

Response to Comments on the 2017 Draft
General NPDES Stormwater Permit No. GAG610000
Phase II MS4

Permit Section	Comment/Requested Change	EPD Response
4.2.1 and 4.2.2	The commenter requested that the text be revised from “The program should consider options...” to “It is recommended that the permittee’s program include topics...”	The intent of the language is the same. The original text was retained.
4.2.3.6	A commenter requested that permittees with populations exceeding 10,000 be mandated to inventory and inspect industrial facilities.	There is no regulatory requirement for Phase II MS4s to address industrial facilities. No change made.
4.2.5.1	A commenter requested that the paragraphs titled “Stormwater Runoff Quality/Reduction” within the section be revised to provide the flexibility provided by the Georgia Stormwater Management Manual (GSMM). The GSMM provides the option to implement the runoff reduction requirement or to implement the water quality requirement. The permittee also expressed concern that the developer of a site should not be burdened with proving that his site can or cannot meet the runoff reduction standard.	The permit provides the flexibility outlined in the GSMM by allowing the permittee to choose between Option (a), Runoff Reduction, or Option (b), water quality, prior to December 6, 2020. The permittee has the option to develop a “feasibility program”, whereby criteria can be considered that would preclude a developer from implementing the runoff reduction standard. No change made.
4.2.5.1	A commenter indicated that the criteria used to demonstrate that the stormwater runoff quality/reduction standard is not feasible should be outlined in the permit, as opposed to permittees being allowed to make their own determination.	The determination that a performance standard cannot be applied, in part or in whole, on a project, will be made on a case-by-case basis using the GSMM. No change made.
4.2.5.1	Commenters requested that the permit include all 6 of the exemptions to the performance standards contained in the GSMM, instead of only the 2 exemptions contained in the existing	Permittees are required to apply performance standards from the GSMM where feasible. EPD will not establish additional feasibility criteria in the permit since the exemptions may

	permit.	be different for each MS4. This approach will allow the MS4 flexibility in determining the GSMM exemptions that will be applied in their jurisdiction. No change made.
4.2.5.2	A commenter requested a change in the text from "...for linear transportation projects being constructed by the permittee..." to "...for linear transportation projects being constructed by local governments or authorities". This would allow projects by other entities, such as a County constructing a roadway within a City, to utilize the feasibility program.	This comment was provided during the stakeholder process. The revision was incorporated and was evident in the public notice version of the permit.
4.2.5.2	A commenter requested that one of the exemptions from the GSMM, "land disturbing activity that consists solely of cutting a trench for utility work and related pavement replacement" be added here, if not included in Part 4.2.5.1 with other exemptions.	The feasibility determination will be based on a site specific basis by the permittee. No change made.
4.2.5.3	A commenter stated that GI/LID requirements should be applied to all permittees, regardless of population.	Smaller permittees (<10,000 population) have limited development and construction of new projects. Requiring the smaller permittees to implement the full GI/LID program would be burdensome, without a large benefit. No change made.
Table 4.2.5(a), 7(a)	A commenter requested that the inspection frequency for GI/LID structures be increased to greater than once every 5 years.	EPD has determined that once every 5 years is a reasonable, achievable inspection frequency for all types of structures. A permittee is able to conduct inspections at a greater frequency if they identify this need. No change made.
Appendix A, Linear Transportation Projects	A commenter requested that following wording be added to the definition of "Linear Projects", "...as well as linear utility projects that consist solely of cutting trenches for utility work and related pavement replacement".	The definition is for descriptive purposes and does not address all scenarios. No change made.
Appendix A, Maximum	A commenter requested the definition of "Maximum Extent Practicable" be revised to	Maximum extent practicable applies to many areas of the permit, not just the runoff reduction

Extent Practicable	add, "It also refers to limitations of the unchangeable physical characteristics of a site, such as the ability of the underlying soil to infiltrate stormwater."	requirement. No change made.
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