

Response to Public Notice Comments
Draft NPDES Stormwater Permit No. GAS000XXX
Phase I Large MS4

Permit Section	Comment Received	EPD Response
Table 3.3.3 (4)(a)	Commenter supports the addition of specific educational activities for industrial facilities that permittees can implement and the addition of frequency (i.e., once each reporting period).	Comment noted.
Part 3.3.7	Commenter requests clarification on what is needed for the Impaired Waters Plan (IWP) (i.e., Is one plan sufficient if it includes all pollutants and all streams or does it have to be a separate plan for each pollutant and each stream ?).	Per the Permit, the permittee must develop an IWP addressing each pollutant of concern (POC). If the permittee has several impaired waterbodies with the same POC (i.e., fecal coliform bacteria), the permittee may submit one IWP and list all of the impaired waterbodies. The permit may also choose to develop an IWP for each impaired stream segment.
Part 3.3.8	The consolidation of the annual municipal employee training requirements and the addition of training requirements specific to the runoff reduction methodology and GI/LID practices is welcomed and will assist in the implementation of the permit.	Comment noted.
Part 3.3.9 (1)(b)	Recommend changing “activity” to “type of activity” as measuring each individual activity may prove to be difficult.	The requested modification has been made in the measurable goals for 1.b and 1.c.
Part 3.3.11 (a)(2)	Commenter recommends the State provide the criteria/process for evaluating the feasibility or infeasibility of the onsite retention requirements in the permit so that it is uniformly applied across Georgia.	Feasibility must be evaluated on a project by project basis based on the project specifications, unique site conditions, and local zoning and development requirements. By providing MS4s with the flexibility to develop their own feasibility criteria, the permit allows the development of a program that is responsive to local development code and unique local conditions. Per Table 3.3.11(b)(2)2.a., EPD will review the permittee’s feasibility analysis and site applicability of different GI/LID techniques and practices. EPD has developed a rubric as guidance to assist permittees with this process. No change made.
Part 3.3.11(b)(2)	Commenter states that the minimum inspection requirement included within	The permit includes an annual minimum inspection frequency. Permittees may benefit

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	<p>the Permit for permittees' green infrastructure/low impact development (GI/LID) structures could lead to the improper functioning of the structures.</p>	<p>from adhering to the recommended inspection and maintenance schedule for each specific GI/LID structure type as recommended in the GSMM or equivalent manual. Permittees may conduct inspections more frequently if preferred or as detailed for a specific GI/LID structure. Additional maintenance information for individual BMPs, including a schedule for specific maintenance activities, can be found in the GSMM, Appendix E, Operations & Maintenance Guidance Document. No change made.</p>
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