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Georgia Department of Transportation

Illicit Discharge Detection and Elimination Plan

Revised: April 2015

Illicit Discharge Detection and Elimination Plan

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Georgia Department of Transportation

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1 Introduction

The Georgia Department of Natural Resources Environmental Protection Division (EPD), in compliance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), the Federal Clean Water Act, as amended (33 U.S.C. 1251 et seq.), and the Rules and Regulations promulgated pursuant to each of these acts, has issued the Georgia Department of Transportation (GDOT) a National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit GAR041000 (hereinafter referred to as the MS4 Permit) effective January 3, 2012. Of the several provisions of the MS4 Permit is the requirement to develop, implement, and enforce a program to detect and eliminate illicit discharges to the GDOT MS4.

This document provides the program plan of activities to be undertaken to satisfy the provisions and specific requirements of Part 4 of the Stormwater Management Program, Minimum Control Measure 4.2.3, Illicit Discharge Detection and Elimination (IDDE).

1.1 MS4 Permit Requirements

MS4 Permit Section 4.2.3 specifies that GDOT must develop, implement, and enforce a program to detect and eliminate illicit discharges (as defined in 40 CFR Part 122.26(b) (2)) into its MS4. At a minimum, the program must contain the elements and schedule included in Table 4.2.3:

4.2.3.1 Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls.

4.2.3.2 Prohibit through GDOT policy, non-stormwater discharges to the MS4 and implement appropriate procedures and actions for ensuring the discharges are eliminated to the MEP.

4.2.3.3 Develop and implement a plan to detect and address non-stormwater discharges including illegal dumping to the MS4.

4.2.3.4 Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper disposal of wastes.

4.2.3.5 Address the following categories of non-stormwater discharges or flows (i.e. illicit discharges) only if they are identified as significant contributors of pollutants to GDOT's MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated groundwater 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 habitats and wetlands, de-chlorinated swimming pool discharges, and street wash water (discharges or flows from firefighting activities are excluded from the effective prohibition against non-stormwater and need only be addressed where they are identified as significant sources of pollutants to the waters of the State of Georgia).

1.2 GDOT Policy

GDOT maintains a system of policies and procedures that prohibit non-stormwater discharges to the GDOT MS4. These policies and procedures are found in GDOT's:

- Regulations for Driveway and Encroachment Control (Chapter 2)
- General Facilities Environmental Guidelines (Chapters I, II, and III)
- Manual on Drainage Design for Highways (Chapter 1, Section 1.2)
- Erosion Sediment and Pollution Control Provisions in Construction Contracts (Special Provisions 161 and 167)
- Facilities Stormwater Pollution Prevention Plan (Section 3)
- Stormwater System Inspection and Maintenance Manual (Sections 3 and 4)

This IDDE Plan will be made part of this system to identify and address or eliminate, as appropriate, non-stormwater discharges into GDOT's MS4 to the maximum extent practicable.

2 Outfall Inventory and Inspection

The IDDE program centers on inventory and inspection of Outfalls within GDOT's MS4 area. The MS4 Permit defines an outfall as: "The most downstream point on an MS4 where it discharges to waters of the State. It does not include cross-drain structures or culverts installed under a road that function only to maintain the natural flow of surface waters and drainage. However, a structure that collects or diverts drainage that has contacted road surfaces for discharge into waters of the State is considered an outfall under the MS4 Permit." For the remainder of this document, all outfalls meeting the MS4 Permit definition will be referred to as "Outfalls". GDOT understands that the most downstream point on its MS4 where it discharges directly to another MS4, is not considered an Outfall.

2.1 Outfall Inventory and Mapping

A comprehensive inventory of the Outfalls will be conducted. While during the initial inventory (first permit term), all accessible discharge points or outlets from the MS4 are located and inspected; only those meeting the definition of Outfalls in the MS4 Permit are classified as such in the database and Outfall map.

The field inventory team will be typically comprised of the following members:

Location Technicians: Location technicians will be equipped with sub-meter global positioning system (GPS) receivers and relevant spatial datasets. The data collected will include attributes for Outfall location, identification, condition, and dry-weather screening.

Location technicians will collect GPS positions, photographs, and attributes of the Outfalls located along GDOT roadways and facilities. Upon the assignment of an inventory and inspection area, the location technician will be provided with base data for the inventory area, consisting of at least the following:

- Assigned inventory area
- GDOT routes
- GDOT right-of-way (ROW) boundary
- City and county boundaries

- National Hydrology Dataset (NHD) streams
- Potential Outfall locations

Quality Control Specialist: The quality control specialist reduces, scrubs, and scrutinizes the field data collected by location technicians. Within the post-field reduction process and workflow, the quality control specialist performs a quality control analysis of Outfall location data and other collected attributes to identify missing, inaccurate, or inconsistent data and then works with the location technicians to correct issues. If needed, the location technicians will revisit Outfalls to correct location or attribute data before the Outfall survey and inspection within a geographic area are considered complete and the data is submitted to GDOT.

Field Coordinator: The mobile geographic information system (GIS) field coordinator oversees and verifies that the proper procedures and data collection protocols are being employed on a daily basis. Working in conjunction with the mobile GIS field location technicians and the quality control specialist, the field coordinator checks that the data being collected in the field and received by the quality control specialist is spatially accurate, appropriately attributed, logical, and complete. The field coordinator closely monitors the field progress and location of each location technician to avoid any field data collection redundancies and to ensure that the data collection milestones or schedule is being met.

2.2 Outfall Inspection

As mentioned above, an inspection of all Outfalls will be performed at the time of initial field inventory and mapping (first permit term). Because of the extent of GDOT's MS4 statewide and the need to prioritize resources for MS4 Permit compliance, GDOT will perform inspections once every 10 years for those Outfalls where:

- The drainage area to the Outfall is comprised entirely of GDOT roadways and rights-of-way and no dry-weather discharge was observed during the initial inspection.
- The Outfall is located along a GDOT roadway classified as Rural where there is little to no potential for illicit discharges and no dry-weather discharge was observed in the initial inspection.

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All other Outfalls will be inspected once every 5 years. The inspection frequency (5 year or 10 year) for each Outfall will be noted in the inventory database.

All Outfall inspection information will be collected by the location technician and entered into an electronic form. This form will contain the following information:

- Sub-meter GPS position
- Date and time of inspection
- Inspector's name
- Outfall identification number
- GDOT state route number
- Name or designation of the body of water into which the Outfall flows
- Precipitation within the last 72 hours
- Outfall structure type
- Structure condition (structural integrity)
- Functional condition of structure (ability of structure to perform as designed)
- Outfall designation
- Evidence of dry-weather flow from Outfall
- Flow condition (e.g., base flow, bank full flow, Outfall fully or partially submerged) in the receiving stream, if applicable
- Evidence of an illicit discharge
- Evidence of erosion at Outfall or channel bank
- Suggestions for maintenance

- Digital photographs of the structure and the surrounding area

At the completion of data collection in the assigned inventory and inspection area, the collected data will be reviewed by the location technician for completeness and accuracy before being uploaded to the Internet Data Management System (IDMS) website for review by the quality control specialist. All data will be reviewed and undergo quality control procedures.

2.3 Internet Data Management System and Quality Assurance/Quality Control

An Internet Data Management System (IDMS) website may be created to facilitate and monitor the current status of the Outfall inventory and inspection process. This secure website would only be accessible to approved users and would have accompanying levels of access. The field coordinator would assign inventory and inspection areas through this site to the location technicians. A typical set of status levels will be used to identify the current status of each area. The order of status levels is as follows:

- Not Set – This area has not been assigned.
- Assigned – This area has been assigned to a location technician and will be attributed as such.
- Under Construction- The assigned area has been field verified as being under-construction.
- In Progress – The location technician is currently performing the inventory and inspection process in this area.
- Downloaded – The quality control specialist has downloaded the completed data from the location technician.
- Reduced – The quality control specialist has performed quality control procedures on the data.
- Comments – Any comments the quality control specialist needs the location technician to address regarding the data are ready for the location technician.

- Field Revised – The location technician has addressed all comments from the quality control specialist and has made any edits needed to the data. Any additional edits that are needed will set the status back to "Comments."

- Ready for Delivery – The data has been processed through the quality control procedures again by the quality control specialist and is ready for delivery to GDOT. A notification is sent to GDOT stating that data is ready for review.

- Delivery Received – Data has been downloaded by GDOT and is in the process of review.

- GDOT Comments – Any comments GDOT would like to be addressed by the contractor are uploaded and ready for review by the quality control specialist.

- GDOT Comments Revised – All comments provided by GDOT have been addressed and the revised data is ready for review by GDOT.

- Accepted – Data has been accepted by GDOT with no further comments.

As discussed above, field-collected data uploaded by location technicians or obtained from other MS4s will be downloaded and reviewed by the quality control specialist upon notification that data is available. Any applicable status changes to the inventory and inspection area feature located on the IDMS site will be made.

2.4 Schedule and Progress Reporting

The MS4 Permit requires that the Outfall inventory and mapping be initiated during the second year of the permit and be completed by the end of the first permit cycle in 2016. The inventory will be maintained in the future to include other newly constructed or discovered Outfalls.

Approximately 25 percent of Outfalls, based on an initial estimate, will be mapped each year. This estimate will be refined as the inventory progresses. A proposed schedule is included in Appendix A.

Reporting will be performed in real time. The contractor and GDOT will have access to the IDMS site, and instructions will be provided for checking and changing inventory and inspection status for each area. Instructions will also be provided for generating

reports based on the user's specified criteria. All records will be reported to Georgia EPD in accordance with the Recordkeeping and Annual Reporting section of this plan.

3 Outfall Field Screening

This procedure will aid in the screening and evaluation of regulated Outfalls to determine if an illicit discharge is present. Illicit discharges are any non-stormwater discharges except those exempted under Section 4.2.3.5 of the MS4 Permit and discussed further in Section 4.1.1 of this plan.

3.1 Dry-weather Screening

Detection of discharges during dry-weather is considered indicative of a potential illicit discharge in the absence of groundwater infiltration or stream flow. Dry-weather flow conditions are described as having rainfall of less than 0.1 inches per day over the preceding 72 hours of the field screening procedure. The primary objective of dry-weather screening is to evaluate stormwater Outfalls to determine if an illicit discharge is present. If an Outfall is determined to have a discharge, it will be traced and eliminated if needed as discussed in section 4.

When possible, dry-weather screening should be performed in conjunction with activities associated with inventory or inspections of Outfalls to reduce field costs. Field inspectors should be qualified, equipped, and prepared to conduct the field sampling protocols and procedures described in this section.

3.2 Sampling

Dry-weather screening of Outfalls will encompass field screening observation, field water quality testing and grab sample collection for laboratory testing. All necessary materials and equipment, including maps, a dry-weather Outfall screening form (see Appendix B), sampling bottles, and a field water quality testing kit, will be available during the field survey. The following procedures and protocols will be followed.

Any signs of present or past illicit connections and illegal discharges to the MS4 can often be determined by careful field screening observation. The field screening observation consists of qualitative observations of the Outfall and dry-weather flow. The dry-weather outfall screening form provided in Appendix B will be completed for each Outfall screening. The location technician will complete the form even if there is no flow present. The qualitative observation includes examination of dry-weather flow rate, color, odor, turbidity, oil sheen, presence of floatables, visible deposits/stains, condition of vegetation, and structural damage. The following table summarizes some observable sensory parameters pertaining to pollutants and potential sources.

Table 3.1 Sensory Parameters and Potential Sources

Potential Source	Color	Odor	Turbidity	Floatables
Sanitary sewer, residential and commercial wash water, and septic tank discharges	White or Gray	Sulfide, Ammonia, Sewage, Soap	Slightly Cloudy, Cloudy	Sewage (Toilet Paper), Biofilm/ Bacteria, Sheen, Algae, Foam
Industrial discharge	Could Vary – Depends on the Industrial Process	Sulfides	Could Vary (Clear to Opaque)	Sheen, Foam
Food preparation facilities	Could Vary	Soap, Rancid/ Sour, Grease	Could Vary (Slight Cloudy to Opaque)	Grease, Food
Facilities associated with vehicle and equipment maintenance	Gray, Green, Red, or Black	Petroleum/Gas, Soap	Could Vary (Slight Cloudy to Opaque)	Oil Sheen, Foam
Construction site or unstabilized soil (eroded soil and clay)	Brown, Orange/ Rust	---	Muddy	---

In addition to the sensory indicators for pollution listed in the table, Outfalls will be examined for any residues, stains, or deposits. These stains may occur in the form of oily/greasy patches, colored deposits, or a silt or powder layer. Excess vegetation growth or decaying/dead plants in the vicinity of the stormwater Outfall may indicate excess nutrients or toxic waste.

3.3 Water Quality Testing

All identified dry-weather discharges will be tested using commercially available field water quality test meters or analyzed using EPA-approved laboratory analysis methods. Field data collection activities will be properly conducted by gathering required information about the Outfall as identified in the dry-weather screening form. Each inspection and/or incident will be documented with photographs and made a part of the inspection report. If flow is present, a grab sample will be taken and tested either in the field or laboratory for the following indicator parameters:

- pH
- Conductivity
- Fluoride

- Surfactants (detergents)

Field instruments will be calibrated prior to use, and the viability of test kit reagents will be checked regularly. The standard water quality sampling protocol and testing procedure described below will be followed during the outfall screening. Field inspectors will be trained to conduct water quality sampling. Equipment will be maintained to the manufacturer's standard for reliability of field results. All equipment must be cleaned and serviced at the end of a field shift.

Results from dry-weather discharge testing beyond the levels in Table 3.2 may indicate the presence of an illicit discharge. Further lab analysis of the discharge may be required to test for additional parameters, such as fecal coliform bacteria, based on the suspected source. Beyond Table 3.1, references, such as the Center for Watershed Protection's Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments (October 2004) and Georgia EPD's Phase I MS4 Medium and Large Storm Water Management Program Guidance (July 2014) will be consulted to identify potential sources based on the field observation and initial test results.

Table 3.2 Indicator Parameter Levels

Indicator Parameter	Level
pH	< 6.5 or > 7.5
Conductivity	>300 µmho/cm
Fluoride	>0.6 mg/L
Surfactants	>0.25 mg/L

Dry-weather screening typically involves collection of grab samples. Protocols for grab sampling, sample containers, hold time, labeling and handling of the sample, including chain-of-custody procedures, field QA/QC will be followed as prescribed in the Appendix B.

Tracing will be undertaken to locate the source of the illicit discharge (see section 4).

3.4 Records and Reporting

GDOT will maintain records of all dry-weather Outfall inspections. Appendix C provides a tracking form that will be used for reporting the dry-weather Outfall inspections to EPD.

All field screening inspections will be documented on the Dry-weather Outfall Screening Form included in Appendix B. Potential illicit discharges will also be documented using this form. All completed field screening inspections and subsequent follow-up actions will be retained and reported to EPD in accordance with the Recordkeeping and Annual Reporting section of this plan.

4 Tracing and Elimination

GDOT will trace all outfalls with flow present. Upon discovering a discharge through field screening, GDOT will initiate within 48 hours (two business days) tracing of the discharge upstream to locate the source and eliminate the discharge if needed. Adjacent MS4s will be notified within 24 hours if an identified discharge will impact their MS4. Tracing and elimination procedures will include source identification, corrective actions, recordkeeping, and reporting for each potential illicit discharge.

4.1 Source Identification

GDOT will employ the field screening protocols for sampling, discharge classification, and source classification to identify, trace, and pursue appropriate actions. Tracing will be carried out to the source of the discharge or to the limits of the GDOT ROW. As required, further field analysis may be conducted to compare indicator parameter readings found at the Outfall to assist in identifying the source of the pollutant. If the discharge source is found, photographs, video, and other proper evidence will be collected to document the discharge. Further field analysis may also include confirmation of similar readings and concentrations of indicator parameters tested at the Outfall. The Outfall may be inspected periodically to monitor compliance.

If the illicit discharge originates outside the GDOT ROW, the adjacent jurisdiction or MS4 will be identified in accordance with the Notification or Complaints section of this document. Should no action be taken by the adjacent jurisdiction or MS4 within 48 hours (two business days), or if the discharge is considered to be reportable, GDOT will notify the EPD Emergency Operation Center and the adjacent jurisdiction.

Regardless of the source and whether the illicit discharge originates within the GDOT ROW or from an upstream MS4, GDOT will notify the adjacent (downstream) MS4 that will be impacted by the discharge within 24 hours of the discovery of an illicit discharge or spill. The notification will be made to the MS4 Stormwater Contact (or equivalent) and a record will be maintained of the time/day of the call and the person and their title to which the notification was made. In the event the MS4 Stormwater Contact cannot be determined, the office of the highest elected official (e.g., mayor or chair of the Board of Commissioners) will instead be notified.

4.1.1 Permitted Non-Stormwater Discharge Categories

In accordance with Section 4.2.3.5 of the MS4 Permit, the following discharges are to be addressed only if they are identified as significant contributors of pollutants: 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 habitats and wetlands, dechlorinated swimming pool discharges, and street wash water (discharges or flows from firefighting activities are excluded from the effective prohibition against non-stormwater and need only be addressed where they are identified as significant sources of pollutants to the waters of the State of Georgia). All discharges discovered during dry-weather screening of Outfalls will be handled in accordance with the procedure outlined in the previous section.

4.1.2 Source Classification

The type of pollutant and the associated concentration can often be useful for tracking an illicit discharge to the source. For example, lower dissolved oxygen or higher fecal coliform indicates biological activity due to an increase in organic loading from sources including human or animal waste. Higher levels of surfactants (detergents) and fluorides may be attributed to laundry or household wastewater discharge. Elevated levels of pH or conductivity may be an indication of pollution from industrial or commercial activities. Furthermore, turbid waters are often from erosion and sediment transport from construction and other land disturbing activities. Because there is overlap between the types of pollutants that could potentially be generated from a particular source, it is often useful to analyze a water sample using a combination of pollutant parameters to help classify the potential sources.

4.2 Corrective Actions

If the illicit discharge is found to originate from a GDOT facility or ROW, appropriate corrective measures will be initiated within 24-hours (one business day) of confirmation of the source and eliminated typically within 30-days. However, some circumstances may require additional time to resolve. If the discharge is found to originate from outside the GDOT MS4 (upstream), the concerned authorities will be informed, as described above. GDOT will follow up until the illicit discharge is eliminated. If the responsible party does not eliminate the illicit discharge, GDOT will notify EPD.

4.3 Records and Reporting

All records of tracing and elimination, including the dry-weather screening form and records of follow-up actions, will be maintained. Each Annual Report will summarize the illicit discharges and corrective action taken by GDOT. All records will be reported to EPD in accordance with the Recordkeeping and Annual Reporting section of this plan.

5 Spill Response

This section covers response and cleanup of spills to the MS4, when GDOT becomes aware of such spills. Reporting of spills/releases will be in accordance with *Georgia Oil or Hazardous Material Spills and Releases Reporting* requirements (Appendix E).

5.1 Reportable Spills

Large spills within the GDOT ROW (interstates, U.S. routes, and state routes) are primarily handled by the local fire department or other emergency responders through 911 (first responder). Georgia State Patrol (GSP), Georgia EPD, and GDOT staff may be present at the scene as well. Cleanup of these spills is typically performed by certified private vendors contracted through insurance carriers of commercial haulers or first responders. GDOT may also engage private vendors under emergency situations, if the responsible party is no longer present at the scene or unable to handle the matter, or the spill/release is a result of GDOT actions. The first responder or the hauler is responsible for reporting the spill/release to EPD Emergency Operations Center. If the responsible party or first responder is not present at the scene, or the spill/release is a result of GDOT actions and the spill/release is considered to be reportable, GDOT staff at the scene will contact the respective GDOT district environmental compliance officer for further action. Telephone numbers for GDOT, GSP, and the Georgia Emergency Operations Center are provided in Appendix E.

Reportable spills will be reported to the Georgia EPD Emergency Operations Center (800.241.4113) within 15 minutes of having knowledge of such spills/releases. Records of the incident will be maintained in accordance with section 5.4 Records and Reporting.

5.2 Other Spills (Non-Reportable)

Other spills include instances frequently encountered by GDOT field personnel, such as a leaking or ruptured vehicle fuel tank, radiator or hose, fuel line, oil pan, or crankcase often found at the scene of an accident; a leaking or ruptured sewerage storage system for recreation vehicles, buses, or vacuum trucks; spilled cement or asphalt; or spilled paint during roadway striping.

Cleanup of these spills is considered routine and does not require reporting under the Oil or Hazardous Material Spill or Release Act, or compliance with the MS4 program.

5.3 Records and Reporting

GDOT will maintain documentation of known reportable spills that reach the MS4 and include that in the MS4 Annual Report submitted to EPD. This record will include the date, time, and weather conditions; nature of spill (substance, approximate amount); responsible party's name and contact information; first responder agencies involved in the response and cleanup; amount of discharge of spill material to the drainage or surface water conveyance system; and final resolution of the matter. All spill records will be reported to EPD in accordance with the Recordkeeping and Annual Reporting section of this plan.

6 Illegal Dumping

This section covers illegal dumping of materials or substances along GDOT's linear facilities that are not determined to be hazardous or subject to the procedures defined in the Spill Response section of this plan. Handling of illegal dumping is also addressed in the Facilities Stormwater Pollution Prevention Plan (F-SWPPP) for dumping on GDOT's facilities.

6.1 Solids

Illegally dumped solids include a wide range of materials and objects, consisting of primarily trash and debris. Debris is found through call-in reports from public safety officials and GDOT daily patrols. GDOT has an established program for trash management, which includes periodic collection along GDOT ROW and trash receptacles at rest areas and other public access areas. Removal of construction debris, furniture, tire debris, automotive parts, and other material that may be granular, particulate, or powdery is subject to GDOT safety procedures in accordance with *Georgia Open Roads Policy Version 6.0.*

6.2 Liquids

Illegally dumped liquid materials are subject to the procedures and protocols defined in the Spill Response section of this plan.

6.3 Corrective Actions

GDOT will investigate the site of the illegal dumping to attempt to ascertain the source of the material and the person(s) responsible for the illegal dumping. GDOT will take appropriate steps to resolve issues regarding the illegal dumping.

GDOT will remove and properly dispose of the illegally dumped material in accordance with applicable maintenance policies and procedure outlined in GDOT's *Foreman's Manual* and the *General Facility Environmental Guidelines (Activities 540 and 545)*.

6.4 Records and Reporting

Records of illegal dumping incidents will be maintained in accordance with existing GDOT policy. All applicable records will be reported to EPD in accordance with the Recordkeeping and Annual Reporting section of this plan.

7 Notification or Complaints

Notifications concerning an illicit discharge from an interstate, U.S. route, state route, or GDOT facility may be made via the Stormwater Pollution Prevention website (http://www.dot.ga.gov/stormwater), via email at stormwater@dot.ga.gov, or by contacting the Office of Design Policy and Support, Roadway and Hydraulics Group at 404.631.1630. The public may enter the notification or feedback directly via the website. If the website is unavailable, or the person simply wishes to convey their notification by some other means, a GDOT employee will file the notification on their behalf. A GDOT employee that observes an illicit discharge will also file a notification using the same website, when available. The notification will then be logged and processed using GDOT's REMEDY software. Upon the notification being logged, an automatically generated email notification will be forwarded to the designated GDOT personnel for follow-up actions. The email will include a tracking number to access the complaint.

Assigned personnel will review the details of the notification within 24 hours (a business day) and respond, as necessary. The complaint status will be updated as it is handled. Status options include the following:

- New – New notifications that have not been reviewed.
- Assigned – The notification/complaint has been reviewed and assigned to GDOT personnel for follow-up actions.
- Work in Progress – GDOT personnel has contacted the person who submitted the notification/complaint for additional information and/or they have been to the location of the reported illicit discharge.
- Resolved – The complaint has been addressed.
- Closed – If the status remains resolved for more than 10 days, it automatically updates to Closed. Notifications that are closed will be archived.
- In the event the illicit discharge is determined to be reportable, the Georgia EPD Emergency Operations Center will be notified within 15 minutes of the determination that the spill is reportable. Within 24 hours (a business day) of this determination, all reasonable attempts will be made to trace and eliminate the source of the discharge within the GDOT ROW. If the discharge is determined to

enter the GDOT ROW from another jurisdiction or MS4, contact will be made with that jurisdiction or MS4 regarding the illicit discharge.

7.1 Discharge Classification

Notifications will be classified by the type of discharge observed: Polluted Water, Erosion/Sedimentation/Dirt Run-Off, Spill, Illegal Dumping, or Other. GDOT personnel dispatched to the site will follow procedures and protocols defined in this plan.

7.2 Resolution

The first notification to GDOT occurs when the entry is created in the REMEDY system. GDOT personnel will read the notification and make a determination as to how to respond within 24 hours (a business day). GDOT personnel assigned to investigate will respond, as deemed appropriate, based on the nature of the notification. A report will be filed in the REMEDY software upon resolution of the notification. In the event the illicit discharge is determined to be reportable, the Georgia EPD Emergency Operations Center will be notified within 15 minutes of the determination that the spill is reportable. Within 24 hours (a business day) of this determination, all reasonable attempts will be made to trace and eliminate the source of the discharge within the GDOT ROW. If the discharge is determined to enter the GDOT ROW from another jurisdiction or MS4, contact will be made with that jurisdiction or MS4 regarding the illicit discharge.

7.3 Records and Reporting

A summary of notifications, initial report date, record of resolution, and date resolved will be maintained.

8 Timely Dissemination of Information to Central Office

GDOT Central Office will oversee dry-weather screening of Outfalls. Should any illicit discharge be found, the Central Office will communicate with the District Environmental Compliance Engineer to investigate and eliminate the source of illicit discharge.

Unless otherwise noted in this plan for incidents of illicit discharge or illegal dumping that require notification to EPD, should illicit discharge be observed by GDOT District Staff, notifications of such incidents will be sent to the MS4 Program Manager, Office of Design Policy and Support, within five business days. The field staff will report the incident to the supervisor, who in turn will report it to the District Environmental Compliance Engineer. Upon review of the information the District Environmental Compliance Engineer will forward it to the MS4 Program Manager. The email address under 'Contacts' on GDOT's Stormwater Pollution Prevention webpage may be used for this purpose.

9 Education and Training

The GDOT education and training program for IDDE will be a part of the overall comprehensive education and public outreach program specified under Sections 4.2.1 and 4.2.2 of the MS4 Permit.

10 Recordkeeping and Annual Reporting

GDOT will maintain all records referenced in this plan in accordance with standard GDOT policies or a minimum of three years beyond permit expiration in accordance with Section 5.3 of the MS4 Permit, whichever is later.

Records maintained at the District Office, Area Office, or other locations outside the Central Office will be forwarded to the MS4 Permit Program Manager, Office of Design Policy and Support, at the Central Office on a monthly basis. The Central Office will review and compile the reports and submit copies of the appropriate documents to EPD with the MS4 Annual Report, unless more immediate notification is required as otherwise noted in this plan.

Appendix A

Proposed Schedule for Outfalls Inventory

Table A-1: Proposed Schedule for MS4 Outfalls Inventory[1]

Permit Year	Inventory Area (GDOT District)	Estimated MS4 Outfalls by GDOT District	Estimated No. of MS4 Outfalls for Inventory	Percentage of Total Estimated Outfalls by GDOT District	Percentage of MS4 Outfalls Statewide
2 (2013)	District 1	1,709	1,709	100.0%	
	District 7	1,761	1,051	59.7%	
	Sub-Total		2,760		25.0%
3 (2014)	District 7	1,761	710	40.3%	
	District 6	3,123	2,050	65.6%	
	Sub-Total		2,760		25.0%
4 (2015)	District 6	3,123	1,073	34.4%	
	District 3	2,267	1,687	74.4%	
	Sub-Total		2,760		25.0%
5 (2016)	District 3	2,267	580	25.6%	
	District 2	800	800	100.0%	
	District 4	553	553	100.0%	
	District 5	825	825	100.0%	
	Sub-Total		2,758		25.0%
Total			11,038		

[1] Inventory area for each permit year may change based on staff availability and budget.

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Appendix B

Dry-weather Screening Form

Dry-weather Outfall Screening Form

SECTION 1: GENERAL INFORMATION

Date:	Time:	Precipitation < 0.1' in last 72 hrs?:☐ Yes ☐ No	
Name of Field Inspector:			District:
City:	County:	Road:	
Upstream Landuse: ☐ Commercial ☐ Industrial ☐ Residential ☐ Other			
Location Description:			

SECTION 2: OUTFALL DESCRIPTION

Outfall ID:	Photo Number (s):	Lat:	Long:
Outfall Type: ☐ Closed Pipe ☐ Open Channel Remarks			
Vegetation Around Outfall: ☐ None ☐ Dead ☐ Over flourishing			
Deposits/Stains/Residue:	☐ None ☐ Sediment ☐ White residue ☐ Oily ☐ Paint ☐ Flow Line ☐ Other		
Receiving Waterbody:		Watershed Name:	

SECTION 3: FIELD SCREENING OBSERVATION

Flow description: ☐ Trickle ☐ Moderate ☐ Over half-full ☐ No Flow	
Odor	☐ None ☐ Sewage ☐ Rancid/sour ☐ Sulfide (rotten egg) ☐ Petroleum/gas ☐ Ammonia ☐ Chlorine ☐ Chemicals ☐ Other Relative Severity: ☐ Faint ☐Strong ☐Very Strong
Color	☐ Clear ☐ White ☐ Gray ☐ Black ☐ Orange/Rust ☐ Red ☐ Yellow ☐ Green ☐ Brown ☐ Other Relative Intensity: ☐ Faint ☐ Dark ☐ Very Dark
Turbidity	☐Clear ☐Cloudy ☐Muddy ☐Milky ☐Other Relative Intensity: ☐Slight ☐Moderate ☐High
Floatables	☐ None ☐ Sewage, toilet paper, etc. ☐ Suds ☐ Petroleum (oil sheen) ☐ Scum ☐ Foam ☐ Garbage ☐ Other Relative Severity (Please describe the item in brackets): ☐ Few/Slight (,) ☐ Moderate (,) ☐ Heavy (,)

SECTION 4: FIELD WATER QUALITY ANALYSIS

PARAMETER	RESULT	PARAMETER	RESULT
pH		Conductivity	
Fluoride		Surfactants	

SECTION 5: WATER QUALITY SAMPLING FOR LABORATORY TESTING

Sample IDs:	Duplicate Samples Taken: ☐ Yes ☐ No
Parameters to be analyzed: ☐ Fecal Coliform Other:	
Additional Comments:	

SECTION 6: RESULT OF DRY-WEATHER SCREENING INVESTIGATION

Potential Illicit Discharge: ☐ Unlikely ☐ Possible ☐ Probable ☐ Obvious
Possible source of discharge:

SECTION 7: FOLLOW-UP ACTIONS (TO BE USED DURING TRACING AND ELIMINATION PROCEDURE)

By Whom:	Dates:
Nature of action:	

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Appendix C

Outfall Inspection Reporting Form

Table C-1: Outfall Inspection Reporting Form

Date	Outfall ID Number	Flow? (Y/N)	Odor	Color	Tuburbidity	Floatables	Temp. (deg C)	pH	Conductivity (μmhos/cm)	Fluorides (mg/L)	Surfactants (mg/L)	Fecal Coliform (MPN/100 ml)	Follow-up Actions

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Appendix D

Georgia Oil or Hazardous Material Spills and Release Reporting

Georgia Oil or Hazardous Material Spills and Releases Reporting

Every spill must be cleaned up, whether or not it is reportable. [OCGA §12-8-2]
It is the duty to immediately take all reasonable and necessary steps to prevent injury to property and downstream users of waters of the State of Georgia. [Chapter 391-3-6-.05(3)]

OCGA §12-14-1 [Law] Oil or Hazardous Material Spill or Release Act

Who Reports:

Anyone who **owns** or **has control** of a spilled/released substance

What to Report:

Oil*
Unknown amount
OR
Amount that creates a **significant sheen on top of state waters** or creates an **emulsion or sludge under state waters****

What to Report:

Hazardous Materials***
Unknown amount spilled/released **into environment**
OR
Amount **exceeding the reportable quantity** (RQ)

When to Report:

Immediately upon having knowledge of a spill/release. EPA has determined immediately to mean **within 15 minutes**

Whom to Report to:

Georgia EPD Emergency Operations Center
800-241-4113

391-3-6-.05(3) [Rule] Water Quality Control Emergency Actions

Who Reports:

The **person in charge** of a spilled/released substance

What to Report:

Any **toxic or taste and color producing substance, or any other substance which would endanger downstream users** of the waters of the State or would damage property, is **discharged** into such waters, or is so **placed that it might flow, be washed, or fall into** them

When to Report:

At the time **forthwith (15 minutes)**

Whom to Report to:

Georgia EPD Emergency Operations Center
800-241-4113
or local district/branch office

391-3-15-.08 [Rule] Underground Storage Tank Petroleum Spills

Who Reports:

Owner or operator of UST system

What to Report:

Spill or overfill of petroleum that exceeds **25 gallons**
OR
Amount that creates a **significant sheen on state waters**

When to Report:

Within **24 hours**

Whom to Report to:

UST Program **404-362-2687** during business hours or Georgia EPD Emergency Operations Center **800-241-4113** after hours

* OIL: includes but is not limited to gasoline, crude oil, fuel oil, diesel oil, lubricating oil, sludge, oil refuse, oil mixed with wastes, and any other petroleum related product.
** EXEMPTION: Accidental discharges of oil made by an individual during maintenance of that individual's personal vehicle or farm machinery shall be exempt.
*** EXEMPTION: A hazardous substance does not include: natural gas, natural gas liquids, liquefied natural gas, synthetic gas usable for fuel, or mixtures of natural gas and such synthetic gas.

This document is intended to provide a brief informational summary of responsibility for spill reporting in accordance with state regulations. It is not intended to be complete legal guidance on the issue. [Revised: February 2010]

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Appendix E

Telephone Numbers

Telephone Numbers

GDOT Traffic Management Center (TMC)……511

GDOT MS4 Program……404-631-1630

GDOT Environmental Compliance……404-463-1049

Georgia State Patrol……*GSP (*477)

Local Emergency Responders……911

Georgia EPD Emergency Operations Center……800-241-4113