

Phase I Large MS4

City of Grayson Stormwater Management Program 2024-2028



Initial Submission: December, 2024

Re-submitted: June 27, 2025

Amended:

Note: Updated Items highlighted in Yellow

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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: City of Grayson
- B. NPDES Permit Number: GAS00140
- C. Mailing Address (if providing a post office box, also provide a street address):
475 Grayson Parkway
PO BOX 208 (475 Grayson Parkway)
Grayson, GA 30017
- D. Name of responsible official: Allison Wilkerson
Title: Mayor
Mailing Address: PO BOX 208 (475 Grayson Parkway)
City: Grayson State: Georgia Zip Code: 30017
Telephone Number: 770-963-8017
Email Address: awilkerson@cityofgrayson.org
- E. Designated stormwater management program contact:
Name: Joe Walter
Title: Principal Planner
Mailing Address: 400 Pike Blvd.
City: Lawrenceville State: Georgia Zip Code: 30046
Telephone Number: 770-468-8096
Email Address: jwalter@ppi.us
- F. Provide the river basin(s) to which your MS4 discharges: Yellow River (via Big Haynes Creek; Alcovy River)
- 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: 33.8932724733525 Longitude: -83.958143348971

2. Sharing Responsibility

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

SWMP Component:

1. Name of entity: Gwinnett County

2. SWMP component to be implemented by entity on your behalf:
Please see Appendix M for Shared responsibilities. IGA with Gwinnett County has been included in this Appendix as well.

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

3. **Certification Statement**

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

Printed Name: _____ Date: _____

Signature: _____ Title: _____

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

1. A1 - MS4 Structure Inventory and Map

1. **Description of SWMP Component:** The City is required to maintain a current map and inventory of municipal storm sewer system infrastructure (MS4). At a minimum, the inventory and map must include catch basins; ditches (linear feet), detention/retention ponds and underground detention and storm drain lines (linear feet). The inventory and map are currently complete with annual updates annual to reflect new infrastructure constructed and/or identified during the reporting period. This BMP will focus on updating the inventory and map on an annual basis to enable the City to effectively implement all inspection and maintenance activities. A copy of the current map and inventory of MS4 structures is included in this report. The City will also describe any changes made to the stormwater portion of the document during the reporting period in each annual report.
2. **Measurable goal(s):** The City will update the MS4 Map and Inventory on an annual basis
3. **Documentation to be submitted with each Annual Report:** The City will submit an updated inventory and map of municipal storm sewer system infrastructure as well as the number and type of new structures added and deleted during the reporting period in each annual report.

Associated Appendices: MS4 Inventory and Map are included in **Appendix A1**.

2. A2 - MS4 Inspection and Maintenance Program

1. **Description of SWMP Component (Ensure the text describes both the inspection and maintenance of the MS4 structures):** The City will conduct inspections of all MS4 stormwater management structures within the 5-year period. The structures that will be inspected: catch basins, ditches, pipes and City-owned detention ponds and all those structures listed on the MS4 inventory required by BMP F1. The City will document inspections through worksheets prepared by the City's consultant. The City will provide the number of structures inspected during the reporting period in each annual report.

Inspected structures that are found to be in need of maintenance will be documented and reported by the City's consultant. Minor maintenance such as removal of silt/debris and trash will be performed by the City's Public Works Director and documented. Maintenance activities beyond the removal of debris, etc., will be performed by an outside contractor that has been previously selected by the City. The City Engineer will put together a Task Order outlining the work to be done and obtain a price from the contractor. Once scope and fee have been approved, the contractor will perform the maintenance activities.
2. **Measurable goal(s):** The City will inspect a 100% of all inventoried assets within a 5-year period. The City will perform and document maintenance and repairs, as needed, on MS4 structures during the reporting period.

3. **Documentation to be submitted with each Annual Report:** The City will provide a list of all structures inspected during the reporting period in each annual report. The City will include copies of completed inspection reports to document the inspection activity. The City will document maintenance activities through (1) Task Orders, contractor invoices and proof of payment, or (2) through maintenance logs for minor activities such as debris removal from MS4 structures, etc.

Associated Appendices: Inspection sheets and Task Orders are included in **Appendix A2**.

3. **A3 - Planning Procedures**

1. **Description of SWMP Component:** Review and Update the Grayson Comprehensive Plan 2040, Community Policies–Natural Resources Section to more specifically address reducing pollution from MS4 discharges.
2. **Measurable goal(s):** Review the Grayson Comprehensive Plan to determine if language addressing MS4 pollution reduction is sufficient to drive City Policy. If amendments are needed, then the City Planner will make such changes that are needed and present to Council for review and adoption.
3. **Documentation to be submitted with each Annual Report:** Communities Policies Section of the Comprehensive Plan with evidence that the document has been approved by Council.

Associated Appendices: Grayson Comprehensive Plan is included in **Appendix A3**.

4. **A4 - Street Maintenance**

1. **Description of SWMP Component:** The City of Grayson routinely hires a street sweeping contractor to sweep along roads and intersections in City limits that are highly trafficked and/or where litter tends to accumulate. Generally speaking, one (1) or more road miles are swept each reporting period. However, funding for street sweeping activities in the City is approved by City Council on an annual basis, and is subject to availability. As such, in years when street sweeping funds are not available, the City will arrange for at least one (1) “Team Up to Clean Up” event to occur to supplement this requirement. See the “Grayson Team Up to Clean Up” section below for information on the event.

Street Sweeping Program

Procedures for Street Sweeping relating to Water Quality

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

- The contractor will not sweep street during rain events.
- The debris collected is to be taken to a local landfill for disposal.
- If the contractor comes upon deceased animal(s) in the road, they will dispatch Gwinnett County Animal Control to remove the deceased animal(s), and sweep around the animal(s).
- The contractor generally uses a dry vacuum sweeper.

Grayson Team Up to Clean Up

The City of Grayson's "Team Up to Clean Up" events involve residents and citizens working together to perform general beautification activities in the City. These activities involve trash and litter removal efforts that generally occur along City streets and right-of-ways or on publicly-owned property throughout the City, such as the City Park and City Hall. Litter is collected in trash bags and placed for pickup by the City's waste hauler. The City of Grayson will ensure that at least one (1) "Team Up to Clean Up" event is held in the City as the City's alternate method of street cleaning in reporting years when street sweeping is not performed.

2. **Measurable goal(s):** Ensure that either a) one (1) mile of street sweeping occurs within City limits, OR b) that one "Team Up to Clean Up" event is held within City limits each report year to meet the requirements in this section of the permit.
3. **Documentation to be submitted with each Annual Report:**

Street Sweeping Program: In reporting periods when street sweeping occurs in the City of Grayson, the City will provide an invoice describing the street sweeping activities that occurred, including which roads/intersections were swept and how many total miles were swept, in each Annual Report.

Team Up to Clean Up: In reporting periods when street sweeping does not occur in the City of Grayson, the City will provide documentation for the "Team Up to Clean Up" event that will be held as the alternate method of street cleaning. This documentation will include:

- The date of the event
- The location of the event
- The number of participants
- The total # of trash bags collected
- Photos from the event

5. A5 - Flood Management Projects

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

New Flood Management Projects

In November 2017, the City of Grayson adopted the new Gwinnett County Stormwater Management Manual (GCSWMM) which provides the technical guidelines for stormwater management facility design to include Runoff Reduction Water Quality by requiring that the first 1" of stormwater volume from impervious surfaces be retained onsite. All new and redevelopment projects that meet the minimum applicability standard must provide Runoff Reduction and/or Water Quality. As such, all new or redevelopment projects (that meets the minimum applicability standard) in the City of Grayson are required to incorporate runoff reduction and/or water quality BMPs into that development to improve the quality and quantity of post construction runoff from that development.

Existing Permittee-owned Flood Management Projects

As of the effective date of this permit, the City of Grayson does not currently own any flood management/control facilities (e.g., detention or retention ponds). Any flood

management facilities planned in the future will be designed and constructed to meet the water quality standard set out in the most recent Gwinnett County Stormwater Management Manual. Following installation, any newly constructed flood management facilities owned by the City of Grayson will be incorporated into Gwinnett County's Watershed Improvement Plan (WIP) Program and will be assessed for retrofitting to address potential water quality impacts.

2. Measurable goal(s):

- a. Continue to require all new flood management projects (e.g., detention and retention ponds) to be assessed for water quality impacts during the design phase in accordance with the most recent version of the Gwinnett County Stormwater Management Manual (GCSWMM).
- b. Existing Permittee-owned Flood Management Projects: Continue to incorporate reviews of City-owned flood management projects (e.g., detention and retention ponds) to assess feasible retrofit activities which would incorporate water quality benefits to the BMPs. Gwinnett County will assess 100% of the City-owned detention/retention ponds within the 5-year permit term, with at least one (1) structure assessed annually.

3. Documentation to be submitted with each Annual Report:

- a. New Flood Management Projects: The City will provide a detailed list of all new City-owned flood management projects (e.g., detention and retention ponds) assessed during the reporting period with each Annual Report.
- b. Existing Permittee-owned Flood Management Projects: The City will provide Assessment Sheets and the status of any retrofit activities conducted on existing flood management projects within the reporting period in each Annual Report.

See **Appendix A5** for a copy of the form used to review new flood management projects in the City (2024 Site Development Plan Review Checklist).

6. A6 - 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):

Inventory

The City of Grayson will develop, and annually update, an inventory of municipal facilities with the potential to cause pollution. The inventory will be provided in each annual report. Per EPD's request, this inventory will not include any facilities that are subject to the Industrial General Permit (IGP).

Inspection Program

The City of Grayson will inspect all municipal facilities listed on the most recent municipal facility inventory at least once within the 5-year permit period. At least one (1) municipal facility with the potential to cause pollution will be inspected each year.

At a minimum an inspection will consist of:

- Review of the file history for the facility prior to inspection.

- Contacting the Facility Management to arrange for the inspection.
- A site visit, which includes a site tour, both inside and outside all buildings. This site tour will concentrate on:
 - educating the facility manager (or appointee)
 - identifying actual or potential pollutant sources(s)
 - discussing potential pollutant source containment and control practices,
 - addressing identifiable discharges, i.e., illicit discharges or illegal connections
 - discussions concerning good housekeeping, secondary containment, etc.
- Developing a written report which will include a completed inspection form, a site map, inspection photos, any pertinent enforcement documents, and notes on any other issues of concern.
- Appropriate educational materials will be provided at the time of the inspection, or as soon as possible thereafter, if necessary.

2. Measurable goal(s):

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

3. Documentation to be submitted with each Annual Report:

- a. Inventory of Municipal Facilities excluding any facilities addressed in Section 3.3.3: This inventory list will be updated each year and included in each Annual Report.
- b. Municipal Facility Inspection Program: Completed inspection forms for all Municipal Inspections performed during the reporting year will be included in each Annual Report.

Associated Appendices:

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

7. A7 - Pesticide, Fertilizer, and Herbicide Application

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

Commercial Applicators

The City relies heavily on the State Department of Agriculture (DoA) and Gwinnett's Cooperative Extension Service (CES) for assistance in addressing requirements for this part of the program. The State DoA requires commercial applicators of pesticides

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

Municipal Applicators

Municipal employees who use pesticide, herbicides, and/or fertilizers in the course of performing their job duties will be trained in the proper use, storage, and disposal of these chemicals. The training offered through the CES and described in the Commercial Applicators section above is also available to municipal employees. The City will ensure any applicable municipal staff obtain and maintain their Commercial Applicator’s license.

Inventory of Products

A complete inventory of pesticides, herbicides and fertilizers utilized by municipal staff and that are stored onsite will be provided in each Annual Report. As of the submittal of this SWMP, the city has no pesticide, herbicide, or fertilizer products stored onsite, thus no inventory can be provided.

2. Measurable goal(s):

Commercial Applicators

- The City of Grayson will report classes and training provided by the Gwinnett County Cooperative Extension Service covering the Commercial Pesticide Applicators License.

Municipal Applicators

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

3. Documentation to be submitted with each Annual Report: The City’s Annual Report will include, if applicable:

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

B. Illicit Discharge Detection and Elimination Program (IDDE)

Table 3.3.2 of the Permit

1. B1 - Legal Authority

1. Description of SWMP Component:

The City's Storm Water Management Ordinance and Enforcement Procedures

The City of Grayson's "Illicit Discharge and Illegal Connection" ordinance, which is consistent with the Model Ordinance issued by the Metropolitan North Georgia Water Planning District (MNGWPD), was adopted on June 15, 2009. See **Appendix B1** for a copy of this ordinance.

2. Measurable goal(s):

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

3. Documentation to be submitted with each Annual Report:

- If the IDIC ordinance is revised during the reporting period, the City of Grayson will submit a copy of the revised adopted ordinance with the annual report.

Associated Appendices: City of Grayson's current Illicit Discharge and Illegal Connection (IDIC) ordinance can be found in **Appendix B1**.

2. B2 - Outfall Inventory and Map

1. Description of SWMP Component:

The City of Grayson coordinates closely with Gwinnett County to provide the most accurate inventory data available on the City's MS4 structures. With this data, Gwinnett County develops and updates the City's MS4 outfall inventory.

A copy of the City's most recent outfall inventory and map can be found in **Appendix B2**. All outfalls have been geolocated and are readily available to staff through GIS.

2. Measurable goal(s): Gwinnett County, on behalf of the City of Grayson, will continue to update the City's outfall inventory as updated MS4 structure inventory data is provided to the County each year.

3. Documentation to be submitted with each Annual Report: The City of Grayson will provide in each Annual Report:

- The number of outfalls added during the reporting period;
- A list of the outfalls added during the reporting period;
- The total number of outfalls in the inventory;
- A list of all the outfalls in the inventory;
- An updated map showing the location of all outfalls from the MS4 and the names and location of all waters of the State that receive discharges from those outfalls.

- The percentage of outfall inspections conducted during the reporting period and documentation of the inspections in each annual report

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

- A copy of the City of Grayson's current DWS Outfall Inventory;
- A map showing the location of all the outfalls from the MS4 and the names and location of all waters of the State that receive discharges from those outfalls.

3. **B3 - 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):**

Dry Weather Screening (DWS) Program

Gwinnett County implements the Dry Weather Screening (DWS) Program on behalf of the City of Grayson. Gwinnett County's Dry Weather Screening (DWS) program focuses on screening for illicit discharges at outfalls during dry weather conditions (less than 0.1" of rainfall per 24 hours for the preceding 72 hours) to increase the chances that any observed flow is more likely to be associated with an illicit discharge. Each year Gwinnett County will perform Dry Weather Screening (DWS) at a portion of the outfalls on the DWS Inventory, as submitted in the most recent version of the annual report. The County will aim to perform DWS activities at 20% of the MS4 outfalls on an annual basis in order to meet the permit requirement to perform DWS at 100% of the outfalls in the MS4 system within the 5-year permit term.

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

The goal of the DWS program is to identify and eliminate any unpermitted illicit discharges to the MS4. Each DWS outfall will be inspected for flow. If there is no flow at the outfall, it will be recorded as "dry." If there is flow present, the following actions will occur:

- Visual and olfactory observations will be recorded for odor, turbidity, color, and floatables.
- In-situ measurements using probes and/or a field test kit will be run for pH, conductivity, temperature, fluoride, and detergents. See table 1 below for parameter threshold values and information pertaining to field test kit models used.
- If in-situ conductivity is greater than 300 $\mu\text{S}/\text{cm}$, a sample will be collected for laboratory bacteria analysis.
- If in-situ fluoride is greater than 0.2 mg/L, a sample will be collected for laboratory fluoride analysis.
- All dry weather flow will be traced upstream to the source and appropriate enforcement action taken if an illicit discharge is identified. Tracing activities may include:
 - Hiking upstream and pulling catch basin lids to inspect for flow.
 - Sampling upstream using in-situ probes or field test kits.
 - Dye tests
 - Smoke tests
 - Sandbagging to capture flow.
 - Lamping to identify illegal taps.

Grayson Stormwater Management Program (SWMP)

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

Investigative and Follow-up Procedures

If the field samples show higher than baseline levels (See Table 1 on the following page) for pH, conductivity, fluoride, detergents, or temperature, or if there is the distinctive odor of sanitary wastewater/septic waste, samples may be collected for laboratory analysis. Additionally, anytime there is flow detected during dry weather, the flow will be tracked to the source and appropriate enforcement action taken, if necessary.

If outfall screening indicates the presence of groundwater during dry weather conditions, the apparent groundwater flow will be traced up the stormwater system until a dry section of pipe is found without any potential pollutant sources identified, such as a nearby residence, commercial business, or industry. If necessary, Gwinnett County will establish a groundwater fingerprint using the method referenced in the Center for Watershed Protection's document, Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments by Robert Pitt et al. Also, the DWS outfall with groundwater flow will be identified in the tracking system/database as having a higher propensity for groundwater flow. This information will be readily available to staff when performing DWS inspections at the noted structure in the future.

Table 1: Summary table of DWS in-situ parameters, threshold values, and testing methods

Parameter	Threshold Values	In-situ Method Name (Model)	Notes
Conductivity	< 300 μ S/cm	HANNA Instruments Waterproof Tester pH, EC, TDS (HI 98129)	Surface waters in Gwinnett County generally have a low conductivity (< 300 μ S/cm). Conductivity levels > 300 μ S/cm may indicate an illicit discharge.
pH	6.0 - 8.5	HANNA Instruments Waterproof Tester pH, EC, TDS (HI 98129)	The normal pH range for stormwater varies from 6-8.5, with a few excursions down to 5.5.
Temperature	< 32° C/ 90° F	HANNA Instruments Waterproof Tester pH, EC, TDS (HI 98129)	The normal temperature should be ambient (not exceed 32°C/90°F).
Total Fluoride	< 0.2 ppm	HANNA Low Range Fluoride Colorimeter - Checker HC (HI729)	Fluoride is a better indication of potable water than chlorine, since chlorine is highly volatile and will rapidly dissipate from a sample.
Detergents	< 0.2 mg/L	CHEMetrics – CHEMets Kit Detergents (K-9400)	This parameter is associated with cleaning and washing operations and may indicate contamination by domestic wastewater. EPD NonPoint Source Program has requested a baseline limit of no more than 0.2 mg/L.
<i>E. coli</i>	May-Oct: 126 MPN/100 mL; Nov-April: 410 MPN/100 mL	N/A	If an identified dry weather flow possesses a sewer odor or high conductivity (>300 μ S/cm), a sample will be collected for <i>E. coli</i> laboratory analysis.

Elimination of Identified Illicit Discharges

If an illicit discharge is suspected during DWS inspections, DWS field staff will immediately alert their supervisor of the apparent discharge and an IDIC work order (WO) will be created to further investigate the apparent discharge. Once the presence of an illicit discharge has been confirmed and the source has been identified, Gwinnett County will implement the City's ERP for IDDE Violations to eliminate any illicit discharges identified through the DWS Program. This may include the issuance of pertinent educational materials, a guidance notice (GN), notice of violation (NOV), and/or a citation. Illicit

discharges from sanitary sewer overflows or leaking water lines will be immediately referred to the appropriate DWR work group through the WO system. This will allow an immediate response to the problem and complete transfer of all related information.

Documentation & Data Storage

All DWS data and documentation, including follow-up WO investigations and any subsequent enforcement actions, will be stored in our WO system/database so that all employees in the MS4 Compliance Group have access to pertinent information. All data fields required by EPD reside in the WO system so that summary reports may be generated for annual reporting. Current DWS Form data fields in the WO system include:

- Info Receipt Form
 - Structure #
 - Status
 - Inspection Type
 - Tracking #
 - Jurisdiction
 - PIN
 - Nearest Address
 - Watershed
 - Land Use
 - Receiving Stream
- Sample Info Form
 - Structure Rec #
 - Stream Smpl Type
 - Sample Date
 - Sample Time
 - Sampled By
 - Weather
 - Report Year
 - Conduct Meter Calib
 - pH meter calib
 - Jurisdiction
 - Valid Outfall?
 - Illicit Discharge?
 - Flow Present?
 - Flow Type
 - Fluoride (ppm)
 - Surfactants
 - Odor Type
 - Odor Severity
 - Color Type
 - Color Severity
 - Turbidity
 - Turbidity Severity
 - Floatables
 - Floatables Severity
 - Bacteria Sample?

- Bacteria Sample ID
- Grab Sample?
- Grab Sample ID
- Referred to
- Work Order #

3. Documentation to be submitted with each Annual Report:

The following documentation will be included in each Annual Report in table/summary report format:

- The total # of DWS events completed during the reporting period.
- The results of the DWS events and associated sampling completed during the reporting period (i.e., investigative findings where dry weather flow was observed).
- Any enforcement actions taken resulting from DWS activities.

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

- **Appendix B3**
 - Gwinnett County's DWS Decision Tree
- **Appendix J1**
 - The ERP for IDDE Violations

4. B4- Spill Response Procedures

1. Description of SWMP Component:

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

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

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

Fire Department

Spill Containment Procedure

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

Spill Response Procedure

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

Record Keeping

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

Department of Water Resources (DWR)

Spill Prevention, Containment and Response Procedures

Gwinnett County DWR provides sewer service in the City of Grayson. The County will respond to and mitigate spills that occur within the county-owned and maintained sewer system in the City. However, the County is not responsible for mitigating and reporting on SSO's that are not associated with a part of the County-owned and maintained sanitary sewer system.

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

Record Keeping

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

2. Measurable goal(s):

Continue implementation of programs and procedures as described above.

- **Fire Department:** The County Haz Mat teams will respond to spills within the City, as they are notified, and as appropriate.
- **DWR:** The County will respond to and mitigate spills that occur within the county-owned and maintained sewer system in the City.

3. Documentation to be submitted with each Annual Report:

Document implementation of programs and procedures as described above.

- **Fire Department:** The County will report spills that occur to the City's MS4 as they are provided by the Fire Department, with the data required by the State: Spill Date, Spill Location, Party Responsible for Spill, Substance Spilled, and Amount Spilled.
- **DWR:** The City will report SSOs, as defined above, in the MS4 Annual Report, with the data required by the State: Spill Date, Spill Location, Party Responsible for Spill, Substance Spilled, and Amount Spilled.

5. B5 - Public Reporting Procedures

1. Description of SWMP Component:

The City of Grayson has multiple mechanisms in place to address this requirement. As a result of the IGA with Gwinnett County, many of these come from County sources, while others are promoted by the City.

Public Education Program

The City of Grayson includes educational articles on the “Stormwater Education” page of the City website. At least one article on the Stormwater Education page will include information on public reporting of illicit discharges.

Gwinnett County Reporting Procedures

Gwinnett County responds to and investigates reports of illicit discharges on behalf of the City of Grayson. The County advertises their stormwater hotline phone number in various forms, including in articles and brochures, throughout the year, which are available to Grayson citizens.

IDDE Investigations

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

2. Measurable goal(s):

Public Reporting Procedures

- a. The City of Grayson will ensure that one (1) article per year is published on the “Stormwater Education” section of the City’s website that describes ways for citizens to report suspected illicit discharges, or any concerns with stream water quality. *Note: This article will be incorporated into the Public Education element of the SWMP.*
- b. The City of Grayson will provide information on each IDDE related report that was received and investigated during the reporting period in each annual report, including its status. The complaints will be reported in a tabular format, summarizing the major issues of the complaint, i.e., the location, the problem, the resolution, etc.

3. Documentation to be submitted with each Annual Report:

Public Reporting Procedures

- a. The City of Grayson will provide a screenshot of the (1) one article per year published to the City’s website that describes ways for citizens to report suspected illicit discharges, or any concerns with stream water quality. *Note: This documentation will be included in the Public Education section of each Annual Report.*
- b. The City of Grayson will provide information on each IDDE related report received during the reporting period in a table format, as a report from the WO system. as a summary report including the major components of each complaint, i.e., the location, the problem, the resolution, etc.

6. B6 - Proper Management and Disposal of Used Oil and Toxic Materials

1. Description of SWMP Component:

Education & Outreach

Per the IGA, Gwinnett County DWR implements multiple public education and outreach initiatives in City of Grayson. The County has, through its partnerships, developed a workshop concentrating on Household Hazardous Waste (HHW) activities. The topics include management of gardening chemicals and management of household cleaning materials, with the target audience being homeowners. This workshop will be presented on a biennial basis in the City. Data for the workshops will be entered into DWR's Task Database (presently Lucity), and the digital network, after each event. This will include date of event, event location, and number of attendees.

The City of Grayson will also publish one (1) article each year on the topic of HHW, to be included on the City's website under the "Stormwater Education" page.

2. Measurable goal(s):

Education & Outreach

1. Gwinnett County, on behalf of the City, will continue presenting the Household Hazardous Waste (HHW) workshop on a biennial basis in the City.
2. The City of Grayson will continue publishing one (1) article concerning HHW on the City's website under the "Stormwater Education" page.

3. Documentation to be submitted with each Annual Report:

Education & Outreach

1. Documentation will include a copy of the Workshop Calendar in years the HHW Workshop is held in the City, and data pertaining to the HHW Workshop: the date, Workshop title, and number of participants. This information will be included in the Public Education section of the Annual Report.
2. Documentation will include a screenshot of the one (1) HHW article that is to be published to the City's website under the "Stormwater Education" page each year. This information will be included in the Public Education section of the Annual Report.

7. B7 - Sanitary Sewer Infiltration Controls

1. Description of SWMP Component:

The sanitary sewer system in the City of Grayson is owned and operated by Gwinnett County. Therefore, the County will handle documentation on the requirements pertinent to this section of the permit in the County's Annual Reports. In the event that the City identifies seepage from the sanitary sewer system in the City's MS4, the City will notify the Gwinnett County Department of Water Resources.

2. Measurable goal(s):

The City will continue to report issues related to seepage of the County's sewer system into the City's MS4 to DWR as they arise.

3. Documentation to be submitted with each Annual Report:

None; The City does not own/operate sanitary sewer in its jurisdiction.

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

1. C1 - Industrial Facility Inventory

1. Description of SWMP Component:

Per the IGA, Gwinnett County implements Industrial Business Inspections in the City of Grayson. The county has a well-established program to monitor and control pollutants in storm water discharges to municipal systems from industries as labeled in the MS4 Permit.

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

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

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

2. Measurable goal(s):

- Gwinnett County, on behalf of the City of Grayson, will continue to update the Industrial Facility Inventory on an annual basis.

3. Documentation to be submitted with each Annual Report:

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

2. C2 - Inspection Program

1. Description of SWMP Component:

Per the IGA, Gwinnett County implements this requirement for the City of Grayson. The County has a well-established Industrial Inspection Program, which includes an Industrial Monitoring Program. This Program provides for inspections of businesses and industry types that have the potential to contaminate stormwater runoff that discharges from those sites to the MS4.

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

- a) Municipal waste landfills
- b) Hazardous waste treatment, disposal and recovery facilities
- c) Industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA)

- d) Businesses that are subject to the State's General Permit for Stormwater Discharges Associated with Industrial Activity (IGP)

2. Measurable goal(s):

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

3. Documentation to be submitted with each Annual Report:

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

Associated Appendices: A blank inspection form can be found in **Appendix C2**. Note that this form is used for all business inspections, and a field at the top of the form identifies which type of inspection it is; municipal, industrial or HVPS.

3. C3 - Enforcement Procedures

1. Description of SWMP Component:

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

2. Measurable goal(s):

When an industrial facility that discharges to the City's MS4 is found to be in violation of the Illicit Discharge & Illegal Connection Ordinance, Gwinnett County will continue to undertake appropriate enforcement actions, utilizing the City's most recent Enforcement Response Plan (ERP) for IDDE Violations as guidance.

3. Documentation to be submitted with each Annual Report:

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

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

4. C4 - Educational Activities

1. Description of SWMP Component:

Per the IGA, Gwinnett County implements this requirement for the City of Grayson. Gwinnett County will use multiple methods of educating the industries within the City's jurisdiction. See below:

- Direct Communication: The most efficient way to educate the industries is at the time of the inspection. We use any accurate and available sources for this education material. This may include materials from Volume Three of the Georgia Stormwater Management Manual, materials from other public agencies, or materials we have developed ourselves. Educating the business representative, on site, during the business inspection, allows the business representative to ask questions and acquire clarity about the subject matter before we leave the site. We will also provide the same educational material with the Inspection Report that we mail to the business after the inspection.
- Website Posts: In an attempt to educate multiple businesses at the same time, the City will provide educational posts under the "Stormwater Education" section of its website four (4) times a year. These posts will cover topics such as: IDDE, Good Housekeeping, Watersheds and Pollutants of Concern, etc.

2. Measurable goal(s):

The City of Grayson will report on the multiple methods of educating the industries within the City's jurisdiction.

- Direct Communication: Gwinnett County will continue to provide, during each inspection, educational materials and clarification on any stormwater related questions the business representative may be concerned about.
- Website Posts: The City will provide educational posts to its website under the "Stormwater Education" section four (4) times a year. These posts will cover topics such as: IDDE, Good Housekeeping, Watersheds and Pollutants of Concern, etc.

3. Documentation to be submitted with each Annual Report:

The City of Grayson will document the multiple methods of educating the industries within our jurisdiction.

- Direct Communication: The inspection report, including the educational materials provided to the business during each inspection, will be included in each Annual Report.
- Website Posts: Screenshots of the educational posts to the City's Website will be included in the Annual Report. These posts will occur four (4) times a year.

D. Construction Site Management

Table 3.3.4 of the Permit

1. D1 - Legal Authority

1. Description of SWMP Component:

The City of Grayson administers the Plan Review activities, Land Disturbance Permit, and Erosion and Sedimentation Control activities in accordance with the current City of Grayson Soil Erosion Sedimentation and Pollution Control Ordinance (ESPC). The ESC ordinance was adopted **December 18, 2017**.

The City of Grayson is defined as a Local Issuing Authority (LIA) with the Georgia Soil & Water Conservation Commission (GSWCC) and retains the ability to issue Land Disturbance Permits (LDP). Because the City does not have a Memorandum of Agreement (MOA), GSWCC provides erosion control related plan reviews of construction related documents. The City has continuously been in compliance with the Georgia Erosion and Sedimentation Act (GESA).

2. Measurable goal(s):

The City of Grayson will continue to maintain and evaluate the E, S and PC Ordinance in compliance with the most recent version of the State's Model ESPC rule. If the City's ESPC Ordinance is evaluated and is revised during the reporting period, a copy of the updated ordinance will be provided in the subsequent annual report.

3. Documentation to be submitted with each Annual Report:

Updated ESPC Ordinance.

Associated Appendices: The current Grayson ESPC Ordinance is included in **Appendix A1**.

2. D2 - Site Plan Review Procedures

1. Description of SWMP Component:

Protection of water quality from construction related pollutants is overseen by an engineering firm contracted by the City of Grayson. All new developments and redevelopments, both commercial and residential, are required to submit land development plans for review to the City, which are then routed to the contracted engineering firm for review. Erosion Sedimentation and Pollution Control Plans (ESPC) are routed to GSWCC for review. The review of these plans includes a comment and resubmittal process, allowing developers to adjust their submittals in order to achieve approval by the City, along with managing the Land Disturbance Activity Permits (LDP). All construction projects are required to install at least minimum measures to control ESPC runoff, even if the project is exempt from the requirement to apply for a Land Disturbance Permit (LDP).

Developers use both structural controls and non-structural controls to protect the water quality of the receiving streams. A complete listing of structural and non-structural BMPs can be found in the Manual for Erosion and Sedimentation Control (Green Book), which is produced by the Georgia Soil and Water Conservation Commission. The structural controls typically used by developers include silt fencing, inlet structure filter bags,

detention and retention ponds, riprap, check dams, and other BMPs noted in the Green Book. Non-structural controls may include buffers, site planning procedures and good housekeeping, also listed in the Green Book.

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

Water Quality Site Review Procedure

- 1) Site plans are submitted to the City by developers.
- 2) Sediment and Erosion Control plans are required for any development that will disturb areas larger than 5,000 square feet and that is not exempted by the City of Grayson Soil Erosion Sedimentation and Pollution Control Ordinance (ESPC). See a copy of the ESPC Ordinance in Appendix D1.
- 3) ESPC Plans are reviewed by GSWCC.
- 4) Once an ESPC Plan has been reviewed and approved, an LDP permit is issued by the City.

City Projects

All City projects are responsible for meeting the requirements of the Georgia Erosion and Sedimentation Act (GESA), the City of Grayson ESPC Ordinance, and all applicable State and Federal Permits. As with the developers, all construction projects are required to install at least minimum measures to control E&S runoff, even if the project is exempt from the requirement to apply for a Land Disturbance Permit (LDP).

2. Measurable goal(s):

1. The City of Grayson will annually provide the results of the most recent audits by either GSWCC or EPD concerning the GESA in order to show parallel compliance with those requirements of the NPDES Phase I Large MS4 program that relate to E&S. Compliance with GESA will indicate compliance with the MS4 program in regards to E&S activities.
2. The City of Grayson will submit semiannual LIA Reports to the GSWCC that summarize plan review and inspection activities for the City.
3. The City of Grayson will provide a list of the site plans received and the number of plans reviewed, approved, or denied during the reporting period in each annual report.
4. The City of Grayson will provide the number of Land Disturbance Permits (LDP) issued during the reporting period in each annual report.

3. Documentation to be submitted with each Annual Report:

- LIA Semiannual Reports submitted to GSWCC
- List of plans reviewed during the reporting year.

Associated Appendices: A copy of the Plan Review Flow Chart and the Site Plan Review Checklist are included in **Appendix D2**.

3. D3 - Inspection Program

1. Description of SWMP Component:

The City of Grayson has retained an outsourced professional engineering company to conduct development inspections and erosion control inspections. The inspector will also inspect storm water BMPs such as detention and water quality facilities for proper construction. This includes residential, commercial and county projects that have gone through the site plan review activities. If a site is found to be in non-compliance with the approved site plans, the LDP Permit, and the City's ordinances, the City will undertake appropriate enforcement actions.

The process that the development inspector uses is outlined in the following section:

Site Development Inspection Procedures for the City of Grayson

When the inspector arrives for work in the morning how does he/she choose which sites to visit that day?

The inspector will determine his/her schedule for the day by the inspection requests that have been phoned in on the previous day. He/she will also schedule to visit any sites where a complaint has been filed with the City. The inspector will check with the City Administrator upon arriving in Grayson and will verify any written requests or complaints. Sites which have not requested a site inspection will be randomly inspected on a weekly basis for erosion and sediment control compliance.

What are the priorities used in developing that list?

Inspections are scheduled to be performed within 24 hours of the request. Inspection requests received by close of business are usually scheduled for the next business day. Sites which have not requested a site inspection within the previous week will be randomly inspected on a weekly basis.

Are there a minimum number of inspections per site, per the length of the project?

The standard procedure is that the contractor must have the Erosion & Sedimentation Control structural BMPs installed and inspected prior to initiating land disturbing activities. The Development Permit will not be given to the Developer until the Erosion and Sedimentation controls have been inspected and approved, which may require multiple re-inspections to ensure compliance. The inspector will leave the Development Permit card on site of the contractor to post. When the inspector is scheduled to be on-site for other site development inspections (e.g., proof rolling streets, storm drain installation, etc.), he/she will check to make sure that the Erosion and Sedimentation Controls are in place and still functioning correctly. A final inspection will be completed at the time of final platting to ensure proper stabilization has been achieved. If no inspections are requested in a week's time the site will be inspected for compliance with the City's Erosion and Sediment Control Ordinance.

With regard to ongoing building projects, the inspector will examine erosion and sedimentation control BMPs while on the site for a scheduled inspection (footing, slab, roughs, etc.)

What are the procedures during the inspection process?

The inspector checks that the controls have been installed properly and in the correct locations and the site is in compliance with the NPDES permit. The inspector will notify superintendent or foreman if the BMP is full of silt/malfunctioning and needs to be cleaned out, the construction exit needs to be reconfigured, mud in the road, etc.

How are inspections documented and information tracked?

The inspector fills out an inspection form documenting condition of E&SC BMPs at the time of inspection. This form is given to the City Engineer to review and place in the project file. A copy of the inspection report is also given to the superintendent or foreman to retain in file onsite.

What triggers enforcement action?

Enforcement action will be triggered if the controls are not installed properly or if they are not in the correct locations on the site.

2. Measurable goal(s):

The City of Grayson will continue to provide the number of active sites and the number of inspections conducted during the previous calendar year in each annual report. At a minimum, the City will conduct at least one inspection at each active construction site during the reporting period.”

3. Documentation to be submitted with each Annual Report:

The City will include:

- A list or table of active sites and the number and dates of inspections conducted;
- Activity logs; and
- LDPs issued

during the reporting period.

Associated Appendices: The worksheet used for inspection of sites and the enforcement of the City’s adopted ordinances is attached as **Appendix D3**.

4. D4 - Enforcement Procedures

1. Description of SWMP Component:

Enforcement procedures for erosion and sedimentation control problems were prepared as required under the MS4 Permit and are included in this Plan.

2. Measurable goal(s):

Ensure that enforcement actions are taken for 100% of the documented E&S violations at construction sites.

3. Documentation to be submitted with each Annual Report:

- Copies of the logs of E&S violations and the actions taken for each site.
- Amount of penalties assessed during each reporting year.

Associated Appendices: The ERP for E&S violations is included in Appendix D4.

5. **D5 - Certification**

1. **Description of SWMP Component:**

Certifications

Builders, developers and other entities involved in construction activities are required to comply with the Georgia Erosion and Sedimentation Control Act and the rules adopted by the GSWCC. The City will assist in this effort by required that builder and developers submit proof of certifications at the time of issuance of building and land disturbance permits. The City will also use certified personnel to perform erosion control inspections and plan review.

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

100% of the builders, developers and other entities comply with the requirements by maintaining current GSWCC certifications.

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

The City will provide copies of the certification cards held by the City's review and inspection staff. The City will also collect and provide copies of the certification cards from building and developers.

Associated Appendices: Copies of certification cards for the City's review and inspection staff are included in **Appendix D5**.

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

1. E1 - HVPS Facility Inventory

1. Description of SWMP Component:

Per the IGA, Gwinnett County implements this activity for the City of Grayson.

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

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

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

Gwinnett County, on behalf of the City of Grayson, will continue to annually review all accurate and available data sources in developing the HVPS Facility Inventory. These sources may include Gwinnett County's business license list and any other accurate and reliable lists available.

2. Measurable goal(s):

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

3. Documentation to be submitted with each Annual Report:

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

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

2. **E2 - Inspection Program**

1. **Description of SWMP Component:**

Per the IGA, Gwinnett County DWR implements HVPS Facility Inspections on behalf of the City of Grayson. Gwinnett County has a well-established HVPS Facility inspection program. The program provides for inspections of businesses and industry types that have the potential to contaminate stormwater runoff that discharges from those sites to the MS4.

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

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

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

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

Associated Appendices: A blank inspection form can be found in Appendix E2. Note that this form is used for all business inspections, and a field at the top of the form identifies which type of inspection it is; municipal, industrial or HVPS.

3. **E3 - Enforcement Procedures**

1. **Description of SWMP Component:**

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

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

- When an industrial facility that discharges to the City of Grayson's MS4 is found to be in violation of the Illicit Discharge and Illegal Connection Ordinance, Gwinnett County will continue to undertake appropriate enforcement actions, utilizing the City's most recent Enforcement Response Plan (ERP) for IDDE Violations as guidance.

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

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

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

4. **E4 - Educational Activities**

1. **Description of SWMP Component:**

Per the IGA, Gwinnett County implements this requirement for the City of Grayson. Gwinnett County will use multiple methods of educating the HVPS businesses within the City's jurisdiction. See below:

- **Direct Communication:** The most efficient way to educate the HVPS businesses is at the time of the inspection. We use any accurate and available sources for this education material. This may include materials from Volume Three of the Georgia Stormwater Management Manual, materials from other public agencies, or materials we have developed ourselves. Educating the business representative, on site, during the business inspection, allows the business representative to ask questions and acquire clarity about the subject matter before we leave the site. We will also provide the same educational material with the Inspection Report that we mail to the business after the inspection.
- **Website Posts:** In an attempt to educate multiple businesses at the same time, the City will provide educational posts under the "Stormwater Education" section of its website four (4) times a year. These posts will cover topics such as: IDDE, Good Housekeeping, Watersheds and Pollutants of Concern, etc.

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

The City of Grayson will report on the multiple methods of educating the HVPS businesses within its jurisdiction.

- **Direct Communication:** Gwinnett County will continue to provide, during each inspection, educational materials and clarification on any stormwater related questions the business representative may be concerned about.
- **Website Posts:** The City will provide educational posts to its website under the "Stormwater Education" section four (4) times a year. These posts will cover topics such as: IDDE, Good Housekeeping, Watersheds and Pollutants of Concern, etc.

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

The City of Grayson will document the multiple methods of educating the industries within the City's jurisdiction.

- **Direct Communication:** The inspection report, including the educational materials provided to the business during each inspection, will be included in each Annual Report.
- **Website Posts:** Screenshots of the educational posts to the City's website will be included in the Annual Report. These posts will occur four (4) times a year.

F. 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. F1 - Public Education Program - Educational Activity #1

1. Description of SWMP Component:

Educational Materials

The City of Grayson benefits from the IGA with Gwinnett County by sharing the same educational materials utilized by the County. Gwinnett County Department of Water Resources utilizes multiple sources of educational materials. In some cases, we have developed our own brochures and fact sheets. In other instances, we use materials issued by regional programs, such as the Metropolitan North Georgia Water Planning District. These are kept on-hand at Grayson City Hall and are checked periodically for restocking needs. The educational materials utilized by Gwinnett County are also issued during IDDE activities, as well as industrial, HVPS and municipal facility inspections that occur within the city. Occasionally, educational materials will be delivered by mail to a geographical region (e.g., a neighborhood, to address the needs of an IDDE investigation).

Gwinnett County will evaluate the topics covered by the educational materials on an annual basis. Based on the review the following activities may occur:

- Updating of educational materials and reprinting
- Development of new educational materials
- Elimination of old or outdated educational materials

2. Measurable goal(s):

- Gwinnett County, on behalf of the City of Grayson, will perform an evaluation of the topics covered by the educational materials on an annual basis.

3. Documentation to be submitted with each Annual Report:

Documentation of the annual evaluation will include:

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

4. F2 - Public Education Program - Educational Activity #2

1. Description of SWMP Component:

Educational Articles

The City of Grayson does not publish a newsletter, but does include links to educational articles under the "Stormwater Education" tab on its website. A minimum of four (4) articles appear on this page, with topics including, but not limited to:

Grayson Stormwater Management Program (SWMP)

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

Articles will be rotated year to year, with new topics being constantly developed.

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

- A minimum of four (4) articles per year will be posted to the “Stormwater Education” section of the City’s website. At least one article per year will be dedicated to the topic of IDDE issues and public reporting procedures as committed in Element B5 of this SWMP, and at least one article per year will be dedicated to HWW/proper disposal of used oils and toxics as committed in Element B6 of this SWMP.

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

- Screenshots of each of the four (4) articles posted to the “Stormwater Education” section of the City’s website will be included in the Annual Report.

G. 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. G1 - Public Involvement Program- Activity #1

1. Description of SWMP Component:

Gwinnett Adopt-a-Stream Monitoring Program

The Gwinnett County Adopt-a-Stream (AAS) program has been operating in Gwinnett County since 1991, and is available to City of Grayson residents. The main focus of the program is to educate the public on water quality issues by offering volunteers the opportunity to receive training in stream monitoring methods such as chemical, biological, and bacterial monitoring. The program also offers supplies to volunteers in order to help facilitate volunteer monitoring efforts. The program also tracks the locations of volunteer monitoring sites throughout Gwinnett County, including any AAS activities that occur within the City of Grayson. Per the IGA, Gwinnett County will offer one (1) AAS certification class or training event on chemical, biological, and/or bacterial monitoring in the City of Grayson each reporting period.

2. Measurable goal(s):

- Ensure at least one (1) AAS certification class or training event is held in the City of Grayson each reporting period.

3. Documentation to be submitted with each Annual Report:

Information about the Gwinnett Adopt-a-Stream training events held in the City of Grayson will be reported on in each annual report. This information shall include

- Training Topic(s), i.e., chemical, biological, etc.
- Date of event
- Location of event
- Number of participants

2. G2 - Public Involvement Program - Activity #2

1. Description of SWMP Component:

Pet Waste Stations

The City of Grayson has two (2) pet waste stations located on City property at Grayson Park. These pet waste stations are equipped with free baggies, and are attached to disposal bins in order to encourage park goers to properly remove and dispose of their pet's waste. These pet waste stations are routinely serviced by City staff, during which times the bins are emptied and the stations are supplied with new baggies, as needed.

2. Measurable goal(s):

- Ensure at the two (2) pet waste stations located at Grayson Park are serviced, as needed, throughout the reporting period.

3. Documentation to be submitted with each Annual Report:

- An inspection log detailing the dates the two (2) pet waste stations located at Grayson Park were serviced during the reporting period will be included with each Annual Report.

Associated Appendices

- See Appendix G2 for the blank pet waste station inspection logs.

H. Post-Construction
Part 3.3.11 of the Permit

1. H1 - Ordinance Review (Part 3.3.11(a)(1) of the Permit)

1. Provide the date of the adoption of the Post-Construction ordinance: **March 19, 2018**
2. Provide the date of the adoption of the Georgia Stormwater Management Manual or an equivalent or more stringent local design manual: **11/20/2017; 11/16/2020**
3. Ensure a copy of the Post-Construction ordinance is attached to the SWMP.

2. H2 - Linear Transportation Projects (Part 3.3.11(a)(3) of the Permit)

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

Yes ____ No **X**

1. If yes, is the linear transportation feasibility program attached to the SWMP?

Yes ____ No ____

2. If you plan to develop a linear transportation feasibility program, provide the schedule for submitting the program:

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

1. I1 - 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):

The City reviewed the development regulations and Zoning Ordinance in 2010 and made changes to the ordinances in 2014 to address GI/LID issues. The City adopted the Gwinnett County Stormwater Management Manual in November, 2017, which included several additional components of GI/LID design and innovation. The City will review these ordinances during the permit period now that the GI/LID Program is in place to ensure that these documents conform.

Specifically, the City Engineer will develop an updated code comparison table and review the ordinance against the permit requirements.

2. Measurable goal(s):

The City will review building, zoning and development ordinances within the permit period and update them as needed to conform with the adopted GI/LID Program in accordance with the permit requirements.

3. Documentation to be submitted with each Annual Report:

- Updated ordinances will be submitted with the Annual Report if revisions are made.
- If proposed ordinance updates will span multiple reporting years, the City will provide a schedule in the Annual Report regarding the anticipation assessment and updates.

Associated Appendices: The previous code comparison document is included in **Appendix II**.

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. I2 - GI/LID Program

1. Description of SWMP Component:

The City implemented a GI/LID Program in 2018. The City will continue to support the program and implement the site feasibility information into the development plan review process. The City will collect maintenance agreements for new GI/LID BMPs as a part of the overall site development process.

2. Measurable goal(s):

Assess/review the effectiveness of the Program during the permit period and revise as needed.

3. Documentation to be submitted with each Annual Report:

Revisions to the Program will be provided in the Annual Reports.

Associated Appendices: The current GI/LID Program is included in **Appendix I2**.

3. I3 - GI/LID Structure Inventory

1. Description of SWMP Component:

The City has developed an inventory of GI/LID structures as a part of the development of the GI/LID Program. The City will add GI/LID structures to the inventory as the BMPs are added in the community.

2. Measurable goal(s):

Ensure that 100% of the GI/LID BMPs added in Grayson are added to the inventory within the permit period.

3. Documentation to be submitted with each Annual Report:

- GI/LID inventories will be provided in each Annual Report, with annotations when BMPs are added.
- The ownership of the BMPs will be included in the AR (public, private, publicly owned by other entities, etc.)

Associated Appendices: The current GI/LID Inventory is included in **Appendix I3**.

4. I4 - Inspection and Maintenance Program

1. Description of SWMP Component:

The City of Grayson will inspect GI/LID BMPs during the permit period in accordance with the GI/LID Program requirements. If deficiencies are noted, the City will make the necessary repairs on publicly owned BMPs and will notify the property owner of deficiencies on privately-maintained BMPs

2. Measurable goal(s):

100% of the GI/LID BMPs will be inspected during the permit period. 100% of the noted deficiencies will be addressed during the reporting period.

3. Documentation to be submitted with each Annual Report:

Completed Inspection sheets will be submitted with each annual report. Maintenance records will be provided if routine maintenance was performed during the reporting year.

Associated Appendices: GI/LID Inspection Sheets are included in **Appendix I4**.

Appendix (J)

J1 - 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: **9/4/2015**
 - 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. **See Appendix J1 for a copy of the ERP for the IDDE.**

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 (K)

Impaired Waters **Part 3.3.7 of the Permit**

1. Population at the time of permit issuance: **4,975**
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.

See Appendix K – NOTE: There are no Impaired Waters within the City of Grayson.

Appendix (L)

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

1. Description of the Employee Training Program:

The City of Grayson and Gwinnett County (per the IGA) MS4 staff have reviewed the suggested training topics mentioned in the MS4 Permit, and other topics covered in the MS4 Permitting Guide. We evaluated activities at the various Departmental Facility sites in order to determine which Departments would benefit from some NonPoint training. The attached tables (Table A and Table B) show the results of these reviews, including the topics to be covered, as well as the method and frequency of delivery.

2. Measurable goal(s):

Municipal Employee Training: The City of Grayson and/or Gwinnett County will provide the training according to the frequency and methods identified in the attached tables.

3. Documentation to be submitted with each Annual Report:

Municipal Employee Training: The Annual Report will include pertinent information concerning the training events for the MS4 staff, and other City staff, during the reporting period. This will include: the dates, session titles, and numbers of participants for these events.

Associated Attachments: See Table A and Table B on the next page for the above referenced tables.

Table A
Municipal Employee Training – EPD Suggested Topics

Topic	Department	Workgroup	Method	Frequency
IDDE	All City Staff	All Employees	Email blast	Annual
Good Housekeeping & Pollution Prevention	All City Staff	All Employees	Email blast	Annual

Table B
Municipal Employee Training – Departmental Topics

Department	Topic	Method	Frequency
City Hall Staff	NonPoint Source Pollution in relation to: • Landscaping • Material Store Yards • IDDE	Commercially available videos, in-person training, virtual presentations, etc.	Once every 5 years

Appendix (M)

**Intergovernmental Agreement between Gwinnett County and
the City of Grayson**

IGA is attached to this document as Appendix M.



Jeffrey W. Cown, Director

Watershed Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1470A, East Tower
Atlanta, Georgia 30334
404-463-1511

July 1, 2025

Honorable Allison Wilkerson, Mayor
City of Grayson
P.O. BOX 208
Grayson, GA 30017

RE: Phase I Municipal Separate Storm Sewer
System
NPDES Permit No. GAS000140
2024 Stormwater Management Program

Dear Mayor Wilkerson:

In a June 18, 2025 letter the Georgia Environmental Protection Division (EPD) received the City of Grayson's (City) requested revisions to the 2024 Stormwater Management Program. Based on our review, we have determined that the update is acceptable. EPD will update our copy of the SWMP and please ensure the City updates its SWMP.

Thank you for your cooperation in this matter. If you have any questions, please contact me at 470-607-2604 or hailey.rinehart@dnr.ga.gov.

Sincerely,

A handwritten signature in cursive script that reads "Hailey Rinehart".

Hailey Rinehart
Environmental Compliance Specialist
Municipal Stormwater Team

Cc: Mr. Joe Walter, Principal Planner (email only)