

City of Morrow

Phase I Large MS4 Stormwater Management Program



**STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

Stormwater Management Program (SWMP)

1. General Information

- A. Name of MS4: City of Morrow
- B. NPDES Permit Number: GAS000126
- C. Mailing Address (if providing a post office box, also provide a street address):
City of Morrow
1500 Morrow Road
Morrow, GA 30260
- D. Name of responsible official: John Lampl
Title: Mayor
Mailing Address: 1500 Morrow Road
City: Morrow State: Georgia Zip Code: 30260
Telephone Number: 770-961-4002
Email Address: jlampl@morrowga.gov
- E. Designated stormwater management program contact:
Name: Brandon Hermsmeier
Title: Public Works Director
Mailing Address: 6311C Murphy Drive
City: Morrow State: Georgia Zip Code: 30260
Telephone Number: 770-960-3000
Email Address: bhermsmeier@cityofmorrow.com
- F. Provide the river basin(s) to which your MS4 discharges: Flint (HUC 03130005),
Upper Ocmulgee (03070103)
- 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: 33.583897 Longitude: -84.341337

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 Clayton County Water Authority (CCWA)

2. SWMP component to be implemented by entity on your behalf:
The City of Morrow has an MOU in place with CCWA to provide stormwater services, including multiple aspects of the MS4 NPDES permit requirements and most stormwater management efforts; however, the City of Morrow has retained its responsibilities for the following portions of the permit:

- Routine maintenance (mowing and litter removal) of drainage ditches.
- Litter control and street sweeping.
- Construction site management activities.

The Memorandum of Agreement (MoA) between the City of Morrow and CCWA is attached in the Shared Responsibility folder.

- 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: John Lampl

Date: _____, 2024

Signature: _____

Title: Mayor, City of Morrow

Structural and Source Control Measures
Table 3.3.1 of the Permit

1. MS4 Structure Inventory and Map

1. Description of SWMP Component:

CCWA maintains a complete inventory (**Attachment 3.3.1-1**) of stormwater structures that was developed from three main sources of information: CCWA-led countywide inventory, ongoing CCWA plan reviews, and Clayton County Special Purpose Local Option Sales Tax (SPLOST) program. Before the stormwater utility was implemented, the County collected stormwater infrastructure and condition data in neighborhoods at least 25 years old as part of the SPLOST program. After the utility was implemented, CCWA completed the countywide stormwater structure inventory of structures for which the MS4 is responsible that were not included under the SPLOST program.

Table 1 summarizes the permanent structures inventoried in Morrow. The inventory includes standardized definitions for infrastructure components (i.e., catch basins, ditches, detention/retention ponds and underground detention, and pipes) to provide an accurate and consistent record of infrastructure locations, features, and condition. The database is updated on a regular basis to reconcile the inventory with:

1. CCWA's review process by incorporating new record drawings into the database,
2. Field verification and rectification carried out during field inspections and maintenance, and
3. Regulatory updates.

CCWA is conducting an ongoing analysis that will review jurisdiction and responsibilities of inspecting and maintaining stormwater structures. This may result in a change in the total number of structures which will be provided in each annual report. The inventory provided in **Attachment 3.3.1-1** of this SWMP is based on the latest ongoing structural analysis.

Table 1. MS4 Structures in Inventory	
<i>Structure Type</i>	
Catch basins	461
Retention/detention ponds	1
Storm drain lines length (miles)	7.7
Ditch length (miles)	1.6
Underground Detention	0

2. Measurable goal(s):
Update the existing MS4 structure inventory and map as needed, but at least annually.
3. Documentation to be submitted with each Annual Report:
An updated inventory and map, number of MS4 structures added or deleted during the reporting period, and the total number of structures in the inventory.

2. MS4 Inspection and Maintenance Program

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

Under its NPDES MS4 permit, Morrow must inspect at least 5% of the total stormwater structures in its inventory annually and 100% of its structures within the 5-year permit term. As documented in the City of Morrow Stormwater Utility (SWU) Ordinance (Article V, Section 25-360), CCWA is responsible for inspection of MS4 structures within the City's right-of-way. Morrow and CCWA responsibilities to meet this permit requirement are summarized in **Table 2** and documented in the Morrow SWU Ordinance included in **Attachment 3.3.1-2**. The City conducts maintenance on select MS4 structures (drainage ditches and publicly owned land) as needed. CCWA is responsible for maintenance and improvements of stormwater structures within the City's right-of-way.

Table 2. Structural Maintenance Responsibilities		
<i>Maintenance Responsibility</i>	<i>CCWA</i>	<i>Morrow</i>
Within MS4 and public right-of-way	X	
Drainage ditches, routine (i.e., mowing, litter removal)		X
Drainage ditches, non-routine (i.e., re-grading, sediment removal)	X	
On CCWA property	X	
On City-owned land		X

CCWA prioritizes inspections based on proximity to a documented complaint or service request. Inspections are completed by trained staff in specific jurisdictions based upon location, subdivision age, accessibility, or concern. Once the staff complete their allocated number of inspections, any remaining inspections are conducted by subcontractors to ensure the required number of inspections occurs on an annual basis. This approach allows staff to respond efficiently to known problems, while documenting the condition of other structures in adjacent areas. Each complaint is entered as a work order using CCWA's asset management system software. Emergency situations are addressed immediately; others generally are addressed chronologically. Once CCWA can reduce the inspection and maintenance backlog, areas will be identified to prioritize inspections based on structure condition, frequency of failure, and age.

CCWA staff follows the procedures outlined in **Table 3** as part of stormwater structure inspections and maintenance program. During each inspection, conditions are documented on an inspection report form (**Attachment 3.3.1-2**), and maintenance work orders are prepared if necessary.

Maintenance activities follow the same pattern as the inspections since most structures being repaired or maintained are part of the backlog. Once maintenance is conducted, information is documented regarding the efforts, final condition, and follow-up needs of the structure as indicated below.

Table 3. Stormwater Structure Inspection & Maintenance Procedures

<i>Catch Basins</i>	
1.	Before lifting catch basin lid, inspect lid for signs of damage. Replace collapsed or cracked lids.
2.	Inspect ground around top of catch basin for erosion. Stabilize eroded area.
3.	If lid is in good condition, lift lid and inspect inner wall and bottom of catch basin for structural defects such as cracks or chips. Repair structural defects.
4.	Inspect grout surrounding inlet and outlet pipes for cracks. Grout should be waterproof.
5.	Inspect condition of pipes (inner wall). Replace severely rusted or collapsed pipes.
6.	Look through pipes with flashlight and inspect for blockages. Clean out blocked pipes.
7.	If 1/3 of the catch basin depth is filled with sediment or debris, clean out catch basin.
<i>Culverts/Pipes</i>	
1.	Inspect area around pipe ends. Trim brush or trees that prevent flow of water.
2.	Inspect pipes for structural defects. Replace/line severely corroded or collapsed pipes.
3.	Look through pipes for blockages. Clean out blocked pipes.
4.	Inspect inlet and outlet of pipes for trash and debris. Remove trash and debris.
5.	Inspect stream bank for erosion. Stabilize eroded areas.
6.	When walking from one catch basin to another or from a catch basin to an outfall, inspect ground for erosion or soft spots. Erosion or soft spots may be a sign of collapsed pipe, and the pipe must be replaced or lined.
<i>Detention Ponds</i>	
1.	Inspect bottom and sidewalls of structure for erosion, trash and debris. Remove trash and debris exceeding 25% of the depth of detention pond or catch basin. Stabilize eroded areas.
2.	If standing water is observed (48 hours after a rainfall), regrade pond so that water drains to an outfall, if possible.
3.	If a structure requires major debris removal (sediment or debris exceeding 25% of the channel depth) or grading, submit a work order.
4.	Check for permission to inspect privately owned stormwater ponds. If maintenance is needed, prepare a letter and send to the owner with maintenance recommendations.
5.	If stormwater pond owner does not correct deficiencies during inspection, provide owner with a copy of the inspection form along with recommended corrective action. If the owner has not corrected the deficiency within 30 days (or a longer period, if deemed appropriate) of receiving the inspection form, depending on the severity of the deficiency, the appropriate jurisdiction may impose a fine for each day the violation remains unsolved after receipt of the inspection form. CCWA staff will schedule follow-up visit to ensure that corrective actions are taken.
6.	A log of inspections, corrective actions and non-compliances is maintained and included in the MS4 annual report to GAEPD.
<i>Drainage Ditches</i>	
1.	Inspect bottom and sidewalls of drainage ditches for erosion, trash and debris. Remove trash and debris exceeding 25% of the depth of the ditch. Stabilize eroded areas.
2.	If standing water is observed in a ditch (48 hours after rainfall), regrade ditch so that water drains to an outfall.
3.	If ditch requires debris removal (sediment or debris exceeding 25% of the depth of the channel) or grading, submit a work order. Otherwise, the local Public Works Department should be contacted for regular mowing and litter removal.
<i>Underground Detention*</i>	
1.	Inspect the contributing drainage area and the inlet and outlet structures to make sure they are not clogged or obstructed. Remove any trash/debris and sediment buildup from inlet and outlet structures. Perform structural repairs to inlet and outlets if necessary.
2.	Inspect the access opening for sediment built up inside structure. Remove sediment using either a vacuum or boom truck. Ensure maintenance is conducted by an individual who is certified in Occupation Safety and Health Administration (OSHA) confined space entry.
3.	Inspect the underground detention area for any water that may be flowing from a hazardous facility. Clean underground detention if hazardous or foreign substances are spilled in the contributing drainage area.

*None in the inventory at the time of SWMP Development

2. Measurable goal(s):
MS4 structures listed in this SWMP will be inspected so that 100% of the structures are inspected within the 5-year permit term. At a minimum, CCWA and the City will conduct inspections on 5% of the total structures annually so that some inspections are performed during each reporting period. If a low percentage of inspections is conducted during one reporting period, then CCWA and the City will increase the inspection frequency in subsequent reporting periods to ensure that 100% of the structures are inspected within a 5-year permit term. CCWA and the City will conduct maintenance on MS4 structures as needed.
3. Documentation to be submitted with each Annual Report:
The number and percentage of MS4 structures inspected during the reporting period and documentation will be included in the annual report.

The number of MS4 structures maintained during the reporting period and documentation of the maintenance performed will also be included in the annual report.

3. Planning Procedures

1. Description of SWMP Component:

The City of Morrow has a comprehensive plan that follows the framework of government policy to guide growth within the community, coordinate public services, and identify the quantities, types, locations, and timing of future development. The current plan was last updated in 2023 and runs through 2034. A copy of the City’s updated plan is included as **Attachment 3.3.1-3**. This plan was developed in compliance with the guidelines of the Georgia Planning Act’s Minimum Standards and Procedures for Local Comprehensive Planning and has received the support of the jurisdiction’s elected officials and residents.

Morrow adopted multiple ordinances to address new development and redevelopment requirements. These ordinances and other development rules for Morrow are included in the *Stormwater Development Guidelines (Attachment 3.3.1-3)*. The purpose of the *Guidelines* is to incorporate the requirements of each jurisdiction that is part of the stormwater utility into a consistent set of rules, and to provide design requirements and construction standards for installing structural stormwater management controls in new and redevelopment. All public and private stormwater management systems in the CCWA service area must be based on guidance provided in the current *Georgia Stormwater Management Manual (GSMM)* except as otherwise noted in the *Stormwater Development Guidelines* (2024).

Any property owner or developer desiring a land disturbance permit must refer to the ordinances adopted by the local jurisdiction. **Table 4** lists the ordinances related to stormwater management and watershed protection.

Table 4. Stormwater Management & Watershed Protection Ordinances	
Ordinance	Reference
Soil Erosion and Sedimentation Control Ordinance The Soil Erosion and Sedimentation Control Ordinance regulates soil runoff. This ordinance establishes policies that affect any land-disturbing activity involving greater than 1 acres or sites that are less than 1 acres but are within 200 feet of the bank of any State waters. Under these requirements, BMPs must be designed to control soil erosion and sedimentation for all rainfall events up to and including a 25-year, 24-hour rain event. Unless otherwise authorized by the City, no land-disturbing activity is allowed within 25 feet of the bank of any State waters.	City of Morrow: Title 8, Chapter 3 (2/13/18) Ord. No. 2018-01, 2-13-18
Litter Control Ordinance The Litter Control Ordinance provides a prohibition against littering, including dumping or depositing litter and debris on any public or private property. It also delineates an enforcement mechanism with penalties for dealing with those found littering.	City of Morrow: Title II, Article B, Section 11-1-43 (4/27/2004) Ord. No. 2004-09, 4-27-04

Table 4. Stormwater Management & Watershed Protection Ordinances

Ordinance	Reference
<p>Floodplain Management/Flood Damage Prevention Ordinance</p> <p>The purpose of the Floodplain Management and Flood Damage Prevention Ordinance is not only to promote public health and safety, but also to minimize flood damage to property. The provision is designed to restrict or prevent uses of land in flood zones that may contribute to increased erosion or flood velocities with potential to damage riparian zones.</p>	<p>City of Morrow: Title 8, Chapter 4 (12/8/2020)</p> <p>Ord. No. 2020-15, §1(Exh. A), 12-8-20</p>
<p>Conservation Subdivision Ordinance</p> <p>The Conservation Subdivision Ordinance conserves and protects natural resources and encourages the use of public open spaces for recreational and educational use. In addition, this ordinance sets minimum standards on the use of septic tanks in subdivisions.</p>	<p>City of Morrow: Title 8, Chapter 6, Section 8-6-21 (4/27/2004)</p> <p>Ord. No. 2004-07, §1, 4-27-04</p>
<p>Stormwater Utility</p> <p>This Stormwater Utility Ordinance lays out that stormwater management is needed throughout Morrow, and that a utility provides the most practical and appropriate means of properly delivering storm water management services. Clayton County, Forest Park, Jonesboro, Lake City, Lovejoy, Morrow, and Riverdale all presently own and operate stormwater management systems. A stormwater utility is the best way to effectively manage, protect, control, regulate, use, and enhance stormwater systems consistently and in concert with the management of other water resources in the city. The city's governing authority also finds that a utility fee provides the most practical and appropriate means of funding storm water management services in the City, and so lays out the authority, structure, and process for collecting utility fees.</p>	<p>City of Morrow: Title 5, Chapter 4 (4/11/2006)</p> <p>Ord. No. 2006-04, §1, 4-11-06</p>
<p>Stream Buffer Protection Ordinance</p> <p>This ordinance delineates requirements that regulate land development within buffers, such as setbacks and other limitations, as well as exceptions, variances and enforcement and penalties. Buffer zone protections stabilize stream banks, protect water quality and preserve aquatic and riparian habitat.</p>	<p>City of Morrow: Title 8 Chapter 6 Section, 8-6-22 (4/27/2004)</p> <p>Ord. No. 2004-10, §§1-11, 4-27-04</p>
<p>Illicit Discharge and Illegal Connection Ordinance</p> <p>The Illicit Discharge and Illegal Connection Ordinance delineates the authority to deal with illicit discharges (any discharge to a storm sewer that are not composed entirely of stormwater runoff) and establishes enforcement actions for those persons or entities found to be in noncompliance or that refuse to allow access to their facilities for verification purposes. Illicit discharges may occur due to illegal dumping or illegal connections to the stormwater drainage system.</p>	<p>City of Morrow: Title 5, Chapter 3 (4/27/2004); Title 5, Chapter 4 (4/11/2006)</p> <p>Ord. No. 2004-08, §1, 4-27-04; Ord. No. 2006-04, §1, 4-11-06</p>

Table 4. Stormwater Management & Watershed Protection Ordinances	
Ordinance	Reference
<p>Post-development Stormwater Management for New Development and Redevelopment</p> <p>The Stormwater Management Ordinance is designed to control pollutant discharges via stormwater runoff to the municipal storm sewer system by:</p> <ul style="list-style-type: none"> • Reducing discharges of pollutants to the MS4 from areas of new development; this may require both structural and source control measures. • Incorporating controls necessary to reduce pollutants after construction is completed. • Ensuring that the post-development peak stormwater runoff rate is no greater than the pre-development rate, thereby minimizing downstream erosion and property damage. 	<p>City of Morrow: Title 8, Chapter 6, Section 8-6-18 (12/8/2020)</p> <p>Ord. No. 2020-15, §1, 12-8-20</p>
<p>Stormwater Management</p> <p>Federal regulations require maintenance and management of municipal stormwater systems and discharges. The objective of this ordinance is to comply with state and federal stormwater regulations developed pursuant to the Clean Water Act. This ordinance lays out the responsibilities of the City and includes maintenance requirements for private systems.</p>	<p>City of Morrow: Title 8, Chapter 3 (6/13/95)</p> <p>Ord. No. 95-06, §1, 6-13-95</p>
<p>GI/LID Ordinance</p> <p>Clayton County and the incorporated Cities have each conducted a review of local ordinances and regulations to ensure the use of GI/LID techniques is not prohibited or impeded. The review was conducted using worksheets developed by the U.S. Environmental Protection Agency Ordinance and the Center for Watershed Protection. Based on the recommendations identified in the worksheet, revised ordinances have been adopted by the eight jurisdictions.</p>	<p>City of Morrow: Title 8, Chapter 6; Appendix A, Article 12 (4/12/2016)</p> <p>Ord. No. 2016-03, §1, 4-12-16</p>

2. Measurable goal(s):
The existing comprehensive planning document will be updated on an as-needed basis or at least once every 10 years to address areas of new development and redevelopment to reduce pollutants in discharges from the MS4.
3. Documentation to be submitted with each Annual Report:
Any changes to the comprehensive planning document related to stormwater during the reporting period will be documented in each annual report.

4. Street Maintenance

1. Description of SWMP Component:

The City of Morrow is responsible for conducting annual street maintenance in its incorporated areas, with emphasis on high-traffic areas. Street maintenance activities are conducted to maintain public roads and may include street sweeping and/or removal of litter on right-of-ways. The City contracts with a private company to conduct sweeping three to four times per year. City Public Works crews and community service workers clear right-of-ways. City Public Works crews pick up yard debris, furniture, appliances, limbs, and bags of leaves; remove dead animals on city right-of-ways; clean and cut grass on city roads and right-of-ways; and assist in cleaning and mowing along state roads within the city. A private hauler picks up and disposes of collected waste at state-approved facilities outside of Clayton County.

To minimize the amount of litter on roadways, City law enforcement officers enforce the litter control ordinance (**Attachment 3.3.1-4**) in right-of-ways by imposing a fine of up to \$1,000, imprisonment up to 6 months, or assignment to remove litter from public properties. The local court has the authority to publish the names of persons convicted of violating the ordinance.

2. Measurable goal(s):

Street maintenance activities will be reported in miles of road swept or cleaned; at least 1 mile of road will be maintained within Morrow each reporting period.

3. Documentation to be submitted with each Annual Report:

The City uses a spreadsheet to tally specific street sweeping and/or litter removal activities for reporting purposes. At the end of each reporting period, CCWA coordinates with the city to report these counts in the Morrow MS4 annual report. Street maintenance activities will be reported in miles of road swept or cleaned; at least 1 mile of road will be maintained within Morrow each reporting period.

5. **Flood Management Projects**

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

Morrow and CCWA work together to ensure that future development does not cause water quality impacts; CCWA reviews existing infrastructure within current developments for opportunities to retrofit to improve pollutant removal.

Future Development

As administrator of the stormwater utility, CCWA reviews all applicable proposed projects for compliance with the *Stormwater Development Guidelines (Attachment 3.3.1-5)*, including water quality protection. The attached guidelines list all stormwater management requirements that must be met for new development or redevelopment that involves construction of 5,000 square feet or more of impervious surface, or a designated hotspot area. These guidelines also reference the current *GSMM* for stormwater control system design, which includes requirements for water quality treatment. CCWA reviews projects for stormwater management, water quality, floodplain, drinking water and sanitary sewer design. Projects are also reviewed by Morrow for erosion control, grading, driveway specifications, and road construction for commercial and residential construction project requirements. CCWA approval of the proposed stormwater management requirements must be obtained before a construction permit is issued by the City of Morrow.

Existing Development

GAEPD encourages communities to retrofit structural controls that provide flood control for pollutant removal, such as wet or dry detention ponds and drainage channels. As part of all structural stormwater control inspections, CCWA assesses existing structures based on capacity, condition, and other factors that may make them good retrofit candidates to increase water quality protection. For instance, structures designed prior to implementation of the *GSMM* or before April 15, 2016 do not meet current design standards for water quality treatment. As part of the inspection process, structures are visually inspected to identify any deficiencies, outline any compliance issues, and the inspector may provide recommendations for necessary maintenance activities. Structures that have some potential to be modified to improve downstream water quality are flagged on the field inspection form for additional retrofitting analysis. This analysis, and the type of retrofits needed, will vary from case to case, being a simple structural change or redesign using a full hydrologic and hydraulic analysis, depending on the extent and severity of the problem. The time frame for constructing retrofits will depend on the severity of the problem and availability of funding.

The City of Morrow currently only has one flood control management structure in its inventory. It was assessed for retrofit potential during the previous permit period. A table will be provided in each annual report listing the date and results of the assessment as well as the status of any retrofitting activities. Any flood management

projects that are added in the future will not require a retrofit assessment as they would be designed using the current version of the GSMM. If an assessment was previously performed on an existing flood management project using the 2016 GSMM or latest edition, prior to the effective date of this permit, then an additional assessment will not be performed.

2. Measurable goal(s):
 - a. CCWA will review 100% of new flood management projects to ensure potential water quality impacts are appropriately assessed.
 - b. CCWA will track the status of applicable/feasible retrofitting activities for the City of Morrow's one pond that was assessed during the previous permit period.
3. Documentation to be submitted with each Annual Report:
 - a. CCWA will provide the number of plans reviewed for water quality impacts in each annual report.
 - b. CCWA will provide a table listing the date and results of previously completed retrofit assessments as well as the status of any retrofitting activities.

6. **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):

Morrow has one facility not subject to the Industrial General Permit (IGP) with potential to cause pollution. The current inventory of the facility that falls into this category is attached. (**Attachment 3.3.1-6**).

All municipal facilities are inventoried, inspected, and regulated following the same procedures as industrial facilities and HVPS. The staff responsible for operating the specific facility are charged with carrying out inspections of their facility at least once per year and submitting the completed form to CCWA. Also, CCWA conducts inspections of 100 percent of the municipal facilities with potential to cause pollution within the 5-year permit term. As Morrow has less than 5 municipal facilities, at least 1 inspection will be conducted each reporting period. If the inventory grows to include more than 5 municipal facilities, CCWA will conduct inspections on 5% of the municipal facilities each reporting period. If a low percentage of inspections is conducted during one reporting period, then CCWA must increase the inspection frequency in subsequent reporting periods to ensure that 100% of the municipal facilities are inspected within the 5-year permit term. An example form used to document these inspections can be found in **Attachment 3.3.1-6**.

If a structure within a municipal facility property requires minor maintenance, such as cleaning up a work area or some other quickly remedied housekeeping issue, that can be completed with available staff and tools kept on-site, the work order is handled in-house by Morrow.

2. Measurable goal(s):

- a. Annually update the inventory of municipal facilities in Morrow with the potential to cause pollution (e.g., drinking water treatment plants, wastewater plants < 1.0 MGD, recycling facilities, waste transfer facilities, materials recovery facilities) and provide in each annual report as necessary.
- b. Conduct inspections on 100% of inventoried facilities within the 5-year permit term, with at least 5% inspected annually. At the current time there is only one municipal facility, and it will be reinspected each year during this reporting period.

3. Documentation to be submitted with each Annual Report:

The updated inventory along with inspection documentation, including any follow-up actions taken to address noncompliance issues, will be provided in each annual report.

7. Pesticide, Fertilizer, and Herbicide Application

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

CCWA and Morrow have significantly reduced the use of pesticides, herbicides, and fertilizers. These chemicals are not stored onsite and are purchased in quantities to be used immediately by CCWA or City staff or a qualified third-party contractor. Should it become necessary to store chemicals, an updated inventory of chemicals will be maintained by staff and included in MS4 annual reports. Third party contractors and staff applying these chemicals will do so consistent with state requirements, which includes possession of a valid commercial application license issued by Georgia Department of Agriculture. To obtain a valid license, applicators must pass an exam. Applicators must earn a requisite number of recertification credits every 5 years or be reexamined. The Department of Agriculture sends a list of educational meetings to earn recertification points each year.

CCWA's stormwater utility sponsors the annual Household Hazardous Waste Amnesty Day for citizens of Morrow, so that they may legally dispose of household hazardous materials, including pesticides, fertilizers, and herbicides, at no cost to them. This event is one of the measurable goals elsewhere in this plan and is detailed further in that section. CCWA's website maintains a direct link to the Clean Water Campaign website, which contains information of the proper application, storage, and disposal.

2. Measurable goal(s):

- a. Continue to implement ongoing program to reduce pollution based on the use of pesticides, fertilizers, and herbicides on both a commercial and municipal level.
- b. Ensure 100% of City / CCWA staff or third-party contractors performing the application of pesticides, fertilizers, and herbicides is certified by the Georgia Department of Agriculture.

3. Documentation to be submitted with each Annual Report:

Documentation related to certifications and educational activities will be provided in each annual report, as well as any changes to chemical storage practices or quantities.

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

1. Legal Authority

1. Description of SWMP Component:

The City of Morrow has adopted the Metropolitan North Georgia Watershed Protection District's (Metro District) model ordinance for illicit discharge and illegal connection. The most recent Illicit Discharge and Illegal Connection Ordinance can be found in **Attachment 3.3.2-1**. This ordinance, adopted on April 27, 2004, was designed to meet the following goals and does not currently require revision:

- Regulate the contribution of pollutants to the MS4 by any person.
- Prohibit illicit discharges and illegal connections to the MS4.
- Prevent non-stormwater discharges, generated as a result of spills, inappropriate dumping, or disposal, to the MS4.
- Establish legal authority to carry out all inspection, surveillance, monitoring and enforcement procedures necessary to ensure compliance with this article.

The enforcement procedures for the Illicit Discharge and Illegal Connection Ordinance are provided in **Appendix A** (Enforcement Response Plan). These procedures outline the authority to administer, implement, and enforce the Illicit Discharge and Illegal Connection Ordinance.

2. Measurable goal(s):

Re-evaluate and modify the existing illicit discharge and illegal connection ordinance when necessary for compliance with the permit.

3. Documentation to be submitted with each Annual Report:

If the ordinance is revised during the reporting period, a copy will be provided in the annual report.

2. Outfall Inventory and Map

1. Description of SWMP Component:
CCWA maintains a GIS outfall inventory for Morrow that is updated on an annual basis and verified during outfall screenings based on GAEPD guidance. As defined in the 2019 Phase I Large MS4 Permit, an outfall is defined as “the most downstream point (i.e., final discharge point) on an MS4 where it discharges to the waters of the State.” CCWA further clarified this definition in a letter to EPD on March 12, 2019 after an additional GIS analysis was performed to identify the most downstream point where the MS4 discharges to the waters of the State. To be conservative, CCWA placed a 200-foot buffer on either side of the State waters to ensure those outfalls were included. The current inventory of the City’s outfalls and a map of these structures are included in **Attachment 3.3.2-2**.
2. Measurable goal(s):
 - a. Annually, update the inventory and map showing the location of all outfalls from the City of Morrow MS4 and the names and locations of all waters of the State that receive their discharges with each annual report.
 - b. Provide the number of outfalls added or removed during the reporting period as well as the current total number of outfalls in the inventory in each annual report.
3. Documentation to be submitted with each Annual Report:
The City will provide the updated map and inventory, the number of outfalls added to or removed from the inventory during the reporting period and the total number of outfalls in the inventory in each annual report.

3. **IDDE Plan**

1. Description of SWMP Component (Ensure the text discusses the outfall inspections, any stream walks activities, illicit discharge tracing, and illicit discharge elimination):
The procedures for implementing the Illicit Discharge Detection and Elimination (IDDE) Plan are provided in **Attachment 3.3.2-3** and include a description of the outfall screening prioritization and frequency, dry-weather outfall screening procedures, including clarifying the inspection process when access to outfall location is unavailable, source tracing procedures, and source elimination.
2. Measurable goal(s):
 - a. Implement the IDDE Plan, including the dry-weather screenings of 100 percent of outfalls within the 5-year period as detailed in **Attachment 3.3.2-3**. At a minimum, CCWA will conduct dry-weather inspection on at least 5% of the outfalls each reporting period. If a low percentage of inspections is conducted during one reporting period, then CCWA/the City will increase the inspection frequency in subsequent reporting periods to ensure that 100% of the outfalls are inspected within a 5-year permit term.
 - b. Implement source tracking of 100% of potential illicit discharges in accordance with details in the IDDE Plan (**Attachment 3.3.2-3**). Any identified illicit discharges shall be eliminated. If source of illicit discharge is identified as deriving from an adjacent MS4, CCWA will notify that MS4.
 - c. Ensure 100% of illicit discharges are eliminated. If necessary, implement enforcement procedures outlined in the Enforcement Response Plan (ERP) (**Appendix A**).
3. Documentation to be submitted with each Annual Report:
The number and percentage of inspections conducted will be included in each annual report along with documentation of the inspections. If limited or unavailable access to outfall necessitates an alternate upstream inspection location, that information and location will be noted with inspection documentation. Information related to any investigation of potential illicit discharges and subsequent elimination and/or enforcement activities will be provided in each annual report.

4. Spill Response Procedures

1. Description of SWMP Component:

The Morrow Fire Department responds to spills of hazardous substances and takes measures to contain spills to prevent substances from entering the MS4 in the City. The Agency provides documentation of each spill to the City and CCWA. CCWA maintains a database of all reported spills and submits this information to GAEPD as part of the MS4 annual report.

The City's ordinances for illicit discharge and illegal connection provides instructions that individuals should follow if there is an accidental discharge or unavoidable loss to the storm sewer system of any designated hazardous waste material or any substance other than unpolluted stormwater (**Attachment 3.3.2-1**). The ordinance states that the responsible party shall take the necessary steps to ensure that discovery, containment, and cleanup are executed by following these actions:

- Notify the authorized enforcement agency in person, by phone, or by facsimile regarding the nature, quantity, and time of the discharge within 24 hours of occurrence.
- For a discharge of prohibited materials from a commercial or industrial site, retain an onsite written record of the discharge and the actions taken to prevent its recurrence.
- Take immediate steps to ensure no recurrence of the discharge or spill.
- Immediately notify emergency response agencies or other appropriate agencies.

2. Measurable goal(s):

Implement the spill procedures described above for 100% of spill response activities.

3. Documentation to be submitted with each Annual Report:

Documentation on spill occurrences during the reporting period will be included in each annual report.

5. **Public Reporting Procedures**

1. **Description of SWMP Component:**

The Clean Water Campaign, hosted by the Metropolitan North Georgia Water Planning District, receives inquiries regarding illicit discharges via email at info@cleanwatercampaign.com and via phone at 470-378-1627. The contact information to “Report a Polluter” can be found online at <https://northgeorgiawater.org/contact/>.

In addition, complaints of suspected illicit discharge can be filed to the CCWA by contacting the Stormwater Compliance Technician at 770-960-5200.

When complaints of suspected illicit discharges are received by the City or CCWA, a CCWA Compliance Technician investigates the complaint and follows through to resolution. These inspections are documented on an inspection report and tracked in the IDDE electronic database maintained by CCWA. A response to a complaint may be immediate if the severity of the potential illicit discharge is deemed to be directly impacting waters of the State or causing a public health or other environmental concern. All complaints will be responded to within 48 hours. If a complaint results in a property owner or facility requiring corrective action, the owner/facility will have a maximum of two weeks to correct the problem. This timeframe may be less if the inspector determines a higher potential for adverse impacts.

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

- a. Continue to promote, publicize, and facilitate public reporting of illicit discharges. Implement procedures described above related to receiving and responding to complaints related to illicit discharges. The City, working with CCWA, will perform at least one formal notification to the public of methods available to the report an observed illicit discharge (e.g., website posting, newsletter, bill insert) each reporting period.
- b. Implement the procedures for receiving and responding to complaints related to illicit discharges as described above, investigating 100% of complaints within two business days.

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

- a. Documentation of the formal notification of public reporting methods conducted during the reporting period in each annual report. These could include screenshots of a website posting or copies of printed materials distributed during the reporting period.
- b. Documentation on each complaint received and investigated during the reporting period in each annual report, including its status. This could include a table/spreadsheet of the complaints that were logged and copies of completed work orders when applicable.

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

1. Description of SWMP Component:
During routine stormwater structure inspections, facilities are reviewed to ensure that hazardous substances are properly stored and disposed of so that they do not enter the stormwater system. CCWA conducts activities to educate and assist Morrow citizens on the proper disposal and management of used oil and toxic materials. Once a year, CCWA sponsors a Household Hazardous Waste Amnesty Day for citizens to legally dispose of household hazardous materials at no cost to them. At this event, educational information is given to each participant, which include brochures and pamphlets on toxic material and various activities to properly manage and alleviate unwarranted discharges into the City's stormwater system.
2. Measurable goal(s):
CCWA will host an annual Household Hazardous Waste Amnesty Day and distribute educational information to the participants.
3. Documentation to be submitted with each Annual Report:
The details of the event, including the date(s) and number of vehicles participating in the annual Household Hazardous Waste Amnesty Day will be documented in each annual report along with copies of the information provided to participants.

7. Sanitary Sewer Infiltration Controls

1. Description of SWMP Component:

The City of Morrow does not own or operate a sanitary sewer system. Operation and maintenance of Morrow's sanitary sewer collection system is done by CCWA as a combined effort of their General Services Department and Distribution and Conveyance Department. The General Services Department is responsible for the operation and maintenance of the lift stations, warehousing, parts inventory, fleet maintenance, building maintenance, and all electrical maintenance. The Distribution and Conveyance Department is responsible for the maintenance and repair of the collections system, including overflow response and complaint investigations.

CCWA developed a Capacity Management, Operations, and Maintenance (CMOM) Program, consistent with EPA guidelines, intended to reduce the number of sanitary sewer overflows, inflows, and infiltration. The CMOM program is an aggressive approach to the proper maintenance, management, and operation of its sanitary sewer collection system, which strives to be proactive in the proper operation of the collection system. Activities in this program are reported annually to GAEPD as required by the CMOM Consent Agreement No. EPD-WQ-6110 (**Attachment 3.3.2-7**). Using the CMOM program, CCWA implements various ongoing activities to reduce sanitary sewer overflows, inflow, and infiltration, including but not limited to, the following:

- Routine maintenance on CCWA's lift stations,
- Sewer line rehabilitation,
- Routine pipe cleanings,
- Dry-weather outfall screenings that may detect seepage of sanitary sewer flow into storm system,
- Regular sewer system inspections,
- Regular manhole inspections and manhole repairs, including mortar and a corrosion-resistant epoxy, and
- Flow monitoring.

However, the following categories of non-stormwater discharges or flows are addressed only if they are identified as significant contributors of pollutants to the MS4:

- water line flushing;
- landscape irrigation;
- diverted stream flows;
- rising ground waters;
- uncontaminated ground water infiltration (as defined in 40 CFR Part 35.2005(20));
- uncontaminated pumped ground water;
- discharges from potable water sources;
- foundation drains;
- air conditioning condensation;

- irrigation water;
- springs;
- water from crawl space pumps;
- footing drains;
- lawn watering;
- individual residential car washing;
- flows from riparian habitat and wetlands;
- swimming pool discharges;
- street wash water; and
- flows from firefighting activities.

2. Measurable goal(s):

CCWA, on behalf of the City, will perform at least one CMOM activity to detect and eliminate seepage and spillage from the sanitary sewer system to the MS4 each reporting period.

3. Documentation to be submitted with each Annual Report:

N/A - As CCWA Distribution & Conveyance (D&C) Department submits the CMOM Annual Report as part of their annual report submittal, there is no separate documentation associated with this SWMP component.

Industrial Facility Stormwater Discharge Control
Table 3.3.3 of the Permit

1. Industrial Facility Inventory

1. Description of SWMP Component:
CCWA maintains an inventory of industrial facilities located within Morrow. It is updated annually and includes all facilities with industrial activities that are subject to GAEPD's Industrial General Permit (GAR050000) Notice of Intent (NOI) and No Exposure Exclusion (NEE) online listings. The current inventory of the City's industrial facilities is included in **Attachment 3.3.3-1**.
2. Measurable goal(s):
Update the Industrial Facility Inventory annually and as new facilities are added.
3. Documentation to be submitted with each Annual Report:
Provide an updated inventory of industrial facilities in each annual report.

2. Inspection Program

1. Description of SWMP Component:

- a. Inspections: CCWA conducts stormwater inspections for industrial facilities located in the City of Morrow. These inspections are prioritized based on when the facility was last inspected, previous problems, and service requests for industrial facilities that CCWA has determined are contributing pollutant loading to the MS4. These inspections can include screening for dry weather flows at all outfalls, as described in Attachment 3.3.2-3 (Illicit Discharge and Detection Elimination Plan). The following potential pollutant sources/indications are evaluated during inspections:
 - Industrial machinery in uncovered areas,
 - Industrial activity residuals exposed to rainfall,
 - Spill or leak residuals on the ground,
 - Materials contained in deteriorated or leaking storage drums,
 - Detention ponds on property,
 - Uncontained wash areas,
 - Recent spills,
 - Distressed vegetation,
 - Stained asphalt or concrete, and
 - Material handling/process equipment exposed to rainfall, stored on roads, or stored outdoors.
- b. Monitoring: Industrial facilities subject to the Industrial General Permit (IGP) must conduct at least quarterly visual monitoring of stormwater discharges at outfalls during wet weather events. Additional monitoring is required if the facility discharges stormwater to a 303(d)-listed stream or is within 1 linear mile upstream of a listed stream segment. The facilities submit data to GAEPD as part of the IGP. If CCWA staff suspects that an industrial facility may be contributing to downstream water quality problems caused by pollutants in stormwater runoff, facility inspections may include a request for the facility's monitoring data. Should the monitoring data provided be insufficient to document stormwater pollution, the CCWA may elect to conduct stormwater discharge monitoring at outfalls from the industrial site entering the MS4. Parameters to be measured during monitoring will vary depending on the nature of the water quality issue.

2. Measurable goal(s):

- a. CCWA will inspect 100% of the City's inventoried facilities that discharge to the MS4 within the 5-year permit term. As Morrow has less than 5 industrial facilities, at least 1 inspection will be conducted each reporting period. If the inventory grows to include more than 5 industrial facilities,

CCWA will conduct inspections on 5% of the industrial facilities each reporting period, or if inspections are done by geographical area, then one area or sector must be inspected each reporting period so that some inspections are performed during each reporting period. If a low percentage of inspections is conducted during one reporting period, then CCWA will increase the inspection frequency in subsequent reporting periods to ensure that 100% of the industrial facilities are inspected within the 5-year permit term. Attachment 3.3.2-2 contains a copy of the inspection report form.

- b. If needed, the City/CCWA will implement a monitoring program for stormwater runoff from industrial facilities, waste facilities, and hazardous waste treatment, storage and disposal facilities. The City/CCWA may use monitoring results provided by the industrial facility.

3. Documentation to be submitted with each Annual Report:

The City will provide the total number of industrial facilities, the number and percentage of inspections conducted, and documentation of such inspections conducted by CCWA during the reporting period in each annual report. The City also will provide results of any monitoring conducted by CCWA and any provided by the industrial facility during the reporting period in each annual report.

3. **Enforcement Procedures**

1. **Description of SWMP Component:**

CCWA and Morrow review site plans for new industrial facilities to ensure that adequate stormwater controls are included. Details regarding enforcement procedures and penalties for industrial facilities are provided in **Appendix A**, Enforcement Response Plan (ERP), and are based on the City's IDDE ordinance (Chapter 38, Article VII).

As part of inspections, CCWA staff try to discuss any noncompliance issues with facility operators so that corrective actions can be implemented as quickly as possible. When a facility does not comply with permit requirements, the property owner receives a copy of the inspection form along with recommended corrective actions and the inspector will schedule a follow-up visit. The timeframe of the follow-up visit may vary depending on the severity of the violation. If a facility violation is resulting in an immediate water quality risk or public safety/environmental risk, then corrective actions should take place immediately. If no immediate water quality/public safety/environmental risk is present, then a follow-up inspection should be scheduled within a maximum of 30 days from the initial inspection. If a violation is not corrected within 30 days, or a greater period deemed appropriate at the time the Notice of Violation was issued, the appropriate jurisdiction may impose a fine (depending on the severity of the violation) for each day the violation remains unsolved after receipt of the Notice of Violation. CCWA staff will schedule a follow-up visit to ensure that corrective actions are taken. A log of inspections, corrective actions, and non-compliances is maintained and included in the MS4 annual report to GAEPD.

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

Enforcement procedures will be implemented as necessary as described above and in **Appendix A** (Enforcement Response Plan).

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

Documentation related to any enforcement actions taken during the reporting period in each annual report.

4. Educational Activities

1. Description of SWMP Component:
As part of the stormwater inspections for industrial facilities, facility operators are educated in ways to reduce pollution in stormwater and of proper handling techniques and disposal of chemicals or other substances. Inspectors refer facility operators to CCWA's website which has additional links and stormwater management information. Educational materials provided to industrial facilities are also included as inserts in stormwater bills to provide tips and insights on proper storage and disposal of various industrial materials.
2. Measurable goal(s):
CCWA, on behalf of Morrow, will continue to provide facility operators with educational information related to reducing/minimizing stormwater pollution during routine stormwater inspections. Distribution of these educational materials will occur at least once each reporting period.
3. Documentation to be submitted with each Annual Report:
Documentation of these educational materials distributed to industrial facilities will be included along with each annual report.

Construction Site Management

Table 3.3.4 of the Permit

1. Legal Authority

1. Description of SWMP Component:

Morrow is responsible for reviewing and inspecting land disturbing activities (LDA) within its unincorporated areas to ensure environmental protection. The City acts as the local permit issuing authority for the State Erosion and Sedimentation Control Act pursuant to Chapter 7, Control of Erosion and Sedimentation (Official Code of Georgia Annotated [OCGA] 12-7-8 (a)). Morrow has implemented a consistent construction site management program that has been coordinated with GAEPD on a routine basis.

Morrow's soil erosion and sedimentation control policies can be found in Title 8, Chapter 3 of its Code of Ordinances. (**Attachment 3.3.4-1**). The ordinance references the minimum requirements for erosion and sedimentation control using BMPs, the LDA permitting process, construction plan requirements, and enforcement procedures.

In addition to erosion and sedimentation control, the City has adopted the Metro District's model ordinances for stream buffer protection, conservation subdivisions, and post-development stormwater management for new development and redevelopment. Accordingly, the requirements for protected stream buffers, conservation subdivisions, and post-development stormwater control have been incorporated into the CCWA plan review process as documented in the *Stormwater Development Guidelines*, most recently updated in 2024. In particular, the post-development ordinances and the Guidelines specify the *Georgia Stormwater Management Manual* as a reference for required design elements.

The *Stormwater Development Guidelines* (**Attachment 3.3.4-1**) set the design requirements, material requirements and construction standards for the City of Morrow. Section 5 of the *Guidelines* describes the stormwater management design and plan requirements and includes criteria for pipes and culverts, inlets, stormwater BMPs, open channels, soil erosion and sediment control, stream buffer protection, watershed protection, wetlands, and dams.

2. Measurable goal(s):

Re-evaluate and update the Erosion and Sedimentation (E&S) ordinance when necessary for compliance with the MS4 permit. Ensure the E&S ordinance provides the authority to

- issue LDA permits;
- require BMPs to prevent and minimize E&S;
- require erosion, sedimentation, and pollution control plan submission and review prior to commencing construction;
- conduct inspections and enforcement, including stop work orders, bond forfeiture, and monetary penalties; and

- require education and certification for persons involved in land development, design, review permitting, construction, monitoring, inspection, and other land disturbing activities.
3. Documentation to be submitted with each Annual Report:
If the ordinance is revised during the reporting period, a copy of the adopted ordinance will be provided in the annual report.

2. Site Plan Review Procedures

1. Description of SWMP Component:

CCWA's review procedures are outlined in the latest draft of CCWA's *Stormwater Development Guidelines (Attachment 3.3.4-2)*, including a design approval flow chart and review checklists for preliminary and final plans and plats, as well as operation and maintenance plans.

Although CCWA implements most of the stormwater management activities for the City of Morrow, the City is the local permit issuing authority for LDAs. Therefore, the City is responsible for processing LDA applications, maintaining a list of active LDA permits, conducting inspections / maintenance reports, and enforcing local protective ordinances and the Georgia Erosion and Sedimentation Control Act (Official Code of Georgia Annotated [OCGA] 12-7-8 (a)). As such, site plans are first submitted to Morrow for review. Local ordinances provide minimum requirements for submittals, such as project contact information, size of project, protected stream buffer boundaries, schedule, stormwater and sedimentation management systems, vegetative stabilization plan, floodplain information, detail drawings for all structures, and a maintenance statement to confirm that erosion and sedimentation control measures will be maintained at all times. All applications must contain a certification stating that the plan preparer or designee thereof visited the site prior to creation of the plan or that such a visit was not required in accordance with rules and regulations established by Morrow. After the City's review, CCWA then reviews LDA plans for compliance with stream buffer protection, floodplain management/ flood damage protection, conservation subdivision, and post-development stormwater management ordinances. Final approval of the construction plans comes through the Public Works Department, after the City has coordinated with the Clayton County Soil and Water Conservation District and CCWA for review of all submitted plans. Approval from CCWA (for specific elements listed in the previous paragraph) must be received in writing prior to issuing the LDA. Plans that are designed in house by the city staff are sent to the District for review and ultimate approval. The review procedures are summarized below.

For subdivisions, a preliminary plat must be approved by the Office of Planning, Zoning, & Sustainability prior to submitting site construction plans. For commercial developments, a preliminary site plan or concept plan must be approved by the same Office before submitting site construction plans.

Site construction plans are next reviewed by the Department of Transportation and Development, the Office of Planning, Zoning and Sustainability, and the Fire Marshall. If applicable, site plans also are routed through the Environmental Health Division of the Clayton County Board of Health for review and comments. Three sets of plans and one stormwater management report must be submitted directly to CCWA.

The Land Development Section for the Department of Transportation and Development reviews the plans for grading, stream buffer protection, right-of-way improvements, and erosion control features. The Land Development Section

compiles comments received from the Office of Planning, Zoning, and Sustainability and the Fire Marshall.

The applicant is notified when the plan review is complete, and a meeting is scheduled. All plan review notes from the meeting will be mailed to the applicant the next business day. All plan review comments are to be addressed in the first resubmittal by revision to the plans or an explanation of the omission of the requested revision. Any revisions to the plans other than those requested in the plan review and in response to City comments are to be accompanied by a written description and explanation of the changes.

2. Measurable goal(s):

- a. The City will ensure that 100% of the site plans are reviewed in accordance with the review procedures outlined above.
- b. The City will maintain and provide a list of the site plans received and the number of plans reviewed, approved, or denied during the reporting period.
- c. The City will track the number of LDA permits issued during the reporting period.

3. Documentation to be submitted with each Annual Report:

A list of site plans received, the number of plans reviewed, approved or denied, and the number of LDA permits issued during the reporting period will be provided in each annual report.

3. Inspection Program

1. Description of SWMP Component:

The City of Morrow has construction site inspection responsibilities. The City is responsible for periodic (approximately biweekly during active construction, depending on project complexity) inspections to verify that approved erosion and sedimentation (E&S) control plans are followed. Additionally, the City is responsible for verifying that the E&S controls are being implemented according to the approved plans, current stream buffer/ floodplain regulations, and construction site documentation.

CCWA is responsible for conducting inspections related to all post-development stormwater infrastructure, including pipes, catch basins, outfalls, detention ponds, and other facilities, and occur depending on the size and complexity of the project. Generally, inspections occur at least biweekly during active construction and after each qualifying rain event (0.5 inches precipitation or greater within 24 hours). The purpose of CCWA's inspections is to ensure that stormwater infrastructure will provide enough stormwater control off the site and follow design specifications in the post-development stormwater management ordinance in the *Georgia Stormwater Management Manual*. Inspections are tracked in an electronic database and are submitted to GAEPD with each MS4 annual report. A copy of an example inspection form is provided in **Attachment 3.3.4-3**.

2. Measurable goal(s):

- a. The City will implement the inspection program outlined above to ensure that structure and non-structural BMPs at construction sites are properly designed and maintained as specified in the Construction General Permits (CGPs) or the Georgia Stormwater Management Manual for post-development stormwater controls.
- b. The City will conduct at least one inspection at each active construction site during the reporting period.
- c. The City will track the number of active sites and number of inspections conducted during the previous reporting period in each annual report.

3. Documentation to be submitted with each Annual Report:

A list or table of active sites and the number and dates of inspections conducted during the reporting period will be included in each annual report.

4. **Enforcement Procedures**

1. **Description of SWMP Component:**
Administration and enforcement of erosion and sedimentation (E&S) control activities in the City of Morrow are conducted in accordance with the Erosion and Sedimentation Act of 1975, OCGA 12-7-1 et seq., the Executive Reorganization Act of 1972, OCGA 12-2-1 et seq., and the Georgia Administrative Procedure Act, OCGA 50-13-1 et seq., all as amended. If the responsible party engaged in LDA has failed to comply with the approved plan or with permit conditions, has violated the provisions of the applicable Ordinances, or has not installed the stormwater infrastructure according to plan, enforcement actions may be taken including but not limited to verbal warnings, notice of violations, stop work orders, withholding certificate of occupancy, and monetary or civil penalties. Additional details regarding enforcement procedures are described in Section 2 of **Appendix A** (Enforcement Response Plan).
2. **Measurable goal(s):**
The City will implement enforcement procedures for 100% of E&S violations documented at construction sites as described above and in **Appendix A** (Enforcement Response Plan).
3. **Documentation to be submitted with each Annual Report:**
Documentation related to any enforcement actions taken during the reporting period in each annual report, including the number, type (Notice of Violation, Stop Work Order, etc.) and the amount of any assessed penalties.

5. Certification

1. Description of SWMP Component:

All builders, developers, contractors, and other entities, including MS4 staff, who are involved in construction activities subject to the CGPs must follow the certification requirements of the Georgia Erosion and Sedimentation Act and the rules adopted by the GSWCC.

2. Measurable goal(s):

- a. The City will verify that 100% of builders, developers, contractors, and other entities have at least one GSWCC-certified staff member on site during construction activities subject to the CGPs certification requirements of the Georgia Erosion and Sedimentation Act.
- b. The City will ensure that 100% of MS4 staff involved in construction activities subject to the CGPs follow certification requirements of the Georgia Erosion and Sedimentation Act and rules adopted by the GSWCC.

3. Documentation to be submitted with each Annual Report:

The number and type of current E&S certifications will be documented during each reporting period; copies of current E&S licenses will be provided during each reporting period.

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

1. HVPS Facility Inventory

1. Description of SWMP Component:

Highly visible pollutant sources (HVPS) are commercial facilities, sites not regulated by Stormwater Pollution Prevention Plans, that have a high potential for causing stormwater pollution. CCWA is responsible for updating the HVPS inventory for the City of Morrow, including commercial car washes, auto part stores, nurseries, home improvement stores, kennels, veterinarian clinics, etc. CCWA staff reviews each facility within the service area based on site activity to determine if it should be part of the HVPS inventory. CCWA updates the SIC codes and adds facilities to the inventory for locations in the City. The current inventory of the City's HVPS facilities is included in **Attachment 3.3.5-1**. The HVPS inventory will be updated on an ongoing basis as locations are field verified during inspections. Updated inventories will be provided with each annual report.

2. Measurable goal(s):

Maintain and update the HVPS inventory annually and as new facilities are added.

3. Documentation to be submitted with each Annual Report:

CCWA will provide an updated inventory of HVPS facilities in each annual report.

2. Inspection Program

1. Description of SWMP Component:

CCWA is responsible for inspecting the HVPS within the City of Morrow using a comprehensive inspection form (**Attachment 3.3.5-2**). Site inspections consist mainly of visual investigations during which the inspector examines material storage areas, outdoor work areas, and illicit discharges to identify contaminated runoff and possible sources. A visual inspection includes assessing the integrity of the stormwater collection system; checking for leaks, seepage, and overflows from sludge and waste disposal sites; and ensuring that dry chemicals and dust from working areas are not exposed to wind or rain that may transport them into the runoff. If flows are observed during dry periods, the inspection should focus on determining the source of the discharge and the presence of stains, sludge, odors, and other abnormal conditions. Visual inspections are made at all accessible stormwater discharge outlet locations. Runoff may be examined for the presence of floating and suspended materials, oil, grease, discoloration, turbidity, odor, or foam. Storage areas may be inspected for leaks from containers, discolorations on the storage area floor, or other indications of a potential for pollutants to contaminate stormwater runoff.

Visual inspections may indicate the need to modify good housekeeping practices within a facility to reduce the risk of contaminated runoff. The inspector will notify the property owner and schedule a follow-up visit to ensure that corrective actions are adequate. The timeframe of the follow-up visit may vary depending on the severity of the violation. If a facility violation is resulting in an immediate water quality risk or public safety/environmental risk, then corrective actions should take place immediately. If no immediate water quality/public safety/environmental risk is present, then a follow-up inspection should be scheduled within a maximum of 30 days from the initial inspection.

2. Measurable goal(s):

Conduct inspections on 100% of inventoried facilities within the 5-year permit term. As the City has more than five HVPS facilities in their inventory, CCWA will conduct inspections on 5% of the HVPS facilities on the inventory each reporting period, or if inspections are done by geographical area, then one area or sector must be inspected each reporting period so that some inspections are performed during each reporting period. If a low percentage of inspections is conducted during one reporting period, then CCWA will increase the inspection frequency in subsequent reporting periods to ensure that 100% of the HVPS facilities are inspected within the 5-year permit term.

3. Documentation to be submitted with each Annual Report:

CCWA records inspections into a tablet that directly populates Cityworks to log the inspections conducted, corrective actions, and non-compliances. Detailed reports will be generated from Cityworks that will include the total number of HVPS facilities. These reports will be included in each annual report along with any supporting documentation of the inspections.

3. **Enforcement Procedures**

1. **Description of SWMP Component:**

HVPS violations are enforced under the IDDE ordinance (**Attachment 3.3.2-1**) while Section 4.2 of the ERP describes enforcement mechanisms such as verbal warnings, a notice of violation, abatement costs and civil or criminal penalties.

When an HVPS does not comply, the property owner receives a copy of the inspection form (**Attachment 3.3.5-2**) along with recommended corrective actions. CCWA staff will schedule a follow-up visit to ensure that corrective actions are taken. A log of inspections, corrective actions, and non-compliances is maintained and included in the annual reports to GAEPD. Additional details regarding enforcement procedures can be found in **Appendix A** (Enforcement Response Plan).

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

The City/CCWA will implement enforcement procedures if a stormwater violation is noted at an HVPS facility that discharges to the MS4 as described above and in **Appendix A** (Enforcement Response Plan).

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

CCWA records information directly into Cityworks to log the corrective actions, non-compliances, or other enforcements items. Detailed reports will be generated from the Cityworks data. This information will be included in the annual reports to GAEPD.

4. Educational Activities

1. Description of SWMP Component:

CCWA handles educational activities for the HVPS program as part of the inspection process. While onsite, the stormwater technician discusses the importance of stormwater pollution prevention and best practices with the site representative. Brochures are distributed during each inspection to the site representative to provide reference material to help the facility minimize the potential for pollutants entering the MS4 and ultimately waters of the State.

2. Measurable goal(s):

For 100% of the inspections, provide site representatives with educational information related to reducing/minimizing stormwater pollution.

3. Documentation to be submitted with each Annual Report:

Documentation of the educational materials distributed to HVPS facilities will be included along with each annual report.

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.

Community support of watershed management and acceptance of future implementation efforts are critical to the success of any stormwater management program. To promote watershed stewardship and awareness of nonpoint source pollution, CCWA in partnership with Morrow and other local governments has implemented a proactive educational program to engage local elected officials, community groups, business owners, residents and students. CCWA also works in collaboration with the Clean Water Campaign to implement various educational initiatives. The Clean Water Campaign is the regional education and outreach initiative focused on stormwater pollution and prevention for the greater Metropolitan Atlanta area, with the goal of building awareness of each citizen's contribution to nonpoint source pollution. CCWA continually evaluates existing education and involvement activities to ensure they meet the needs of our local communities.

Educational activities are targeted at educating the public on proper disposal of fat, oils, and grease (FOGs) and harmful or unwanted household hazardous waste. Additionally, CCWA focuses its efforts on educating the public on watershed management and wetland preservation. For example, the Newman Wetlands Center (NWC) is the focal point CCWA's community education efforts; it provides free community education about the crucial role wetlands play in the cycle of water. The Learning Center of the NWC features an indoor classroom, exhibit area, and public restrooms. Exhibits focus on the importance of wetlands, CCWA's sustainable water re-use system, local wildlife, and conservation while it also hosts Unfiltered, a wetlands-inspired art exhibit held each February. Public education and involvement activities are tracked in an electronic database and submitted as a part of the annual report.

In addition, educational activities are required by Metro District guidelines and as a component of the TMDL Implementation Plans for 303(d)-listed stream segments. Certain educational and public involvement activities are conducted as a component of the IDDE Program and the HVPS inventory and inspections.

1. Public Education Program - Educational Activity #1: Utility Bill Insert

1. Description of SWMP Component: Utility Bill Insert or other educational material (also known as the quarterly newsletter Water Works)

CCWA sponsors the distribution of materials including bill inserts to educate water customers about stormwater runoff, stormwater pollution prevention, and water supply protection.

2. Measurable goal(s):

The bill insert or other stormwater educational information will be distributed annually to Morrow's CCWA customers.

3. Documentation to be submitted with each Annual Report:

A copy of the bill insert that was distributed will be provided.

2. Public Education Program - Educational Activity #2: CCWA Website

1. Description of SWMP Component: CCWA Website

CCWA manages an active website (www.ccwa.us), which posts educational materials related to stormwater management.

2. Measurable goal(s):

Annually update CCWA's webpage to include current stormwater education content.

3. Documentation to be submitted with each Annual Report:

Screenshot of CCWA webpage, including links to the City website.

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.

CCWA promotes its public involvement program to complement its educational activities. Public involvement activities provide opportunities for citizens to participate directly in the SWMP. These efforts complement structural BMPs, watershed monitoring, and watershed inspections by encouraging Morrow citizens to play a role in protecting local water resources. Certain public involvement activities are conducted as part of the IDDE Program and the public and private facility inspections. Public involvement activities are tracked in an electronic database, documented by Morrow and submitted as a part of each year's MS4 annual report.

1. Public Involvement Program- Activity #1: Rivers Alive

1. Description of SWMP Component: Rivers Alive Stream Cleanup or other community Clean Up Event

CCWA Stormwater Section hosts the City's Annual Rivers Alive Stream Cleanup where volunteers spend an hour cleaning a portion of a river or stream.

2. Measurable goal(s):

Publicize a cleanup event on the City homepage and/or social media platform; help execute at least one Cleanup per year.

3. Documentation to be submitted with each Annual Report:

A screen shot of City's social media page(s) and/or home website showing details for the event will be submitted. Additionally, photos and sign in documentation from the actual event will also be submitted.

2. Public Involvement Program-Activity #2: Household Hazardous Waste Amnesty Day

1. Description of SWMP Component: Household Hazardous Waste Amnesty Day

This free annual event allows Morrow residents to get involved in watershed protection by cleaning up their homes and properties. City residents can drop off old paints, cleaners, batteries, medications and other items so that hazardous waste doesn't end up in landfills, storm drains or sewers.

2. Measurable goal(s):

Annually host a Household Hazardous Waste Amnesty Day. Publicize Amnesty Day on the City homepage and/or social media platforms; help execute Amnesty Day.

3. Documentation to be submitted with each Annual Report:

A screen shot of City's social media page(s) and/or home website showing details for the event will be submitted. Additionally, photos and number of cars that participated in the actual event will also be submitted.

Post-Construction
Part 3.3.11 of the Permit

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

- A. Provide the date of the adoption of the Post-Construction ordinance: December 8, 2020.
- B. Provide the date of the adoption of the Georgia Stormwater Management Manual or an equivalent or more stringent local design manual:
March 2016.
- C. Ensure a copy of the Post-Construction ordinance is attached to the SWMP.

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

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

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

1. Legal Authority

1. Description of SWMP Component (the text must describe the method used to conduct the review of the building codes, ordinances, and other regulations):
Morrow has conducted a review of local ordinances and regulations to ensure the use of GI/LID techniques is not prohibited or impeded. The review was conducted using worksheets developed by the U.S. Environmental Protection Agency Ordinance and the Center for Watershed Protection. Based on the recommendations identified in the worksheet, revisions were made to three ordinances and adopted as noted in **Table 5**.

Table 5. Summary of Completed Ordinance Revisions	
Ordinance	Date Revision Adopted
E&SC	February 13, 2018
GI/LID	April 12, 2016
Floodplain	December 8, 2020

2. Measurable goal(s):
During each reporting period, Morrow will review and revise building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration, if needed. At a minimum, the City will assess regulations governing residential and commercial development, road design, land use, and parking requirements. During this regulatory review, the City will consider the inclusion of incentives for use of GI/LID practices in the ordinance.
3. Documentation to be submitted with each Annual Report:
If the ordinance(s) are revised during the reporting period, Morrow will submit a copy of the adopted ordinance(s) with the annual report. See **Attachment 3.3.11.b-2** for the worksheet used to conduct the code and ordinance evaluation (Center for Watershed Protection's Code and Ordinance Worksheet, EPA's Scorecard).

If revisions to the ordinances and codes are necessary, the City will include a summary of any proposed revisions, including a schedule for completion of the revisions. In subsequent reporting periods, the City will provide a status report on the ordinance revisions and/or any adopted ordinances. In subsequent annual reports following the first year of the permit, the City will reference the first-year evaluation and certify that additional revisions to the codes and ordinances are not necessary.

2. GI/LID Program

1. Description of SWMP Component:

Morrow developed a program describing the GI/LID techniques and practices that it would implement (**Attachment 3.3.11.b-2**). The program includes procedures for evaluating the feasibility and site applicability of different GI/LID techniques and practices, and various structures and practices to be considered. GAEPD stated in a letter to Morrow dated **May 20, 2019** that the City's GI/LID program document was determined to be acceptable.

To promote the use of GI/LID where it is feasible, Morrow will allow the use of all GI/LID structures, better site planning techniques, and better site design techniques that are included in the current GSMM. However, the City will focus on implementing the following types of structures, including:

- Bioretention Basins
- Enhanced Dry Swales
- Enhanced Wet Swales
- Grass Channels
- Infiltration Practices
- Permeable Paver Systems

2. Measurable goal(s):

The City will implement the procedures described in the approved GI/LID document. It will review and revise the program as necessary to reflect changes in regulations, technology, or procedures.

3. Documentation to be submitted with each Annual Report:

If the GI/LID program is revised during the reporting period, Morrow will submit the revised program to GAEPD for review with the annual report.

3. GI/LID Structure Inventory

1. Description of SWMP Component:

CCWA developed an inventory of publicly owned, publicly owned by other entities (e.g., Board of Education and other entities not covered by an MS4 permit and that the City has legal authority to inspect), and privately-owned non-residential GI/LID BMPs as a subset of its existing stormwater structure inventory, which is maintained using Computerized Maintenance Management System (CMMS) software. The inventory was developed from three main sources of information: Clayton County Special Purpose Local Option Sales Tax (SPLOST) program, CCWA-led countywide inventory, and ongoing CCWA plan reviews. The inventory (**Attachment 3.3.11.b-3**) includes a description of the BMP type, owner, and location.

The City tracks the addition of new water quality-related GI/LID structures through the plan review process to ensure the structures are added to the inventory. Plan reviews are conducted by CCWA for compliance with floodplain management/ flood damage protection and post-development stormwater management ordinances. CCWA's review procedures are outlined in the latest draft of CCWA's Stormwater Development Guidelines, including a design approval flow chart and review checklists for preliminary and final plans and plats, as well as operation and maintenance plans. Approval from CCWA for these specific elements must be received in writing prior to the City issuing the LDA permit. CCWA uses the plan review process to track new GI/LID features.

As part of the plan review process, CCWA will work with applicants to determine appropriate features based on the characteristics of a site. CCWA will continue to refer to guidance from the update to the GSMM with regards to feasibility and site applicability of GI/LID practices. CCWA will recommend a site feasibility study to determine the applicability of one of the six GI/LID structures of interest in Morrow. CCWA will provide a table of Site Feasibility of Focused GI/LID Structures to permittees for use in their assessment and will encourage the permittee to consider the setting of the BMP, construction cost, maintenance burden, size limitations, and soil percolation rates in determining how stormwater requirements will best be met. Site feasibility factors are summarized in Exhibit 3 of the GI/LID Program document and discussed in more detail in the GI/LID Inventory section. When a permittee follows this process, CCWA will document the information provided by the permittee that was used to determine site applicability or non-applicability. This information will be attached to the permit file.

2. Measurable goal(s):

Annually update the inventory of GI/LID structures located within the City, and at a minimum, constructed after June 11, 2014. Ensure maintenance agreements are executed for 100% of non-permittee owned structures constructed after the effective date of this permit.

3. Documentation to be submitted with each Annual Report:

The City will provide an updated inventory including the type, ownership, and total number of GI/LID structures in each annual report.

The City will provide a summary list of all maintenance agreements finalized after the effective date of this permit.

4. Inspection and Maintenance Program

1. Description of SWMP Component:

Inspections are completed by trained CCWA staff of all publicly owned and privately-owned non-residential GI/LID structures in the City. During each inspection, conditions are documented on an inspection form provided in the GSMM for each GI/LID structure type. Inspections are prioritized based on structure location, subdivision age, accessibility, or concern. Once the higher-priority inspections are completed, any remaining inspections are conducted by CCWA staff to ensure the required number of inspections occurs on an annual basis.

If an issue is found or a complaint filed for a publicly owned CCWA structure, a work order is initiated in CCWA's CMMS. Emergency situations are addressed immediately while routine inspections are prioritized based upon the assessed conditions recorded in the inventory. Once CCWA can reduce the inspection/maintenance backlog, areas are identified to prioritize inspections based on structure condition, frequency of failure, and age. Morrow is responsible for maintenance associated with GI/LID structures at municipal facilities in its jurisdiction (e.g., administration buildings, fire stations, maintenance facilities, etc.). CCWA is responsible for ensuring that Morrow is conducting needed maintenance. CCWA also maintains GI/LID structures on its properties (e.g. water production and wastewater treatment plants).

Privately-owned non-residential structures are required to be maintained by individual property owners. Private non-residential property owners are required to complete a signed and notarized maintenance agreement with the City. The maintenance agreement is a requirement during the plan review process and will accompany any transfer of property. The maintenance agreement requires the property owner to submit an inspection form once every 5 years to CCWA to verify inspection and maintenance needs and includes remedies for default. If CCWA identifies non-compliance with the maintenance agreement, the first step to bring the site into compliance is for a CCWA staff member to conduct a site visit or phone call to the property owner. Failure to meet the requirements of the Maintenance Agreement constitutes a violation of Title 8, Chapter 6 of the City of Morrow Code of Ordinances and may be punishable under this article. A re-inspection will be conducted to verify the maintenance activities were performed. The City is responsible for ultimately enforcing the terms of the inspection and maintenance agreement, as well as all the provisions for ongoing inspection and maintenance. CCWA documents all maintenance agreements, inspection forms, property owner communication, and if applicable, documentation of any enforcement actions.

2. Measurable goal(s):

- Conduct inspections and/or ensure that inspections are conducted on 100% of the total privately-owned non-residential and publicly owned GI/LID structures within the 5-year permit term, with a minimum of 5% of

structures inspected annually. If there are less than five structures in the inventory, then at least one structure will be inspected each year.

- Conduct maintenance on publicly owned GI/LID structures as needed, contingent upon available staff and financial resources.
- Ensure 100% of publicly owned structures owned by other entities and privately-owned non-residential GI/LID structures are maintained as needed.

3. Documentation to be submitted with each Annual Report:

- Provide the number and/or percentage of the total structures inspected during the reporting period in each annual report. This will include digital copies of the inspection reports.
- Provide the number and/or percentage of the total public structures maintained during the reporting period in each annual report. This will include digital copies of the work orders generated.
- Provide documentation that privately-owned non-residential structures are being maintained in each annual report. This includes copies enforcement actions and communication from the property owner document that required maintenance issues have been addressed.
- Provide a summary list of all maintenance agreements finalized after the effective date of this permit and for structures constructed prior to the effective date of this permit.

Appendix A

Enforcement Response Plan (ERP)

Part 3.3.6 of the Permit

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program.
 - A. Provide the date the ERP was approved by EPD: June 1, 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.

Appendix B

Impaired Waters **Part 3.3.7 of the Permit**

1. Population at the time of permit issuance: ~6,395
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.

Appendix C

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

1. Description of the Employee Training Program:
CCWA offers stormwater-related training for City employees on an annual basis. Currently, CCWA contracts with Stormwater Go, which offers online training focused on various topics, including inspection and maintenance of the MS4, good housekeeping practices at municipal facilities, IDDE, industrial facility inspections, construction site inspections, HVPS inspections, GI/LID, and runoff reduction/quality.
2. Measurable goal(s):
During each reporting period, CCWA/Morrow will offer its employees that are involved in MS4 activities training in stormwater topics as necessary to do their job.
3. Documentation to be submitted with each Annual Report:
CCWA/Morrow will include documentation of training completed, including the topic, date, and attendees, with each annual report.