

Phase I Large MS4

**Stormwater Management Program
Cobb County, Georgia
December 8, 2024**

General Information for Submitting a SWMP

Your Stormwater 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 written agreement, memorandum of understanding, memorandum of agreement, contract, or other signed document if another entity agrees to implement a SWMP component; 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 or information 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.

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APPENDICES (on accompanying flash drive)

- A. MS4 Inventory and Maps
- B. Illicit Discharge Detection Elimination
- C. Cobb County Ordinances
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**STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

Stormwater Management Program (SWMP)

1. General Information

- A. Name of MS4: Cobb County
- B. NPDES Permit Number: GAS00018
- C. Mailing Address (if providing a post office box, also provide a street address):
Cobb County Water System
660 South Cobb Drive
Marietta, GA 30060
- D. Name of responsible official: Dr. Jackie McMorris.
Title: County Manager
Mailing Address: 100 Cherokee Street
City: Marietta State: GA Zip Code: 30090
Telephone Number: 770-528-2610
Email Address: Jackie.mcmorris@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: GA Zip Code: 30060
Telephone Number: 770-528-1481
Email Address: alicia.giddens@cobbcounty.org
- F. Provide the river basin(s) to which your MS4 discharges: Chattahoochee 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: -84.54433426 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)

SWMP Component:

1. Name of entity _____

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

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

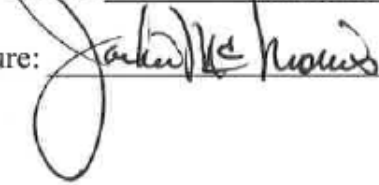
3. **Certification Statement**

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

Printed Name: Dr. Jackie McMorris

Date: December 4, 2024

Signature: _____



Title: County Manager, Cobb County

Structural and Source Control Measures

Table 3.3.1 of the Permit

1. MS4 Structure Inventory and Map

1. Description of SWMP Component:

The MS4 Control Structure Inventory (CSI) was substantially completed in late 2015. Associated with this effort, a stormwater inventory database was developed, and the inventory is available for download or viewing through Cobb County's internal GIS map. The inventory includes:

- Catch basins
- Ditches
- Stormwater pipes
- Detention ponds/retention ponds (including underground ponds)

Incorporating updates and making corrections to the current inventory is a continuous and ongoing activity. When as-builts for new developments are approved, these structures are added to our inventory by GIS staff. Cobb County Water System (CCWS) also utilizes contract crews through our Construction Management Contract (CMS) to inspect structures and update inventory according to information collected in the field.

As noted in CCWS's Corrective Action Letter, dated January 3, 2024, the inventory reported by CCWS in the previous permit cycle included infrastructure owned by others. CCWS acknowledged that the inventory did not distinguish ownership and was unable to provide an accurate inventory. The process of assigning jurisdiction to the current inventory is a difficult task and is anticipated to take several years, but CCWS is committed to this task and has already begun this effort.

To date, structures contained within county right-of-way have been identified to reflect a CDOT jurisdiction. Structures within State right-of-way have been labeled with a GDOT jurisdiction. Stormwater pipes and detention/retention ponds on larger commercial property have been labelled as "private". Subdivision retention ponds have been labeled as "private". Structures within any city limits that CCSW is not responsible for maintaining have been removed from our inventory. CCWS continues working to properly identify ownership of detention ponds and storm drain lines outside the right-of-way. We are still working to determine how to label pipes that cross public and private property and have shared maintenance responsibility.

Refer to **Appendix A** for the current MS4 inventory and maps. This inventory represents structures that have been identified as county owned.

2. Measurable goal(s):

- Each reporting period, the inventory and mapping of MS4 structures will be updated. The inventory includes catch basins, ditches, detention/retention ponds, storm drainage pipes, and underground detention (if applicable).

3. Documentation to be submitted with each Annual Report:

- An updated inventory (spreadsheet) and maps will be provided, along with the total number of structures and amount added or deleted.
- CCWS will provide a status of inventory “jurisdiction” labeling.

2. MS4 Inspection and Maintenance Program

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

Inspection of the MS4 structures will be conducted on a continual basis over the next 5-year reporting period (2024-2029).

As stated above, CCWS utilizes contract employees through our CMS group who are responsible for performing assessments of the stormwater infrastructure, which includes public and private drainage pipes and catch basins. During their inspections, they are also responsible for amending and making corrections to the current inventory. This information is directly entered into a GIS attribute table. If they find issues requiring maintenance, this information is forwarded to the appropriate department.

Issues found within the County right-of-way are reported to Cobb County DOT (CDOT) for follow-up and maintenance. As described in *Street Maintenance* on page 12 of this Plan, proactive, regular inspections of particular catch basins, ditches and cross drains are performed before heavy rains by CDOT. Maintenance crews mobilize to clear any obstructions, or enact whatever maintenance is required. These structures are therefore inspected at least once a quarter, on average. All other maintenance except for catch basins is done on a reactive basis when problems are identified.

Additionally, a range of between 800 and 1,000 catch basins are inspected regularly, and approximately 400 maintained every year by CDOT, as reported in the annual report. The cleaning of catch basin inlets is done daily by two crews and is prioritized if a work order has been issued through a request from the work crew or citizen. CDOT keeps records of maintenance activities that they perform.

Issues found outside the right-way are reported to the Stormwater Maintenance or Environmental Compliance Sections of Stormwater Management. If the structure

is county-owned, Stormwater Maintenance follows-up and performs necessary maintenance or notifies the appropriate County department. Any inspection and maintenance activities performed by the Stormwater Maintenance staff or contractors is documented in CCWS's work order management system. If the structure is privately-owned, it is turned over to Environmental Compliance for further inspection if necessary and notification of property owner.

Inspectors in Stormwater's Environmental Compliance Section are assigned to inspections of county-owned detention ponds. If there are issues requiring maintenance, this information is turned over to the department responsible for the detention pond. Ponds located on county facility property are routinely maintained by staff and/or contractors. CCWS is unique in that it currently accepts ownership of certain subdivision detention pond parcels. CCWS is responsible for functional maintenance of these ponds and conducts this maintenance as necessary. CCWS is not responsible for aesthetic maintenance.

Refer to **Appendix I** for a copy of CCWS's detention pond inspection form and example inspection documented in the work order management system.

2. Measurable goal(s):

- Inspect 100% of the MS4 structures within the 5-year term, focusing on completing a minimum of 20% each year.
- Conduct necessary maintenance on MS4 structures as needed.

3. Documentation to be submitted with each Annual Report:

- The county will provide a spreadsheet documenting structures inspected each reporting year, including include the total number and percentage of inspections performed.
- The county will provide documentation of maintenance activities performed each reporting year, to include:
 - A work order summary of maintenance activities as shown in the exhibit below will be included in Stormwater Management's annual report.
 - Copies of CDOT work orders

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	206
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	386
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

3. Planning Procedures

EXHIBIT 3

1. Description of SWMP Component:

Cobb County has developed comprehensive planning documents referred to as the Comprehensive Land Use 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 Comprehensive Land Use 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 staff comments during the plan review process.

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

- Code Sections 50-101 through 50-162, under Article IV, Post-Construction Stormwater Management for New Development and Redevelopment,

outline the minimum stormwater management requirements and procedures to control adverse effects of increased post-construction stormwater runoff and nonpoint source pollution associated with new development and redevelopment. This Article includes the adoption and implementation of the Georgia Stormwater Management Manual (GSMM) and the requirement for each new project to provide runoff reduction and/or water quality BMPs in accordance with the GSMM. Stormwater management needs for a development are identified by zoning/variance review, are required at plan review and on construction plans, and are inspected for compliance by Community Development Site Inspectors.

- Code Section 50-75, under Article III, Land Disturbing Activities, allows Cobb County Erosion and Sediment Control, Code Enforcement, and Stormwater Management to ensure post construction violations are addressed.
- Code Section 134-198.1, under Article IV, District Regulations, aims to preserve natural resources and greenspace within residential development through the establishment of the open space community (OSC) overlay district. The overlay district is used as a planning tool or mechanism to locate new developments in low impact development areas available for “smart development”. Utilization of the OCS overlay district keeps projects off the steeper ground slopes and out of flood plain hazard area, as well as wetlands and stream buffers. Grading and hard surface areas are kept to a minimum. These undeveloped “greenspaces” preserve pervious areas which can slow runoff and allow time for pollutants to either be filtered, absorbed, or settle out of the runoff.

In addition, all stormwater management plans submitted for review and permitting must include a Landscaping and Open Space Plan in accordance with Code Section 50-130 (d)(8) under Article IV, Post-Construction Stormwater Management for New Development and Redevelopment.

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

Refer to **Appendix C** for copies Cobb County Ordinance referred to in this section.

2. Measurable goal(s):

- Update The Comprehensive Land Use Plan as needed.

3. Documentation to be submitted with each Annual Report:

- Provide description of any changes made to the stormwater portion of the Comprehensive Land Use Plan during the reporting period, if applicable.

4. Street Maintenance

1. Description of SWMP Component:

Street maintenance is performed by Cobb County Department of Transportation (CDOT). Data is provided annually by CDOT for incorporation in the annual report. Roadway sweeps consist of major, minor, and arterial roadway. All waste material is disposed of at the local waste facilities.

Concerning litter removal, CDOT crews pick up litter/debris one day a week and average 4 miles a day. After the litter/ debris has been picked up and bagged, a CDOT crew picks up the trash bags and disposes of them at the Advanced Disposal Transfer Station.

During road or street maintenance, ice and snow removal, or any other work that may impact the roadway, crews and contractors take every precaution necessary to ensure the minimum amount of areas are disturbed by establishing explicit work zones to help with traffic control and heavy equipment encroachment, installing proper erosion control measures, and using emergency strobe light and signs on vehicles.

2. Measurable goal(s):

- CDOT performs litter removal activities at least one day per week (Cobb DOT normally performs these on Saturdays each week and as crews are cutting and beautifying right of way and roadway).

3. Documentation to be submitted with each Annual Report:

CDOT will provide the follow information:

- A work order summary as shown in the exhibit below will be included in Stormwater Management's annual report.
- Copies of DOT work orders will be furnished in the annual report.

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	206
Drainage - Ditch	35
Drainage - Driveway	23
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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	186

EXHIBIT 3

4. **Flood Management Projects**

1. **Description of SWMP Component** *(Ensure the text describes procedures for both proposed and existing flood management projects):*

Assessment for Water Quality Impacts

The Georgia Stormwater Management Manual (GSMM) has been and will continue to be used during plan review of all developments, including government-owned, residential, and commercial properties, to ensure stormwater facilities are designed to address water quality. All new and proposed flood management projects (i.e., detention and retention facilities) are reviewed in-house by Stormwater Management Plan Review Engineers to ensure the design meets water quality standards as established in the 2016 GSMM.

In addition, Cobb County Code Sections 50-106.1, Stormwater Management Standards, and 50-130(d)(4), Post-development Hydrologic Analysis, requires that land developers evaluate the downstream drainage system and to design outflows from detention facilities within the capacity allowance of the downstream system and to minimize channel scour and bank degradation. As a result, approximately 85% of storm events occurring in this area will be captured (first flush) and allowed to infiltrate into the ground or trickle out at a very low rate. The water quality benefits are designed to significantly reduce the hydraulic and pollution loading on the downstream system.

Refer to **Appendix C** for Code Section 50-106.1 and 50-130(d)(4) under Post-Construction Stormwater Management for New and Redevelopment.

Assessment for Water Quality Impacts (Existing County-owned facilities)

All County-owned detention ponds built after February 2007 have been subject to review by in-house Stormwater Management's Plan Review Engineers and were required to meet GSMM water quality provisions that were current at that time. Because ponds constructed between 2007 and 2016 included requirements for water quality, CCWS does not believe that these require assessment for retrofitting.

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. During the previous reporting period, CCWS committed to a goal of assessing 100% of county-owned ponds during the 5-year reporting period. With multiple staffing changes, it is unclear what, if any, progress was made on this task. It will be necessary for CCWS to review the pond inventory and verify year of construction for each pond. CCWS will review construction plans for ponds designed prior to April 15, 2016, to determine if water quality provisions were incorporated. If water quality provisions were not met, CCWS will complete an

assessment to determine feasibility of retrofitting to incorporate water quality provisions as established in the GSMM. Any retrofitting activities recommended would be dependent on available funding.

Not only does the County own and maintain stormwater ponds on property with Cobb County buildings/facilities, but Cobb also began accepting ownership of subdivision detention pond parcels in 1999. It is estimated that Cobb County is responsible for approximately 200-300 ponds. Cobb is currently listed as the owner on many of these and will conduct assessments, if necessary, on ponds that we designed prior to April 15, 2016. Unfortunately, many of these ponds were not properly transferred to Cobb County and are still in developer's name or have been deeded incorrectly to the subdivision HOA. As we work to get ownership properly transferred to Cobb, we will add to the list for assessment, if applicable. Cobb is currently working to propose additional funding strategies for routine maintenance of these ponds. Until this has been accomplished, it is not feasible to consider any of these ponds for retrofitting.

2. Measurable goal(s):

- Assess 100% of new projects using the GSMM during Plan Review and ensure water quality is being addressed.
- Update inventory annually for newly added county-owned ponds.
- Develop a list of county-owned facilities requiring assessment for potential water quality improvement retrofits if feasible, and funding allows. Assess 100% of these ponds within the 5-year permit cycle.

3. Documentation to be submitted with each Annual Report:

- A list of plans reviewed which resulted in new county-owned flood management facilities. *Or where flood management projects are assessed for water quality impacts.*
- A list (or spreadsheet) of County-owned ponds designed prior to April 5, 2015, date of assessment if required, assessment status and retrofit activities, if applicable.

5. Municipal Facilities Excluding Any Facilities Addressed in Section 3.3.3)

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

Municipal Facilities with the Potential to Cause Pollution

As required by the MS4 permit, Cobb County has implemented a program to control runoff from municipal facilities with the potential to cause pollution (e.g., drinking water treatment plants, wastewater plants). The Stormwater Management's Environmental Compliance Inspectors perform annual audits of each municipal facility, except for those facilities that have obtained NEE status.

Documentation of each inspection is recorded on a standard audit form. Historical files of the annual audits are maintained for each municipal facility. Each municipal facility has assigned staff to implement the components of the Stormwater Pollution Prevention Plan (SWP3) to ensure records are complete and up to date, all monitoring is completed, and visual inspections of runoff are conducted during rain events.

Refer to **Appendix D** for a list of Municipal Facilities and contact information.
Refer to **Appendix I** for a copy of the inspection form used for Municipal Facilities.

2. **Measurable goal(s):**

- Annually update the inventory of municipal facilities with potential to cause pollution.
- Inspect 100% of the inventoried facilities during the 5-year reporting cycle, with an internal goal of completing an inspection on 100% of facilities annually.

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

- Updated inventory of facilities and completed inspection reports will be provided each reporting period.
- Documentation of follow-up action(s) taken to address non-compliance will be provided, if applicable.

6. **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 in Cobb County promotes the responsible and safe use of pesticides throughout Georgia through the UGA Pesticide Safety Education Program (PSEP). A variety of resources and information is available through their website: [Pesticide Safety Education | Promoting pesticide stewardship in Georgia](#). Instructions can also be found on obtaining a private or commercial pesticide applicators license, as well as continued education training courses offered for re-certification.

Municipal Applications

The Water System utilizes contractors for easement clearing and maintenance of properties that are owned and maintained for stormwater purposes (e.g., acquired floodplain parcels, dedicated detention pond parcels, etc.). Contract requirements include provisions for contractor(s) to be licensed in accordance with Georgia Department of Agriculture. The Contractor is required to provide Chemical Awareness Training annually, at the request of Water System staff. Information to be covered in training includes a review of specific herbicides that will be used, proper application procedures, exposure risks and treatment, safety protocols, etc. Contractors are required to transport, store, and protect all materials in accordance with manufacturer's recommendations and applicable Federal and State of Georgia guidelines. The contractor is responsible for using herbicides that are safe to aquatic life near waterbodies, flagging areas of herbicide application to ensure work doesn't encroach outside the limits of the easement/treatment area and ceasing application during rain events.

Cobb County PARKS Department generally uses low-growing vegetations grasses such as bermuda, fescue, and rye. Staff utilize granular fertilizer to establish some new turfs. When possible, compost is used to increase plant health and reduce the run-off of fertilizers. Cobb County parks are not treated with any pesticides except for fire ant control on an as needed basis. Pesticides and fertilizers are properly stored in a secure containment area at a central location and distributed as needed. PARKS 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.

The PARKS Department requires at least one person to be certified to spray. Several staff members attend trainings annually on proper 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. In addition, several staff members attend a training session at the GRPA Field Day, annually.

CDOT uses in-house crews use herbicide for spraying kudzu creeping into roads and easements. A non-selective product is used, and staff is not required to be certified.

2. Measurable goal(s):

- Ensure that 100% of staff using pesticides, fertilizers and herbicides are properly certified or are working under the direct supervision of staff that are licensed.

3. Documentation to be submitted with each Annual Report:

- Training certificates or sign-in sheets will be provided if applicable. If these are not available, a list will be provided which will include names of employees that attended training, the date and location of training, and type of training.

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

1. Legal Authority

1. Description of SWMP Component:

Cobb County's ordinance for Illicit Discharge and Illegal Connections can be found in Article V of Chapter 50 (Environment). Cobb County re-evaluates and modifies the existing ordinance when necessary for compliance with MS4 permit requirements for the Illicit Discharge Detection and Elimination (IDDE) Program. This ordinance was last updated on February 24, 2009. The current ordinance provides authority to conduct inspections and monitoring, control illicit discharges and connections, control illegal dumping and spills into the MS4, and provides the authority to take legal action to eliminate illicit discharges and connections.

Refer to **Appendix C** for Cobb County Ordinance for Stormwater Quality/Illicit Discharges.

2. Measurable goal(s):

- Review Sections 50-191, 50-192, and 50-193 of the Cobb County Ordinance at least once every permit cycle to ensure previously referenced code sections are compliant with current MS4 permit requirements.

3. Documentation to be submitted with each Annual Report:

- If amended, a copy of adopted ordinance will be provided.

2. Outfall Inventory and Map

1. Description of SWMP Component:

Cobb County Water System maintains an inventory of all outfalls located within jurisdictional boundaries. During the previous reporting period, the inventory submitted included all outfalls, even those that were not from the MS4. This inventory also included structures mistakenly labeled as outfalls. The identification of outfalls specifically from our MS4 continues to be a work in progress. As with the rest of the MS4 inventory, CCWS is working to properly identify outfalls and delineate “jurisdiction” so that only those from the MS4 can be reported. CCWS recognizes the current inventory is not complete and is substantially smaller than previously submitted, but it does reflect our efforts to submit a more accurate inventory. Each annual report should provide EPD an opportunity to see improvement in our inventory. In the spreadsheet and maps included in this submittal, outfalls are identified as either headwalls or pipe ends. The Water System recently implemented the use of tablets in the field with a GIS application to streamline our inspection process and assist with correcting errors that have been found during field inspection/verification associated with “dry weather screening” efforts.

Refer to **Appendix B** for the current outfall inventory.

2. Measurable goal(s):

- Continue improving inventory through identifying and correcting errors during the outfall inspection process.
- Update inventory and map each reporting period, to include outfalls from the MS4 and the names and locations of waters of the State that receive those discharges.

3. Documentation to be submitted with each Annual Report:

- Updated outfall inventory will be provided each reporting period.
- Number of outfalls added during the reporting period and the total number of outfalls in the inventory will be provided.

3. **IDDE Plan**

1. **Description of SWMP Component** *(Ensure the text discusses the outfall inspections, any stream walks activities, illicit discharge tracing, and illicit discharge elimination):*

Enforcement against illicit dischargers into the stormwater drainage system is one of the primary responsibilities of the Stormwater Environmental Compliance Section. Enforcement starts with a comprehensive ordinance or code that defines illicit discharges which has been in place since Cobb County adopted the model ordinances from the Metro North Georgia Water Planning District in 2004.

Cobb County continues to implement the IDDE Plan to detect and address non-storm water discharges into the MS4 as described below:

A. Dry Weather Outfall Screening

Inspectors are responsible for implementing the Dry Weather Screening Program, as outlined in the *MNGWPD Standards and Methodologies for Surface Water Quality Monitoring*. Cobb County will conduct screening on 100% of the inventoried outfalls with the 5-year permit cycle, focusing on completing at least 20% each year. The schedule for screening is based on geographic area. Once an outfall has been screened, another inspection will not be conducted until the following permit cycle, unless illicit flow is detected requiring follow-up action or water quality problems are detected in a particular area.

During each screening visit or inspection, if flow is detected during dry weather, the County will source trace all discharges. The inspector will conduct the following testing when source tracing does not identify a specific source:

- Observe discharge for color, turbidity, sheen, and odor
- Measure pH, temperature, conductivity in-situ
- Collect grab samples for bacteria if odor or high conductivity are detected.
- Collect samples for fluoride and surfactants

If flow indicates the presence of sewage, field personnel collect a bacteria sample for analysis by the Water System's Water Quality Laboratory. If bacteria results are elevated, field crews continue investigating the area until the source is found. If it is a public sewer, System Maintenance crews are notified of the issue and steps are taken to immediately address the sewer overflow. If the spill is coming from private property, Georgia EPD and the Health Department are notified.

B. Illicit Discharge Detection

When outfall screening detects an illicit discharge, the investigation to determine the source of the discharge begins immediately by Stormwater Environmental

Compliance personnel. If the flow from an outfall is detected by one of our contracted inventory crews, stormwater inspectors are notified and dispatched as soon as possible, which is generally the same day. Inspectors trace the discharge to its source and engage parties responsible for the discharge, resolving it in the most prompt and efficient manner possible. If necessary, Environmental Compliance personnel can implement enforcement procedures as outlined in the ERP and in accordance with Section 50-185 of Official Code of Cobb County.

In addition to outfall screening, several departments are involved in illicit discharge detection activities that are incorporated into their everyday job responsibilities.

The Water System's Stream Monitoring group performs chemical and biological sampling of local streams in compliance with Long Term Monitoring requirements outlined in Cobb County's Watershed Protection Plan. While performing sampling, Stream Monitoring personnel may identify spills, sewer overflows, and other illicit discharges. These are reported to Stormwater and/or other appropriate departments for further investigation and follow-up.

The Water System's Engineering Inflow and Infiltration Section performs routine inspection of sewer crossing and manholes. If necessary, they perform smoke testing and video inspection where roots or other blockages are suspected.

Staff in Water System's Industrial Pretreatment and Grease Management Programs report illicit discharges to the Stormwater Division that may be found during routine audits or inspections local permitted industries and restaurant grease traps.

Citizen complaints can also reveal and alert Stormwater personnel to the presence of an illicit discharge.

Regardless of how the report of a possible illicit discharge is received, Stormwater Environmental Compliance Inspectors promptly investigate and test the discharge if necessary. The source is traced by tracing discharges upstream or backtracking of the stormwater drainages system until found or until the test results show the absence of the chemical in question. If a source is not found, personnel will return to the outfall between 4 and 24 hours to determine if the discharge has been eliminated.

Refer to **Appendix B** for a copy of the Procedures used for Dry Weather Illicit Discharge Screening and **Appendix I** for a copy of the inspection form used for Dry Weather Outfall Screening.

2. Measurable goal(s):

Inspect 100% of the outfalls within the 5-year reporting period, with a goal of 20% each reporting period, but a minimum of 5%.

- Analyze 100% of dry weather flows.

- Track and eliminate 100% of identified illicit discharges.

3. Documentation to be submitted with each Annual Report:

- The County will submit documentation of IDDE inspections conducted. This documentation will also include number and percentage of outfalls inspected.
- The County will provide information on illicit discharge detection activities performed. This information will also include
 - a summary table of eliminated discharges or enforcement actions taken for illicit discharges and copies
 - copies of any non-compliance letters mailed, to include description of the non-compliance, photograph(s), actions to be taken, and timeline for compliance.

4. Spill Response Procedures

1. Description of SWMP Component:

Cobb County will continue to implement the procedures outlined in the previous reporting period, and as described below to prevent, contain, and respond to spills that may discharge into 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 (e.g., gasoline, chemicals, biological agents). HAZMAT also responds to non-emergency calls such as discarded motor oil in a storm drain. Any HAZMAT response that involves the stormwater conveyance system is generally 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. Spills events of this nature are documented in “Incident Notifications” provided by Fire and Emergency Services.

Sanitary sewer overflows from sewer lines owned and maintained by CCWS, are often found and reported by citizens or staff from other Divisions within CCWS. This may include staff from Inflow and Infiltration, Environmental Compliance, Stream Monitoring and Stormwater. Spills are generally reported to CCWS’s Emergency Dispatch and System Maintenance is notified. A crew is dispatched immediately to the location of the overflow and every effort is taken to stop the spill and mitigate the effects as quickly as possible.

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

2. Measurable goal(s):

- Comply with standards and guidance provided in the CMOM program to reduce frequency and volume of sewer spills.
- Respond to 100% reported spills within jurisdictional area by immediately dispatching appropriate personnel for assessment and resolution.

3. Documentation to be submitted with each Annual Report:

- Provide “Incident Notification” reports prepared by Cobb Fire and Emergency Services.
- Provide Excel spreadsheets, summarizing monthly sewer overflows.

5. Public Reporting Procedures

1. Description of SWMP Component:

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

The public has several avenues to report potential illicit discharges to the Water System. These can be called in directly or reported to staff within our Stormwater Division or to Emergency Dispatch. In addition, a list of contact numbers can be found on the Water's System's Education webpage at <https://www.cobbcounty.org/water/education/resources/who-to-call> or they can email water_rsvp@cobbcounty.org. This information is included on many educational brochures and handouts provided to Water System customers.

Once an illicit discharge is reported, it is sent to the appropriate division to address the concern. The System Maintenance Division immediately dispatches crews to investigate reports of potential sewer odors, leaks or overflows. These are tracked through a work order management system. As required by the County's CMOM Program, all sewer overflows are reported through a press release. These are generally posted on the Water System's webpage at <https://www.cobbcounty.org/water/water-sewer/cmom/press-releases> within 24 hours of the discharge being stopped. In addition, the Water System is required to report sewer spills/overflows greater than 10,000 in the county's legal organ, which is the Marietta Daily Journal.

Illicit discharges related to the IDDE are investigated by personnel in the Stormwater's Environmental Compliance Section. Records of these investigations are currently kept within computer network files. The Water System will be transitioning to a new work order management system within the next couple of years and will consider incorporating these types of inquiries into the workflow for the new system.

2. Measurable goal(s):

- Provide one formal notification to the public on CCWS's website and social media per reporting period which provides methods for reporting illicit discharges.
- Monitor, document, and act upon 100% of reported illicit discharges.
- Investigate 100% of complaints within 7 working days.
- Report illicit discharges publicly, at least once per reporting period.

3. Documentation to be submitted with each Annual Report:

- Provide a copy of the formal notification to the public for methods of reporting an illicit discharge by providing a dated screenshot of the website and social media posting.
- Provide documentation (e.g., reports, inspection reports, emails) on any activities conducted relative to illicit discharges reported during the reporting period in each annual report and their resolution or status.
- Provide a copy each Press Release for sewer spills impacting the MS4.
- 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 continues to implement activities to facilitate the proper management and disposal of used oil and toxic materials, including educational activities and household hazardous waste programs. Each year, the Water System partners with Keep Cobb Beautiful to facilitate free household waste collection days. These events allow homeowners to bring in and safely dispose of household waste.

In addition, the Cobb County Transfer Station accepts various items for disposal. These items include, but are not limited to, used motor oil (up to 5 gallons) and antifreeze. The Transfer Station also offers recycling of certain electronic items, paper, glass, aluminum cans, steel, metal, tin, and plastics. Paint, freon, tires and batteries are also accepted by the county waste disposal vendor, GRL Environmental, Monday-Saturday, for a small fee.

CCWS also educates the community about household hazards through hosting workshops and distributing education materials.

2. Measurable goal(s):

- Continue offering annual “amnesty day” for household hazardous waste disposal.

3. Documentation to be submitted with each Annual Report:

- Details on any “amnesty day” event activities performed during the reporting year (e.g., sign-up sheets, volume and type of material collected) will be included.

7. Sanitary Sewer Infiltration Controls

1. Description of SWMP Component:

Identification and remediation of excessive Infiltration/Inflow (I/I) by CCWS is managed under its Flow Monitoring Program and its Sanitary Sewer Condition Assessment and Rehabilitation Program.

Under the Flow Monitoring Program, flow quantity, flow level, and rainfall data is collected from permanent and temporary monitors and rain gauges installed at various locations throughout the wastewater collection system. The data is evaluated to identify areas in the collection system with excessive flows that can be attributed to rainfall.

Under the Sanitary Sewer Condition Assessment Program, CCWS has developed a system to identify sanitary sewers to be inspected based on factors including size, location, material, I/I and reported spills. Inspections of larger sanitary sewers is performed by a contracted company and are generally conducted by closed circuit television (CCTV). The identification of defects and other conditions is done using industry standards such as NASCO PACP Defect Codes. Sewer sections with significant structural defects or excessive I/I are rehabilitated by installing Cured-In-Place Pipe (CIPP) liners, cured in place internal point repairs, sewer replacement and external grouting.

In addition, staff within CCWS's Engineering Inflow and Infiltration Section perform routine inspections of stream crossings, manholes and sanitary sewer lines. This includes visual inspection, smoke testing, dye testing, and CCTV inspection. Any defects found are generally turned over to the System Maintenance Division for further evaluation and repair. The I&I group also installs ADS flow meters throughout the county to monitor the sanitary sewer system for capacity issues, surcharge issues, and inflow and infiltration issues.

2. Measurable goal(s):

- Continue to implement flow monitoring and sanitary sewer condition assessment and rehabilitation programs.
- Document the number of miles of sewer line inspected and rehabilitated for each reporting period.

3. Documentation to be submitted with each Annual Report:

- A list of sewer sections inspected and rehabilitated will be provided for each reporting period.

Industrial Facility Stormwater Discharge Control
Table 3.3.3 of the Permit

1. Industrial Facility Inventory

1. Description of SWMP Component:

CCWS will maintain and update the inventory for facilities with industrial activities that potentially discharge to the MS4. This shall include facilities on EPD's Industrial Stormwater General Permit (IGP) Notice of Intent (NOI) and No Exposure Exclusion online listing.

Refer to **Appendix D** for a current inventory of Industrial Facilities.

2. Measurable goal(s):

- Annually update industrial facilities that are included on EPD's Industrial Stormwater General Permit NOI and NEE online listings.

3. Documentation to be submitted with each Annual Report:

- Updated inventory will be provided for each reporting period.

2. Inspection Program

1. Description of SWMP Component:

CCWS will continue its industrial facility inspection program for all inventoried facilities that discharge to the MS4.

Cobb County's inspection program for industrial facilities consists of the facility inspection prioritization, inspection frequency, and inspection documentation.

Each inspection includes observation of the following:

- Outfalls, MS4, channels, drains, pond, streams on and around the facility
- Stormwater sampling points
- Dumpsters and containment areas
- Fueling stations
- Any liquids, solids, or other materials that can easily flow to storm drain
- Review of records, ensuring they have NOI permit, types of pollutants they have on site and results of any analysis conducted
- Ensure BMPs are in place

In the event the County determines that an industry is discharging through the MS4, and adding a substantial pollutant load to the stream, the County would issue a notice of violation and initiate necessary corrective action(s) which may include a requirement for the industry to conduct monitoring and submit the results to the County for review. CCWS does not anticipate performing sampling for any affected industry.

Refer to **Appendix I** for a copy of the inspection form used for Industrial Facilities.

2. Measurable goal(s):

- Conduct inspections on 100% of the inventoried facilities that discharge to the MS4 within the 5-year permit period, with a goal of 20% each reporting period, but a minimum of 5%.
- Require any industry found to be adding substantial pollutant loading to the stream to conduct monitoring and submit results to CCWS for further evaluation.

3. Documentation to be submitted with each Annual Report:

- Total number of facilities will be provided, along with the number and percentage of inspections conducted during the reporting year.
- Copies of inspections reports and results of any monitoring conducted will be included.

3. Enforcement Procedures

1. Description of SWMP Component:

Violations are handled by Cobb County's Code Enforcement Program and/or Cobb County Stormwater in accordance the ERP and Section 50-185 of the Cobb County Code. Both groups maintain citation authority over Stormwater sections of the code. Depending on the nature of the violation, additional steps may be taken before issuing a citation. Stormwater's Environmental Compliance Section often use warning letters and notices of violations before issuance of a citation. If violations against the requirements of the NPDES General Permit are not addressed, the compliance issues are forwarded to the issuing authority for the NPDES Program (Georgia EPD) for further enforcement action.

Refer to **Appendix C** for Cobb County Code related to Violations, Penalties, and Enforcement of Stormwater Water Quality/Illicit Discharges.

2. Measurable goal(s):

- Continue to implement enforcement procedures as outlined in the SWMP and ERP, and in accordance with Cobb County Code.
- Ensure appropriate follow-up and documentation of resolution at 100% of facilities with a noted violation.

3. Documentation to be submitted with each Annual Report:

- Documentation of any enforcement actions taken during the reporting period to include:
 - A copy of the audit form noting violations; and
 - The letter mailed to the industry (or copy of citation, if applicable).

4. Educational Activities

1. Description of SWMP Component:

When Cobb County's Stormwater Management Division conducts routine inspections of industrial facilities, a copy of the audit form is provided to the facility. This audit form contains information on locating stormwater educational information on the CCWS webpage. As a follow-up to the inspection, if there are recommendations or noted deficiencies, the facility is provided brochures which provide information on the environmental effects and liabilities of stormwater runoff pollution. Staff also make recommendations and offer suggestions to improve BMPs relative to stormwater runoff. The facility may be offered curb markers and other educational materials to address dumping into catch basins and storm drains. Any compliance issues are noted and sent to the industry in a letter or a notice of violation, along with targeted educational materials.

2. Measurable goal(s):

- An educational activity will be performed at least once each reporting period.
- Provide educational information to 100% of non-compliant industries by referring them to Cobb County Stormwater Management webpage and/or providing written education materials.

3. Documentation to be submitted with each Annual Report:

- Audit Inspection Forms will be submitted which includes a checklist item for staff to document that educational materials are provided to the facility.
- If any other educational activities are offered during the reporting year, a list of these, along with date and type of activity, will be provided.

Construction Site Management

Table 3.3.4 of the Permit

1. Legal Authority

1. Description of SWMP Component:

Cobb County's ordinance for Erosion and Sedimentation (E&S) can be found under Land Disturbing Activities, Article V of Chapter 50 (Environment). Cobb County reviews and modifies code as necessary to maintain compliance with State requirements. Amendments were made to this Code Section twice during the 2019-2024 permit cycle.

Cobb County will continue to make necessary updates 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.

In 2004, Cobb County adopted the model ordinances from the Metro North Georgia Water Planning District (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 promulgated floodplain code amendments for the floodplain ordinance (O.C.C.C. chapter 58) during the 2014-2019 permit period. One of the main objectives in this portion of code, relative to stormwater management, is to conserve natural flood plains, stream channels, and natural protective barriers which are involved in the accommodation of floodwaters.

Refer to **Appendix C** for a copy of the Cobb County Ordinance for Land Disturbing Activities and Floods.

2. Measurable goal(s):

- Evaluate the E&S ordinance each reporting period and update when necessary.

3. Documentation to be submitted with each Annual Report:

- If amended, a copy of the adopted E&S ordinance will be provided.

2. Site Plan Review Procedures

1. Description of SWMP Component:

Unless otherwise exempted, all land-disturbing activities in unincorporated Cobb County must be regulated via the issuance of a Land Disturbance Permit (LDP). Permits are issued by the Site Plan Review Section under the issuing authority of the Community Development Agency.

There are three types of land disturbance permits:

- Clearing Only
- Grading Only
- Full Site

The Site Plan Review Section coordinates the review and approval for all construction documents submitted to Cobb County for a LDP to ensure consistency with the zoning requirements (and stipulations) and Cobb County Code. During this process, staff can recommend changes to the site plan to better protect against un-buffered runoff during and after land disturbance before they issue any land disturbance permits.

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.
- The 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.
- Once all recommendation and stipulations are complete, the site plans are stamped for approval and land disturbance begins.

In addition, Cobb County participates in the National Flood Insurance Program. Cobb strictly regulates development in or near the 100-year Special Flood Hazard Area (SFHA). Compliance with SFHA restrictions is confirmed via the use of the FEMA elevation certificate. During permit reviews, Site Plan Review staff verifies that the proposed building project meets or exceeds minimum floor elevations as shown on the subdivision final plat. A condition is then placed on the permit which

requires that an elevation certificate be provided to SPR staff before a framing inspection can occur.

2. Measurable goal(s):

- Continue to implement the site plan review procedures as outline above.
- Ensure 100% of site plans are reviewed to ensure compliance with zoning and code requirements.

3. Documentation to be submitted with each Annual Report:

- A list of plans received will be provided, along with the number of plans reviewed, approved, or denied during the reporting period.
- The number of Land Disturbing Activity (LDA) permits issued during each reporting period will be provided.
- A list or table of permits issues during the reporting period.

3. Inspection Program

1. Description of SWMP Component:

Once land disturbance begins, Community Development's Site Inspection Section will periodically inspect the sites of land disturbing activities for which permits have been issued to determine if the activities are being conducted in accordance with the plan and if the measures required in the plan are effective in controlling erosion and sedimentation.

The Site Plan Review Section reviews individual single family lot plans, building additions, swimming pools, retaining walls, decks, and accessory structures. These plans are compared to the civil engineer plans and final plat for the subdivision to ensure compliance with the Tree Ordinance, State water buffer guidelines, Stormwater Management guidelines, and other Cobb County regulations. In addition, staff verifies that the proposed project does not encroach into or conflict with any overhead or underground utility line or easement.

Sites are generally inspected multiple times during construction. Inspections occur during grading, stormwater conveyance and/or BMP installation, following installation, and after final site stabilization. County staff can assign a specific number of E&S 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 same system used for permitting. 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.

2. Measurable goal(s):

- Continue to implement the construction site inspection program at 100% of permitted construction sites to ensure structural and non-structural BMPs at construction sites are properly maintained as specified in the Construction General Permits.
- At a minimum, one inspection at each active construction site will be conducted.

3. Documentation to be submitted with each Annual Report:

- The number of active construction sites that were inspected during the reporting period will be and the total number of inspections of these active sites were conducted will be provide each reporting period.
- A list of active sites and the number and dates of inspections during the reporting period will be provided each reporting period.

4. Enforcement Procedures

1. Description of SWMP Component:

Violations of the erosion and sediment control ordinance may be found during inspections or may be reported to the county by citizens or members of the public. Cobb County Community Development is responsible for the enforcement of these violations on active construction sites. In the event of non-compliance, penalties may include warnings notices of violation, stop work orders, bond forfeiture, withholding of certificate of occupancy, civil monetary penalties, suspension/revocation/medication of the permit, etc.

2. Measurable goal(s):

- Implement enforcement procedures for 100% of the E&S violations documented at construction sites as described in the SWMP and in accordance with the ERP.

3. Documentation to be submitted with each Annual Report:

- A list of enforcement actions taken during the reporting period will be provided, including the number, type of enforcement action (e.g., warning letters, notices of violation, stop work orders, etc.) and the amount of any assessed penalties, if applicable.

5. Certification

1. Description of SWMP Component:

Cobb County requires that anyone involved in land development, design, review, permitting, construction, monitoring, inspection, or any land-disturbing activity in Georgia must meet education requirements and be certified by the Georgia Soil and Water Conservation Commission (GSWCC). Community Development's webpage contains a link directly to GSWCC's for information on education and certification requirements. This requirement includes Cobb County staff that are involved in construction, permitting, and inspection activities.

2. Measurable goal(s):

- Ensure that 100% of MS4 staff involved in construction activities subject to CGPs are trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission and their certifications remain current.

3. Documentation to be submitted with each Annual Report:

- Provide a summary of certified staff, to include:
 - Name of employee
 - Title
 - Certification ID
 - Level
 - Expiration of Certification

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

1. HVPS Facility Inventory

1. Description of SWMP Component:

CCWS's Stormwater Environmental Compliance Inspectors are responsible for the HVPS inventory and inspections of the following types of commercial businesses and industries:

- Small commercial carwashes
- Detail shops
- Auto repair shops
- Home improvement stores
- Restaurants
- Stables

Environmental Compliance staff obtain a comprehensive list of all business requesting licenses to do business in Cobb County from Community Development's Business License Office. This list includes businesses in the categories referenced above and are entered into the Water Quality database for inventory and inspection tracking.

Refer to **Appendix D** for a current inventory of HVPS facilities.

**Note-This list was generated at the start of the 2024-2025 reporting year and is subject to change each year.*

2. Measurable goal(s):

- Maintain and annually update the inventory for HVPS facilities that discharge to the MS4.

3. Documentation to be submitted with each Annual Report:

- Updated facility inventory will be provided for each 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 Stormwater Environmental Compliance staff which consists of three (3) Inspectors and one Supervisor. 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 annually 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 may be prioritized and inspected more frequently necessary. Stormwater Management anticipates that over 1,285 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.

Refer to **Appendix I** for a copy of the HVPS Inspection Form.

2. Measurable goal(s):

- Conduct inspections on 100% of the inventoried facilities that discharge to the MS4 within the 5-year permit period, with a goal of 20% each reporting period, but a minimum of 5%.

3. Documentation to be submitted with each Annual Report:

- Total number of facilities will be provided, along with the number and percentage of inspections conducted during the reporting year.
- Copies of inspections reports conducted during the reporting period.

3. **Enforcement Procedures**

1. Description of SWMP Component:

Violations are handled by Cobb County's Code Enforcement Program and/or Cobb County Stormwater in accordance with Section 50-185 of the Cobb County Code. Both groups maintain citation authority over Stormwater sections of the code. Depending on the nature of the violation, additional steps may be taken before issuing a citation. Stormwater's Environmental Compliance Inspectors often use warning letters or notices of violations before issuance of a citation. If violations against the requirements of the NPDES General Permit are not addressed, the compliance issues are forwarded to the issuing authority for the NPDES Program (Georgia EPD) for further enforcement action.

Refer to **Appendix C** for Cobb County Ordinance for Violations, Penalties, and Enforcement of Water Quality/Illicit Discharges.

2. Measurable goal(s):

- Continue to implement enforcement procedures as outlined in the SWMP and ERP, and in accordance with Cobb County Code.
- If violation is noted at a facility, ensure there is appropriate follow-up and documentation of resolution.

3. Documentation to be submitted with each Annual Report:

- Documentation of any enforcement actions taken during the reporting period to include:
 - Report noting any violations found at inspected facilities; and
 - Copies of violation letters mailed (or copy of citation, if applicable).

4. Educational Activities

1. Description of SWMP Component:

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

CCWS is currently evaluating two different "pilot" education programs and considering the feasibility of implementing one of them to gauge interest in the HVPS community. Both programs under consideration are aimed towards facilities found in non-compliance, most specifically restaurants. The educational opportunity would allow CCWS a more direct means of educating HVPS facility employees on proper handling of wastes and housekeeping around dumpsters and above ground grease storage containers. One of the aspects of this program under consideration is providing the opportunity for facilities to participate in this voluntary education program, in lieu of immediate enforcement action. As we have not made a final decision on implementation of this pilot, I have not committed to any goals or documentation but will provide a status update in the annual report.

2. Measurable goal(s):

- An educational activity will be performed at least once per reporting period.
- Continue implementing educational activities for HVPS facilities by providing educational materials at each inspection when deficiencies are found or to support staff's recommendations.
- All facilities receiving a notice of violation will be directed to education materials available on the Stormwater Management website.

4. Documentation to be submitted with each Annual Report:

- Audit inspection forms will be included which include a checklist item for staff to document that educational materials were provided to the facility.
- If any other educational activities are offered during the reporting year, a list of these, along with date and type of activity, will be provided.
- A copy of specific education materials (e.g., brochures/factsheets) distributed to HVPS facilities will be provided.

Public Education
Table 3.3.9 of the Permit

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

1. Public Education Program - Educational Activity #1

1. Description of SWMP Component: School Presentations

CCWS's Communication and Education Division utilize an extensive, long-standing relationships with local teachers and schools to provide educational programs to support student understanding of local water resources, water supply, water and wastewater treatment, water conservation and/or watershed management. Students of different age levels are targeted with materials oriented towards that age group. Our staff routinely seeks guidance from teachers on curriculum linkages that would help to identify appropriate grades and times of year to provide this material and develops presentation materials that can be used by presenters (e.g., handouts, speaker guide, demonstration/visual aid, slides).

CCWS staff participate in pre-planning and professional development events organized by the school district, as well as promote school program offerings. Bookings largely occur at the end of the previous school year and during pre-planning because of this direct communication with the teachers. Programs are offered on an on-going basis, upon the request of the school/teachers. CCWS staff typically visit the school in person but also allow for distance learning, utilizing technology to provide virtual lessons to students with both live streaming and video components.

Other school-based activities/presentations are training of educators and/or facilitators in a national education program (e.g., Project WET) and leading water reclamation facility tours when requested.

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:

- Provide a copy of the Communications and Education Division Annual Report which includes a summary of school outreach accomplishments.

2. Public Education Program - Educational Activity #2

1. Description of SWMP Component: Newsletter

Educational materials are provided in the CCWS's newsletter, *Water Matters*. This newsletter is developed by staff within the Communications and Education Division and distributed quarterly to community members who sign up to receive it. Both hard copies and electronic mailings are available. Contact databases are maintained for each method.

2. Measurable goal(s):

- Continue to publish the newsletter, *Water Matters*, each quarter.

3. Documentation to be submitted with each Annual Report:

- Provide a digital copy of one newsletter during the reporting period.

3. Public Education Program - Educational Activity #3

1. Description of SWMP Component: Social Media Program

CCWS continues to maintain an active social media presence across several platforms. These efforts help establish an open channel of communication with utility customers and residents, as well as distribute information related to water resources and water resource management. The social media tools used are Facebook, LinkedIn, Instagram, YouTube, and Nextdoor. CCWS routinely posts applicable content following a daily schedule. The schedule may be subject to change but currently is as follows:

Monday – Mark Your Calendar Mondays (Pre-event promotion)

Tuesday – Special Campaigns and Topics

Wednesday – Water Professional Wednesdays

Thursday – Thank You Thursdays (Post-event recognition)

Friday – Fun Fact Fridays

Saturday/Sunday – Live posts if working an event

2. Measurable goal(s):

- Post to social media at least once per week.

3. Documentation to be submitted with each Annual Report:

- Weblinks to social media accounts and engagement statistics will be provided in the Communications and Education Division Annual Report.

4. Public Education Program - Educational Activity #4

1. Description of SWMP Component: Utility Website

CCWS maintains an active online presence, hosting [Home | Cobb County Georgia](#). A variety of education information is available on this site, as well [Water Education | Cobb County Georgia](#) which is dedicated to water education programs.

2. Measurable goal(s):

- Maintain the website, updating page content as needed to remain current.

3. Documentation to be submitted with each Annual Report:

- URL to website will be provided in the Communications and Education Division Annual Report.

Public Involvement
Table 3.3.10 of the Permit

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

1. Public Involvement Program- Activity #1

1. Description of SWMP Component: Stream Cleanups

CCWS will continue to sponsor and coordinate volunteer stream cleanup efforts in Cobb County. CCWS also often 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. Clean-up events are not only a good opportunity to improve the environment but also a chance to provide information to participants and educate them on stormwater management and water quality.

Events are often scheduled in conjunction with Georgia Rivers Alive (or with other national clean-up events) that provide promotional material but may also be scheduled on an ongoing basis and upon request of local community groups. With extensive, long-standing relationships with local community volunteers, CCWS has built a robust contact database to promote events. Information is disseminated to recruit volunteers and raise general awareness of the event, generally through social media, newsletters, and on website calendars.

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 have been developed to document how events are managed, including waste disposal logistics, which vary depending on site, volume of waste, and partnerships.

2. Measurable goal(s):

- Continue to organize and facilitate two fall and two spring community stream clean-up events.
- Continue to sponsor ongoing waterway cleanup activities throughout the reporting year, providing gloves, bags, and planning assistance.
- Continue to sponsor Rivers Alive t-shirt/annual giveaway for local events.

3. Documentation to be submitted with each Annual Report:

- Summary of waterway cleanup accomplishments, including the events, number of participants, and volunteer service hours, will be provided in the Communications and Education Division Annual Report.

2. Public Involvement Program - Activity #2

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

CCWS continues to facilitate volunteer stream monitoring efforts (chemical, bacterial, macroinvertebrate, and visual) in Cobb County through the Adopt-A-Stream (AAS) Program. CCWS launched this program in 2002 and currently supports approximately 65 monitoring groups, monitoring over 85 sites. Individual residents are welcome to become volunteer monitors, but student groups, neighborhood associations, garden clubs, and other potential organizational partners are also targeted.

Staff in the Communications and Education Division coordinate with the Georgia AAS program and provide training locally, or through regional/state programs, for volunteer water quality monitors. Local training opportunities are promoted on social media, in newsletters, and on website calendars utilizing GA AAS resources and protocols. Workshops are offered monthly and upon request of school groups. Additionally, supplies are provided for monitoring or potential sources of support for supplies are identified.

Trainings and volunteer engagement/monitoring events are tracked in a spreadsheet and includes 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):

- Continue facilitating monthly water quality monitoring workshops.
- Provide kits and other resources to support local volunteer collection efforts.
- Act as point of contact for community questions about water quality.

3. Documentation to be submitted with each Annual Report:

- Summary of AAS 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), will be provided in the Communications and Education Division Annual Report.

3. Public Involvement Program - Activity #3

1. Description of SWMP Component: Storm Drain Marking Program

CCWS will continue to recruit local volunteers and oversee storm drain marking efforts in Cobb County. Local events are scheduled seasonally, supported upon request of community groups, and are promoted on social media, in newsletters, and on website calendars. Free marking kits are provided to volunteers and include aluminum markers, adhesive pads, gloves, bags, and education materials.

2. Measurable goal(s):

- Continue to organize and facilitate two fall and two spring community marking events.
- Recruit, train and sponsor ongoing neighborhood marking activities throughout the reporting year.

3. Documentation to be submitted with each Annual Report:

- Summary of Storm Drain Marking accomplishments, including the number of volunteer participants, events, number of drains marked, and volunteer service hours, will be provided in the Communications and Education Division Annual Report.

4. Public Involvement Program - Activity #4

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

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

Annual HHW Disposal Events generate overwhelming community engagement, with hundreds of participants dropping off waste for disposal at no charge. Local events are promoted on social media, in newsletters, and on website calendars. Materials collected generally include paint, chemicals, (landscape, auto, cleaning chemicals, etc.) and fuels. Materials are collected and disposed of by a qualified vendor that is selected following County procurement policies/procedures.

2. Measurable goal(s):

- Continue to offer an annual HHW Amnesty Day for Cobb County residents to dispose of paint, chemicals, and other hazards free of charge.

3. Documentation to be submitted with each Annual Report:

- Summary of HHW reduction events/efforts, including number of households served, will be provided in the Communications and Education Division Annual Report.

Post-Construction
Part 3.3.11 of the Permit

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

- A. Provide the date of the adoption of the Post-Construction ordinance:
02/09/2021 (date of amendment)
- B. Provide the date of the adoption of the Georgia Stormwater Management Manual or an equivalent or more stringent local design manual: 02/09/2021 (date of amendment)
- C. Ensure a copy of the Post-Construction ordinance is attached to the SWMP.

Refer to **Appendix C** for a copy of the Post-Construction Ordinance

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

- A. The linear transportation feasibility program is voluntary. Have you developed or are you planning to develop a linear transportation feasibility program?
Yes X No
- B. If yes, is the linear transportation feasibility program attached to the SWMP?
Yes X No
- C. If you plan to develop a linear transportation feasibility program, provide the schedule for submitting the program: N/A

Refer to **Appendix E** for the attached linear transportation feasibility program.

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

1. Legal Authority

1. Description of SWMP Component (the text must describe the method used to conduct the review of the building codes, ordinances, and other regulations):

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). Cobb County completed a review of its ordinance using the Center for Watershed Protection (CWP) worksheet during the previous permit cycle. This evaluation was completed and submitted to EPD in 2020.

Refer to **Appendix J** for a copy of the completed CWS COW Scoring Worksheet and the CWP COW Summary of Results.

2. Measurable goal(s):

- 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) each reporting period.

3. Documentation to be submitted with each Annual Report:

- If any ordinance or development standard is revised, a copy of the adopted ordinance or development will be submitted.
- Submit the Code and Ordinance Worksheet (COW) each reporting year and document any progress made towards addressing recommendations to code or development standards.

**Cobb County is currently in the process of drafting a Unified Development Code. We are unable to provide any type of schedule for implementing recommended changes at this time.*

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 submitted the GI/LID Program document to EPD for review during the last permit period and received approval on January 13, 2021. CCWS will continue to implement the GI/LID Program which identifies the procedures for evaluating feasibility and site applicability of GI/LID techniques and practices within Cobb County. These practices are based on those recommended in the latest edition of the Georgia Stormwater Management Manual. This program also defines the practices allowed within the County and provides for inspection and maintenance guidance.

Refer to **Appendix J** for a copy of the approved GI/LID Program document.

2. Measurable goal(s):

- Assess the GI/LID program document annually for any necessary revisions.

3. Documentation to be submitted with each Annual Report:

- If the GI/LID Program document is revised, a copy will be submitted to EPD for review.

3. GI/LID Structure Inventory

1. Description of SWMP Component:

The GI/LID structure inventory for permittee-owned structures, publicly-owned structures owned by other entities, and privately-owned non-residential structures constructed after June 11, 2014, continues to be a work in progress. Cobb County retained a consultant to assist the county in developing an initial inventory. This inventory was completed in 2021. There have been updates to the inventory, but the last documented update was completed in 2023. It is believed that with staffing changes, new water quality-related GI/LID structures were not consistently added to the inventory. Moving forward, CCWS will ensure that this inventory is updated and remains current each year.

Throughout the previous permit period, Maintenance Agreements have been consistently executed for privately-owned non-residential structures. CCWS has not required Maintenance Agreements for publicly owned structures by other entities. CCWS will incorporate this requirement for those entities in which we have legal authority.

Refer to **Appendix J** for a copy of the current GI/LID inventory.

2. Measurable goal(s):

- Track the addition of new water quality-related GI/LID structures through the plan review process and ensure that the structures are added to the inventory.
- Review the current inventory and update to include any GI/LID structures missed in the inventory between 2020-2024.

3. Documentation to be submitted with each Annual Report:

- An updated inventory, which will include the total number of structures, the type and ownership, will be provided each reporting period.

4. Inspection and Maintenance Program

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

Cobb County will continue to perform inspections on GI/LID structures included in the inventory. This includes permittee-owned structures, publicly-owned structures owned by other entities and that CCWS has legal authority to inspect, and privately owned non-residential structures that CCWS has the legal authority to inspect.

Inspections are completed using inspection checklist(s) provided in the GI/LID Program document. These are submitted annually along with photos of each structure inspected. Owners of GI/LID structures will be notified about any necessary maintenance through a warning letter or notice of violation. These structures will be reinspected to ensure compliance.

2. Measurable goal(s):

- Conduct inspections on 100% of permittee-owned structures, as well as publicly owned structures owned by other entities and privately owned non-residential structures for which CCWS has legal authority to inspect within the 5-year permit cycle.
- Conduct maintenance activities permittee owned structures as needed and in accordance with the GI/LID Program document.
- Notify property owners of non-permittee owned structures 100% of the time if there is needed maintenance and issue notice of violation letters within 30 days of inspection if necessary.
- Develop a summary list of maintenance agreements, to include those executed prior to issuance of this permit. Update the list as new agreements are executed.

3. Documentation to be submitted with each Annual Report:

- The number and/or percentage of total structures inspected will be provided each reporting period, along with copies of all inspection reports and photos.
- The number of permitted-owned structures maintained during the reporting period will be provided, along with documentation of the type of maintenance performed.
- A summary list of maintenance agreements for privately owned non-residential structures and publicly owned structured owned by other entities will be provided each reporting period, along with copies of any letters or enforcement actions sent to property owners of to ensure proper maintenance of these structures.

Appendix A

MS4 Inventory and Maps
Part 3.3.1 of the Permit

(Inventory and maps are contained on the enclosed flash drive)

Appendix B

Illicit Discharge Detection Elimination **Part 3.3.2 of the Permit**

Appendix C

Cobb County Ordinance

(Cobb County Ordinances are contained on the enclosed flash drive)

Appendix D

Facility Inventories

Part 3.3.1 (Table 3.3.1 #6) of the Permit

Part 3.3.3 of the Permit

Part 3.3.5 of the Permit

(Municipal, Industrial, and HVPS Facility Inventories
are contained on the enclosed flash drive)

Appendix E

Linear Transportation Feasibility Study
Part 3.3.11(a)(3) of the Permit

(Linear Transportation Feasibility Study is contained on the enclosed flash drive)

Appendix F

Enforcement Response Plan (ERP) **Part 3.3.6 of the Permit**

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program.
 - A. Provide the date the ERP was approved by EPD: June 9, 2021
 - B. If the ERP has not yet been approved, provide the date submitted to EPD: _____
2. A copy of the ERP must be attached to this Appendix.

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 G

Impaired Waters **Part 3.3.7 of the Permit**

1. Population at the time of permit issuance: _766,149 (as of 2020 census) _____
2. The Impaired Waters Plan must, at a minimum, include:
 - A list of impaired waters and the pollutant(s) of concern, including the date of the 303(d) list used;
 - A map showing the location of the impaired waters, the monitoring location, and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters and within the same watershed;
 - The sample location (instream or at the outfalls);
 - Information on the sample type, frequency, and any seasonal considerations;
 - Schedule for starting monitoring for any newly identified pollutants
 - BMPs that will be implemented to address each pollutant of concern; and
 - A schedule for implementing the BMPs;
 - The information to be included in each annual report, including the monitoring data, an assessment of data trends, and an assessment of the effectiveness of the BMPs.
3. If the population exceeds 10,000, and a water is impaired for bacteria, then the MS4 must also address the following in the Impaired Waters Plan:
 - Sampling frequency for bacteria
 - A description of the development of a Sampling Quality and Assurance Plan if the data is below water quality standards for two years.

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).

Appendix H

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

1. Description of the Employee Training Program:

CCWS's Stormwater Division is comprised of three different groups: Engineering, Maintenance, and Environmental Compliance. The entire group is offered general stormwater training opportunities such as in-house or vendor hosted lunch-and-learns, participation in Georgia Association of Water Professionals (GAWP) stormwater committee meetings and conferences, and E&S certification. Additionally, the Stormwater Engineers are encouraged to attend Floodplain Managers Training, pass the FEMA-sponsored CFM exam, and obtain certification as a Certified Floodplain Manager. Stormwater Environmental Compliance Inspectors are encouraged to obtain MS4 NPDES training and certification.

2. Measurable goal(s):

- Each staff member attends at least one training event annually.
- CCWS will provide Stormwater related training to each of the following groups, which may include at least one topic:
 - Engineering
 - Stormwater related committee or conference attendance
 - Floodplain Manager training/certification
 - GSWCC E&S training/certification - obtain certification for new employees, maintain for current employees.
 - Other stormwater training related to maintaining P.E. license
 - Maintenance
 - Stormwater related committee or conference attendance
 - GSWCC E&S training/certification – obtain certification for new employees, maintain for current employees.
 - Other stormwater training that may be provided through lunch-and-learn programs offered by vendors (usually involve discussions on emerging stormwater technologies)
 - Environmental Compliance
 - Stormwater related committee or conference attendance
 - NPDES MS4 Compliance and Enforcement Certified Inspector Training/certification - obtain certification for new employees, maintain for current employees.
 - GSWCC E&S training/certification – obtain certification for new employees, maintain for current employees.

3. Documentation to be submitted with each Annual Report:

- Summary of all employee training efforts will be provided for each reporting year.
- Copies of training certificates, if provided.
- Copies of sign-in sheets if group training is offered, along with a brief description of the training topic(s).

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

Appendix I

Blank Forms

(Forms are contained on the enclosed flash drive)

Appendix J

GI/LID Program Documents

(Documents are contained on the enclosed flash drive)