industrial facility that discharges to the MS4. Sections 22.5–61 through 22.5–66 of the DeKalb County Code of Ordinances provides a range of alternatives for responding appropriately to a given situation or violation.

The County’s ERP outlines procedures the County staff will follow if a stormwater violation is noted at an industrial facility. The ERP outlines actions and procedures that will be used by County staff during instances where there are stormwater violations noted at an industrial facility. The ERP describes different types of violations, provides guidance for determining appropriate enforcement actions, and discusses penalties the County may issue and take enforcement for violations of local stormwater related ordinances. The ERP is included in **Appendix A**.

2. Measurable goal(s): Implement the enforcement procedures described in the SWMP and in accordance with the ERP if a stormwater violation is noted at an industrial facility that discharges to the MS4. Ensure appropriate enforcement is taken for 100% of noted violations pursuant to the procedures in the ERP.
3. Documentation to be submitted with each Annual Report: Provide documentation on any enforcement activities taken during the reporting period in each Annual Report.

4. **Educational Activities**

1. Description of SWMP Component: The County performs educational activities for industrial facilities that include educating industrial facility operators in ways to reduce the discharge of stormwater runoff into the MS4. This on-site education covers proper housekeeping, proper disposal of chemicals and other substances, proper documentation and recordkeeping, and other topics as needed. Other activities may include distribution of brochures, postings on the County website, and public service announcements. A copy of the educational brochure provided to industrial facilities at the time of inspection is included in **Attachment 3.3.3-4**.
2. Measurable goal(s): Implement educational activities for industrial facilities during the reporting period. Distribute an educational brochure and/or flyer at each industrial inspection at least once each reporting period.
3. Documentation to be submitted with each Annual Report: Provide documentation on any educational activities performed during the reporting period in each Annual Report. The industrial inspection report has a check box to document that the educational brochure and/or flyer was provided during the inspection.

Construction Site Management

Table 3.3.4 of the Permit

1. Legal Authority

1. Description of SWMP Component: The County first adopted its Soil Erosion and Sedimentation Control (E&SC) ordinance in 2014. The Ordinance was amended August 13, 2019 to comply with EPD's 2016 Model Ordinance. See **Attachment 3.3.4-1** for a copy of the E&SC ordinance.

Pursuant to the County's E&SC ordinance, any land disturbing activity not exempted under Section 14-38(b)(3) of the Ordinance, must apply for a Land Disturbing/Development Permit. The E&SC ordinance provides the County with the authority to issue land disturbing activity permits. See E&SC Ordinance Sections 14-31(a); 14-38(d). In addition, the County is certified as a Local Issuing Authority (LIA) by EPD which authorizes the County to issue land disturbing activity permits. Additionally, the County has entered into an agreement with the Georgia Soil Water Conservation District authorizing the County to review erosion, sedimentation, & pollution control (ES&PC) plans "in-house". The E&SC Ordinance provides the authority to require BMPs to prevent and minimize erosion and sedimentation, to require erosion, sedimentation and pollution control (ES&PC) plan submission and conduct inspections and enforcement. The County E&SC ordinance also requires that all persons involved in land development, design, review, permitting, construction, monitoring, or inspection to be certified. The E&SC Ordinance includes requirements for application and permit process, plans, inspection and enforcement, and education and enforcement.

2. Measurable goal(s): During each reporting period, the County will re-evaluate and, as necessary modify, its E&SC ordinance to ensure it complies with the MS4 permit and for its effectiveness in addressing erosion and sedimentation control during each reporting period.
3. Documentation to be submitted with each Annual Report: If the E&SC ordinance is revised during the reporting period, the County will submit a copy of the adopted ordinance in its annual report.

2. Site Plan Review Procedures

1. Description of SWMP Component: The County's E&SC ordinance requires that an application for a Land Disturbing/Developing Permit (LDP) be submitted for all land disturbing activities projects, not exempted under Section 14-38(b)(3) of the County's codes. As part of the application process, the applicant must submit ES&PC plans for review and approval. These plans must be approved before the LDP is issued. Section 14-38(b)(5) of the E&SC ordinance describes the application and permit process as well as the requirements for the erosion and sedimentation plans. The Standard Operating Procedures for Construction Activities included in **Attachment 3.3.4-2** shall be followed.

After receipt of the application and the ES&PC plans, the Engineering Plan Review Officer (EPRO) of the Land Development Unit will review the plans for compliance with the County ordinance, the Manual for Erosion and Sediment Control in Georgia, the County review applicable checklists provided in **Attachment 3.3.4-2**, and the NPDES construction permits (i.e., GAR100001, 2 & 3). After the reviews are completed, the EPRO/Land Development Unit notifies the applicant if there are any deficiencies in the plans or if the plans are approved. If comments are made, the engineer/applicant will pick up the comments and address them.

The approval of the ES&PC plans doesn't necessarily mean that the LDP will be issued. Depending on the project, other County departments may be involved in the project. Each department will then ensure that the information required for their review is provided on plans and comply with their respective section of the County ordinances. For example, if the project involves connection to the County sewer line, DWM will have to review and approve the utility plans before issuance of the LDP.

After the LDP is issued, a pre-construction meeting is held with the EPRO/Land Development Unit, environmental inspector, site inspectors, other departmental inspectors as applicable, developer, engineer, contractor, and applicants. The project is then moved to the inspection phase.

2. Measurable goal(s): The County will ensure that 100% of site plans are reviewed in accordance with the site plan review procedures described herein.
3. Documentation to be submitted with each Annual Report: The list of site plans received, and the number of site plans reviewed, approved, and/or denied during the reporting period. The County will also track and provide the list and number of all LDPs issued during the reporting period.

3. Inspection Program

1. Description of SWMP Component: DeKalb County's Stormwater Management Program references Chapter 14 of DeKalb County's Code of Ordinances to address stormwater management, erosion and sedimentation, and water quality. DeKalb County has also adopted the Georgia Stormwater Management Field Manual and uses it as a reference.

DeKalb County inspectors look for potential threats and safety measures and ensure that structural and non-structural best management practices (BMPs) at each site are properly designed and maintained as specified in the Construction General Permits (CGPs). Inspectors check for proper sediment control by ensuring that BMPs are functioning as designed to prevent off-site runoff. Inspections are scheduled weekly. They are also performed after significant rainfall.

During a site visit, items that inspectors check for include:

- Ensure there is a valid Permit posted on site
- Check for site plans on premise
- Ensure BMPs are installed (based on phases listed on the plans), such as:
 - silt fences;
 - sediment traps;
 - construction exit/entrance pads;
 - mulch and seed;
 - riparian buffers; and,
 - sediment detention basins.
- Ensure state waters (if exist) are protected by buffer zones
- Validate applications are in place for variances
- Check for tree saves
- During the pre-construction meeting (PRECON), inspector walks site to ensure adequate BMPs are in place
 - Inspector determines if access to site ensures public safety and is suitable for maintaining erosion control.
 - PRECON opens line of communication between inspector and responsible parties during project.
 - Inspector verbalizes their expectations for site management for controlling, preventing, and maintaining erosion and sedimentation. The inspector also informs site management about regular inspections.
- During 'FINAL' inspection, ensure that the 'complete' site is stabilized.
 - Checks slopes to ensure proper coverage of gutters/downspouts
 - Seeding/hay/grass
 - Trees (residential)

The County uses electronic tablets to document the actions and the findings of the inspection of construction sites. These tablets have live sync capabilities with an

enterprise data management system. This system, Infor Public Sector (IPS), stores construction applications, permits, inspection results, and other pertinent records.

2. Measurable goal(s): 100% of all active construction sites will be inspected at least once during active construction according to the procedures described above. Inspection results will be recorded/documented accordingly. Applications and permits will be monitored and inspected regularly until completion to ensure compliance with construction codes and ordinances.
3. Documentation to be submitted with each Annual Report: The County will provide a list or table of all active construction sites with a land disturbing permit (LDP) and/or a building permit (BP) (where environmental inspections are conducted) and the number and dates of inspections conducted during each reporting period.

4. **Enforcement Procedures**

1. Description of SWMP Component: In the event an inspector determines a site is noncompliant, the inspector follows enforcement protocols delineated in the ERP provided in Appendix A. The inspector may use multiple enforcement mechanisms in an effort to correct the violation. These include notices of violations, stop-work orders, and fines. The Inspector will initiate compliance through weekly spot inspections of sites. If an inspector identifies a violation, the inspector will issue a warning or a notice of violation to the contractor onsite and give the site five business days to come into compliance. If the site remains noncompliant, the inspector may issue a second notice of violation. If the situation is critical and safety issues are present, the inspector can immediately issue a stop-work order for the site to stop all construction activity until the site comes into compliance. If the contractor does not follow the stop-work order, the inspector may issue fines and a summons to appear in magistrate court. If the site is brought back into compliance, then the stop-work order is lifted, and construction may continue. All inspections are logged into the County's computer record data base (IPS) and yearly reports will be sent to all interested parties. All construction sites are inspected multiple times throughout pre and post construction.
2. Measurable goal(s): Implement enforcement procedures for 100% of the E&SC violations documented at construction sites as described herein and in accordance with the ERP (**Appendix A**).
3. Documentation to be submitted with each Annual Report: The County will report enforcement actions taken during the reporting period including the number, type of enforcement actions taken (e.g., notice of violations, stop work orders, and fines) and the amount of any assessed penalties.

5. Certification

1. Description of SWMP Component: All Engineering Plan Review Officers within the Land Development Unit are Level II Plan Reviewers certified by the Georgia Soil and Water Conservation Commission (GSWCC). Inspectors are Level IB certified to ensure they can conduct inspections. All ES&PC plans submitted must be designed by and bear the seal and signature of a Level II Design professional certified by GSWCC.
2. Measurable goal(s): Ensure that 100% of MS4 staff involved in construction activities subject to the CGPs are trained and certified in accordance with the rules adopted by the GSWCC.
3. Documentation to be submitted with each Annual Report: The County will provide a list of all personnel involved in plan reviews and inspection processes during the reporting period with their current certification number, type, expiration date, and a copy of their certification card.

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

1. HVPS Facility Inventory

1. Description of SWMP Component: The County maintains an inventory of sites within the County that are considered to be Highly Visible Pollutant Sources (HVPS). The County annually updates the inventory using business license information and field-collection information on new or closed facilities. The HVPS inventory provided under in this SWMP will serve as a baseline for future updates in the Annual Report. The baseline inventory and map of HVPS facilities is included in **Attachment 3.3.5-1.**

The County considers the following businesses as HVPS sites:

- Auto body repair
 - Auto maintenance
 - Gas stations
 - Car wash
 - Towing
 - Non-home-based landscaping
 - Dry Cleaners
 - Nurseries
 - Pressure washing
 - Kennel/Stable
 - Non-home-based carpet cleaning
2. Measurable goal(s): Update the HVPS inventory annually using business license information and field- collected information on new or closed facilities.
 3. Documentation to be submitted with each Annual Report: An updated HVPS inventory.

2. Inspection Program

1. Description of SWMP Component: The County maintains an inventory of sites within the county that are considered to be HVPS. The County inspects 100% of the inventoried HVPS facilities that discharge to the MS4 within the 5-year permit term. The County inspects at least 5% of the inventoried HVPS facilities that discharge to the MS4 each reporting period. If a low percentage of inspections is conducted during the reporting period, then the inspection frequency will increase in subsequent reporting periods to ensure 100% of HVPS facilities are inspected during the 5-year permit term. The schedule of inspections is prioritized based on the facility's history of previous violations, with facilities with one or more violations given a higher priority. Facilities without any previous violations will be prioritized based on their last inspection date and proximity to other HVPS facilities.

During inspections a County or contracted inspector inspects each facility for compliance with the County's NPDES MS4 permit. If any deficiencies are noted by the inspector during the inspection, the inspector will follow enforcement procedures outlined in the ERP. Inspectors provide facilities with business specific information related to good housekeeping and pollution prevention at the time of inspection. An example inspection form is provided in **Attachment 3.3.5-2**. The inspection results are documented in the County HVPS compliance database system. Reports summarizing inspection results are included in the Annual Report. The SOP for HVPS site inspection provides more details related to inspection of HVPS facilities and is included in **Attachment 3.3.5-2**.

If access to a facility is not granted during the initial visit, specific follow-up measures will be put into place to ensure that the facility is inspected during the permit term. These measures include leaving an inspection notice including the inspector's name and contact information, requesting the facility contact the inspector and schedule an inspection within thirty days of the previous visit, and checking the facility's business license for contact personnel. If the facility does not follow-up with the County within thirty days, the inspector will make a second attempt at inspecting the facility and further failure to gain access will result in a violation following the same escalations described in the ERP.

2. Measurable goal(s): Conduct inspections on 100% of inventoried HVPS facilities that discharge to the MS4 within the 5-year permit period. The County will conduct inspections on at least 5% of inventoried HVPS facilities that discharge to the MS4 each reporting period. If a low percentage of inspections is conducted during one reporting period, then CCWA will increase the inspection frequency in subsequent reporting periods to ensure that 100% of the HVPS facilities are inspected within the 5-year permit term.
3. Documentation to be submitted with each Annual Report: Provide the total number of facilities in the inventory. Provide the number and percentage of inspections

conducted during the reporting period. Provide an HVPS inspection checklist for each of the inspections performed during the reporting period.

3. **Enforcement Procedures**

1. Description of SWMP Component: DeKalb County is required to implement enforcement procedures if a stormwater violation is noted at an HVPS site that discharges to the MS4. Sections 22.5–61 through 22.5–66 of the DeKalb County Code of Ordinances provide a range of alternatives for responding appropriately to a given situation or violation.

The ERP outlines procedures County staff follow if a stormwater violation is noted at an HVPS site. The ERP details how to identify violations, determine the enforcement action needed, and take enforcement for violations of local stormwater related ordinances. The ERP is included in **Appendix A**.

2. Measurable goal(s): Implement the enforcement procedures described in this SWMP and in accordance with the ERP included in **Appendix A**. The County will perform appropriate enforcement on 100% of identified violations within three working days.
3. Documentation to be submitted with each Annual Report: Provide documentation on any enforcement activities taken during the reporting period.

4. Educational Activities

1. Description of SWMP Component: The County performs educational activities for HVPS sites that include educating HVPS site operators in ways to reduce the discharge of stormwater runoff into the MS4. This on-site education covers proper housekeeping, proper disposal of chemicals and other substances, proper documentation, recordkeeping, and other topics as needed. Other activities may include distribution of brochures, postings on the County website, and public service announcements. The County will distribute an educational brochure/flyer (**Attachment 3.3.5-4**) at each HVPS inspection to satisfy this SWMP component.
2. Measurable goal(s): Implement educational activities for HVPS sites. Conduct an educational activity related to HVPS facilities at least once each reporting period by distributing an educational brochure/flyer at each HVPS inspection.
3. Documentation to be submitted with each Annual Report: Provide documentation of any educational activities performed during the reporting period.

Public Education
Table 3.3.9 of the Permit

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

1. Public Education Program - Educational Activity #1

1. Description of SWMP Component: County Stormwater Website. The County maintains a webpage that explains its Stormwater Management Program. The webpage is located within the Roads and Drainage subsection and provides, among other things, a number to report potential illicit discharges. The County will track the number of visitors to the website, thus allowing the County to determine if the website is an effective educational tool.

The County will evaluate, and revise, if necessary, the stormwater page of the County's website to ensure it sufficiently addresses water quality issues and the protection of water resources and encourages the use of GI/LID. The County will include information on topics such as litter control, illicit discharges, household hazardous waste disposal, residential pesticide use, fertilizer and herbicide application, pet waste, fats, oils, and grease, and GI/LID techniques.

2. Measurable goal(s): Update the stormwater page of the County's website at least once during the reporting period to educate our citizens about water quality issues, the protection of water resources, and the use of GI/LID.
3. Documentation to be submitted with each Annual Report: Provide details and documentation of the implementation of the updated stormwater page of the County's website during the reporting year that it is implemented. The County will document the number of website visitors using website analytics.

2. Public Education Program - Educational Activity #2

1. Description of SWMP Component: FOG Presentation. The County has created a presentation on Fats, Oils, and Grease (FOG) and how it impacts the sewer system and water resources. A FOG brochure has also been created and will be distributed at each presentation to further demonstrate the importance of proper FOG disposal. The County will also include information on eliminating improper waste disposal in their presentation and brochure.
2. Measurable goal(s): The County will conduct a FOG presentation to a school or community group at least once during the reporting period to educate attendees on proper disposal of FOG and eliminating improper waste disposal.
3. Documentation to be submitted with each Annual Report: The County will provide a copy of the FOG brochure, a FOG data sheet breaking down all FOG activities during the reporting period, including the total number of presentations and attendees, total number of social media posts and people reached, and a copy of the FOG presentation(s) given.

3. **Public Education Program - Educational Activity #3**

1. Description of SWMP Component: School and Community Presentations. The County has created a presentation for students that teaches the importance of water quality and protection of water resources. The presentation includes hands on activities and fill-in-the-blank forms.

The County will evaluate, and revise, if necessary, the County's stormwater presentation to schools to ensure it sufficiently addresses water quality issues and the protection of water resources and encourages the use of GI/LID. The County will include information on topics such as litter control, illicit discharges, household hazardous waste disposal, residential pesticide use, fertilizer and herbicide application, pet waste, fats, oils and grease, and GI/LID techniques. This presentation will be made to DeKalb County schools.

2. Measurable goal(s): Make a stormwater presentation to a school at least once during the reporting period to educate our students about water quality issues, the protection of water resources, and the use of GI/LID.
3. Documentation to be submitted with each Annual Report: Provide a spreadsheet listing the date of the presentation(s), the location of the presentation(s), and the number of students and/or classes that attended the presentation(s) conducted during the reporting period.

4. **Public Education Program - Educational Activity #4**

1. Description of SWMP Component: Promotional Items/Giveaways. The County has promotional items and giveaways that are distributed at community events hosted by the County. The County will evaluate, and revise, if necessary, the County's promotional items/giveaways in order to ensure they serve as reminders of the importance of water quality, the protection of water resources, and encourage the use of GI/LID. These promotional items/giveaways will be distributed at events and other occasions where citizens are present.
2. Measurable goal(s): At least once during the reporting period, evaluate, and revise, if necessary, the County's promotional items/giveaways to ensure they highlight the importance of water quality and the protection of water resources, and also encourage the use of GI/LID. At least once during the reporting period, the County will hold a community event where promotional items/educational information are distributed.
3. Documentation to be submitted with each Annual Report: Document the County's distribution of promotional items/giveaways and educational information that address the importance of water quality, the protection of water resources, and the use of GI/LID. The County will provide a spreadsheet detailing the date of the event(s), the number of attendees, and the type of items distributed.

Public Involvement

Table 3.3.10 of the Permit

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

1. Public Involvement Program- Activity #1

1. Description of SWMP Component: Storm Drain Marking. The County established a Catch Basin Stenciling Program where DeKalb County employees, residents of DeKalb County, and people who work in DeKalb County can attach a marker on catch basins to remind people not to dump anything down storm drains.

Catch basin stenciling/marking sends a clear message to all of DeKalb County to keep trash, debris, yard litter, and other pollutants out of the storm drainage system.

The County will evaluate, and revise, if necessary, the County's storm drain marking program to ensure it meets the needs of the County and truly provides opportunities for citizens to participate in the SWMP.

The County will solicit volunteers via the County website, news releases, and a Stormwater brochure. The County asks volunteer leaders to complete a field data sheet that records information including the number of participants, the number of storm drains marked, and the subdivision(s) marked. A County employee will be present during the County-sponsored storm drain marking event, as well as at volunteer led storm drain marking events when resources allow.

2. Measurable goal(s): At least once during the reporting period, execute, evaluate, and revise, if necessary, the County's storm drain marking program, ensuring that it meets the needs of the County and provides opportunities for citizens to participate in the SWMP. At least one storm drain marking event will be held during the reporting period.
3. Documentation to be submitted with each Annual Report: Provide details and documentation of the implementation of County's updated storm drain marking program showing it meets the needs of the County and provides opportunities for citizens to participate in the SWMP.

The County will provide a spreadsheet documenting the storm drain marking event(s) that occurred during the reporting period. The spreadsheet will include the location(s), the number of participants, and the number of markers placed. The County will also provide the sign-in sheet from the Storm Drain Marking event(s).

2. Public Involvement Program - Activity #2

1. Description of SWMP Component: Adopt-A-Stream. The County established Adopt-A-Stream events that promote water quality through volunteer work to protect and enhance County water resources. Adopt-A-Stream events may include activities such as workshops, chemical monitoring, macroinvertebrate monitoring, bacterial monitoring, watershed assessments, visual surveys, and other types of monitoring. These will increase public awareness via hands-on activities and further encourage partnerships between citizens and local government and provide tools and training to evaluate and protect local waterways.
2. Measurable goal(s): At least one Adopt-A-Stream event will be held during the reporting period.
3. Documentation to be submitted with each Annual Report: A data sheet containing the number of Adopt-A-Stream events and total attendees, as well as the number of social media posts and people reached will be included in the annual report.

3. Public Involvement Program - Activity #3

1. Description of SWMP Component: Pet Waste Station and Pet Waste Materials. The County will provide pet waste stations in multiple locations in an effort to prevent pet waste from entering the storm sewer system, thereby potentially reducing bacterial loads within the County. Pet waste materials, including clips, pamphlets, and bags will also be given away via DeKalb Animal Services providing further materials on stormwater management through pet waste management.
2. Measurable goal(s): The County will maintain a pet waste station in at least one County Park. The County will maintain this station and replace pet waste bags as needed, ensuring that it meets the needs of the County and provides opportunities for citizens to participate in the SWMP.
3. Documentation to be submitted with each Annual Report: The County will submit invoices for the number of pet waste bags ordered during the reporting period. A pet waste brochure and spreadsheet documenting any pet waste materials given away by DeKalb Animal Services during the reporting period will also be provided.

4. Public Involvement Program - Activity #4

1. Description of SWMP Component: Household Hazardous Waste Disposal. The County holds a Household Hazardous Waste (HHW) event each reporting period. The HHW event offers County residents an opportunity to properly dispose of dangerous household materials that are no longer in use. These materials include aerosols, batteries, adhesives, flammables, lawn care products, fluorescent light bulbs, photo chemicals, paint, and paint-related products. The event is typically held at DeKalb County's Sanitation Central Transfer Station. Unlike the County's recycling events, the County does not accept or shred paper at the HHW event.
2. Measurable goal(s): The County will hold at least one HHW event each reporting period.
3. Documentation to be submitted with each Annual Report: The County will provide details and documentation of the of the implementation of the County's household hazardous waste disposal event showing it meets the needs of the County and provides opportunities for citizens to participate in the SWMP. The County will submit a spreadsheet with each Annual Report documenting the date(s), location(s), and numbers of cars that participated in each HHW Event. The County will submit photographs of the HHW Event with each Annual Report to document that the event occurred, and citizens participated in the event.

Post-Construction
Part 3.3.11 of the Permit

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

- A. Provide the date of the adoption of the Post-Construction ordinance: February 8, 2022
- B. Provide the date of the adoption of the Georgia Stormwater Management Manual or an equivalent or more stringent local design manual:
The County requires use of the latest Georgia Stormwater Management Manual (2016). Since 2017, the County has been requiring all permittees to comply with option (a) as described on page 22 of the NPDES Permit No. GAS000111 unless technical justification is provided to the infeasibility. The County stormwater management checklist was updated to that effect.
- C. Ensure a copy of the Post-Construction ordinance is attached to the SWMP.
A copy of the Post-construction Ordinance is included as Attachment 3.3.11-a-1.

2. Linear Transportation Projects (Part 3.3.11(a)(3) of the Permit):

- A. The linear transportation feasibility program is voluntary. Have you developed or are you planning to develop a linear transportation feasibility program?
Yes X No _____
- B. If yes, is the linear transportation feasibility program attached to the SWMP?
Yes X No _____
- C. If you plan to develop a linear transportation feasibility program, provide the schedule for submitting the program: DeKalb County submitted a copy of its Linear Transportation Feasibility program document (dated January 17, 2023) with the 2022-23 MS4 Annual Report.

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

1. Legal Authority

1. Description of SWMP Component: In 2011, the County assessed its existing codes to determine if there are any codes that present an obstacle to GI/LID approach to stormwater management. The County used the Code and Ordinance Worksheet developed by the Center for Watershed Protection (CWP). The report of the regulatory review was included in the 2012 Annual Report. The report included the worksheet used to conduct code and ordinance evaluation. The report and worksheet are included as Attachment 3.3.11.b-1.

The County will 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 County will assess regulations governing residential and commercial development, road design, land use, and parking requirements. The County will consider the inclusion of incentives for use of GI/LID practices into the ordinance.

2. Measurable goal(s): The County will hold an interdepartmental review at least once annually to certify any revised codes or ordinances do not prohibit or impeded the use of GI/LID practices.
3. Documentation to be submitted with each Annual Report: The County will provide a copy of interdepartmental minutes where codes or ordinances are reviewed. If revisions to the ordinances and codes are necessary, the County will include a report on any proposed revisions, including a schedule for completion of the revisions. In subsequent reporting periods, the County will provide a status report on the ordinance revisions and/or any adopted ordinances.

2. **GI/LID Program**

1. Description of SWMP Component: The County developed and implemented a GI/LID Program, provided in Attachment 3.3.11.b-2, which addresses the following elements:
 - GI/LID BMPs
 - GI/LID feasibility and site applicability for GI/LID techniques and practices
 - GI/LID Inventory and administration
 - GI/LID Structure Inspection and Maintenance
2. Measurable goal(s): Review the GI/LID Program annually.
3. Documentation to be submitted with each Annual Report: A copy of the revised GI/LID Program if revised during the reporting period.

3. GI/LID Structure Inventory

1. Description of SWMP Component: The County maintains an inventory of County owned water-quality related GI/LID structures, publicly-owned by other entities, and privately-owned non-residential water-quality related GI/LID structures constructed after June 11, 2014. The inventory includes the type of water- quality GI/LID structure. The inventory of water-quality related GI/LID structures is updated annually through the plan review process. New water quality related GI/LID structures are added to the inventory. The GI/LID structure inventory provided as an attachment to the SWMP will serve as a baseline for future updates in annual reports. The inventory is included in **Attachment 3.3.11.b-3.**
2. Measurable goal(s): Update the GI/LID inventory annually using data gathered through the plan review process, and at a minimum, constructed after June 11, 2014. Ensure maintenance agreements are executed for 100% of non-permittee owned structures constructed after the effective date of this permit.
3. Documentation to be submitted with each Annual Report: An updated inventory including the type, ownership, and total number of water-quality related GI/LID structures. The County will provide copies of maintenance agreements executed during the reporting period.

4. **Inspection and Maintenance Program**

1. Description of SWMP Component: The County has a program to ensure that inspections are conducted on 100% of the County owned water-quality related GI/LID structures included in the County's inventory and privately-owned non-residential water-quality related GI/LID structures within the 5-year permit period. The program also ensures that inspections are conducted on at least 5% of these structures each reporting year. If a low percentage of inspections is conducted during a reporting period, then the County will 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.

The County requires developers of privately-owned non-residential water-quality related GI/LID structures to complete an inspection & maintenance agreement with the County (**Attachment 3.3.11.b-4**).

2. Measurable goal(s): Conduct inspections on at least 5% of County owned water-quality related GI/LID structures and privately-owned non-residential water-quality related GI/LID structures each reporting year. If a low percentage of inspections is conducted during one reporting period, then the County will 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.
3. Documentation to be submitted with each Annual Report: The number and/or percentage of the total structures inspected during the reporting period. The County will submit the completed inspection forms as documentation of the inspections conducted during the reporting period. The County will submit the work orders or work requests as documentation of any maintenance conducted on County owned water-quality related GI/LID structures. The County will submit copies of letters to owners regarding needed maintenance as documentation of the maintenance conducted on the privately-owned non-residential water-quality related GI/LID structures.

Appendix A

Enforcement Response Plan (ERP)

Part 3.3.6 of the Permit

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program.
 - A. Provide the date the ERP was approved by EPD: _____
 - B. If the ERP has not yet been approved, provide the date submitted to EPD: September 3, 2020
2. A copy of the ERP must be attached to this Appendix. DeKalb County's ERP has been updated to reflect changes in ordinances and enforcement processes and is included in the SWMP.

Appendix B

Impaired Waters **Part 3.3.7 of the Permit**

1. Population at the time of permit issuance: 764,382 (US Census Bureau (10/21/24))
2. The Impaired Waters Plan must, at a minimum, include:
 - A list of impaired waters and the pollutant(s) of concern, including the date of the 303(d) list used;
 - A map showing the location of the impaired waters, the monitoring location, and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters and within the same watershed;
 - The sample location (instream or at the outfalls);
 - Information on the sample type, frequency, and any seasonal considerations;
 - Schedule for starting monitoring for any newly identified pollutants
 - BMPs that will be implemented to address each pollutant of concern; and
 - A schedule for implementing the BMPs;
 - The information to be included in each annual report, including the monitoring data, an assessment of data trends, and an assessment of the effectiveness of the BMPs.
3. If the population exceeds 10,000, and a water is impaired for bacteria, then the MS4 must also address the following in the Impaired Waters Plan:
 - Sampling frequency for bacteria
 - A description of the development of a Sampling Quality and Assurance Plan if the data is below water quality standards for two years.

Appendix C

Municipal Employee Training **Part 3.3.8 of the Permit**

1. Description of the Employee Training Program: The County provides annual employee training concerning methods used to reduce pollution through stormwater, as well as how to handle potentially hazardous waste materials. The training is attended by crew workers, crew supervisors, General Foreman, Stormwater personnel, and managers in the Sanitation and Roads and Drainage divisions, as well as the Department of Watershed Management. The training is conducted by a contractor with experience in Stormwater training. The training is conducted in a classroom setting.

Topics covered may include:

- NPDES Stormwater General Permit
- Stormwater Pollution Prevention Team
- Potential Pollutant Sources
- Best Management Practices Monitoring
- Inspections
- Corrective Actions
- Reporting and Record Keeping

2. Measurable goal(s): The County will conduct one employee training event each reporting year.
3. Documentation to be submitted with each Annual Report: DeKalb County will include documentation of training completed, including the topic, date, and attendees with each annual report. The County will submit the sign-in sheet(s) from the training event(s) with each Annual Report.