

Phase I Large MS4

Storm Water Management Program

Cobb County, Georgia

February 28, 2020

Revision Dates: November 25, 2020

February 26, 2021

June 15, 2023

General Information for Submitting a SWMP

- Your Storm Water Management Program (SWMP) becomes a part of the NPDES Permit, upon SWMP approval. It must be a complete document containing all the necessary components, including copies of the latest versions of the following:
 - 1) Adopted stormwater ordinances, including any ordinances required by the Metropolitan North Georgia Water Planning District;
 - 2) Standard Operating Procedures (e.g. dry weather screening procedures, construction site inspection procedures, street sweeping procedures);
 - 3) Blank copies of forms to be used to implement the SWMP, including inspection forms;
 - 4) Signed Memorandum of Agreements; and
 - 5) Maps and inventories.

- The NPDES Permit contains tables listing the various SWMP Components. The MS4 is required to set a measurable goal for each SWMP Component. In some cases, the Permit establishes the goal (e.g. inspect 100% of the structures within a 5-year period), while in other cases the MS4 must set a specific measurable goal. Ensure that each measurable goal is numeric and trackable.

- The NPDES Permit specifies that the MS4 must provide documentation of each activity implemented. Each SWMP Component must specify the documentation to be submitted with each annual report (e.g. completed inspection forms, work orders, etc.). In some cases, the Permit specifies the documentation to be submitted (e.g. maps and inventories). In other cases, the MS4 will have to establish the documentation to be submitted. Ensure that each SWMP Component spells out the specific documentation to be submitted with each annual report in the section titled "Documentation to be submitted with each Annual Report".

- When developing the SWMP, the format of the SWMP should follow the order of the SWMP components as they appear in the template. For example, the Enforcement Response Plan, the Impaired Waters Plan, and Municipal Employee Training should be included as appendices to the SWMP, not in the sequential order they appear in the Permit.

- Documentation to be submitted as appendices to the SWMP (e.g. ordinances, maps, inventories, etc.) must be submitted on a CD or flash drive. Double-check the CD or flash drive prior to submittal to ensure that the saved information is readable.

- In addition to the SWMP template, the complete SWMP must contain separate appendices for the Enforcement Response Plan (ERP), Impaired Waters Plan, and Municipal Employee Training. Ensure each appendix is clearly labeled with a title, a letter, or a number to separate the various documents.

Table of Contents

		<u>page</u>
1.	General Information.....	4
2.	Sharing Responsibility.....	4
3.	Certification.....	5
4.	Structural and Source Control Measures.....	6
5.	Illicit Discharge Detection and Elimination (IDDE).....	20
6.	Industrial Facility Stormwater Discharge Control.....	33
7.	Construction Site Management.....	37
8.	Highly Visible Pollutant Source.....	45
9.	Public Education.....	51
10.	Public Involvement.....	56
11.	Post Construction.....	61
12.	Green Infrastructure / Low Impact Development.....	62
13.	Impaired Waterbodies.....	68
14.	Municipal Training.....	74

APPENDICES (on accompanying thumb drive)

- A. Cobb MS4 Structural Inventory CD; Drainage System Inventory Progression Map
- B. Copies of the Official Codes of Cobb County
- C. Cobb County Commission Districts Map
- D. Cobb Municipal Waste Facilities Inventory; No exposure Certificates
- E. Cobb Municipal Facilities Inventory
- F. Cobb Pesticide, Fertilizer, and Herbicide Applications Inventory
- G. HVPS Categories by SIC List; HVPS Inventory
- H. MNGWPD Dry Weather Illicit Discharge Screening
- I. Impaired Segments List, Cobb TMDL Data CD
- J. Industrial Stormwater Facilities Inventory
- K. 2009-2010 Cobb Watershed Stewardship Annual Report; Community Partners Program
- L. Cobb County Government Organizational Chart
- M. Home Buyouts and GEMA Grants
- N. Forms
- O. Emergency Response Plan (ERP)
- P. Municipal Employee Training
- Q. Draft GI/LID Program Summary
- R. Draft Cobb County DOT Feasibility Program (LTFP)
- S. Outfall Map, February 2021

STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Storm Water Management Program (SWMP)

1. General Information

- A. Name of Large MS4: Cobb County, Georgia
- B. NPDES Permit Number: GAS000108
- C. Mailing Address (if providing a post office box, also provide a street address):
Cobb County Water System
680 South Cobb Drive
Marietta GA 30090
- D. Name of responsible official: Judy B. Jones
Title: Director, Cobb County Water System
Mailing Address: 660 South Cobb Drive
City: Marietta State: GA Zip Code: 30060
Telephone Number: 770-419-6225
Email Address: Judy.Jones@cobbcounty.org
- E. Designated stormwater management program contact:
Name: Alicia Giddens
Title: Deputy Director – Cobb County Water System
Mailing Address: 680 South Cobb Drive
City: Marietta State: Georgia Zip Code: 30090
Telephone Number: 770-528-1481
Email Address: Alicia.Giddens@cobbcounty.org
- F. Provide the river basin(s) to which your MS4 discharges: Chattahoochee River and Etowah River basins
- 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: 33.93568842 degrees North Longitude: -84.54433423 degrees West

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)

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

Printed Name: Judy B. Jones, P.E. Date: June 15, 2023

Signature: Judy B Jones Title: Director, Cobb County Water System

4. Structural and Source Control Measures
Table 3.3.1 of the Permit

1. MS4 Control Structure Inventory and Map

1. Description of SWMP Component: __

The MS4 Control Structure Inventory (CSI) for Cobb County was substantially completed in late 2015. Associated with this effort, a stormwater inventory database and map was completed and can be accessed internally (by Cobb County staff) on the Cobb County GIS. The GIS map is linked to the database of inventoried MS4 control structures, which includes: catch basins, ditches (miles) on county-owned property, county-owned detention /retention ponds, and storm drain lines. Cobb County's GIS map and corresponding stormwater database has been downloaded onto a flash drive and is included in the Appendix.

Incorporating updates and making corrections to the current MS4 CSI will render this a continuous, ongoing activity. To accomplish this ongoing effort, three full time two-man crews have been assigned. They make updates and corrections to the MS4 CSI and also inspect and assess the condition of existing stormwater systems. For all inventoried structures, these crews record size, material, age, condition, existing state of blockage, x and y horizontal state plane coordinate locations, and depth below grade. The county is required to inventory and map four county-owned, or county-dedicated structure types: catch basins, pipes, ditches, and ponds. The county is required to submit an inventory and map with the SWMP showing the four required county-owned or county-dedicated structures.

2. Measurable goal(s):

Update the inventory and map once each reporting period.

3. Documentation to be submitted with each Annual Report:

The county will provide the map and inventory, the number of structures added, and the total number of structures.

- **MS4 Inspection and Maintenance Program**

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

Inspections of the MS4 structures will be conducted on a continual basis over the next 5-year reporting period (2020-2025). As stated above, Cobb County has assigned three full-time two-man survey crews to inspect and assess the condition of the SWM infrastructure. This work they perform concurrently and in conjunction with amending and making corrections to the current MS4 CSI. In addition to these survey crews, three project managers and three project inspectors are continually inspecting the MS4 structures in connection with scheduled and contracted maintenance activities. This can be accomplished with the three survey crews assigned to this task along with the two water quality staff members, and with Cobb County DOT road crews which maintain all county-owned infrastructure within the county-owned Right of Way.

Maintenance on county-owned and dedicated MS4 structures will be conducted as needed. Although problems may be encountered during the inspection process, more often than not problems are reported by affected property owners and are dealt with at the time. Emergencies are dealt with immediately. Less urgent problems are triaged and entered into DOT's or Stormwater Management's work backlog.

2. Measurable goal(s):

Cobb County is required under our NPDES permit to:

- Inspect 100% of the MS4 structures within the 5-year permit term
- Inspect a minimum of 5% of the structure each reporting period
- Ensure that 100% of the MS4 structures are maintained as needed

3. Documentation to be submitted with each Annual Report:

The number and percentage of structure maintained each year will be reported on MAXIMO work orders and/or on completed inspection forms submitted digitally in each annual report during the reporting period. Cobb County will provide the number and percentage of the total structures inspected during the reporting period and documentation in each annual report. Cobb County will provide the number of the total structures maintained during the reporting period and documentation of the maintenance performed in each annual report.

- MAXIMO Work Orders
- Completed Inspection Forms
- Spreadsheets w Unit Price Contracts Awarded and Completed

3. Planning Procedures

1. Description of SWMP Component:

Cobb County comprehensive planning documents is called the Comprehensive Land Use Plan (Comp Plan) and it is maintained by the County Planning staff. This plan is considered with each zoning, variance, and plan review application before construction plans are approved. The Comp Plan is registered with the State and is updated annually according to State Law to meet the changing character of development.

Environmental impacts of each project are reviewed in Staff Comments to the Board of Zoning Appeals, Planning Commission, and the Board of Commissioners for all Zoning/ Variance applications pertaining to terrain, flood plain, flood hazards, wetlands, stream buffers, and aquatic habitat. These reviews are usually augmented by the community comments and at Plan Review.

Cobb County has several ordinances that allow the development and enforcement of post-construction controls.

- Provisions in the Erosion and Sediment Control ordinances (Section 50-75) allow Cobb County Erosion and Sediment Control, Code Enforcement, and Stormwater Management to ensure post construction violations are addressed.
- Cobb County Code Section 50-132, Post-development stormwater management performance criteria, requires each new project to provide first flush (1.2 inches of rain) water quality BMPs according to guidelines in the Georgia Stormwater Management Manual. The regulations are written for performance. Each proposal must have been demonstrated to work on the elements found in the water column by actual installation or by independent laboratory analysis. Needs in this area are identified by zoning/ variance review, required at plan review and on construction plans, and inspected for compliance by Site Inspectors and Final Inspection Staff from Community Development.
- The Open Space Overlay District Ordinance is used as a planning tool or mechanism to locate new developments in low impact development areas available for "smart development". The Open Space Overlay District Ordinance keeps projects off the steeper ground slopes and out of flood plain/ hazards and wetlands as well as stream buffers. The Ordinance also keeps grading and hard surface area to a minimum and landscaping following the xeriscape philosophy. This ordinance allows the developer some flexibility in

the land disturbance process when leaving undeveloped areas within the project. These "green spaces" preserve pervious areas which can slow runoff and allow time for pollutants to either be filtered, absorbed, or settle out of the runoff.

All procedures discussed here, alluded to, or otherwise practiced by Cobb County's Stormwater Management Division adhere to the Georgia Stormwater Management Manual.

2. Measurable goal(s):

Cobb County's annually updated comprehensive planning document will address areas of new development and redevelopment. The areas of new development and redevelopment are measurable.

3. Documentation to be submitted with each Annual Report:

Any changes made to the stormwater portion of this document (if any) will be described in each annual report during the reporting period. The areas of new development and redevelopment will be submitted with each Annual Report.

4.

Street Maintenance

1. Description of SWMP Component:

Street maintenance and street maintenance data, which is collected by Cobb County DOT, is included in **Exhibit 3**. This information will also be included in Stormwater Management’s annual report Roadway sweeps consist of major, minor, and arterial roadways and all waste material is disposed of by a contractor at the local waste facilities.

Road Maintenance Completed Work Orders (2014)

Issue	Total
Asphalt Repair	159
Bridge Maintenance	6
Concrete Work	64
Curb and Gutter Damaged	8
Debris on Shoulder	258
Drainage - Catch Basin	208
Drainage - Ditch	35
Drainage - Driveway	23
Drainage - House Flooding	9
Drainage - Roadway Flooding	31
Grading	5
Grass Cutting	718
Guardrail Maintenance	31
Landscaping	81
Litter/Graffiti	451
Pot Hole	1015
Roadside Trimming	396
Roadway Ice	534
Shoulder Rut/Drop Off	54
Sidewalk Damaged	64
Sink Hole in Driveway	2
Sink Hole in Roadway	52
Sink Hole on Shoulder	105
Speed Hump Installation	3
Stormwater Pipe Problem	57
Street Sweeper	87
Tree Blocking Roadway	159
Tree or Bush Blocking Sight	185

EXHIBIT 3

Concerning litter removal, Cobb Department of Correction officers supervise 18 inmates divided into two crews. The crews pick up litter/ debris five days a week and average 14 miles a day. After the litter/ debris have been picked up and bagged, a Cobb County Department of Transportation (CCDOT) Supervisor along with inmate labor pick up the trash bags and dispose of them at the Advanced Disposal Transfer Station.

Maintenance of the culvert systems within roadway Right of Ways is handled by CCDOT personnel. Proactive, regular inspections of approximately 200 problem catch basins, ditches and cross drains are performed *before heavy rains*; the CCDOT maintenance crews then mobilize to clear any obstructions, or enact whatever maintenance is required. These structures are therefore inspected at least once a month, *on average*. All other maintenance except for catch basins is done on a reactive basis when problems are identified.

A range of between 1200 and 1500 catch basins are inspected, and approximately 800 maintained every year by CCDOT, as reported in the annual report. The cleaning of catch basin inlets is done on a daily basis by eight crews, two in each District, and is prioritized if a work order has been issued through a request from the work crew or citizen.

During road or street maintenance, ice and snow removal, or any other task CCDOT work crews take every precaution necessary to ensure a minimum amount of areas are disturbed by establishing explicit work zones to help with the traffic control and heavy equipment encroachment; installing proper erosion control measures; and using emergency strobe lights and signs on vehicle.

2. Measurable goal(s):

Our objectives are to keep Cobb County streets and county owned stormwater infrastructure clear of debris and functioning properly and remove debris promptly when discovered by county road crews or reported by the traveling public. Cobb County to: currently has a street sweeping program in place which accomplishes those objectives and will continue to do so through the 5 year reporting period.

The MS4 NPDES permit requires Cobb County to:

- At least 1 mile per year of street to be swept annually.
- Perform litter removal activities at least one day per week (Cobb DOT normally performs these on Tuesdays and Saturdays each week as crews are cutting and beautifying right of way and roadway).

3. Documentation to be submitted with each Annual Report:

- A work order summary as shown in Exhibit 3 (see above) will be included in Stormwater Management's annual report.
- Copies of DOT work orders will be furnished in the annual report.
- Road names and mileage for street sweeping and litter removal activities will be included. Although Cobb DOT does not use log sheets or forms for this activity, they keep up with it using large overlay maps for the cutting and sweeping routes, which will be furnished in the annual report.

5. Flood Management Projects

1. Description of SWMP Component:

Assessment for Water Quality Impacts: The Georgia Stormwater Management Manual (GSMM) has been and will continue to be used during plan reviews to ensure detention facilities are designed to address water quality. Procedures will be implemented to ensure new flood management projects (e.g. detention and retention basins) are assessed for water quality impacts. Details will be provided in each annual report on the assessments conducted during the reporting period.

For new or proposed detention ponds the design will be reviewed in-house by one of Stormwater Management's Plan Review Engineers, to ensure that the design comports with the Georgia Stormwater Management Manual (GSMM) to meet the water quality standards as established in that manual.

Cobb County began accepting ownership of detentions ponds in 1999.

The design of all existing County-owned detention ponds built after February 2007 were reviewed in-house by one of Stormwater Management's Plan Review Engineers, to ensure that the design comported with the Georgia Stormwater Management Manual (GSMM) and that it met the water quality standards as established in that manual. Existing county-owned ponds built between 1999 and 2007 were required to incorporate water quality provisions, but the extent to which they conformed with the GSMM is unknown. An assessment of these ponds will be made using the applicable worksheets in **Appendix N – Forms** to determine whether they need (or can) be retrofitted to incorporate water quality provisions as established in the GSMM.

Documentation: Since NPDES-MS4 permit requires procedures to be implemented to ensure existing structural flood control devices be evaluated during each reporting period to determine if retrofitting the devices for additional pollutant removal is feasible, and documentation of the evaluations will be provided of the evaluations conducted during the reporting period.

Post Development Impacts Downstream: Cobb County Codes/Regulations require land developers to evaluate the downstream storm drainage system and to design outflows from the detention facilities within the capacity allowance of that downstream system and to minimize channel scour and bank degradation. As a result of Water Quality system

requirements approximately 85% of the storm events occurring in this area will be captured in the (first flush) device and allowed to trickle out at very low rates. The water quality benefits are designed to significantly reduce the hydraulic and pollution loading on the downstream system.

2. Measurable goal(s):

The county will:

- Assess 100% of the county-owned ponds during the 5-year reporting period for water quality improvement retrofits.
- Report on whether water quality improvement retrofits are feasible at each county-owned pond and schedule water quality improvements where they are deemed feasible.
- Update inventory annually for newly added county-owned ponds.
- Assess 100% of new projects using the GSMM during Plan Review to ensure water quality is addressed.

3. Documentation to be submitted with each Annual Report: _

The county will:

- Provide a list of plans reviewed which resulted in new county-owned flood management ponds.
- Provide a copy of the pond assessment worksheet for existing county-owned ponds, in the Appendix of each Annual Report

6. **Municipal Facilities Excluding Any Industrial Facilities**
(Addressed in Permit Section 3.3.3)

1. Description of SWMP Component:

Municipal Facilities with the Potential to Cause Pollution: The Stormwater Management's Water Quality Section (WQS) environmental compliance technicians perform audits of each municipal facility and records their findings on a standard audit sheet. Historical files of the annual audits are maintained for each municipal facility. Each municipal facility has assigned staff to implement the components of the SWP3 such as ensure records are complete and up to date, ensure all monitoring is completed, and conduct visual inspections of runoff during rain events. Cobb County will continue to establish, maintain, and update an inventory of municipal facilities with the potential to cause pollution. Cobb County will provide an updated inventory in each subsequent annual report.

Cobb County will continue to implement a program to control runoff from municipal facilities with the potential to cause pollution (e.g. drinking water treatment plants, wastewater plants), and provide in each annual report. The program shall include the facility inspection prioritization, inspection frequency, and inspection documentation protocol as described in the SWMP. Cobb County will conduct an inspection on 100% of the inventoried facilities within the 5-year permit term. Documentation of the inspections and documentation of follow-up actions taken to address noncompliance issues will be provided in each annual report during the reporting period.

The Cobb County Fleet Maintenance Facility, Cobb Department of Transportation facility, and the Cobb Water System Operations facility are 3 facilities with the potential to cause pollution and are not Industrial stormwater permitted facilities. These three facilities have stormwater best management practices (BMPs) in place to protect the storm drainage system and to prevent pollution of the local waterways. These facilities will be inspected during the new MS4 permit cycle to ensure pollution prevention measures are still in place. Stormwater Management has added the Cobb County Adult Detention Center for yearly Municipal Facility inspections since its external diesel tanks have the potential to pollute.

In summary, municipal facilities with the potential to cause pollution are: McCollum Airport, Northwest WRF, Noonday WRF, South Cobb WRF, R.L. Sutton WRF and the Cobb Community Transit Maintenance Facility, Cobb County Fleet Maintenance Facility, Cobb Department of Transportation Facility; Cobb Water Systems Operations Facility; and the

Cobb County Adult Detention Center. The Northwest WRF has been issued a No Exposure Exclusion from Georgia EPD and is exempt from the industrial stormwater permitting.

2. Measurable goal(s):

The county will:

- Update the inventory during the 5-year reporting period
- Inspect all (100%) of the facilities on the inventory within the 5-year permit term.

3. Documentation to be submitted with each Annual Report:

The county will:

- Provide an updated inventory and copies of inspection reports
- Provide copies of inspection reports
- Provide copies of follow up actions taken to address non-compliance

...for municipal facilities with the potential to cause pollution in each annual report submitted in each annual report during the 5-year reporting period.

7.

Pesticide, Fertilizer, and Herbicide Application

1. Description of SWMP Component (Ensure the text addresses both commercial applicators and municipal use:

Commercial Applications. Cobb County utilizes a program to reduce pollution by the application of pesticides, fertilizer, and herbicides by commercial applicators and distributors in accordance with Georgia Department of Agriculture requirements.

The University of Georgia (UGA) Cooperative Extension Service e.g. (“the Extension Service”) in Cobb County has programs available to commercial applicators as well as municipal employees in Cobb County. The Extension Service provides a training video called “Super Crew Landscaper training” for commercial landscapers addressing safety, use, storage, and other management measures, in the application of fertilizers, pesticides, and herbicides. The Extension Service also provides information and registration on a satellite pesticide workshop that is simulcast from a conference held on pesticide applications. The Extension Service makes educational materials, brochures, and information on conferences and workshops available to any commercial applicator in Cobb County.

Municipal Applications. Cobb County has implemented a program to reduce pollution caused by the municipal use of pesticides, fertilizers, and herbicides, which includes as inventory, municipal staff training in application and safety by the Georgia Department of Agriculture. The Parks and Recreation Department personnel are trained at least once a year on pesticide use, storage, and safety. Parks and Recreation conduct a maintenance management school at Little Ocmulgee State Park that addresses pesticide use and safety in several classes. Students get five (5) credit hours for Pesticide Recertification in Cat. 24.

Documentation of the program activities will be provided in each annual report during the 5-year reporting period. Within the 5-year reporting period, the county will contact its business license department to compile a list of commercial pesticide, fertilizer and herbicide applicators that are located and who operate within Unincorporated Cobb County this will be cross checked against the Georgia Department of Agriculture’s list of commercial applicators. From that, a list of uncertified commercial applicators will be compiled by the county. Any uncertified commercial applicators will be notified in writing to become certified within 60 days.

Cobb County Municipal Facility personnel are trained in pesticide, fertilizer, and herbicide applications. Cobb County uses the Cobb County

Extension Office as well as other programs to provide training and certifications for municipal employees. During Parks and Recreation Department operations, the common areas in Cobb County parks are not treated with any pesticides except for fire ant controls on an as needed basis. Compost is used to increase plant health and reduce the runoff of fertilizers. Pesticides and fertilizers that are used are properly stored in secure containment area at a central location and distributed as needed by Cobb County Parks and Recreation. Cobb County personnel maintain only enough pesticide inventory to be used within a two month period and only apply post emergent pesticides on an as needed basis. CCDOT uses herbicide for spraying kudzu creeping into the roads and easements and uses granular fertilizer to establish some new turfs. Cobb County personnel use low growing vegetation grasses such as bermuda, fescue, and rye in parks as well as on CCDOT projects. Personnel are trained prior to each application to demonstrate proper spraying of pesticides and proper calibration to ensure correct amounts are applied. An inventory of fertilizers, pesticides, and herbicides used by Cobb County personnel is included in **Appendix F**.

2. Measurable goal(s):

Cobb County's primary goal will be to stay in compliance with all applicable permit requirements related to Pesticide, Fertilizer and Herbicide Applications. The Cobb County Parks Department follows State regulations applicable to the proper licensing of personnel using pesticides, fertilizers and herbicides. Staff members who handle pesticides, fertilizers and herbicides who are not licensed by the state, work under the direct supervision of county staff that are licensed by the state to handle these chemicals.

The county will:

- Ensure that all (100%) Parks Department staff who handle these chemicals receive proper training in accordance with State regulations.

3. Documentation to be submitted with each Annual Report:

The county will:

- Furnish documentation in each annual report:
 - training certificates
 - sign-in sheets for training seminars...demonstrating that staff has received proper training in accordance with State regulations.

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

1. Legal Authority

1. Description of SWMP Component

Legal Authority: Cobb County will re-evaluate and modify the existing IDDE ordinance when necessary for compliance with this permit. Previous audits of Cobb County conducted by EPD and by USEPA in 2006 ascertained that Cobb County's IDDE 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 includes Cobb County's authority to take legal action to eliminate illicit discharges or connections. If the ordinance is revised during the reporting period, Cobb County will submit a copy of the adopted ordinance with the annual report.

Based upon Cobb County staff's internal review and as subsequently confirmed by GaEPD and USEPA audits, the current Cobb County ordinance related to Illicit discharge and illegal connections, as referenced below, provides the authority to: conduct inspections and monitoring; control illicit discharges and unlawful connections; control illegal dumping and spills into the MS4; and provides Cobb County the authority to take legal action to eliminate illicit discharges or connections.

2. Measurable goal(s):

Inspection of Section 50-191; 50-192; 50-193 will confirm that this permit requirement has been met and is codified.

The county will:

- Follow up on all (100%) observed or reported illicit discharges; unlawful connections; illegal dumping; and spills into the MS4 within a 24-hour period.
- Evaluate the ordinances referenced above at least once each 5-year reporting period to ensure the code sections referenced above are applicable.

3. Documentation to be submitted with each Annual Report:

The county will:

- Furnish a copy of the adopted ordinance in the Annual Report if the ordinance is revised during the reporting period
- Furnish copies inspection reports and follow up monitoring reports related to illicit discharges; unlawful connections; illegal dumping; and spills into the MS4

2. Outfall Inventory and Map

1. Description of SWMP Component:

An Inventory and a map showing the location of all outfalls from the MS4 and the location of all waters of the State that receive discharges for those outfalls is provided in the Appendix. The identification of outfalls on our stormwater inventory is still a work in progress. The County has identified all outfalls, however, many errors have been found during field inspection/verification associated with "Dry Weather Screening." Our goal is to inspect 20% of our outfall inventory and have a complete and accurate inventory at the end of our 5 year permit cycle (2024). The map and inventory will be updated each reporting period.

2. Measurable goal(s):

The number of GIS /stormwater inventory tiles has been completed. Map accuracy improves every time an outfall inspection identifies errors to be corrected.

The county will:

- Inspect 20% of our outfall inventory each year during the 5-year reporting cycle.
- Verify that the outfall map is accurate (100%) by the end of the 5-year permit cycle.

3. Documentation to be submitted with each Annual Report

The county will:

- Provide an updated Outfall Map and Outfall Inventory
- Provide the number of outfalls added during the reporting period, and the total number of outfalls in the inventory

3. IDDE Plan

1. Description of SWMP Component

Enforcement against illicit dischargers into the stormwater drainage system is one of the primary responsibilities of the WQS staff. Enforcement starts with a comprehensive ordinance or code that defines illicit discharges. In 2004, Cobb County adopted the model ordinances from the Metro North Georgia Water Planning District to maintain consistency with all the other metro municipalities. This ordinance was updated in 2006 following an audit by GaEPD, and is included in **Appendix B**.

Cobb County will continue to implement the IDDE Plan to detect and address non-storm water discharges to the MS4 as described below.

The major components of the IDDE Plan are:

- Dry Weather Screening & Illicit Discharge Detection (ref. page 29)
- Response to Spills (ref. page 34)
- Highly Visible Pollutant Sources Inspections (ref. page 54)

3.1 Dry Weather Outfall Screening & Illicit Discharge Detection Procedures:

Dry Weather Outfall Screening:

The Cobb Stormwater Management Inventory crews and the WQS are responsible for implementing the dry weather screening program. Cobb County will conduct dry weather screening (DWS) inspections on 100% of total outfalls within the 5-year period in accordance with the procedures contained in the SWMP, as detailed below. Cobb County conducts stream walks in conjunction with our CMOM program, and these inspections are also often helpful in identifying and tracing spills, and in finding illicit discharges and illegal connections. Cobb County will conduct a percentage of the DWS inspections each year and will provide the number and percentage of outfall inspections conducted during the reporting period and document these inspections in each annual report.

Per GAEPD direction in their letter dating June 13, 2005 outlining stipulations from Federal Code 40-122.26, Cobb County has developed a Dry Weather Outfall Screening Program to meet the requirements mandated by the GAEPD and the MNGWPD. The Cobb County Stormwater Management's WQS staff and the Stormwater Inventory staff are responsible for the implementation of the Dry Weather Outfall Screening Program and the inventory of outfalls. The total

number of dry weather outfalls identified and previously screened in the MS4 inventoried and screened to date is approximately 1750. As mentioned previously, the outfall map is a work in progress. According to our most recent efforts, the total number of outfalls displayed on the 1 mile buffer map is 9,532. This 1 mile buffer map is included in the appendix. During the 2020-2025 reporting period, Stormwater Management will annually screen as outfalls 20 per cent of the total number of identified dry weather outfalls. The outfalls are prioritized based on areas not screened in the reporting period and based on potential water quality problems in a certain area. Each year within a five year permit cycle the outfall locations will be rotated. Outfalls are screened in industrial, commercial, and residential areas, and the total number reported in the annual report includes all three areas.

During each screening visit or inspection, if flow is detected, the County will source trace all dry weather flows. The County will conduct testing as described below in an effort to identify possible sources when source testing does not identify a specific source. When conducting testing the County's field personnel will:

- Check the observed discharge for color, turbidity, sheen, and odor.
- Measure the pH, temperature, conductivity, and determine the quantitative presence of fluorides and surfactants in the discharge.
- Collect grab samples for fecal coliforms, if odor, high conductivity or surfactants are detected in dry weather discharge.
- Observe ranges for :
 - pH (6-9)
 - Fluoride (< 0.2 mg/l)
 - Surfactants/ Detergents (<0.2 mg/l)
 - Conductivity (< 300 µmho/cm)

Once the outfalls are selected and screened in a reporting period, new locations will be selected and screened the next reporting period. Each year within a five (5) year permit cycle the outfall locations will be rotated.

If a discharge or flow is detected at the outfall, WQS field personnel will use meters and chemical field kits to screen for the parameters mentioned previously. If flow indicates a possible sewage spill, field personnel will take a grab sample for fecal coliform to the Central Laboratory for lab analysis. When more precise and extensive testing is required, the Central Laboratory will continue to support field personnel with chemical analysis.

The procedures followed by Cobb County for dry weather screening are outlined in the MNGWPD Standards and Methodologies for Dry Weather Illicit Discharge Screening report. Cobb County also screens for all

parameters at discharging outfalls as the GAEPD requests, regardless of the pH and conductivity findings. The listing of the screening procedures can be found in **Appendix H Dry Weather Illicit Discharge Screening**.

Illicit Discharge Detection: Cobb County will continue to implement investigative and follow-up procedures when the results of the screening indicate a potential illicit discharge, including the sampling and/or inspection procedures as described below. Cobb County will provide information on illicit discharge detection activities performed to eliminate any illicit discharges identified during the reporting period in each annual report.

Several Departments in the Cobb County Water System have illicit discharge detection activities incorporated into every day job responsibilities. Cobb County Water System Engineering Division has an Inflow and Infiltration Section that annually inspects sewer lines that follow creek alignments. They annually inspect approximately 1500 creek crossings and 4000 sanitary sewer manholes. The Inflow and Infiltration Section has ten (10) employees and does smoke testing and line televising where roots or other blockages are suspected; where a line sags and collects grease; and/or to assess manholes. Cobb County Water System's Water Protection Division has the Stream Monitoring Department which performs habitat assessments, visual surveys, and chemical monitoring to meet permit requirements and to assist in detecting illicit discharges. The chemical monitoring occurs four (4) times a year at each of the 91 stream sampling locations. There are 24 biological monitoring sites that are visited once a year for biological monitoring. Habitat assessments are performed once a year in one (1) of the four (4) wastewater treatment plant basins in a five (5) year cycle.

When screening detects an illicit discharge then the investigation to determine the source of the discharge begins immediately by the WQS staff. If the flow from an outfall is detected by the Inventory crews then the WQS is notified and dispatched as soon as possible (same day) to screen the discharge and conduct the field investigation if an illicit discharge is detected. WQS personnel will trace the discharge to its source and engage parties responsible for the discharge resolving it in the most prompt and efficient manner possible.

The source of any illicit discharge is pursued by tracing discharges upstream or backtracking of stormwater drainage until found *or* until the test results show the absence of the chemical in question, and no salient source presents itself. Personnel will return to the outfall between 4 to 24 hours to determine if the discharge has been eliminated. Field technicians use a variety of procedures ranging from dye testing to chemical sampling

and utilization of electronic probes for immediate in-stream testing results to narrow the search. A guide that county personnel uses to evaluating dry weather screening results and a listing of illicit discharge tracking methods recommended by the MNGWPD can be found in **Appendix H**.

If a sanitary sewer spill is suspected and is not located visually or there is a pipe in question, the Cobb County System Maintenance Department uses different procedures such as line televising, dye testing, smoke testing, and walking sewer lines and easements to find the source. When more precise and extensive testing is required, the Cobb County Central Laboratory will continue to support field personnel with chemical analysis.

Citizen complaints can also reveal and alert WQS staff to the presence of an illicit discharge. During the next reporting period, calls from citizens will be investigated by WQS field personnel to determine if an immediate response is in order. Once that determination is made, WQS field personnel will be dispatched or "on call" personnel are dispatched after business hours and on weekends.

Long Term Trend Sampling / Bacteria Monitoring: Per GAEPD's December 8, 2008 memorandum and Metro North Georgia Water Planning District (MNGWPD) December 2008 Public Comment Drafts, previously required NPDES stormwater permit wet weather trend monitoring is satisfied by trend monitoring done in compliance with municipalities' Watershed Protection Plans; in Cobb County, chemical and biological trend monitoring required by the Watershed Protection Plan and performed by the Cobb Stream Monitoring Program satisfies all current GAEPD and MNGWPD trend monitoring requirements.

The procedures as outlined above are designed to ensure that any identified illicit discharges are detected and subsequently eliminated. If necessary, Cobb County WQS staff can implement enforcement procedures described in Section 50 of the Official Code of Cobb County (see **Appendix B**) and as re-stated and reinforced in the Enforcement Response Plan (ERP).

2. Measurable goal(s):

The county will:

- Inspect 100% of the outfalls within the 5-year reporting period
- Inspect a minimum of 5% of the outfalls annually during the 5-year reporting period
- Analyze 100% of dry weather flows
- Eliminate 100% of identified illicit discharges

3. Documentation to be submitted with each Annual Report: _

The county will:

- Provide the number and percentage of outfalls inspected
- Provide copies of inspection forms
- Provide laboratory bench sheets with results of sampling, if sampling was conducted
- Provide Information on any enforcement actions taken for illicit discharges
- Provide a copy of the letter which is mailed to the non-compliant party, including:
 - description of the non-compliance
 - a photograph of the area
 - actions to be taken and timeline to take action.

4. Spill Response Procedures

1. Description of SWMP Component:

Cobb County will continue to implement the procedures as used in the previous reporting period, and as described below to prevent, contain, and respond to spills that may discharge to the MS4. Cobb County will provide documentation on spill occurrences during the reporting period in each annual report.

The Cobb County Fire Department oversees the Cobb County Hazardous Material (HAZMAT) Response Team. HAZMAT is sent to major spills that involve categorically hazardous materials (i.e. gasoline, chemicals, biological agents). HAZMAT responds to non-emergency calls such as discarded motor oil in a storm drain. Any HAZMAT response that involves the stormwater conveyance system is coordinated with Stormwater Management personnel dispatched to the spill site. The HAZMAT Team is trained on the containment of spills and is equipped to handle most spills to the MS4. A record of all spill events is maintained by HAZMAT and Stormwater Management.

Cobb County Water's System Maintenance, Inflow and Infiltration, Environmental Compliance, Streams and Water Quality departments stay in constant communication through Central Dispatch in locating, prioritizing, diagnosing the cause of, and repairing sanitary sewer overflows.

Cobb County participates in the state sponsored Capacity Management Operations Maintenance (CMOM) program that involves incentives to reduce spills by maintaining infrastructure, prioritize problem areas, fund capital improvement projects, and allocate funding reserves for sewer infrastructure improvements on an ongoing basis.

2. Measurable goal(s):

The county will:

- Comply with all (100%) of the standards and guidance provided in the CMOM program to reduce spills.
- Respond to 100% of reported spills by immediately dispatching a Cobb Water System Maintenance crew for assessment.

3. Documentation to be submitted with each Annual Report:

Documentation on spill occurrences will be provided during the reporting period in each annual report.

The county will:

- Provide an "Incident Notification" report prepared by Cobb County Fire & Emergency Services.
- Provide an Excel spreadsheet prepared by Cobb County Water System's System Maintenance Department on a monthly basis detailing sewer overflows

5. Public Reporting Procedures

1. Description of SWMP Component

Illicit discharges are published in Cobb County's Stormwater Management Annual MS4 report to the GAEPD, with a narrative describing the principals, mechanism, and environmental effects of each incident. The public has several avenues to pursue for illicit discharge information. There is a water system emergency hotline, (770) 419-6201, that takes all calls ranging from drinking water problems to illicit discharges; brochures and handouts with a listing of numbers to call concerning water problems; the Cobb County website has a number for surface water problems/ illegal dumping; and the Clean Water Campaign website has a section to report illegal dumping and surface water problems. Website reports are directed to the proper Cobb County personnel for investigation and response.

Cobb County will implement the procedures for receiving and responding to complaints related to illicit discharges used in the previous reporting period and as described above. The county tracks complaints in its MAXIMO work order system.

Cobb County will implement the procedures as used in the previous reporting period, to promote, publicize, and facilitate public reporting of illicit discharges.

2. Measurable goal(s):

The county will:

- Monitor, document and act upon 100% of reports of illicit discharge recorded at the Water Systems emergency hotline, from the Cobb County website and from the Clean Water Campaign's website
- Investigate 100% of complaints within 7 working days
- Report publicly and publish at least once per reporting period on illicit discharges

3. Documentation to be submitted with each Annual Report:

The county will:

- Provide information on complaints (i.e. reports, phone logs, inspection reports, emails) related to IDDE that were received and investigated during the reporting period in each annual report, including their resolution.
- Provide documentation (i.e. reports, inspection reports, emails) on any activities conducted relative to illicit discharges reported during the reporting period in each annual report.

- Provide a copy of the public notice *Press Release* for qualifying sewer spills.
- Provide “Incident Notification” reports prepared by Cobb County Fire & Emergency Services
- Provide Excel spreadsheet prepared by Cobb County Water System’s System Maintenance Department on a monthly basis detailing sewer overflows

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

1. Description of SWMP Component:

Cobb County will implement activities to facilitate the proper management and disposal of used oil and toxic materials, including educational activities, household waste collection programs, etc. During the previous reporting period Cobb County held "amnesty days" to allow homeowners to bring in household waste.

Cobb County's Solid Waste Division has turned over operation of the Cobb County Transfer Station to Advanced Disposal. Advanced Disposal collects used oil, antifreeze, old tires, lead acid batteries, paper, aluminum, and other scrap materials. A manifest is generated for final disposition of these materials by a certified recycler or special waste disposal company.

2. Measurable goal(s):

The county will:

- Provide tonnage of used oil and other toxic materials collected at the transfer station and during any amnesty days held.
- Perform one amnesty day activity each reporting period as required by the Permit

3. Documentation to be submitted with each Annual Report:

Details on any activities performed during the reporting period will be provided in each annual report during the reporting period.

The county will provide:

- sign-in sheets
- photographs
- water manifests

7. Sanitary Sewer Infiltration Controls

1. Description of SWMP Component:

Monitoring for sanitary sewer leaks is administered by the Cobb County Water System's Stream Monitoring Program; Inflow and Infiltration stream walks at sewer crossings of streams and at manholes; and by the Adopt-A-Stream volunteers. Cobb County Water System's 9.4 mile tunnel project has been completed and will relieve pressure off a main sewer line that collects and runs through part of the Sope Creek basin and Rottenwood Creek, thereby reducing the potential for sanitary sewer overflow in those basins. The Cobb County Water System's South Cobb Tunnel, which performs a similar purpose in south Cobb, is 5.5 miles in length and 27 ft in diameter. It is the largest capital improvement project in CCWS history and collects and treats wastewater for most of the northwest Atlanta, Georgia region. Cobb Water System Engineering also maintains a manhole raising program in low lying areas to place sewer caps above the latest FEMA floodplain levels, curtailing excessive inflows leading to sanitary sewer overflows. If dry weather flow indicates the presence of sewage, personnel calls the Cobb Water System Dispatch Center and System Maintenance crews are dispatched to repair the problem immediately.

2. Measurable goal(s):

The county will:

- Continue to implement the activities to detect and eliminate seepage and spillage from municipal sanitary sewers to the MS4 as described above.
- Report on the number of miles of sewer line inspected each reporting period.
- Set 15 miles of sanitary sewer line to be inspected annually.

3. Documentation to be submitted with each Annual Report:

Details on any activities performed during the reporting period will be provided in each annual report.

The county will provide:

- Site inspection daily work logs
- MAXIMO work order reports

...to document this activity.

6. Industrial Facility Stormwater Discharge Control Table 3.3.3 of the Permit

1. Industrial Facility Inventory

1. Description of SWMP Component:

Cobb County will update our inventory for facilities with industrial activities that potentially discharge to the MS4. 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. For a listing of industrial categories required to obtain IGP coverage, see Appendix J.

2. Measurable goal(s):

The county will:

- Determine that the inventory listing for facilities with industrial activities that potentially discharge to the MS4 is 100% complete by including a copy of EPD's online listings for:
 - Industrial Storm Water General permits (IGP)
 - Notice of Intents (NOI) and
 - No Exposure Exclusion (NEE).
- Update the inventory once each reporting period.

3. Documentation to be submitted with each Annual Report:

The county will:

- Provide the inventory with the annual report.
- Provide an Updated Inventory in each subsequent annual report.

2. Inspection Program

1. Description of SWMP Component:

Inspection: Cobb County will continue its industrial facility inspection monitoring program for all facilities in the industrial facilities inventory. In the event the County determines that an industry is discharging through the MS4 and adding a substantial pollutant load to the stream, then the County will require the industry to conduct monitoring and will collect monitoring results from the affected industry. Cobb County inspection monitoring program consist of inspection only. Cobb County does not anticipate performing sampling for any affected industry. If an industry believed to be discharging through the MS4 and adding a pollutant load to the stream does not provide monitoring results for their industry, then they

will be given written notice to do so within 30 days. Cobb County's inspection monitoring program for industry facilities consists of the facility inspection prioritization, inspection frequency, and inspection documentation.. Cobb County will continue its inspection monitoring program for stormwater runoff from industrial facilities, waste facilities, hazardous waste treatment, storage and disposal facilities.

2. Measurable goal(s):

The county will:

- Conduct inspections on 100% of the inventoried facilities that discharge to the MS4 within the 5-year period.
- Conduct no less than 10% percent of the inspections of the inventories facilities in any given year.

3. Documentation to be submitted with each Annual Report

Documentation of the inspections will be included in each annual report. Cobb County will provide the results of any monitoring conducted during the reporting period in each annual report. This shall include all facilities that Cobb County determines are contributing a substantial pollutant loading to the MS4. Cobb County will provide the total number of facilities and the number and percentage of inspections conducted during the reporting period.

3. Enforcement Procedures

1. Description of SWMP Component

Any violations are handled by Cobb County's Enforcement Program and will receive enforcement action. Cobb County Stormwater Management prosecutes industrial violators under the Federal, State, and County Codes through Cobb County Community Development's citation procedure. If violations against the requirements of the NPDES General Permit are not addressed, then the compliance issues are forwarded to the GAEPD, the issuing authority for the NPDES Program, for enforcement actions. The Industrial Pre-Treatment Program uses consent orders for enforcement. Water System consent orders, reviewed by the Cobb County Attorney, directly bill the violator for the violation along with the monthly water usage and sewer surcharge bill.

2. Measurable goal(s):

The county will:

- Continue to implement enforcement procedures as described above to be utilized if a stormwater violation is noted at an industrial facility that discharges to the MS4 during the reporting period and in accordance with the ERP.
- Ensure enforcement is taken for 100% of noted violations.

3. Documentation to be submitted with each Annual Report:

The county will:

- Provide documentation on any enforcement actions taken during the reporting period in each annual report including:
 - A copy of the audit form noting violations
 - The letter mailed to the industry.

4. Educational Activities

1. Description of SWMP Component

Cobb County's Stormwater Management Division conducts annual inspections of industrial facilities, distributes brochures discussing the environmental effects and liabilities of stormwater runoff pollution, recommends changes and BMP improvements pertinent to stormwater runoff, and offers curb markers and other educational materials in addressing dumping at catch basins and into storm drains. Any compliance issues are noted and sent to the industry in a letter or a notice of violation.

2. Measurable goal(s)

Samples of educational materials and activities performed during previous reporting periods are included **Appendix K**.

The county will:

- Continue to implement educational activities for industrial facilities.
- Provide educational materials at 100% of our inspections
- Refer industries to the Cobb County Stormwater Management webpage for educational materials at 100% of our inspections

3. Documentation to be submitted with each Annual Report

The county will:

- List educational activities performed during the reporting period in each annual report.
- Add a line to the audit inspection form to indicate staff has referred industries to the Cobb County Stormwater Management webpage for educational materials.

7. Construction Site Management **Table 3.3.4 of the Permit**

1. Legal Authority

1. Description of SWMP Component

During the 2020-2025 reporting period Cobb County's existing Erosion and Sedimentation (E&S) ordinance will be re-evaluated and modified when (and if) necessary for compliance with Cobb County's N.P.D.E.S. permit. Cobb County will continue to ensure that the E&S ordinance provides the authority to issue land disturbing activity permits; require best management to prevent and minimize E&S; require erosion, sedimentation and pollution control plan submission and review prior to commencing construction; conduct inspection 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.

Cobb County will implement and enforce a program to maintain structural and/or non-structural BMP's to reduce pollutants in stormwater runoff from construction sites to the MS4 as defined in the SWMP. The program will contain the following elements:

In 2004, Cobb County adopted the model ordinances from the MNGWPD to maintain consistency with all the other metro municipalities. Cobb County adopted the code amendments from the District for the Erosion and Sedimentation Control Ordinance to match the District's ordinance. Cobb County adopted recently promulgated floodplain code amendments for the floodplain ordinance (O.C.C.C. chapter 58) during the 2014-2019 reporting period.

2. Measurable goals

The county will:

- Evaluate the Erosion and Sediment Control ordinance once each reporting period, per the Permit

3. Documentation to be submitted with each Annual Report

The county will:

- Submit a copy of the adopted ordinance in the annual report, if the E&S ordinance is revised during the reporting period

2. Site Plan Review Procedures

1. Description of SWMP Component

The Site Plan Review Section coordinates the review of all construction plans prior to land disturbance to ensure consistency with the zoning and attached stipulations and Cobb County Code. During this process, staff can recommend changes to the site plan to better protect against unbuffered runoff during and after land disturbance before they issue any land disturbance permits. Community Development (which includes Site Plan Review) also issues permits for grading and other processes. Once all recommendation and stipulations are complete, the site plans are stamped for approval and land disturbance begins. Cobb County is a Local Issuing Authority. Site Plans are reviewed and tracked as follows: The Cobb County Community Development Agency utilizes a permitting software and document management system to organize and track the review of submitted construction projects. Upon initial submittal to the county, a set of civil engineering drawings (including sediment and erosion control plans) is distributed to multiple reviewing departments, including the Erosion & Sediment Control (ESC) division. These departments produce markups and review comments, which are then provided to the applicant. The applicant then addresses these comments and submits revised plans as necessary to the appropriate departments. The permitting software tracks the approvals of each department and ensures that a land disturbance permit is not issued unless all departments have given preliminary approval. The following is an explanation on how Construction Inspections are documented and how the information is tracked: The same permitting software is used to manage project inspections. County staff can assign a specific number of ESC inspections and/or specific inspection dates. Alternatively, a project can be assigned regularly scheduled, recurring inspections. The results of these inspections are then logged into the system. Inspection report forms are also completed by the inspector, and these are loaded into the document management system. These reports are grouped together within the project record so that they are easily accessible. A sample Inspection Form is included in the Appendices under "Forms".

2. Measurable goal(s):

The county will:

- Continue to implement the site plan review procedures as described above 100% of the time.
- Ensure 100% of site plans are reviewed to ensure compliance with the manual of Erosion and Sediment Control in Georgia.

3. Documentation to be submitted with each Annual Report

The number of site plans reviewed are kept and recorded in the MS4 annual report.

The county will:

- Provide a list of the site plans received
- Provide the number of plans reviewed, approved, or denied during the reporting period
- Provide the number of Land Disturbance Activity (LDA) permits issued

3. Inspection Program

1. Description of SWMP Component:

Once land disturbance begins, the Site Inspection Section has the responsibility of making sure all erosion and sedimentation controls are in place. Sites are inspected three (3) times a week during the land disturbance, grading, and stormwater conveyance installation, and every three (3) to four (4) days after the infrastructure has been installed. Inspections occur following installation of initial BMPs, during active construction, and after the final site stabilization. The Cobb County Community Development Agency utilizes a permitting software and document management system to organize and track the review of submitted construction projects. Upon initial submittal to the county, a set of civil engineering drawings (including sediment and erosion control plans) is distributed to multiple reviewing departments, including Erosion & Sediment Control (ESC) Division. These departments produce markups and review comments, which are then provided to the applicant. The applicant then addresses these comments and submits revised plans as necessary to the appropriate departments. The permitting software tracks the approvals of each department and ensures that a land disturbance permit is not issued unless all departments have given preliminary approval. The same permitting software is used to manage project inspections. County staff can assign a specific number of ESC inspections and/or specific inspection dates. Alternatively, a project can be assigned regularly scheduled, recurring inspections. The results of these inspections are then logged into the system. Inspection reports are also completed by the inspector, and these are loaded into the document management system. These reports are grouped together within the project record so that they are easily accessible.

Included in the Community Development Agency's responsibilities is maintaining the stream bank buffer ordinance. Streams have been assigned various widths of buffer ranging from fifty (50) feet to two-hundred (200) feet each side depending on the size of the contributing watershed and the sensitivity of the stream.

The construction site inspection program shall include the facility inspection prioritization, inspection frequency, and inspection documentation protocol described above.

2. Measurable goal(s):

The county will:

- Continue to implement the construction site inspection program to ensure that structural and non-structural BMPs at construction sites are properly designed and maintained as specified in the

Construction General Permits (CGPs) at all (100%) construction sites

- Conduct at least 1 inspection at each active construction site during the reporting period. An example inspection form is provided in the Appendix.

3. Documentation to be submitted with each Annual Report:

The county will:

- Provide the number of active sites and the number of inspections conducted during the previous calendar year in each annual report.
 - Inspection Forms will be submitted with each Annual Report

4. Enforcement Procedures

1. Description of SWMP Component:

The Cobb County Community Development Department employs 14 full-time staff in the prosecution of the Erosion and Sediment Control ordinance. Enforcement ranges from warnings to after seven days, stop work orders to, after seven days more, fines of \$2100 and \$300 a day in the event of non-compliance with Cobb County's Erosion and Sedimentation Control ordinance.

Cobb County will provide documentation on any enforcement actions taken during the reporting period in each annual report, including the number and type (Notice of Violation, Stop Work Order, etc.)

2. Measurable goal(s):

The county will:

- Continue to implement enforcement procedures for E&S violations documented at construction sites as described above
- Ensure enforcement action is taken for 100% of noted violations, in accordance with the ERP included in Part 3.3.6 of Cobb County's N.P.D.E.S. permit.

3. Documentation to be submitted with each Annual Report:

The county will:

- Provide:
 - the name of the development
 - the enforcement action and
 - the date of the action is submitted to the WQS

5. Certification

1. Description of SWMP Component

The Cobb County Erosion and Sediment Control Department staff conducts state sanctioned courses for developers and builders that produce a Cobb County Erosion and Sediment Control Certification necessary for pulling permits in order to begin land disturbance and construction. Cobb County's Erosion Control Division Manager and Stormwater Management's Division Manager ensure that reporting MS4 staff involved in construction activities are trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission (GSWCC)

2. Measurable goal(s):

During the next reporting period (2020-2025) the county will:

- Continue to require that all (100%) builders, developers, contractors, and other entities involved in construction activities subject to the Code of Good Practice (CGP) comply with the certification requirements of the Georgia Erosion and sedimentation Act and the rules adopted by the Georgia Soil and Water Conservation Commission. Ensure that all (100%) 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.

3. Documentation to be submitted with each Annual Report

The county will:

- Provide a summary of the training conducted during the reporting period in each annual report.
- Provide the number and type of current certifications in each annual report.
- Submit copies of GSWCC cards or printouts from the GSWCC website in each annual report to document that MS4 staff involved in construction activities are certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission (GSWCC)

8. Highly Visible Pollutant Sources (HVPS)

Table 3.3.5 of the Permit

1. HVPS Facility Inventory

1. Description of SWMP Component

HVPSs are equivalent to our SIC list of potential stormwater pollutant sources. The WQS of the Cobb County Stormwater Management is responsible for the inventory and inspections of the following types of commercial industries and businesses to the HVPS inventory, including:

- small commercial car washes
- detail shops
- auto repair shops
- home improvement stores
- garbage transfer stations
- dry cleaning businesses
- paint businesses.

WQS staff obtains a comprehensive list of all businesses requesting licenses to do business in Cobb County from the Business License Office. A list, sorted by SIC number, is produced. The SIC number is compared to a required list of priority industries. The SIC numbered businesses that match the SIC numbers on the list of priority businesses are entered into the Water Quality database.

2. Measurable goal(s):

The county will:

- Establish, maintain, and/or update an inventory for HVPS facilities that discharge to the MS4.
- Prepare an updated list of HVPS facilities at the beginning of each permit cycle.
- Update the inventory one time during each annual reporting period.

3. Documentation to be submitted with each Annual Report

The county will:

- Include the HVPS facilities inventory with each annual report.
- Provide an updated inventory in each annual report during the 2020-2025 reporting period.

2. Inspection Program

1. Description of SWMP Component:

Inventory and inspection of all businesses included in the priority list of potential polluters is the responsibility of the WQS staff which consists of three (3) Environmental Compliance Technicians. After the initial inspection the potential to pollute is noted in the database as well as the resolution to any problems found along with dates for re-inspection.

The inspections of these businesses are based on: citizen complaints, random stormwater inspections, and investigations resulting from downstream chemical sampling. The HVPS inventory is updated monthly and each business is scheduled to be inspected according to the type of facility and other factors. If the facility has a high potential to pollute, the facility is prioritized to be inspected first and the frequency of inspections is determined accordingly. Stormwater Management anticipates that over 800 old and new businesses will qualify as Highly Visible Pollutant Sources and as such will be included in the Storm Water Quality Section database and inspected every 5 years. Businesses opened or closed during the cycle are flagged for inspection or deleted from the list as they are submitted.

2. Measurable goal(s):

The county will:

- Inspect 100% of the HVPS facilities within the 5-year permit term, with at least 5% of the facilities inspected each reporting period. The Inventory of the HVPS businesses can be found in **Appendix G Highly Visible Pollutant Sources (HVPS) Inventory**.
- Implement the HVPS facility inspection program which includes:
 - the facility inspection prioritization
 - inspection frequency, and
 - inspection documentation protocol...as done in the previous reporting period, and as described above.
- Conduct inspections on 100% of inventoried facilities that discharge to the MS4 during the 5-year reporting period from 2020-2025.

3. Documentation to be submitted with each Annual Report:

Cobb County will inspect 100% of the businesses in the HVPS database during the reporting period (20% on the average each year) and will document the percentage inspected in each annual report submitted during the reporting period.

The county will:

- Provide Inspection forms completed for each HVPS inspection will in annual reports
- Provide the total number of inspections, which will also be provided as a percentage of the total number of HVPS facilities.

3. **Enforcement Procedures**

1. Description of SWMP Component:

On-going compliance issues that are not remediated are turned over to Cobb County Code Enforcement at Community Development Agency for possible further action. Water quality educational materials such as pamphlets, brochures, and fact sheets are mailed to businesses needing assistance in pollution prevention to better educate the facility managers or owners. All enforcement activities are recorded and filed with inspection reports.

2. Measurable goal(s):

The county will:

- Continue to implement enforcement procedures if a stormwater violation is noted at an HVPS facility that discharges to the MS4 in accordance with the applicable County Codes, and the ERP referenced in Part 3.3.6 of Cobb County's current N.P.D.E.S. permit.
- Implement enforcement procedures for 100% of noted violations.

3. Documentation to be submitted with each Annual Report:

The county will:

- Report on enforcement actions in each annual report submitted during the 2020-2025 reporting period.
- Provide a copy of the "Notice of Violation" letter for each instance of noted violations addressed during the reporting period.

4. Educational Activities

1. Description of SWMP Component:

Cobb County's Stormwater Management Division distributes educational materials to business inspected through the HVPS inspection program. These businesses with noted problems are given educational materials such as industry specific fact sheets, brochures, and pamphlets educating the business and its staff in stormwater pollution prevention.

Community Partners for Healthy Streams (CPHS) is an outreach program developed by the Cobb County Water System's Watershed Stewardship Program and the Cobb Stormwater Management Division. Based on materials and protocols developed by Washtenaw County, Michigan, CPHS helps local businesses learn ways to protect their watersheds. Using the Washtenaw County program as a template, Cobb County edited existing education materials to make them appropriate for state and local ordinance requirements. Currently the CPHS program has transitioned to a podcast outreach format. Every month, a new podcast and illustrative infographic is published online on Cobb Water's website and shared through major social media platforms. Each podcast covers best management practices for professional audiences to learn how to prevent storm water pollution and conserve water at their workplaces. In the future, CPHS plans to invite third-party guest experts from Cobb County's commercial industries to make our conversations more inclusive to the wider community, and to expand our audience. The program has adopted this outreach format in response to public safety in-person meeting restrictions due to the COVID-19 pandemic, and, on request, continues to offer technical advice on best management practices through phone or virtually.

2. Measurable goal(s):

The county will:

- Continue to Implement educational activities for HVPS facilities. Details of any educational activity performed during the reporting period will be provided in each annual report.
- Note on the inspection form when educational material is provided during an HVPS inspection.
- Direct 100% recipients of notice of violations (NOV's) to the educational materials available on the Cobb County Stormwater Management website, when violations are noted at HVPS facilities.

3. Documentation to be submitted with each Annual Report:

The county will:

- Ensure that 100% of MS4 staff involved in HVPS activities obtain the appropriate education and training

- Provide a summary of the training conducted during the reporting period in each annual report.
- Include a copy of specific educational materials (brochures/factsheets) provided to Notice of Violation recipients in the annual report.

9. 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 - Educational Activity #1

1. Description of SWMP Component: School Presentations

- *Providing education programs to schools to support student understanding of local water resources, water supply, water and wastewater treatment, water conservation and/or watershed management*
- *Targeting students at different age levels with materials oriented toward that age group*
- *Developing education presentation materials that can be used by presenters (e.g., handouts, speaker guide, demonstration/visual aid, slides)*
- *Trained educators and/or facilitators of a national education program (e.g., Project WET)*
- *Seeking guidance from local teachers on curriculum linkages that would help to identify appropriate grades and times of year to provide this material*
- *Coordinating water festivals and facility tours*

Implementation of School Programs

- *With extensive, long-standing relationships with local teachers and schools, bookings largely occur at the end of the previous school year and during preplanning as a result of direct communication to teachers*
- *Staff participate in pre-planning & professional development events organized by the school district as well to promote school program offerings*
- *Scheduled on an ongoing basis, upon request of the school/teachers*
- *Staff typically visit the school in person, presenting as requested*
- *Due to COVID-19, CCWS has modified school programs to allow for distance learning, utilizing technology to provide virtual lessons to students with both live streaming and video components*

2. Measurable goal(s): Reach 10,000+ students at 75% of Cobb County public schools each school year.
3. Documentation to be submitted with each Annual Report: Communications & Education Division Annual Report includes a summary of school outreach accomplishments.

2. Public Education - Educational Activity #2

1. Description of SWMP Component: Newsletter

Educational materials are provided in our quarterly newsletter, Water Matters.

Starting in spring 2020 we added a mail chimp distribution for community members who sign up through the Cobb County website in addition to the Campaigner signup that Cobb Water has been using for the past 10+ years. The table below details the distribution numbers. Of course, there are also the passive views on the website in addition to the quarterly proactive campaigns.

Date	Edition	Method	Number
6/7/19	Summer	Campaigner	2723
		Paper	422
9/25/19	Fall	Campaigner	2722
		Paper	422
12/23/19	Winter	Campaigner	3208
		Paper	416
4/13/20	Spring	Campaigner	3116
		Mail Chimp	78
		Paper	418

2. Measurable goal(s): Continue to publish our newsletter, *Water Matters*, quarterly.
3. Documentation to be submitted with each Annual Report: Weblink to the newsletter archive is included in the Communications & Education Division Annual Report. Both hard copy and electronic mailings are sent quarterly. Contact databases are maintained for each method.

3. Public Education - Educational Activity #3

1. Description of SWMP Component: Social Media Program

- *Establish a presence on a social media platform to open a channel of communication with utility customers and residents*
- *Distribute water resources and water resource management information to citizens and utility customers via one or more social media tools (e.g., Facebook, Twitter, LinkedIn, Instagram)*
- *Promote social media connections with citizens and customers through other means (e.g., website, local media, bill stuffers)*

CCWS continues to maintain an active social media presence across several platforms, tracking engagement and proactively implementing strategies to increase promotion, image building, and traffic to Cobb County Water System social media accounts.

CCWS routinely posts content as applicable on the following schedule each week:

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday Sunday
Mark Your Calendar Mondays (Pre-Event Promotion)	Tip Tuesdays	Water Professional Wednesday	Thank you Thursdays (Post event recognition)	Fun Fact Fridays	Live posts if working an event

2. Measurable goal(s): Post to social media once each week.
3. Documentation to be submitted with each Annual Report: Weblinks to the social media accounts and engagement statistics are included in the Communications & Education Division Annual Report.

Public Education - Educational Activity #4

1. Description of SWMP Component: Educational brochures and digital display content at public facilities (including Educational Display with Promotional Items/Giveaways)
 - *Making educational brochures available for visitors at government buildings with public access*
 - *Distributing educational content for use in digital displays in government buildings with public access*
 - *Maintaining an exhibit or educational kiosk in a publicly accessible place with a focus on water resource topics*

CCWS continues to setup monthly educational displays in the Cobb County Water System lobby, providing a monthly educational giveaway that aligns to the theme. Example: In June we have a “Dogs Days of Summer” display setup with water quality education information and free pet waste bag dispensers available for those that choose to take one. CCWS currently assists approximately 1,100 customers per month at our Customer Service Counter. Based on the number of giveaways distributed to date, we estimate directly reaching 500 people per month through this effort.

Monthly Education Campaign Theme				
Date	Monthly Theme	Giveaway	Education Document(s)	Giveaway Inventory Status
June	Dog Days/Pet Waste	pet bags bandanas bowls	Pick it Up trifold	On hand
July	Smart Irrigation	moisture meters flags	EPA flyer	On hand
Aug	You're the Solution	straws leak tabs	rainbow bookmarks	On hand
Sept	Septic Smart	kitchen aerators leak tabs	EPA homeowners guide	On hand
Oct	Shower Better	shower heads bathroom sink aerators leak tabs	PPCP fact sheet EPA flyer	On hand
Nov	Holiday FOG	kitchen sink strainers leak tabs	FOG fact sheet	On hand
Dec	Don't be Naughty	shower timer leak tabs	indoor audit	On hand
Jan	Commit to Good Habitats	water bottles leak tabs	volunteer rack card	On hand
Feb	Love You Pipes/Sewer	drain cleaning tool leak tab	toilet is not a trash can rack card	On hand

Mar	Fix A Leak	pressure gauges leak tabs	indoor audit EPA doc	On hand
Apr	Take Care of Our Earth	rain gauge leak tabs	PPCP fact sheet HHW booklet/rack card	On hand
May	Sprinkler Spruce Up	spray nozzle flags	outdoor audits	On hand
budget for 500 items/month				

2. Measurable goal(s): Update the monthly education display and track draw down of resources.
3. Documentation to be submitted with each Annual Report: Lobby display records will be included in the Communications & Education Division Annual Report and the table below will be updated including the number of giveaways taken each month in place of the inventory status column.

10. 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 - Activity #1

1. Description of SWMP Component: Stream Cleanups

- *Hosting local stream, roadside, and/or community cleanup events with volunteers (e.g., Rivers Alive cleanup)*
- *Providing participants with stormwater management and water quality information*
- *Disseminating information about the event to recruit volunteers and raise general awareness of the event*
- *Scheduling in conjunction with Georgia Rivers Alive and with other regional and national cleanup events that provide promotional material*

CCWS will continue to sponsor and coordinate volunteer stream cleanup efforts in Cobb County including tracking events, participants, and service hours.

Implementation of Stream Cleanups

- With extensive, long-standing relationships with local community volunteers, CCWS has built a robust contact database to promote events
- CCWS partners with local Keep America Beautiful Affiliates (Cobb, Marietta, Smyrna, etc.) and Parks (National Park Service and Cobb County Parks) to plan, promote, and implement events
- Local events are promoted on social media, in newsletters, and on website calendars
- Scheduled on an ongoing basis and upon request of community groups
- Event details are recorded in a spreadsheet including date, location, participant numbers, watershed, etc.
- Volunteer information is also shared via the Rivers Alive website and database
- Protocols document how events are managed including waste disposal logistics which vary depending on the site, volume, and partnerships

2. Measurable goal(s): CCWS will continue to organize and facilitate two fall and two spring community stream cleanup events as well as sponsor ongoing waterway cleanup activities throughout the reporting year, providing gloves, bags, and planning assistance. CCWS will also continue to sponsor Rivers Alive t-shirts/annual giveaway for local events.

3. Documentation to be submitted with each Annual Report: Communications & Education Division Annual Report includes a summary of waterway cleanup accomplishments including the number of participants, events, and volunteer service hours.

2. Public Involvement - Activity #2

1. Description of SWMP Component: Adopt-A-Stream Program

- *Established and administering a local volunteer water quality monitoring program (e.g., Adopt-A-Stream program)*
- *Providing training locally or through regional/state programs for volunteer water quality monitors; provide supplies or identify potential sources of support for supplies*
- *Coordinating with Georgia Adopt-A-Stream program*
- *Targeting student groups, neighborhood associations, garden clubs and other organizations as partners*

CCWS continues to facilitate volunteer stream monitoring efforts (chemical, bacterial, macroinvertebrate, and visual) in Cobb County including tracking trainings, monitoring events, and service hours.

Implementation of Adopt-A-Stream (AAS) Program

- CCWS launched Cobb's AAS Program in 2002 and currently supports approximately 50 monitoring groups, monitoring over 75 sites
- Public workshops are offered monthly and upon request of school groups
- Local training opportunities are promoted on social media, in newsletters, and on website calendars utilizing GA AAS resources and protocols
- Trainings as well as volunteer engagement is tracked in a spreadsheet including date, location, participant numbers, activity type, etc.
- Volunteer information is also shared via the Georgia Adopt-A-Stream website and database

2. Measurable goal(s): CCWS will continue to facilitate monthly Adopt-A-Stream volunteer water quality monitoring workshops, provide kits and other resources to support local volunteer data collection efforts, and acting as a point of contact for community questions about water quality.
3. Documentation to be submitted with each Annual Report: Communications & Education Division Annual Report includes a summary of Adopt-A-Stream monitoring accomplishments including number of people trained, number of monitoring events submitted, and number of volunteer service hours reported for each data collection effort (bacterial, chemical, macroinvertebrate, and visual).

3.

Public Involvement - Activity #3

1. Description of SWMP Component: Storm Drain Marking Program

- *Recruit local volunteers to mark storm drains with messages about water resource protection*
- *Provide equipment for marking*

CCWS will continue to oversee volunteer storm drain marking efforts in Cobb County including tracking events, participants, and service hours.

Implementation of Storm Drain Marking

- With extensive, long-standing relationships with local community volunteers, CCWS has built a robust contact database to promote events
- Local events are promoted on social media, in newsletters, and on website calendars
- Scheduled seasonally and supported upon request of community groups
- Providing free marking kits including aluminum markers, adhesive pads, gloves, bags, and education materials
- Event details are recorded in a spreadsheet including date, location, participant numbers, watershed, etc.
- Protocols document how events are managed

2. Measurable goal(s): CCWS will continue to organize and facilitate two fall and two spring community marking events as well as recruit, train, and sponsor ongoing neighborhood activities throughout the reporting year.
3. Documentation to be submitted with each Annual Report: Communications & Education Division Annual Report includes a summary of Storm Drain Marking accomplishments including the number of volunteer participants, events, drains marked, and volunteer service hours.

4. **Public Involvement - Activity #4**

1. Description of SWMP Component: Household Hazardous Waste (HHW) Disposal Event

Host or participate in a regional household hazardous waste and/or pharmaceuticals collection day

CCWS will continue to sponsor and facilitate, in partnership with Keep Cobb Beautiful, annual HHW Amnesty events for Cobb County residents.

Implementation of HHW Disposal Event

- Annual HHW Disposal Events generate overwhelming community engagement, with hundreds of participants bringing waste for drop-off
- Local events are promoted on social media, in newsletters, and on website calendars
- Providing free HHW Disposal for paint, chemicals (landscape, auto, cleaning chemicals, etc.) and fuels
- Materials are collected and disposed of by a qualified vendor selected following county procurement guidelines

2. Measurable goal(s): CCWS will continue to offer an annual HHW Amnesty Day for local residents to dispose of paint, chemicals, and other hazards free of charge. Current estimated expense to CCWS is approximately \$20,000 per event with over 500 participants.

3. Documentation to be submitted with each Annual Report: Communications & Education Division Annual Report includes a summary of HHW reduction efforts including number of households served.

**11. Post-Construction
Section 3.3.11 of the Permit**

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

- A. Provide the date of the adoption of the Post-Construction ordinance: 2-09-21
- B. Provide the date of the adoption of the Georgia Stormwater Management Manual: 2-27-07
- C. Ensure a copy of the Post-Construction ordinance is attached to the SWMP. **It is.**
- D. Describe the status of implementing the stormwater runoff quality/reduction performance standard (Section 3.3.11(a)(2) of the Permit), including the implementation of Option (a) by the deadline date of December 10, 2020:
The revised Post Construction Ordinance was approved and adopted on February 9, 2021. A copy of the adopted amended Post Construction Ordinance is included in the amended Appendices to Cobb County's SWMP.

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?
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: A copy of the Linear Transportation Feasibility Plan (LTFP) is included in the amended appendices (**Appendix R**) of Cobb County's SWMP.

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

1. Legal Authority

1. Description of SWMP Component:

Cobb County will continually review its existing Codes and Ordinances, and Development Standards to ensure they do not prohibit or impede the use of Green Infrastructure/Low Impact Development (GI/LID). The county has completed a review of its ordinance using the Center for Watershed Protection (CWP) worksheet. A copy of this completed worksheet (Date modified 11/10/2020 3:07 PM) is included in the Appendix Q along with a summary of the results of the evaluation (Date modified 11/10/2020 3:10 PM).

2. Measurable goal(s):

Cobb County will:

- Assess the regulations which govern residential and commercial development, road design, land use, and parking requirements for prohibitions or impediments to GI/LID practices through the application of the Code and Ordinance Worksheet (COW) once each 5-year permit cycle.
- Measurable goals include reducing impediments to GI/LID practices.

3. Documentation to be submitted with each Annual Report:

Cobb County will:

- Submit a copy of any and all amended ordinances,
- Submit the Code and Ordinance Worksheet (COW) each reporting year to document progress.

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.

2. GI/LID Program

1. Description of SWMP Component:

Cobb County will develop and implement a GI/LID program which, will be incorporated as standard practice. This program will identify the procedures for evaluating feasibility and site applicability of GI/LID techniques and practices within Cobb County. These practices are based on those recommended by the Georgia Stormwater Management Manual, latest edition. This program also defines the practices allowed within the County and provides for inspection and maintenance guidance. In Appendix Q please see the "Background Narrative" on page 2 of the PDF file titled "Cobb County GI-LID Program Documents – Revised for EPD's comments 10-14-2020," and Appendices A, B and C of the aforementioned PDF.

2. Measurable goal(s):

The county will:

- Provide annual changes to the program,
- Report on the use of the County's feasibility guidance through record keeping practices
- Report on the use of inspection and maintenance checklists for GI/LID structures
- Evaluate the GI/LID Program once each reporting period.

3. Documentation to be submitted with each Annual Report:

Cobb County will provide:

- Amended or updated GI/LID program to EPD if revised during the reporting period.
- Inspection and maintenance checklists

3. GI/LID Structure Inventory

1. Description of SWMP Component

The GI/LID structure inventory for permittee-owned structures, publicly-owned structure owned by other entities, and privately-owned non-residential structures constructed after June 11, 2014 is work in progress. Cobb County is in the process of compiling an inventory of GI/LID structures constructed after June 11, 2014. At a minimum the inventory will include permittee-owned GI/LID structures, those publicly-owned GI/LID structures owned by other entities, and privately-owned non-residential GI/LID structures. The addition of new water quality-related GI/LID structures will be tracked through the plan review process to ensure that the structures are added to the inventory Cobb County has retained an outside consultant to assist the county in completing this effort by June 15, 2021.

2. Measurable goal(s):

Cobb County will:

- Establish, maintain, and/or update an inventory for GI/LID structures that are permittee-owned, publicly-owned by other entities, and privately-owned non-residential within the County
Update the GI/LID inventory at least once each reporting period.

3. Documentation to be submitted with each Annual Report:

Cobb County will:

- Include the GI/LID structures inventory with each annual report.
- Provide the inventory, and the type and the total number of structures.

4. Inspection and Maintenance Program

1. Description of SWMP Component:

Cobb County will use the inventory created above to inspect (or ensure inspections of privately owned) permittee-owned GI/LID structures, those publicly-owned GI/LID structures owned by other entities, and privately-owned non-residential GI/LID structures. Owners of those GI/LID structures will be notified about any necessary maintenance through Notice of Violation Letters within 30 days of inspection..

2. Measurable goal(s):

Cobb County will:

- Inspect t 100% of the structures within the 5-year reporting period.
- Conduct maintenance activities in accordance with the GI/LID Program document where appropriate.
- Notify private non-residential property owners of needed maintenance.
- Transmit Notice of Violation letters to owners regarding needed maintenance within 30 days of inspection.

3. Documentation to be submitted with each Annual Report

Cobb County will:

- Document the inventoried GI/LID structures inspected in each annual report submitted during the reporting period using:
 - Applicable inspection forms
 - Notices of Violation, and
 - Maximo Work Orders.
 - Copies of Letters to owners of GI/LID structures on commercial properties
- ...in each annual report during the 5-year reporting period.

Appendix (“O”)

Enforcement Response Plan (ERP)

Section 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 Storm Water Management Program.
 - A. Provide the date the ERP was approved by EPD: **N/A**
 - B. If the ERP has not yet been approved, provide the date submitted to EPD:
 6/15/2015

2. A copy of the ERP must be attached to this Appendix. **A pdf of Cobb County’s ERP is included in Appendix “O”.**

NOTE: Ensure the Appendix has a number or letter designation (e.g. Appendix #1, Appendix A). Attach a copy of the ERP to this appendix cover page.

Appendix ("I")

Impaired Waters Section 3.3.7 of the Permit

1. Population at the time of designation: 756,865
2. The Impaired Waters Plan (see Part 3.3.7 of the NPDES Permit) 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;
 - 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, as 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 fecal coliform bacteria, then the MS4 must also address the following in the Impaired Water Plan:
 - Sample frequency for E. coli bacteria to include four geometric means per reporting period (16 samples);
 - A description of the development of a Sampling Quality and Assurance Plan if the E. coli data is below water quality standards for two years.

NOTE: Upon completion, the Impaired Waters Plan will be attached to this page as an Appendix to the SWMP. Ensure the Appendix has a number or letter designation (e.g. Appendix #2, Appendix B).

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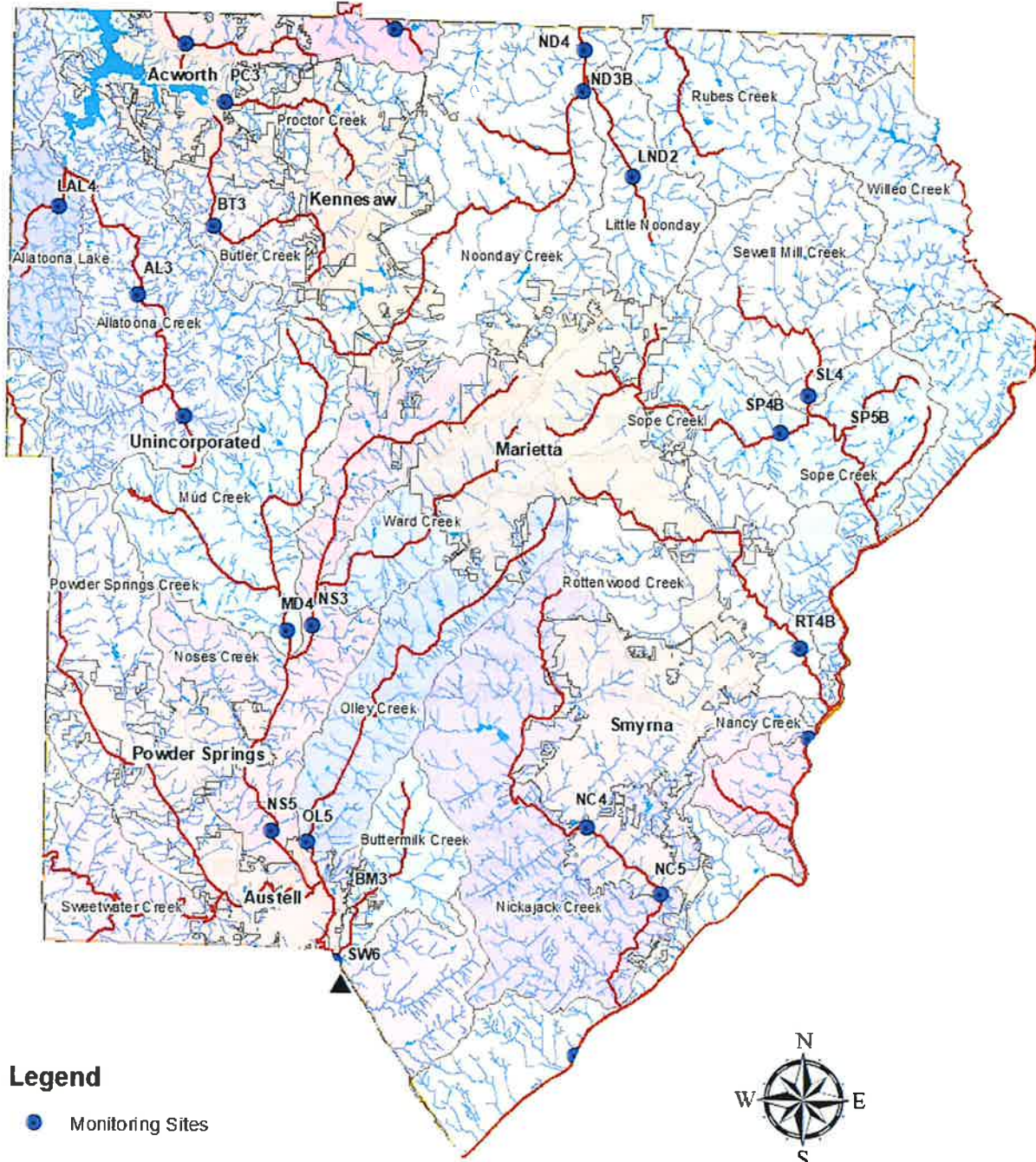
13. Impaired Waters **Section 3.3.7 of the Permit**

1. Population of Cobb County as of 2018: 756,865
2. In preparing the Impaired Waters Plan the monitoring efforts of The Stormwater Management Division's Water Quality Section and the Stream Monitoring Program (Environmental Compliance Division) have been combined and detailed in attached table and map.
 - The included table includes a list of the impaired waters from the 2020 Georgia 305(b)/303(d) Integrated Report and identifies the pollutant of concern.

2020 Impaired Waters - Listed sites with coordinates

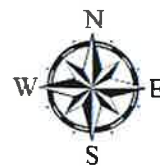
Acworth Creek	East Lakeshore Drive		Fecal Coliform
Allatoona Creek	Midway Rd	AL1	Fecal Coliform
Allatoona Creek	Stilesboro Rd	AL3	Fecal Coliform
Bishop Creek	Indian Hills Pkwy		Fecal Coliform
Butler Creek	Jim Owens Rd	BT3	Bio F
Buttermilk Creek	Collins Ind Blvd	BM3	Fecal Coliform
Chattahoochee River	Hwy 41/Boat Ramp		Fecal Coliform
Chattahoochee River	South Cobb WRF		Fecal Coliform
Clark Creek	Hamby Road		Fecal Coliform
(Trib to) Mud Creek	Casteel Road	MD3	Fecal Coliform
Mud Creek	Macland Rd	MD4	Fecal Coliform
Nickajack Creek	Cooper Lake Rd	NC4	Fecal Coliform; Bio F
Noonday Creek	Hawkins Store Rd	ND3B	Bio F
Noonday Creek	Shallowford Rd	ND4	Bio F; Bio M
Noses Creek	Macland Rd	NS3	Bio F
Olley Creek	Clay Rd	OL5	Fecal Coliform; Bio M
Proctor Creek	Highway 293	PC3	Fecal Coliform; Bio F
Rottenwood Creek	Interstate N. Pkwy	RT4B	Bio M
Rubes Creek			Bio F
Sewell Mill Creek	Robinson Rd	SL4	Fecal Coliform
Sope Creek	Old Canton Road	SP4B	Bio F
Sweetwater Creek	Legion Field	SW4	Fecal Coliform
Tanyard Creek	Cherokee School Rd	T2	Fecal Coliform
Ward Creek	Casteel Road	WR3	Fecal Coliform
Willeo Creek	Roswell Road	WL3	Fecal Coliform

- The included map displays streams throughout Cobb County and, specifically, those designated as impaired waters. MS4 outfalls have been inventoried in Cobb County and are available as a layer in the larger Cobb County Water Internal GIS. Our *MS4 Dry Weather Outfall Inspection Program* begins with a larger set (over 40,000) of headwalls and pipe ends. During inventory, the designation of those headwalls and pipe ends as outfalls were not always accurately recorded or the definition of MS4 was not always clearly defined. After review, those which qualify as MS4 outfalls are inspected as part of our Illicit Discharge, Detection and Elimination program and updated in our GIS to properly reflect their designation as an MS4 outfall.
- Upon completion of all inspections throughout Cobb County we will have an accurate number of MS4 outfalls, however, this remains a work in progress and, therefore is not included on the map. The larger set of all headwalls and outfalls is available.



Legend

- Monitoring Sites
- Stream
- 303(d) Listed Stream Reach
- Lakes
- Cities in Cobb County
- Cobb County Boundaries



- All stream samples, whether for chemical analysis or biological assessment, are collected instream.

- Monitoring of pollutants is scheduled according to EPD guidelines and established protocols of the Cobb County Stream Monitoring Program. Currently, any stream listed for fecal coliform is sampled a minimum of 16 times per year (2 geomeans May-October and 2 geomeans November-April). Any stream listed for Bio M or Bio F is sampled for *E. coli* 8 times per year (2 geomeans May-October). With the exception of Acworth Creek, Bishop Creek, Chattahoochee River and Clark Creek, all sites in table referenced above are sampled by the Cobb County Stream Monitoring Program a minimum of 2 times per year for a suite of parameters, including Total Suspend Solids (TSS). As suggested by the Division, for Bio listed sites, we will use TSS as a surrogate parameter for the annual data assessment in years when biological sampling does not occur. Approved Georgia Rapid Bioassessments are also conducted to determine the quality of macroinvertebrate and fish populations at streams listed for Bio M or Bio F twice every 5 years. However, there are two exceptions. The volume, depth and flow in Sweetwater Creek make it unsafe for routine biological monitoring. Also, as of the writing of this report, Rubes Creek has been identified as a stream listed for Bio F but is currently only sampled two times per year for water chemistry. Adding a site on Rubes Creek for bioassessment will be considered.
- In the Annual Stormwater report, four (4) geometric means will exist for at least one monitoring site from each segment on the impaired waters list. Regarding assessment, bacteria data will be compared with results from the previous year to determine if conditions are improving. For biological assessment, The Index of Biotic Integrity will be used to compare changes over time for fish population at sites listed for "Bio F." The Multi Metrix Index historically used by EPD will be used for comparing changes in macroinvertebrate populations over time at sites listed for "Bio M." In years when a biological assessment for fish or macroinvertebrates is not completed, TSS will be used as a surrogate parameter as suggested by The Division.
- Cobb County water quality sampling has led to delisting of streams and, regarding the 2018 list, Cobb is not aware of any newly identified pollutants or newly added impaired stream segments.
- Below is a list of Best Management Practices implemented throughout Cobb County. Regarding impaired waters in Cobb County, the primary pollutant of concern is fecal coliform. Efforts to address this pollutant are focused on public education. The Watershed Stewardship Program works with community volunteers to monitor bacteria (*E. coli*) in local streams. Annually they conduct 5 community workshops and visit local schools to train volunteers in sampling protocols. Additionally, the Stormwater Management budget provides funding for The Watershed Stewardship Program to provide "Pet Waste Stations" in Cobb County parks. These stations provide baggies and remind owners to "Pick it Up." Education and outreach efforts also work with volunteers to mark stormwater catch basins with "No Dumping. Drains to Streams." medallions. Finally, the Stream Monitoring Program has coordinated with Kennesaw State University for

DNA analysis of water samples at nine targeted sites. Testing parameters include human associated Bacteroides, dog associated Bacteroides, and total animal associated Bacteroides.

BMP effectiveness will be assessed at three (3) sites in Cobb County:

Allatoona Creek Habitat Restoration/Stream bank stabilization – Mars Hill Road
 Mark Avenue Regional Stormwater Management Facility – Mark Avenue
 Chastain Meadows Regional Stormwater Management Facility–Chastain Meadows

Samples will be collected annually upstream and downstream of each BMP. E. Coli and Total Suspended Solids analysis will be completed for each sample. Recorded results may provide an assessment of BMP effectiveness over time. One additional site, Noonday Creek Mitigation Bank at Canterbury, is also being considered for annual sampling/assessment. However, before committing, the site must be evaluated for sampling accessibility and effectiveness.

BMP Description	Start Date	Completed? Yes/No	Completion Date	Projected Completion Date
Floodplain (Vacant Land) & flooded homes property acquisition	1998	No	Ongoing	Ongoing
Chastain Meadows Regional Stormwater Management Facility	1999	Yes	July 15, 2011	2011
Mark Avenue Regional Stormwater Management Facility	1999	Yes	October 31, 2012	2012
Noonday Creek Mitigation Bank at Canterbury (formerly a Golf Course)	2006	No	Ongoing	2014
Storm Drainage Structure Inventory	1998	No	Ongoing	2015
Updating FEMA flood insurance rate maps	1998	Yes	March 4, 2013	2013
Habitat Restoration / Stream bank Stabilization – Allatoona Creek	2005	Yes	December 31, 2010	2011
USGS Stream flow Gauge Program	1998	No	Ongoing	O&M Ongoing
Section 206 Environmental Restoration Program – Butler Creek (w Mobile District USACOE)	2001	No	Ongoing	Ongoing
Section 206 Environmental Restoration Program – Allatoona Creek (w Mobile District USACOE)	2011	No	N/A	Not Started

Section 206 Environmental Restoration Program – Procter Creek (w Mobile District USACOE)	2011	No	N/A	Not Started
Sweetwater Creek Flood Mitigation Alternatives Study (w Mobile District USACOE)	2017	No	N/A	2020

3. Since the population of Cobb County exceeds 10,000, certain conditions are included in our Impaired Water Plan.
 - As described above, sampling frequency of listed streams where the primary pollutant of concern is fecal coliform includes four geometric means per reporting period.
 - Rather than a Sampling Quality and Assurance Plan, our water quality sampling protocols and schedule are detailed in our Watershed Protection Plan.

Appendix ("P")

14. Municipal Employee Training Section 3.3.8 of the Permit

1. Description of the Employee Training Program:

The Cobb County Stormwater Management Division sends engineers to FEMA sponsored classes to obtain Floodplain Management Training; take the FEMA-sponsored floodplain managers exam and become Certified Floodplain Managers (CFM's). Our Environmental Compliance Techs are sent to MS4-NPDES training classes to become certified MS4-NPDES Inspectors. Although Stormwater Management's engineers do not review and approve erosion control plans, Andrew Heath has obtained erosion and sediment control training in Georgia Soils and Water Conservation Committee's (GSWCC) Level II program. Personnel in Community Development's Erosion and Sediment Control Division have also received training through GSWCC's training programs and have become certified (**APPENDIX P**). Some of Cobb County Stormwater Management's project managers in construction have obtained training and certification in GSWSS's Level I program. In accordance with permit requirements all MS4 staff will receive training annually either through outside classes and seminars, or through YOUTUBE videos, or through both. For the YOUTUBE video classes, MS4 staff will fill out and sign the sign-up sheets with the URL(s) of the YOUTUBE video(s) they watched. Cobb County will hold at least one of these YOUTUBE Video Classes annually.

2. Measurable goal(s):

All licensed Professional Engineers in the Stormwater Management Division are encouraged to obtain the Floodplain Managers Training; pass the FEMA-sponsored CFM exam given by FEMA and obtain certification as Certified Floodplain Manager. All Environmental Compliance Techs will be required to obtain MS4 - NPDES training and certification. Stormwater staff will continue to be encouraged to obtain training and certification in Georgia Soil and Water Conservation Committee's (GSWCC's) program. Persons in Community Development's Erosion Control Division who are involved with plan review and/or construction inspection will continue to hold proper GSWCC certification for their job responsibilities. Cobb County will obtain stormwater related training for its employees at least once each reporting period, per the Permit.

3. Documentation to be submitted with each Annual Report:

Cobb County Stormwater Management will document employee training with:

- completed certificates

- YOUTUBE class sign-in sheets
- Copies of educational material

...in each annual report during the 2020-2025 reporting period.

NOTE: Ensure the Appendix has a number or letter designation (e.g. Appendix #3, Appendix C).

