

**EPD Response to Stakeholder Comments on
2022 Industrial Stormwater Stakeholder Draft General Permit (IGP) No. GAR050000**

Permit Part	Comment/Requested Change	EPD Response
1 Eligibility (Sector-Specific Requirements)	A commenter noted that EPD should ensure that the permit applies to facilities discharging to a Combined Sewer System (CSS).	Any stormwater discharge to a Publicly Owned Treatment Works (POTW) or to a sanitary sewer is exempt from stormwater permit application requirements but is instead subject to a pretreatment program under Section 037(b) of the Clean Water Act. Discharges to combined sewer systems are also exempt from NPDES permitting but are subject to pretreatment requirements. EPD issues permits for CSS, therefore, requiring industrial permit coverage of facilities that discharge to a CSS would constitute dual permit coverage and is therefore not allowed under the IGP. No change made.
1.1.3 (Allowable Non-Stormwater Discharges)	A commenter requested an exception to be made to the prohibition of discharge of non-contact cooling water under certain conditions.	According to EPA's NPDES Storm Water Program - Question and Answer Document - Volume 1, 1992, EPA 833-F-93-002, non-contact cooling waters are considered a non-process wastewater. A discharger of once-through noncontact cooling water with no chemical additives may submit an NOI to obtain coverage under the NPDES Cooling Water General Permit (GAG200000). No change made.
1.1.4.1 (Discharges Mixed with Non-Stormwater)	A commenter requested the permit be revised to authorize discharges of stormwater mixed with non-stormwater when the latter is subject to coverage under another NPDES permit with appropriate effluent limits or other controls.	A permittee must ensure that all stormwater discharges associated with industrial activity are covered by a NPDES permit. The facility may seek authorization to discharge stormwater comingled with non-eligible non-stormwater discharges under a separate NPDES permit. No change made.
1.3.1 (How to Obtain Authorization)	A commenter asked what date permittees submit current renewal NOIs.	Existing dischargers must submit NOIs no later than 30 days after the effective date of the permit (June 1, 2022).

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1.3.1 (How to Obtain Authorization)	A commenter asked if the facility registration process through GEOS has changed.	This procedure remains the same. Facility Information Forms and instructions are available on EPD website at: https://epd.georgia.gov/forms-permits/watershed-protection-branch-forms-permits/storm-water-forms/npdes-industrial-storm . No changes.
1.3.1.1 (How to Obtain Authorization)	A commenter asked if facilities that discharge to dry ephemeral ditches have coverage under the IGP, or does 1.3.1.1.a require that the point source discharges to wet perennial waters of the State.	Yes, discharges to ephemeral streams or drainage systems are required to obtain coverage under the IGP. The definition, per O.C.G.A. 12-5-22, of waters of the state or Waters of Georgia does not exclude ephemeral streams.
1.3.1.1.a (How to Obtain Authorization)	A commenter recommended language be added to allow for permit coverage to facilities discharging either directly or indirectly to waters of the State of Georgia.	This requirement is already conveyed in the permit. Additional language is unnecessary. No change made.
1.3.1.1.e.xvii (How to Obtain Authorization)	A commenter requested that there be downloadable NOI forms available on the EPD website to assist in assembling the required information before going online to complete the forms within GEOS.	A sample form will be provided on the EPD website once the permit is reissued. However, the official NOI submittal will only be through GEOS and paper copies submitted to EPD will not be accepted.
1.3.1.3 (How to Obtain Authorization)	Several commenters expressed concern that the footnote added to Table 1-1 was too broad and could be interpreted as preventing authorization to discharge due to minor deficiencies.	The footnote regarding incomplete or inaccurate NOIs has been removed. There is no change to current practice.
1.3.1.3 (How to Obtain Authorization)	Table 1.3.1.3 states that for existing discharges, a NOI must be submitted within 30 days after the effective date of the permit. However, in Section 5 the draft states that for existing dischargers the SWPPP must be reviewed and updated within 90 days. Condition 5.3.2 (note 5.3.1 is missing from the	Part 5.3.2 of the permit has been revised to remove the requirement to make the SWPPP publicly available thus removing the SWPPP timing inconsistency.

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	draft) states that the SWPPP must be attached to the NOI.	
1.3.1 (How to Obtain Authorization)	A commenter questioned if all currently registered sites in GEOS need to resubmit new NOI's after 6/1/2022.	Yes, all previous permittees will be required to submit a renewal NOI within 30 days of the effective date of the permit.
1.3.2 (Continuation of this Permit)	A commenter requested that a stipulation be put in the permit to hold the Division accountable for responding to NOI and Annual Report submittals in a timely manner.	EPD has implemented multiple enhancements and internal procedures to address data errors pertaining to NOI and Annual Report submittals. EPD expects the new enhancements will realize significant efficiencies for the renewal of 2022 IGP and subsequent reporting. No change made.
1.3.7 (Requirement to Post a Sign of Permit Coverage)	Several commenters expressed concerns with the requirement to post a sign of permit coverage expressing that it provides no clear benefit to the protection of water quality, could be a safety concern for vehicles stopping to read and record information, are duplicative of information in the public SWPPPs and are an extra expense and potential safety issue when information can be easily obtained online, or through an open records request to EPD.	By providing notice of permit coverage, interested parties are better informed and educated on how to contact the facility and EPD if stormwater pollution is observed in the discharge. Signage of facilities will increase public awareness of those facilities that have coverage under the IGP therefore, increasing transparency of the NPDES Program. This requirement aligns with EPA's Next Generation Compliance Strategy which includes transparency as one of the five components to improve the effectiveness of compliance with the NPDES Program. While the Next Generation Compliance Initiative concluded in FY2017, EPA has stated that many of the tools and approaches continue to be relevant and useful. No change made.
1.3.7 (Requirement to Post a Sign of Permit Coverage)	A commenter requested additional guidance regarding the sign requirements to address large sites where it may be infeasible to post a sign.	The permit language has been revised to address the inability to post a sign if no publicly accessible location is in close proximity to the facility.

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1.3.7 (Requirement to Post a Sign of Permit Coverage)	A commenter asked how EPD will address comments received related to a permittee's IGP coverage and what processes and regulations will guide EPD.	EPD already has established procedures to be responsive to citizen inquiries, comments and investigate complaints. Currently, EPD makes information available about industrial stormwater permittees through the industrial stormwater webpage, the GEOS public portal and GORA requests. For public complaints, EPD uses the EPD Complaint Tracking System to document the complaints received and information about EPDs investigation of the complaint.
1.3.7 (Requirement to Post a Sign of Permit Coverage)	A commenter requested that facilities co-located at an airport and covered under their SWPPP be allowed to be listed on the airport required sign and not required to have their own sign.	A single sign containing information about multiple permittees will satisfy this permit requirement as long as all the required information is included on the sign. No change made.
1.3.7 (Requirement to Post a Sign of Permit Coverage)	A commentor asked if this part of the permit applies to military facilities.	Yes, the requirement to post a sign of permit coverage applies to all permittees unless otherwise prohibited or inaccessible.
1.4.1 (Submitting a NOT)	A commenter noted that the reference to 1.4.2 in Part 1.4.1 is incorrect and should be 1.4.3.	The correction has been made.
1.4.1 (Submitting a NOT)	A commenter requested clarification on when permit coverage is considered terminated, either upon submittal or upon EPD approval of the NOT. Concern was raised over timely notice of NOT deficiencies. A suggestion was made that GEOS not accept an NOT submittal until after a data check to ensure all information is complete.	As stated in the permit, if all the conditions in Part 1.4.3 are met, the authorization to discharge terminates at midnight on the day that a complete NOT is submitted to EPD.
1.4.1 (Submitting a NOT)	A commenter requested EPD redesign the NOT form to only allow submittal after a data check to ensure that all information required is complete.	The permit has been revised to remove Part 1.4.3.1.d, requiring the submittal of outstanding annual reports or monitoring data before EPD approval of the NOT. The current NOI form

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		includes several required fields which must be completed in order for the permittee to submit the NOI. No change made to the permit.
1.4.1 (Submitting a NOT)	A commenter requested EPD clarify when permit coverage terminates and if the permittee will receive any notice from EPD.	The submittal confirmation provided by the electronic system once an NOT is submitted serves as the permittee's notice. The permit has been revised for clarification.
1.4.3.1.d (Information to Be Included in NOT)	One commenter requested clarification of the term 'outstanding' as used in this requirement.	The permit has been revised to remove Part 1.4.3.1.d, requiring the submittal of outstanding annual reports or monitoring data before EPD approval of the NOT.
1.5 (Conditional Exclusion for No Exposure)	A commenter requested that NEE facilities not be exempt from Smoke and Dye Testing nor indicator monitoring in order to give EPD a more accurate baseline for updating/adding benchmark limits.	Facilities that certify that none of the industrial materials or activities performed are exposed to precipitation are exempt from all provisions of the IGP as long as the condition of no exposure is maintained. No change made.
1.5 (Conditional Exclusion for No Exposure)	A commenter requested EPD add a definition of "past industrial activity" in bullet 3.	EPD believes the common language in the permit is sufficient to reflect that a conditional exclusion for no exposure would not be appropriate if there are areas where industrial activity has taken place in the past and significant materials remain and are exposed to stormwater. No change made.
1.5 (Conditional Exclusion for No Exposure)	The commenter expressed concern regarding the interpretation and application of the 11 enumerated conditions for an NEE and recommends the removal of the list.	The enumerated conditions for a No Exposure Exclusion are a reiteration of 40 CFR Part 122.26(g). No change made.
1.5 (Conditional Exclusion for No Exposure)	Several commenters raised concern regarding the proposed language requiring certification of no exposure now or in the foreseeable future. The commenters recommend that EPD revise the language to 'reasonably foreseeable future'	The permit has been revised to remove "now or in the foreseeable future".

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	<p>circumstances or remove the reference to future conditions all together.</p>	
2.1.1.h (Control Measure Selection and Design Considerations)	<p>A commenter requested that this new requirement refer to facilities which have had stormwater quality impacted by such storm events by modifying the statement to: '<i>If the facility has previously had storm water discharge quality impacted by such major storm events</i>'.</p> <p>A commenter requested "<i>impacts from stormwater discharges</i>" be limited to illicit discharges, permit limitation violations, ongoing benchmark exceedances, spills or other specific significant IGP violations.</p> <p>Several commenters asked that the new requirement in 2.1.1.h be removed or revised to provide more specific and definable parameters and requirements.</p> <p>A commenter noted that the number of actions a permittee must consider outnumber all of those required by the prior general permit and many of these conditions would be particularly onerous for the permittees and also expressed concern that the required actions would divert key personnel and resources when doing so its most costly, even if the permittee is only "considering" some of the actions listed in the new provisions.</p> <p>A commenter asked why scenario-based emergency training is necessary.</p>	<p>Based upon the comments received and upon careful evaluation, EPD believes that additional consideration of specific controls due to major storm events is unnecessary given the existing comprehensive list of design considerations already provided. The existing list of considerations is provided irrespective of size or volume of storm events and should be interpreted to include major events and are not intended to prevent a facility from contemplating additional structural controls, if needed, to prevent the discharge of pollutants. The permit has been revised to remove Part 2.1.1.h.</p>

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2.1.1.h (Continued) (Control Measure Selection and Design Considerations)	<p>A commenter requested additional details on adequate flood training.</p> <p>Several commenters noted that the stakeholder draft permit does not define what constitutes an ‘extreme’ or ‘heavy’ storm event nor does it clarify what qualifies as ‘flood events’ or ‘major’ storms.</p> <p>A commenter recommended the statement in subpart iii be modified as follows: <i>‘and a <u>major storm event</u> is anticipated within 48 hours ...’</i>.</p> <p>Several commenters stated that the new provision goes beyond discharges regulated by the Clean Water Act, Georgia Water Quality Control Act and NPDES permitting program because they do not implicate additions from “point sources,” major storm events that produce flooding or sheet flow across the facility do not come within the permitting scope of the NPDES program.</p>	
3.3 – 3.5 (Corrective Actions)	A commenter requested clarification on the notification method for corrective actions.	Notification must be provided in writing and in accordance with Part 7.7.
4.1.1, 4.2.1, 4.3.1.1 (Inspections)	<p>A commenter is concerned that these additional requirements suggest that no amount of pollutant(s) may reach stormwater or be discharged.</p> <p>A commenter suggests the following addition: “Whenever [a routine facility inspection or visual assessment] shows evidence of stormwater pollution in the discharge <u>exceeding background, normal, or historical observations</u>, the permittee</p>	The permit has been revised to clarify that corrective actions are needed if an inspection shows evidence of pollution “due to industrial activities”.

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	must initiate the corrective action procedures in Part 3.”	
4.1.1 (Inspections)	Commenters are concerned that these requirements could be misinterpreted or applied to mean that no amount of foreign material, like any degree of color or material, may reach storm water or be discharged. The commenters requested clarification in the revised draft that this is not the case and proposed the following alternative language: “...evidence of stormwater pollution in the discharge <i>exceeding normal observations</i> , ...” or “evidence of stormwater pollution <i>due to industrial activities</i> ”.	The permit has been revised to clarify that corrective actions are needed if an inspection shows evidence of pollution “due to industrial activities”.
4.2 (Quarterly Visual Assessment)	A commenter asked if visual inspection results need to be reported via NetDMR.	No, visual inspection results are not reported in NetDMR. Permittees must document the results of visual assessments and maintain this documentation onsite with the SWPPP only, as required in Part 5.4.
4.2.1 (Quarterly Visual Assessments)	A commenter recommended EPD change “...stormwater pollution in the discharge” to, “... stormwater pollution <u>due to industrial activities</u> in the discharge” on pages 25 & 28.	The permit has been revised to incorporate “due to industrial activities”.
4.2.2.f (Documenting Quarterly Visual Assessments)	Multiple commenters asked that the new requirement regarding what types of observations to report be removed from the IGP draft noting that it is not possible to visually assess the quality, quantity, or degree of constituent such as color, odor, turbidity, floating debris, settled solids, suspended solids, foam or scum, or oil sheen. There was concern that this could be interpreted as requiring the laboratory measurement of these constituents instead of a visual observation.	Part 4.2.1 has been revised to clarify that the permittee must “visually inspect or observe”.

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5.1 (Contents of the SWPPP)	A commenter noted a typo in the first sentence regarding reference to Part 5.5 of the permit.	The correction has been made.
5.1.1 (Stormwater Pollution Prevention Team)	A commenter noted it is imperative that EPD implement training on topics such as water sample collection and SWPPP development to ensure that facilities understand the requirements of the permit and have the knowledge to comply.	EPD will take this into consideration when planning for further training.
5.1.2 (Employee Training)	A commenter noted that there is no mention of flood (strong storm event) in the training section, but it is mentioned on page 15, and recommend it be included in both or removed from both.	The permit has been revised to remove Part 2.1.1.h.
5.1.3 (Site Plan)	A commenter suggested that EPD provide a template for the site description and consider a more manageable level of detail and/or an exemption for existing industrial sites.	The permit language is broad to encompass all the industries. No change made.
5.1.3 (Site Plan)	Commenters questioned the relevance of requesting size and material type of existing structural control measures, stormwater conveyances and asked for examples.	This language has been added to facilitate structure identification and proper maintenance. Examples of desired information include: concrete, PVC, gravel, grass channel.
5.1.3 (Site Plan)	A commenter requested that reporting the size of all structural control measures and conveyances be removed due to lost records.	The permittee should have accurate records of their stormwater structures, and this information should readily available. No change made.
5.1.3.c. (Site Plan)	Commenter noted that inclusion of information on the size and material of every storm water control structure, conveyance, pipe, inlet, etc. may result in a site plan that is 'too' busy or otherwise unintelligible (or require multiple drawings) and asked that this requirement be removed from the IGP draft.	The following text has been added to the permit: "To ensure the quality and legibility of the site map, the permittee may incorporate some of the site map information listed in items a. – l. above as an attachment to the site map."

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5.1.4.4.f (Non-stormwater Discharges)	A commenter requested clarification regarding if Smoke and Dye Testing conducted in the 2012 permit cycle needs to be retested during this permit cycle.	The permit has been revised to allow for test conducted after 1/1/2012 provided the permittee evaluates any new areas impacted since the last test.
5.2 & 5.3 (SWPPP Modifications and Availability)	A commenter asked if SWPPP updates are required every year regardless of triggering corrective action or only after formal corrective action is triggered that specifically requires SWPPP updates.	Yes, the SWPPP is intended to be a living document that the permittee must update the SWPPP in accordance with Part 5.2. In addition, the publicly available SWPPP must be updated yearly in accordance with Part 5.3.
5.3.2 (Making the SWPPP Publicly Available)	<p>Multiple commenters requested EPD consider adding language to exempt sensitive location or material information from the publicly available SWPPP.</p> <p>Multiple commenters requested that SWPPPs only be viewable upon a Freedom of Information Act or Georgia Open Records Act request.</p> <p>A commenter asked if EPD is going to require a public version and a facility version of the SWPPP.</p> <p>A commenter requested that the SWPPP be emailed to EPD to keep on file instead of posting publicly.</p> <p>A commenter asked what precautions are going to be put in place to protect the intellectual property for SWPPPs created by consultants.</p>	The permit has been revised to remove the requirement to post the SWPPP publicly. The public may continue to request review of EPD files by submitting a file review request or an open records request to determine if EPD has responsive records.
5.3.2 (Making the SWPPP Publicly Available)	A commenter noted that periodic stormwater inspections by EPD would be a more effective and less intrusive method of determining how well a facility maintains and updates its SWPPP.	EPD will continue to conduct facility inspections, including a review of all applicable documentation, to ensure compliance with the permit. The requirement to post the SWPPP publicly has been removed.

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5.3.2 (Making the SWPPP Publicly Available)	<p>A commenter requested clarification regarding if section 5.3.2 is meant to be a separate requirement from 5.3.</p> <p>A commenter requested clarification regarding the posting of SWPPP updates including where and when to post such updates to the living document.</p> <p>A commenter requested clarification on whether the SWPPP needed to include references to information on chemical storage, chemicals, and storage locations.</p> <p>A commenter requested clarification on what the SWPPP “records and other reporting elements” that need to be submitted or posted.</p>	The permit has been revised to remove the requirement to post the SWPPP publicly.
5.4 (Additional Documentation Requirements)	A commenter asked that the language be revised to clarify who must have access to pertinent documents.	The permit has been revised clarify that documents should be available to the “regulatory inspector”.
5.4 (Additional Documentation Requirements)	A commenter asked if the “Additional Documentation Requirements” listed in Section 5.4 are required to be uploaded to the publicly available SWPPP each year or only the actual modified SWPPP.	The permit has been revised to remove the requirement to post the SWPPP publicly.
6 (Monitoring)	A commenter asked if each tenant is required to submit NetDMR entries in addition to the airport’s entry.	Each permittee that has filed an NOI will be required to submit sampling results through NetDMR. While the reporting requirement is the permittees’ responsibility, NetDMR will allow the permittee to delegate data entry to a preparer.

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6 (Monitoring)	A commenter noted that for facilities with multiple outfalls requiring monitoring, these additional parameters will further extend the time each outfall takes to inspect. Consideration was requested for ways to reduce current required repetitive explanations of why the sample was not unobtainable within the 30-minute window would be appreciated.	Samples collected within the first 30 minutes are intended to characterize the maximum concentration of a pollutant that may occur in the discharge and/or may indicate intermingling of non-storm water discharges. The permittee should make all efforts to collect the samples within this window to reduce reporting why collection within the window was unobtainable.
6.1.1 (Monitored Outfalls and Substantially Identical Outfalls)	A commenter asked how rotational sampling of substantially identically outfalls should be handled if the outfall is not easily accessible.	The permittee should make efforts to access all outfalls at least once during the permit cycle, however, if access poses a threat or safety concern the permittee shall include the justification in the SWPPP. EPA's Industrial Stormwater Monitoring and Sampling Guide recommends going upstream of the discharge until a sample can be taken (i.e., to the nearest manhole or inspection point) if the outfall is inaccessible.
6.1.1 (Monitored Outfalls and Substantially Identical Outfalls)	A commenter requested additional guidance on what a permittee should do if there is an exceedance with the rotationally sampled outfall(s).	If there is a benchmark exceedance at a substantially identical outfall, the permittee must continue to sample at the outfall showing the exceedance until the benchmark is met or make a determination that no further pollutant reductions are achievable per Part 6.2.2.2 of the Permit. The permittee must proceed with rotational sampling of the remaining substantially identical outfalls. The permit has been revised to provide the additional clarification.
6.1.1 (Monitored Outfalls and Substantially Identical Outfalls)	A commenter requested the requirement to rotationally sample a substantially identical outfall be removed adding it is an overreach and negates	The permittee should conduct monitoring at all outfalls once during the permit term to ensure proper operation of the stormwater system and

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	the entire reason for having substantially identical outfalls.	to confirm that the effluents discharged are substantially identical. No change made.
6.1.7 (Monitoring Periods)	Several commenters requested that reporting periods match monitoring periods as quarterly. Several commenters requested that monthly reporting be revised to annual reporting. A commenter requested that the requirement to report monthly be removed.	The permit has been revised to reflect that the reporting will be required on a quarterly basis.
6.1.7.b (Monitoring Periods)	A commenter recommended that the permittee only be required to submit a DMR after an actual permitting requirement deadline.	The permit provides certain flexibility to the permittee regarding sample collection. As such, the permit has been revised to reflect reporting on a quarterly basis.
6.2.1 (Indicator Monitoring)	A commenter requested clarification on if COD indicator monitoring is now required for all Sectors.	Yes, annual COD indicator monitoring is required for all sectors, if not otherwise required.
6.2.1 (Indicator Monitoring)	A commenter requested that COD be removed as an indicator monitoring parameter as it will not be relevant to all sectors and should instead be included as a benchmark or effluent limit for those sectors where COD could indicate a water quality concern.	COD has been identified as one of the parameters that can provide a basic indication of the effectiveness of stormwater control measures at an industrial facility. EPD is interested in obtaining COD data for sectors not currently monitoring for COD to establish a comparable baseline across all sectors. EPD plans to evaluate the data collected to determine if numeric benchmarks for additional sectors are warranted in future proposed permits.
6.2.1 (Indicator Monitoring)	Several commenters would like clarification between indicator monitoring and benchmark monitoring.	Indicator monitoring has been added to the permit as a means to collect information that EPD and the permittee can use to assess potential water quality impacts that are currently

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		unquantified and to assess the effectiveness of BMP performance. The permittee will not be required to perform indicator monitoring if the permittee is already required to monitor the parameter under the benchmark or effluent monitoring requirements.
6.2.1 (Indicator Monitoring)	A commenter asked why the indicator monitoring requirement lasts the length of the permit.	Permittees may find it useful to evaluate and compare indicator monitoring data over time to identify any fluctuating values and why they may be occurring, and further inform any revisions to the SWPPP or control measures, if necessary.
6.2.1 (Indicator Monitoring)	Several commenters questioned why indicator monitoring for pH, TSS and COD is being added.	EPD reviewed the National Research Council National Academies of Sciences Industrial Stormwater Study and agreed with the recommended industry-wide monitoring for pH, TSS and COD as basic indicators of the effectiveness of stormwater control measures employed on site. These three parameters are appropriate as broad, low-cost indicators of stormwater pollution.
6.2.1 (Indicator Monitoring)	A commenter requested clarification of the appropriate reference for testing methods in the Permit.	Unless otherwise specified, samples must be analyzed consistent with 40 CFR Part 136. Please refer to Appendix B.14 for additional information. No change made.
6.2.1 (Indicator Monitoring)	A commenter noted that PAH sampling and testing is unnecessary and therefore should be removed from the stakeholder draft General Permit.	PAHs are a group of chemicals that are persistent in the environment. Many PAHs can have impacts on human health and the environment. Several PAHs have been shown to be extremely toxic to and bioaccumulate in fish and aquatic invertebrates and are known or probable human carcinogens. Man-made sources include the incomplete burning of organic materials like coal,

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		oil, gas, wood, and garbage, vehicle exhaust, asphalt, coal-tar sealcoat, and creosote. According to the U.S. Department of Health and Human Services, 15 PAHs are listed as “reasonably anticipated to be human carcinogens”. The requirement to monitor PAHs due to the application of coal-tar sealcoat has been removed from the permit, however, the requirement to monitor PAHs due to sector-specific industrial activity remains.
6.2.1 (Indicator Monitoring)	A commenter expressed concern on supplying data with no applicable standards or statutory guidelines, in anticipation of any following assessments that may be made based upon data supplied as an indicator.	Indicator monitoring is intended to provide permittees and EPD with a baseline and comparable understanding of stormwater discharge quality and stormwater control measure effectiveness at facilities.
6.2.1.1 (Applicability and Schedule of Indicator Monitoring)	A commenter requested clarification if there is a specific time of year required for the annual COD monitoring.	Permittees must conduct indicator monitoring of stormwater discharges annually (once per year), beginning in the first full quarter of permit coverage.
6.2.1.1.a.ii (pH, TSS, and COD Schedule)	A commenter requested that the permit be revised to allow facilities to monitor and count samples in the quarter immediately after permit issuance.	Permittees must conduct indicator monitoring of stormwater discharges for pH, TSS, and COD annually (once per year), beginning <u>no later than</u> the first full quarter of permit coverage. No change made.
6.2.1.1.a.ii (pH, TSS, and COD Schedule)	A commenter recommended modifying the phrase to ‘beginning in the first full year of permit coverage’ instead of ‘beginning in the first full quarter of permit coverage’.	Indicator monitoring is required to begin in the first full quarter of permit coverage to be consistent with the existing requirement of monitoring initiation per Part 6.1.7.1 of the Permit. No change made.
6.2.1.1.b (Polycyclic Aromatic Hydrocarbons)	A commenter asked if EPD plans to provide guidance to the regulated community related to the	PAH monitoring data will be used to assess the levels of PAHs in industrial stormwater, further identify industrial activities with the potential to

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	REDUCTION of those pollutants, via either Best Practices and/or BMP's.	discharge PAHs in stormwater and inform future consideration of PAH benchmark monitoring for sectors with the potential to discharge PAHs in stormwater. If, in the future, EPD determines benchmark concentrations for PAHs, technical guidance can be provided regarding BMPs to control pollutant discharge.
6.2.1.1.b (Polycyclic Aromatic Hydrocarbons)	A commenter requests that the requirement to monitor for PAHs due to application of coal-tar sealcoat be removed due to a potential unintended consequence being permittees delaying or significantly limiting sealcoat application, which is an important function in protecting and maintaining asphalt pavement from cracking.	The requirement to monitor PAHs due to the application of coal-tar sealcoat has been removed from the permit.
6.2.1.1.b (Polycyclic Aromatic Hydrocarbons)	A commenter asked if PAH monitoring is a one-time event after sealing or ongoing after application.	The requirement to monitor PAHs due to the application of coal-tar sealcoat has been removed from the permit.
6.2.2.1.b (Applicability of Benchmark Monitoring)	A commenter requested EPD consider further clarifying and limiting the scope of alternative benchmarks available to permittees.	The permit explicitly states that the use of an alternative benchmark cannot cause or contribute to an exceedance of a Water Quality Standard. No change made.
6.2.2.1.b (Applicability of Benchmark Monitoring)	A commenter expressed concern regarding the option to establish alternative benchmarks and the automatic approval upon 90 days of no response from EPD. What strategies are in place to ensure that EPD does not miss the review of a request?	EPD requires submittal of alternative benchmarks and supporting data by return receipt certified mail (or similar service) outside of GEOS and prioritizes the evaluation of alternative benchmark requests to ensure timely review.
6.2.2 (Benchmark Monitoring)	A commenter asked if EPD's benchmarks are used, do benchmark samples still need to be taken.	Yes, benchmark monitoring data are for the permittee's use in determining the effectiveness of the control measures noted in Part 2 of the permit.

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6.2.2 (Benchmark Monitoring)	A commenter asked for clarification regarding the Indicator Monitoring for pH, TSS, and COD and if there are “limits” associated with them or are they purely just a “report only” indicator.	The indicator monitoring parameters are “report-only” and do not have thresholds or baseline values for comparison. The data will be valuable for EPD and permittees to evaluate the performance of BMPs installed on site.
6.2.2.1 (Applicability of Benchmark Monitoring)	A commenter asked if the benchmarks for hardness dependent parameters will be reflected in NetDMR or only in the monitoring results.	Yes, if a permittee supplies the hardness on the NOI, NetDMR will include the appropriate limit based on the provided hardness. In the absence of a hardness value, the hardness of zero will be used as specified in the permit.
6.2.2.2 (Benchmark Monitoring Schedule)	A commenter believes that the proposed language is unreasonable and recommends the following revised language: <i>“The permittee must conduct annual benchmark monitoring within one of the first four quarters or in the first full calendar year of permit coverage whichever comes first.”</i>	The permit has been revised to clarify that annual benchmark monitoring performed in the calendar year of permit reissuance does not need to be repeated until the following year.
6.2.2.2 (Benchmark Monitoring Schedule)	The commenter suggested that there should be some flexibility in the timing of annual benchmark monitoring if it would be more convenient or effective for a permittee to conduct such monitoring at other times of the year.	The permit language provides for significant flexibility of sampling timing in the first 6 months of the year and additional flexibility if a qualifying rain event doesn't occur. No change made.
6.2.2.2 (Benchmark Monitoring Schedule)	A commenter questioned if permittees will be required to conduct benchmark monitoring twice in 2022 (once between January – June and then again after permit reissuance).	The permit has been revised to clarify that existing permittees only need to conduct benchmark monitoring once per calendar year.
6.2.2.2.b.iii. (Benchmark Monitoring Schedule)	Commenters are concerned that the revised language would result in non-numeric effluent limitations and requested the changes be removed.	The revision to the permit referencing continuing exceedances of benchmarks is intended to provide additional guidance to the permittee on the expectation of escalating control measure responses. The permit is not intended to make a benchmark exceedance a permit violation, as is the case with an effluent limit violation. The

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		permit has been revised to explicitly provide for the determination that no further reductions are technologically available and economically practicable.
6.2.2.2.b.iii.2 (Benchmark Monitoring Schedule)	A commenter recommended revising the permit to address what the permittee must do if all reasonable controls have been installed. A commenter stated that the new language is tied to structural control or treatment (technologies) and those may not result in water quality protection. In addition, the commenter stated that EPD did not take into consideration site-specific control measures or the cost of installing structural controls.	Part 6.2.2.2.b.iii has been updated to provide a permittee the ability to make a determination that no further pollutant reductions are technologically available and economically practicable.
6.2.2.2.b.iii.2 (Benchmark Monitoring Schedule)	A commenter asked how benchmark exceedances should be addressed for the rotational sampling outfalls.	The following text has been added for clarification to Part 6.2.2.2.b.iv: "If the sampled outfall represents other substantially identical outfalls and the annual sample exceeds the benchmark, the permittee must make the necessary modifications and proceed with quarterly sampling at the outfall showing the exceedance until the benchmark is met or make a determination that no further pollutant reductions are achievable per Part 6.2.2.2. The permittee must proceed with rotational annual benchmark sampling of the remaining substantially identical outfalls." The following text has been added to Part 6.1.1: "If the permittee has more than 5 substantially identical outfalls, the permittee may submit an alternative sampling schedule for identical outfalls for EPD review and approval. The request for an

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		alternative schedule must include a listing of which outfalls will be monitored during the permit term and must be submitted to the EPD address in Part 7.7"
6.2.4 (Laboratory and Analyst Accreditation)	A commenter asked if the monthly samples need to be completed by a certified lab.	EPD does not require monthly monitoring. Per Part 6.2.4 and Part B.14.3 of the permit, all monitoring data not prepared in situ shall be prepared by a laboratory accredited by the State of Georgia in accordance with EPD Rules for Commercial Environmental Laboratories 391-3-26. However, per 40 CFR 136.3, due to the small timeframe required for accurate pH samples, the proliferation of pH sampling required by this permit, and the remoteness of many of the types of sites covered by this permit, EPD waived the certification requirement.
6.2.4 (Laboratory and Analyst Accreditation)	A commenter asked what the acceptable methods for pH testing are.	pH may be measured in-situ with a probe or meter.
6.2.4 (Laboratory and Analyst Accreditation)	A commenter noted that requiring facilities to send samples to an off-site laboratory for TSS and COD analysis would create a novel and significant burden on permittees if they are not already required to do this.	EPD evaluated the effort required to comply with the proposed language, including laboratory analysis costs, cost of data entry and level of effort and does not believe this is a novel or significant burden when compared to the worth of information gained. No change made.
6.3.1 (Exceedance Notification Report)	A commenter asked if an exceedance of a benchmark monitoring parameter is considered a violation of the permit.	No, a benchmark exceedance is not a violation of the permit.
7 (Reporting and Recordkeeping)	A commenter inquired about what is being indicated monthly when there is no sampling data to be reported.	NetDMR will provide a list of NODI (no data indicated) codes to be used when there is no data to report. However, if no data was collected

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		during the reporting period, then No Data Indicator (NODI) code 9 should be used to reflect that monitoring wasn't required that period.
7 (Reporting and Recordkeeping)	Several commenters requested the permit provide clarification on which electronic system to use to submit NOI's, annual reports and data.	The permit is being written to allow for potential future changes in electronic reporting systems. As of this writing, NOI's and annual reports will continue to be submitted using GEOS and data should be reported using NetDMR. No change made.
7 (Reporting and Recordkeeping)	A commenter asked if the annual report will be revised to remove the benchmark monitoring summary since this information will be provided via NetDMR.	Yes, updated annual report forms will be released in advance of the due date of the first annual report required under the reissued permit (Jan 2023).
7 (Reporting and Recordkeeping)	A commenter asked how the monthly monitoring requirement will impact quarterly sampling contracts.	EPD originally proposed monthly reporting, not monthly monitoring. The permit is being updated to require quarterly reporting instead of monthly reporting.
7 (Reporting and Recordkeeping)	A commenter requested that the Annual Report Form should have a comment box where required instead of one giant comment box at the end.	EPD will take this into consideration when developing new forms. No change to the permit.
7 (Reporting and Recordkeeping)	A commenter asked what the repercussions are for not completing "empty/no sampling" monthly DMRs on NetDMR. A commenter asked if someone neglects to file a null report during those months when no sampling is performed, if that is considered non-compliance with the permit.	A violation will be automatically generated for failure to report. Yes, failure to report is a violation of the permit.
7 (Reporting and Recordkeeping)	A commenter asked if NetDMR will have "Exceedance Thresholds" (i.e. 100mg/L TSS) and if	NetDMR will have the appropriate benchmarks and effluent limits coded in the system. These values will be compared against sampling results

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	not considered a violation, how the data will be evaluated for compliance.	to evaluate permit compliance. However, NetDMR will not have thresholds established for indicator monitoring parameters and compliance will be evaluated based on complete reporting, not comparison against a specific value.
7 (Reporting and Recordkeeping)	A commenter asked why EPD is creating violations for non-reportable months.	Violations are automatically generated in the NetDMR system when no report is submitted. Permittees will be required to enter information on a quarterly basis. If no data was collected during the reporting period, then No Data Indicator (NODI) code 9 may be used to reflect that monitoring wasn't required that period.
7 (Reporting and Recordkeeping)	Several commenters asked about NetDMR training.	USEPA hosts regular NetDMR training sessions. Permittees can find information and register for NetDMR training at the following website: https://netdmr.zendesk.com/hc/en-us/articles/214226346-Training-Schedules In addition, EPD has additional NetDMR resources at the following website: https://gaepd.zendesk.com/hc/en-us/sections/360010760854-NetDMR-Support
7.1 (Reporting Monitoring Data to EPD)	A commenter asked when the permitted sites will be available in NetDMR.	Permittee sites will be available in NetDMR after EPD approval of the NOI. The permittee will receive a notification.
7.1 (Reporting Monitoring Data to EPD)	A commenter asked if all permittees need to report each month in Net DMR even if samples were not taken that month.	Based on comments received during Stakeholder process, the reporting will only be required on a quarterly basis.
7.1	A commenter asked if all permittees need to get NetDMR access.	Yes, all permittees will need to access NetDMR in order to submit monitoring data.

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(Reporting Monitoring Data to EPD)		
7.1 (Reporting Monitoring Data to EPD)	A commenter asked if specific guidance will be issued for signing up for NetDMR, including both new Sites and Facilities that already have other NetDMR accounts for other permits.	Technical assistance regarding NetDMR can be found at https://epd.georgia.gov/forms-permits/eservices/netdmr-technical-assistance
7.1 (Reporting Monitoring Data to EPD)	A commenter recommended that EPD delay the requirement for submitting sampling results through NetDMR by a sufficient time (e.g., 12 months) to ensure that EPD has been able to process all NOIs and has input sampling requirements for each Facility correctly into the system to avoid inaccurate violations automatically generated.	The permit has been revised to reflect that the requirement to report data in NetDMR will begin January 1, 2023, in order to allow necessary processing time for NOIs. Sampling data collected in 2022 should continue to be reported with the Annual Report in GEOS.
7.1 (Reporting Monitoring Data to EPD)	A commenter asked if airport tenants will be required to report the sampling data collected by the airport.	Yes, each permittee that has filed an NOI will be required to submit sampling results through NetDMR. While the reporting requirement is the permittees' responsibility, NetDMR will allow the permittee to delegate data entry to a preparer.
7.1 (Reporting Monitoring Data to EPD)	The commenter supports the transition to NetDMR but recommended that the reporting frequency be consistent with the frequency of sampling, or if possible, set the NetDMR report to a default 'conditional sampling' NODI code.	The permit has been revised to reflect the requirement to report quarterly.
Sampling and Reporting	Multiple commenters expressed that the monthly reporting requirements and additional monitoring requirements will result in increased labor and testing costs to the impacted stakeholders. These increases in cost could be a burden to permittees and customers.	Based on the comments received, the NetDMR reporting requirements have been decreased from monthly to quarterly. Monitoring for water quality parameters is a necessary component of the NPDES program. EPD evaluated the effort required to comply with the proposed language, including laboratory analysis costs, cost of data

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		entry and level of effort and does not believe this is a significant burden to permittees.
7.1 – 7.2 (Reporting Monitoring Data to EPD)	The commenter asked that EPD reconsider some the reporting and recordkeeping provisions to make them clearer and less burdensome for permittees.	EPD has revised the permit to reduce the reporting burden from monthly to quarterly and will make training available to permittees.
7.2 (Submission Deadline)	A commenter asked if the due date for annual benchmark exceedance is January 15.	Benchmark monitoring data will be required to be reported quarterly via NetDMR no later than 11:59 p.m. on the 45th day following the reporting period. The annual report is due on January 31 st and should be submitted via GEOS.
7.2 (Reporting Monitoring Data to EPD)	Several commenters requested an adjustment to the reporting due date being the 15 th of the month following the sampling period.	The permit has been revised to provide permittees 45 days following the reporting period to report data in NetDMR.
7.2 (Submission Deadline)	The commenter asked if the RO will have to submit data through NetDMR or if an authorized user or contractor will be able to submit on their behalf.	An authorized user will be able to submit on the RO's behalf.
7.2 (Submission Deadline)	The commenter recommended that the reporting frequency be consistent with the frequency of sampling.	The reporting frequency has been revised to reflect quarterly reporting in NetDMR.
7.2 (Submission Deadline) (Reporting Monitoring Data to EPD)	A commenter asked if there will be grace period for entering data into NetDMR.	The permit has been revised to require data reporting in NetDMR beginning January 1, 2023. Additionally, in accordance with Part 7.2, the permittee shall submit DMR no later than 45 days following the reporting period.
8 (Sector-Specific Requirements)	The commenter asked EPD to reevaluate its wording related to commingling of industrial storm water with process wastewater discharges.	Stormwater discharge associated with industrial activity is defined at 40 CFR 122.26(b)(14). Process wastewater is specifically noted as a non-allowable non-stormwater discharge. A NPDES permitting pathway exists to provide

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		authorization to discharge process wastewater. No change made.
8 (Sector-Specific Requirements)	A commenter asked if PAH sampling is required prior to an anticipated new or reseal activity.	The requirement to monitor PAHs due to the application of coal-tar sealcoat has been removed from the permit.
8 (Sector-Specific Requirements)	A commenter asked if PAH monitoring for facilities using coal-tar sealcoat would be required to monitor annually and for how long and if the monitoring is required only for the impacted outfall (s) or for all outfalls.	The requirement to monitor PAHs due to the application of coal-tar sealcoat has been removed from the permit.
Sector 8.L (Landfills, Land Application Sites, and Open Dumps)	A commenter requested that EPD consider adding language specifically to address Coal Combustion Residual (CCR) under sector L to clarify the permit requirements CCR permit requirements under the IGP. The request included proposed language to add the following definitions.	EPD has evaluated the request and determined that the proposed additions are not necessary as CCR permit coverage is already included within the permit.
Sector 8.L.2 (Landfills, Land Application Sites, and Open Dumps)	A commenter requested EPD consider including a definition to clarify what constitutes uncontaminated groundwater.	A definition for “Uncontaminated Discharge” has been added to Appendix A and revised in Sector 8.J for consistency.
Sector 8.L.2	A commenter requested EPD consider including clarifying language regarding Stormwater Discharges Associated with Construction Activities in Sector 8.L.	The definition has been added to Part 8.L.2.3 of the permit.
Sector 8.S	A commenter asked if PAH sampling is required if no pavement areas are sealed or re-sealed with coal-tar for Sector S facilities.	Facilities that fall within Sector S will be required to conduct PAH monitoring due to the nature of their industrial activity. The requirement to monitor PAHs due to the application of coal-tar sealcoat has been removed from the permit.
Sector 8.U.6 – Table 8.U-1	A commenter noted that Table 8.U-1 incorrectly includes Indicator Monitoring for PAHs.	The requirement to monitor PAHs due to the application of coal-tar sealcoat has been removed from the permit.

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(Indicator Monitoring)		
Appendix A (Definitions)	A commenter requested EPD add a definition of GEOS.	The Georgia EPD Online System (GEOS) isn't specifically referenced in the permit so a definition is unneeded. No change made.
Appendix C (Impaired Stream Segment Sampling and Requirements)	Several commenters expressed concerns regarding monitoring waterbodies listed as 'impaired' but also those that are 'assessment pending.'	The permit has been revised to remove the requirement to perform impaired waters monitoring on waters listed as assessment pending for bacteria.
Appendix C (Impaired Stream Segment Sampling and Requirements)	Several commenters would like EPD to consider 'upstream' defined on a watershed level (Hydrologic Unit Code 10), or at most a sub-basin level (Hydrologic Unit Code 8).	The sampling requirement contained in Appendix C is triggered if a facility is discharging within one linear mile upstream of and within the same watershed, regardless of the size of the watershed, of an impaired water. The upstream consideration is provided to capture the potential pollutant input to the downstream receiving waterbody. In addition, the current definition is consistent with other NPDES permits issued by EPD. No change made.
Appendix C.2.4 (Specific Requirements for Assessment Pending Streams)	A commenter asked why EPD is changing the bacteria standard in Part C.2.4.	<i>E. coli</i> and enterococci are better indicators of fecal contamination and gastrointestinal illness than fecal coliform. During the 2013 Triennial Review, Georgia adopted <i>E. coli</i> and enterococci as the pathogen indicators for waters designated as recreation where primary contact recreational activities such as swimming, water skiing, and white-water boating occur. As part of the 2019 Triennial Review, Georgia proposed <i>E. coli</i> and enterococci criteria for waters designated as fishing, coastal fishing, and drinking water to protect secondary contact recreators who may inadvertently ingest water. The permit was

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		revised to be consistent with the proposed surface water quality standards.
Appendix C.2.4.1 (Specific Requirements for Assessment Pending Streams)	A commenter requested clarification on the use of the seasonal statistical threshold value (STV) applicable to the impaired waters benchmark for <i>E. coli</i> . The permit requires facilities to monitor two times per quarter, however, according to the draft water quality standards the STV is based on multiple samples collected and analyzed in a 30-day period. How would a facility calculate the STV?	A facility will not be required to calculate the STV. A facility should refer to Chapter 391-3-6-03 of the Rules and Regulations for Water Quality Control or the applicable TMDL for the appropriate STV, which represents the estimated 90th percentile of the water quality distribution. A single grab sample should be compared against the established STV. Collection of data to calculate a 30-day geometric mean is not needed.
C.2.4.1 (Specific Requirements for Assessment Pending Streams)	A commenter noted that the wording used to describe an impaired stream segment in this paragraph does not match the specific wording used in the first paragraph of Appendix C.	Language in Part C.2.4 has been revised.
General (Additional Permit Requirements)	A commenter encourages EPD to carefully consider the burden of new requirements against the perceived benefits of those requirements, particularly where those requirements appear to have been modeled after provisions in EPA's 2021 NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity.	EPD conducted a thorough review and only adapted permit provisions from EPA's MSGP where water quality in Georgia would benefit.
General	A commenter noted the inconsistent use of Storm Water vs Stormwater.	The permit has been revised to make stormwater one word except in cases where titles of existing documents are listed.
General	A commenter requested the consistent use of either permit cycle or permit term.	The permit has been revised to use "permit term" consistently.
General	A commenter asked for guidance on what the procedure is for an adjacent facility that has issues	EPD encourages permittees to work in partnership to address issue. Permittees may

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	with their stormwater outfalls that discharge onto their property.	contact EPD if there are additional questions or need technical assistance.
General (NOI Form)	A commenter asked if the new proposed NOI form be posted with the draft permit.	A PDF version of the NOI form will be posted on the Industrial Stormwater webpage upon permit issuance as a reference. The official NOI submittal shall be through the GEOS portal.
General (Permit Fees)	A commenter recommended that EPD establish industrial stormwater permit application fees to support the industrial stormwater program.	State law does not grant EPD authority to establish permit fees for the Industrial Stormwater General Permit.
General (Training)	A commenter asked if there is there an EPD led training video available to use for training requirements for stormwater team members. A commenter recommended that EPD develop training including water sample collection, SWPP development to ensure permittees have the necessary tools to comply with the permit.	EPD has not produced any training videos. EPD will take this recommendation into consideration as new training materials are developed.