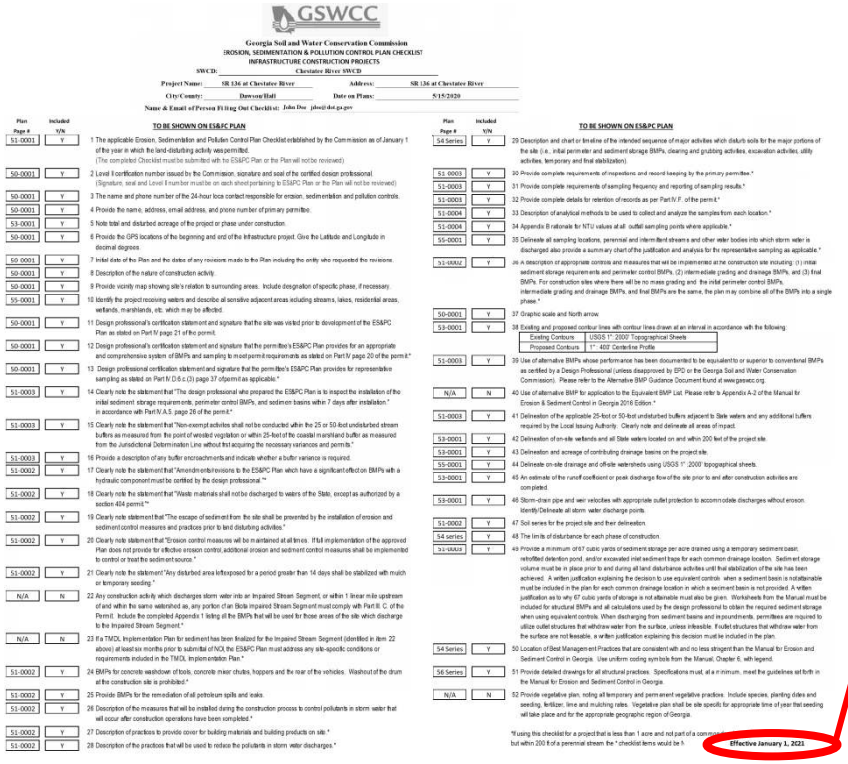
Georgia Department of Transportation

GADNR Environmental Protection Division

ES&PC Plan Review Comment Analysis – January 2019 thru May 2021

GPTQ Engineering Services Subcommittee



GSWCC

Georgia Soil and Water Conservation Commission

EROSION, SEDIMENTATION & POLLUTION CONTROL PLAN CHECKLIST

INFRASTRUCTURE CONSTRUCTION PROJECTS

SWCD: Chestatee River SWCD

Project Name: SR 136 at Chestatee River Address: SR 136 at Chestatee River

City/County: Dawson/Hall Date on Plans: 5/15/2020

Name & Email of Person Filling Out Checklist: John Doe jdoe@dot.ga.gov

Plan Page #	Included Y/N	TO BE SHOWN ON ES&PC PLAN
51-0001	Y	1 The applicable Erosion, Sedimentation and Pollution Control Plan Checklist established by the Commission as of January 1 of the year in which the land-disturbing activity was permitted. (The completed Checklist must be submitted with the ES&PC Plan or the Plan will not be reviewed)
50-0001	Y	2 Level II certification number issued by the Commission, signature and seal of the certified design professional. (Signature, seal and Level II number must be on each sheet pertaining to ES&PC Plan or the Plan will not be reviewed)
50-0001	Y	3 The name and phone number of the 24-hour local contact responsible for erosion, sedimentation and pollution controls.
50-0001	Y	4 Provide the name, address, email address, and phone number of primary permittee.
53-0001	Y	5 Note total and disturbed acreage of the project or phase under construction.
50-0001	Y	6 Provide the GPS locations of the beginning and end of the infrastructure project. Give the Latitude and Longitude in decimal degrees
50-0001	Y	7 Initial date of the Plan and the dates of any revisions made to the Plan including the entity who requested the revisions.
50-0001	Y	8 Description of the nature of construction activity.
50-0001	Y	9 Provide vicinity map showing site's relation to surrounding areas. Include designation of specific phase, if necessary.
55-0001	Y	10 Identify the project receiving waters and describe all sensitive adjacent areas including streams, lakes, residential areas, wetlands, marshlands, etc. which may be affected.
50-0001	Y	11 Design professional's certification statement and signature that the site was visited prior to development of the ES&PC Plan as stated on Part IV page 21 of the permit.
50-0001	Y	12 Design professional's certification statement and signature that the permittee's ES&PC Plan provides for an appropriate and comprehensive system of BMPs and sampling to meet permit requirements as stated on Part IV page 20 of the permit.*
50-0001	Y	13 Design professional certification statement and signature that the permittee's ES&PC Plan provides for representative sampling as stated on Part IV.D.6.c.(3) page 37 of permit as applicable.*
51-0003	Y	14 Clearly note the statement that "The design professional who prepared the ES&PC Plan is to inspect the installation of the initial sediment storage requirements, perimeter control BMPs, and sediment basins within 7 days after installation." in accordance with Part IV.A.5. page 26 of the permit.*
51-0003	Y	15 Clearly note the statement that "Non-exempt activities shall not be conducted within the 25 or 50-foot undisturbed stream buffers as measured from the point of wrested vegetation or within 25-feet of the coastal marshland buffer as measured from the Jurisdictional Determination Line without first acquiring the necessary variances and permits."
51-0003	Y	16 Provide a description of any buffer encroachments and indicate whether a buffer variance is required.
51-0002	Y	17 Clearly note the statement that "Amendments/revisions to the ES&PC Plan which have a significant effect on BMPs with a hydraulic component must be certified by the design professional."*
51-0002	Y	18 Clearly note the statement that "Waste materials shall not be discharged to waters of the State, except as authorized by a section 404 permit."*
51-0002	Y	19 Clearly note statement that "The escape of sediment from the site shall be prevented by the installation of erosion and sediment control measures and practices prior to land disturbing activities."
51-0002	Y	20 Clearly note statement that "Erosion control measures will be maintained at all times. If full implementation of the approved Plan does not provide for effective erosion control, additional erosion and sediment control measures shall be implemented to control or treat the sediment source."
51-0002	Y	21 Clearly note the statement "Any disturbed area left exposed for a period greater than 14 days shall be stabilized with mulch or temporary seeding."
N/A	N	22 Any construction activity which discharges storm water into an Impaired Stream Segment, or within 1 linear mile upstream of and within the same watershed as, any portion of an 8digit Impaired Stream Segment must comply with Part III. C. of the Permit. Include the completed Appendix 1 listing all the BMPs that will be used for those areas of the site which discharge to the Impaired Stream Segment.*
N/A	N	23 If a TMDL Implementation Plan for sediment has been finalized for the Impaired Stream Segment (identified in item 22 above) at least six months prior to submittal of NOI, the ES&PC Plan must address any site-specific conditions or requirements included in the TMDL implementation Plan.*
51-0002	Y	24 BMPs for concrete washdown of tools, concrete mixer chutes, hoppers and the rear of the vehicles. Washout of the drum at the construction site is prohibited.*
51-0002	Y	25 Provide BMPs for the remediation of all petroleum spills and leaks.
51-0002	Y	26 Description of the measures that will be installed during the construction process to control pollutants in storm water that will occur after construction operations have been completed.*
51-0002	Y	27 Description of practices to provide cover for building materials and building products on site.*
51-0002	Y	28 Description of the practices that will be used to reduce the pollutants in storm water discharges.*

Plan Page #	Included Y/N	TO BE SHOWN ON ES&PC PLAN
54 Series	Y	29 Description and chart or timeline of the intended sequence of major activities which disturb soils for the major portions of the site (i.e., initial perimeter and sediment storage BMPs, clearing and grubbing activities, excavation activities, utility activities, temporary and final stabilization)
51-0003	Y	30 Provide complete requirements of inspections and record keeping by the primary permittee.*
51-0003	Y	31 Provide complete requirements of sampling frequency and reporting of sampling results.*
51-0003	Y	32 Provide complete details for retention of records as per Part IV.F. of the permit.*
51-0004	Y	33 Description of analytical methods to be used to collect and analyze the samples from each location.*
51-0004	Y	34 Appendix B rationale for NTU values at all outfall sampling points where applicable.*
55-0001	Y	35 Delineate all sampling locations, perennial and intermittent streams and other water bodies into which storm water is discharged also provide a summary chart of the justification and analysis for the representative sampling as applicable.*
51-0002	Y	36 A description of appropriate controls and measures that will be implemented at the construction site including: (1) initial sediment storage requirements and perimeter control BMPs, (2) intermediate grading and drainage BMPs, and (3) final BMPs. For construction sites where there will be no mass grading and the initial perimeter control BMPs, intermediate grading and drainage BMPs, and final BMPs are the same, the plan may combine all of the BMPs into a single phase.*
50-0001	Y	37 Graphic scale and North arrow.
53-0001	Y	38 Existing and proposed contour lines with contour lines drawn at an interval in accordance with the following: Existing Contours: USGS 1": 2000' Topographical Sheets; Proposed Contours: 1": 400' Centerline Profile
51-0003	Y	39 Use of alternative BMPs whose performance has been documented to be equivalent to or superior to conventional BMPs as certified by a Design Professional (unless disapproved by EPD or the Georgia Soil and Water Conservation Commission). Please refer to the Alternative BMP Guidance Document found at www.gaswcc.org.
N/A	N	40 Use of alternative BMP for application to the Equivalent BMP List. Please refer to Appendix A-2 of the Manual for Erosion & Sediment Control in Georgia 2016 Edition.*
51-0003	Y	41 Delineation of the applicable 25-foot or 50-foot undisturbed buffers adjacent to State waters and any additional buffers required by the Local Issuing Authority. Clearly note and delineate all areas of impact.
53-0001	Y	42 Delineation of on-site wetlands and all State waters located on and within 200 feet of the project site.
53-0001	Y	43 Delineation and acreage of contributing drainage basins on the project site.
55-0001	Y	44 Delineate on-site drainage and off-site watersheds using USGS 1": 2000' topographical sheets.
53-0001	Y	45 An estimate of the runoff coefficient or peak discharge flow of the site prior to and after construction activities are completed.
53-0001	Y	46 Storm-drain pipe and weir velocities with appropriate outlet protection to accommodate discharges without erosion. Identify/Delineate all storm water discharge points.
51-0002	Y	47 Soil series for the project site and their delineation.
54 series	Y	48 The limits of disturbance for each phase of construction.
51-0002	Y	49 Provide a minimum of 67 cubic yards of sediment storage per acre drained using a temporary sediment basin, retrofitted detention pond, and/or excavated inlet sediment traps for each common drainage location. Sediment storage volume must be in place prior to and during all land disturbance activities until final stabilization of the site has been achieved. A written justification explaining the decision to use equivalent controls when a sediment basin is not attainable must be included in the plan for each common drainage location in which a sediment basin is not provided. A written justification as to why 67 cubic yards of storage is not attainable must also be given. Worksheets from the Manual must be included for structural BMPs and all calculations used by the design professional to obtain the required sediment storage when using equivalent controls. When discharging from sediment basins and impoundments, permittees are required to utilize outlet structures that withdraw water from the surface, unless infeasible. Inviable structures that withdraw water from the surface are not feasible, a written justification explaining this decision must be included in the plan.
54 Series	Y	50 Location of Best Management Practices that are consistent with and no less stringent than the Manual for Erosion and Sediment Control in Georgia. Use uniform coding symbols from the Manual, Chapter 6, with legend.
56 Series	Y	51 Provide detailed drawings for all structural practices. Specifications must, at a minimum, meet the guidelines set forth in the Manual for Erosion and Sediment Control in Georgia.
N/A	N	52 Provide vegetative plan, noting all temporary and permanent vegetative practices. Include species, planting dates and seeding, fertilizer, lime and mulching rates. Vegetative plan shall be site specific for appropriate time of year that seeding will take place and for the appropriate geographic region of Georgia.

*If using this checklist for a project that is less than 1 acre and not part of a common [illegible] but within 200 ft of a perennial stream the * checklist items would be h

Effective January 1, 2021

Erik Rohde
GDOT Engineering Services

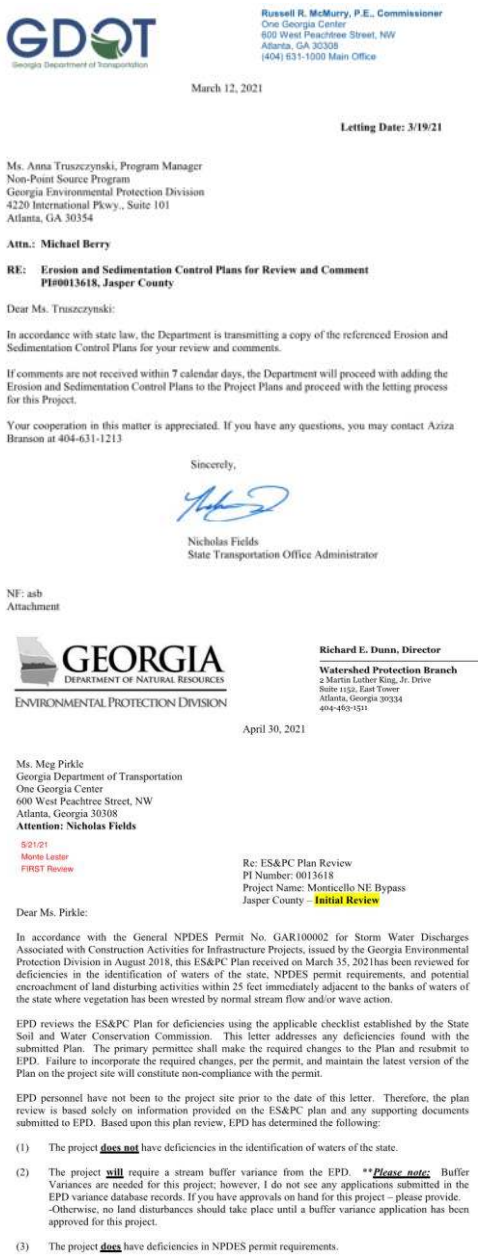
Effective January 1, 2021

27.3% of First Review Plans Did Not Have the Current Checklist (45 of 166 Projects)

Data We've Collected Is From

GDOT ES&PC Plan Submittal Letters to EPD
346 Submittals for 152 Projects

EPD ES&PC Plan Review Deficiency Letters to GDOT
365 Deficiency Letters for 166 Projects



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Georgia Department of Transportation

Russell R. McMurry, P.E., Commissioner
One Georgia Center
600 West Peachtree Street, NW
Atlanta, GA 30308
(404) 631-1000 Main Office

March 12, 2021

Letting Date: 3/19/21

Ms. Anna Truszczynski, Program Manager
Non-Point Source Program
Georgia Environmental Protection Division
4220 International Pkwy., Suite 101
Atlanta, GA 30354

Attn.: Michael Berry

RE: Erosion and Sedimentation Control Plans for Review and Comment
PI#0013618, Jasper County

Dear Ms. Truszczynski:

In accordance with state law, the Department is transmitting a copy of the referenced Erosion and Sedimentation Control Plans for your review and comments.

If comments are not received within 7 calendar days, the Department will proceed with adding the Erosion and Sedimentation Control Plans to the Project Plans and proceed with the letting process for this Project.

Your cooperation in this matter is appreciated. If you have any questions, you may contact Aziza Branson at 404-631-1213

Sincerely,

Nicholas Fields
State Transportation Office Administrator

NF: asb
Attachment

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

April 30, 2021

Ms. Meg Pirkle
Georgia Department of Transportation
One Georgia Center
600 West Peachtree Street, NW
Atlanta, Georgia 30308
Attention: Nicholas Fields

5/21/21
Monte Lester
FIRST Review

Re: ES&PC Plan Review
PI Number: 0013618
Project Name: Monticello NE Bypass
Jasper County – **Initial Review**

Dear Ms. Pirkle:

In accordance with the General NPDES Permit No. GAR100002 for Storm Water Discharges Associated with Construction Activities for Infrastructure Projects, issued by the Georgia Environmental Protection Division in August 2018, this ES&PC Plan received on March 35, 2021has been reviewed for deficiencies in the identification of waters of the state, NPDES permit requirements, and potential encroachment of land disturbing activities within 25 feet immediately adjacent to the banks of waters of the state where vegetation has been wrested by normal stream flow and/or wave action.

EPD reviews the ES&PC Plan for deficiencies using the applicable checklist established by the State Soil and Water Conservation Commission. This letter addresses any deficiencies found with the submitted Plan. The primary permittee shall make the required changes to the Plan and resubmit to EPD. Failure to incorporate the required changes, per the permit, and maintain the latest version of the Plan on the project site will constitute non-compliance with the permit.

EPD personnel have not been to the project site prior to the date of this letter. Therefore, the plan review is based solely on information provided on the ES&PC plan and any supporting documents submitted to EPD. Based upon this plan review, EPD has determined the following:

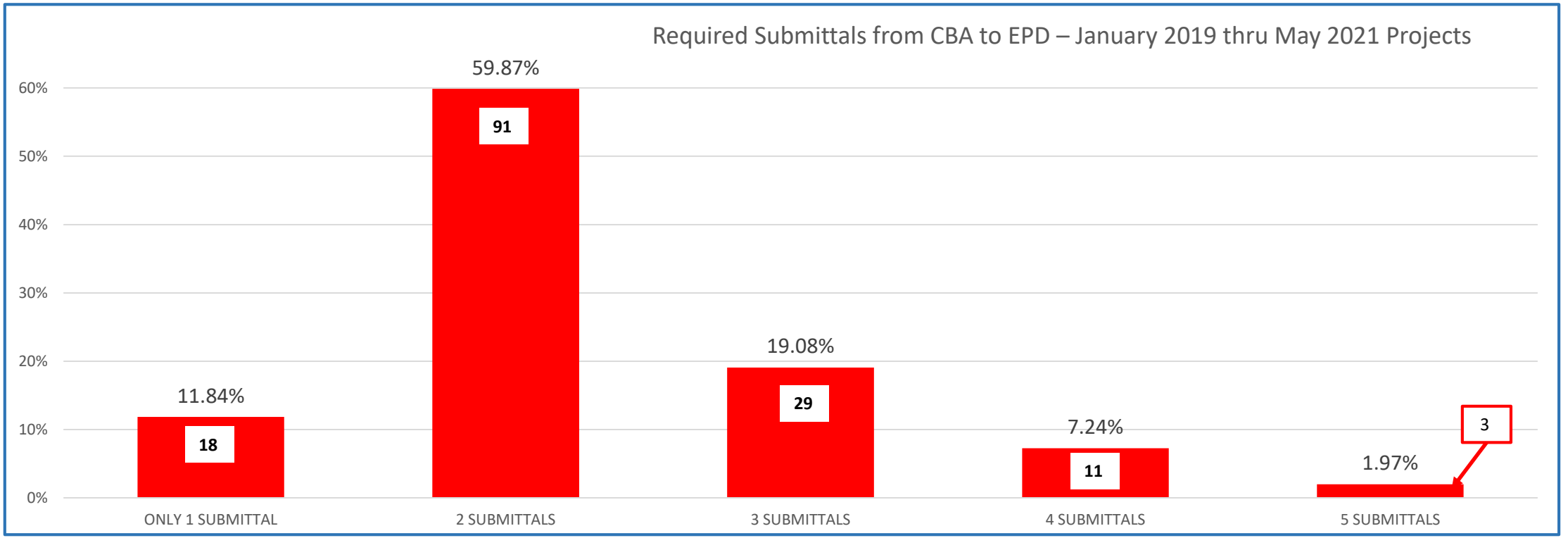
(1) The project **does not** have deficiencies in the identification of waters of the state.

(2) The project **will** require a stream buffer variance from the EPD. ***Please note:*** Buffer Variances are needed for this project; however, I do not see any applications submitted in the EPD variance database records. If you have approvals on hand for this project – please provide. -Otherwise, no land disturbances should take place until a buffer variance application has been approved for this project.

(3) The project **does** have deficiencies in NPDES permit requirements.

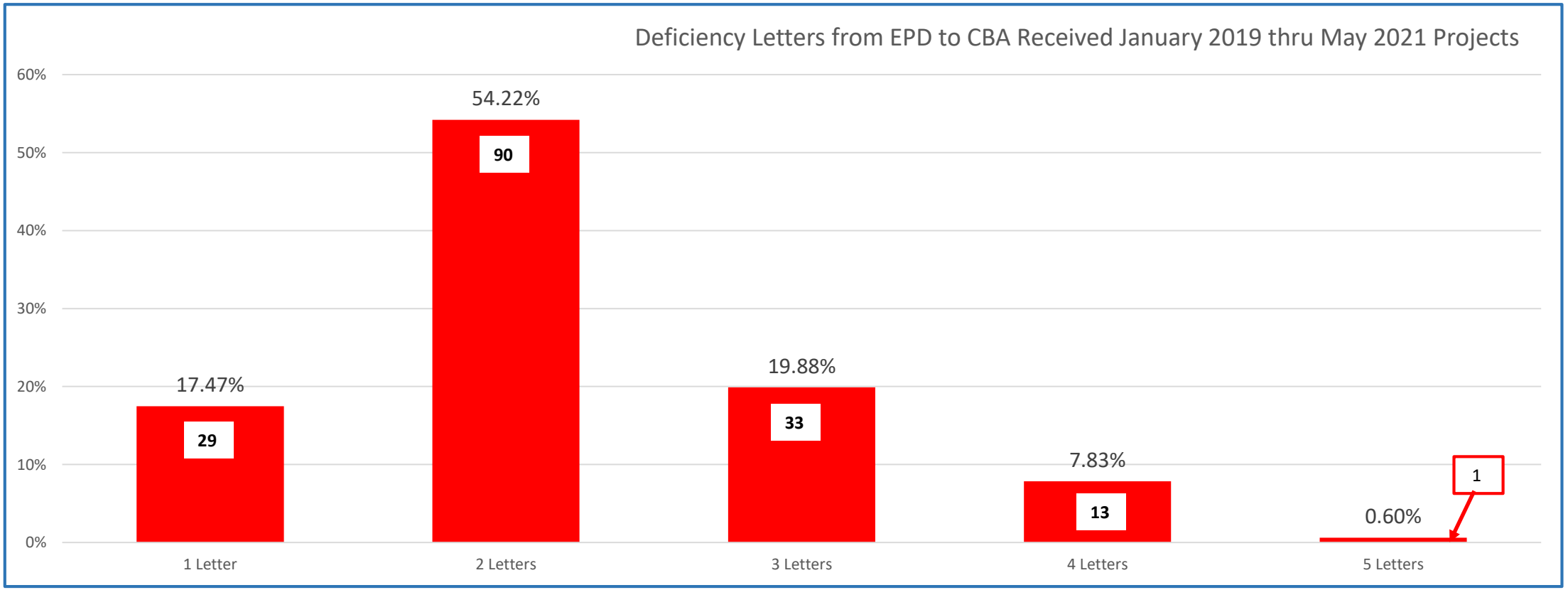
GDOT ES&PC Plan Submittal Letters to EPD – 152 Projects

- Only 18 (11.84%) did not require at least a second submittal to EPD
- 346 total submittals to EPD (average of 2.28 submittals per project)



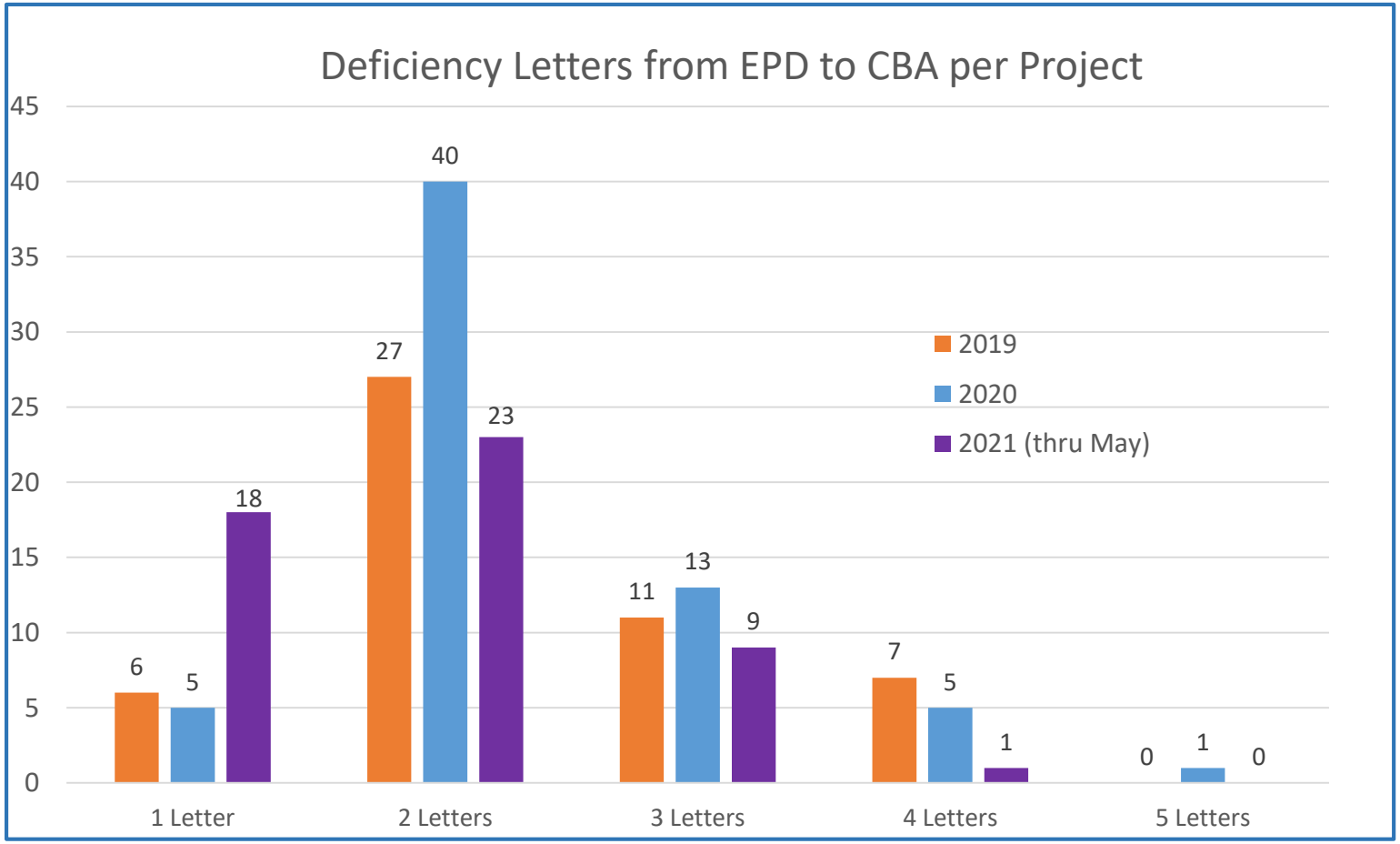
EPD ES&PC Plan Review Deficiency Letters to GDOT – 166 Projects

- 136 (81.93%) projects received two or more Deficiency Letters from EPD
- 365 total Deficiency Letters from EPD (average of 2.20 letters per project)



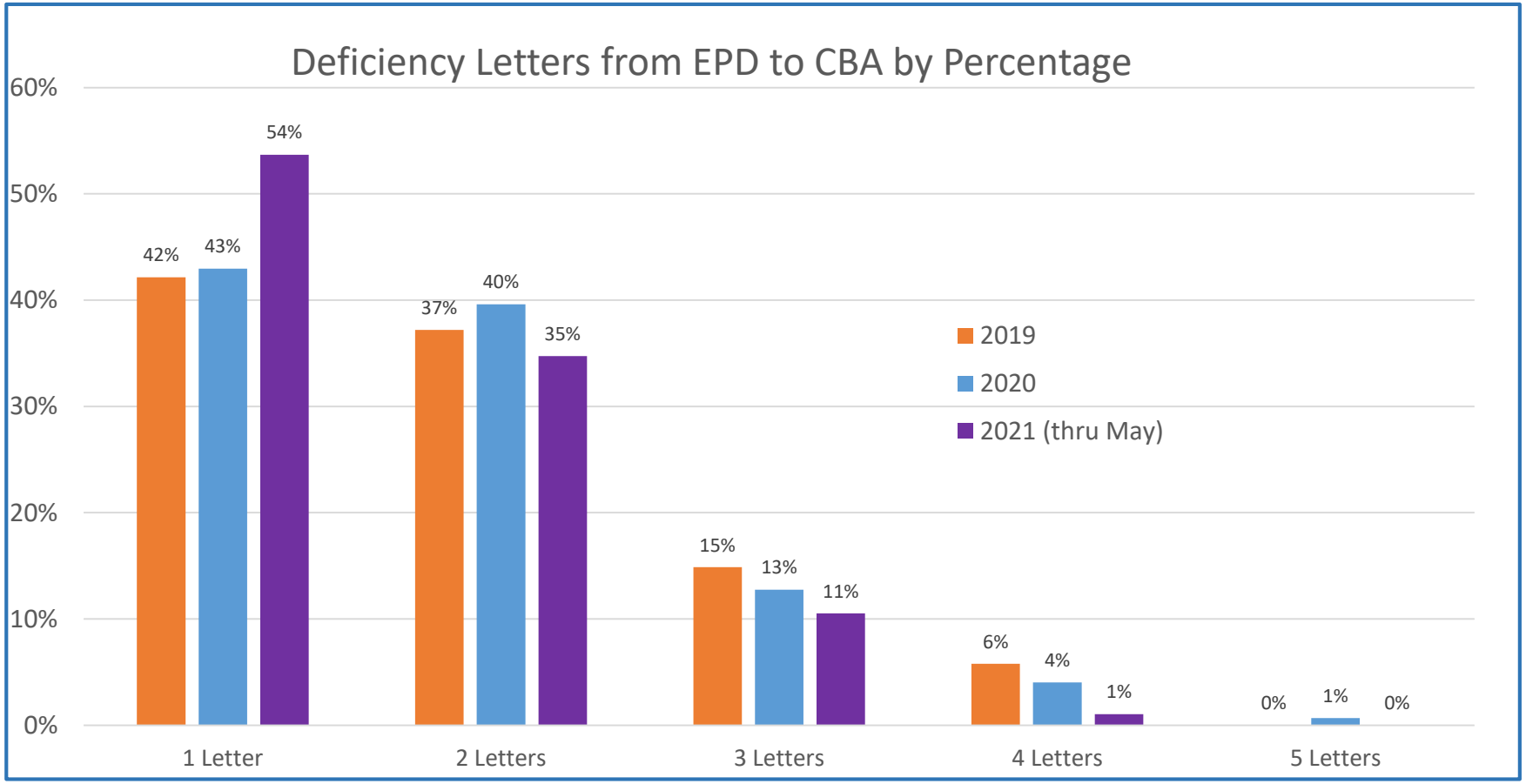
EPD ES&PC Plan Review Deficiency Letters to GDOT – 166 Projects

- **Breakdown by Year**



EPD ES&PC Plan Review Deficiency Letters to GDOT – 166 Projects

- **Breakdown by Year**



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Top Ten Checklist Item Errors

Top Ten Checklist Item Errors by Checklist Number – Grouped by Color			
Rank	Initial Letter	2nd Letter	Subsq. Letters
1	49	35	43
2	43	49	50
3	44	44	49
4	35	43	35
5	50	46	44
6	34	50	34
7	41	34	7
8	42	41	46
9	46	29	41
10	29	42	42

Top Ten Checklist Item Errors

Top Ten Checklist Item Errors - Average Rank - Initial, 2nd, and Subsq. Letters	
Checklist Number	Average Rank
49	2.00
43	2.33
35	3.00
44	3.67
50	4.33
34	6.33
46	7.33
41	8.00
42	9.33
29	> 10.00

Checklist Item 49 – Number 1 Error

"Provide a minimum of 67 cubic yards of sediment storage per acre drained …"

- 111 of 166 (67%) of Initial Deficiency Letters
- 41 of 137 (30%) of 2nd Deficiency Letters
- 19 of 47 (40%) of Subsequent Deficiency Letters

Frequent Deficiency Letter comments

- Sediment Storage table values listed do not match what the Reviewer calculates using plan set data or finds elsewhere in the plan set – 80 Letters
- Sediment Storage table information does not match information in Section 53 Drainage Area Map – 79 Letters
- Written justification not provided or incorrect as to why 67 CY of sediment storage is not attainable for the drainage location – 50 Letters
- Written justification not provided or incorrect to use equivalent controls when a sediment basin is not attainable and not provided – 49 Letters

Checklist Item 43 – Number 2 Error

"Delineation and acreage of contributing drainage basins on the project site"

- 106 of 166 (64%) of Initial Deficiency Letters
- 35 of 137 (26%) of 2nd Deficiency Letters
- 22 of 47 (47%) of Subsequent Deficiency Letters

Frequent Deficiency Letter comments

- Outfall(s) not clearly described/location not clearly shown or location Station & Offset data is missing or incorrect – 82 Letters
- Location incorrectly defined as a permit defined outfall – 66 Letters
- Required outfall information or all outfall locations not shown on Section 53 ESPCP Drainage Area Map – 53 Letters
- Identified outfall is not consistent with calculated values shown on the sediment storage table when cross-checked with the Drainage Area Map – 21 Letters

Checklist Item 35 – Number 3 Error

"Delineate all sampling locations, perennial and intermittent streams and other water bodies into which storm water is discharged …"

- **100 of 166 (60%) of Initial Deficiency Letters**
- **43 of 137 (31%) of 2nd Deficiency Letters**
- **18 of 47 (38%) of Subsequent Deficiency Letters**

Frequent Deficiency Letter comments

- **Sampling locations incorrectly identified on ES&PC Plan sheets or Sampling Table location errors – 95 Letters**
- **Outfall sampling location identified not a valid sampling location – 36 Letters**
- **All contributing drainage basins/outfalls on Section 53 Drainage Area Map not sampled or represented by a sampling location – 33 Letters**
- **Sampling Table information not consistent with other sections of the ES&PC Plan – 30 Letters**

Checklist Item 44 – Number 4 Error

"Delineate on-site drainage and off-site watersheds using USGS 1" = 2000' topographical sheets"

- **104 of 166 (63%) of Initial Deficiency Letters**
- **39 of 137 (28%) of 2nd Deficiency Letters**
- **18 of 47 (38%) of Subsequent Deficiency Letters**

Frequent Deficiency Letter comments

- **Sampling locations on Drainage Map, Sampling Table, and/or Watershed Map and Site Monitoring Plan do not match – 93 Letters**
- **Surface water drainage area/watershed area not delineated/delineated incorrectly on Drainage/Watershed Maps – 67 Letters**
- **Drainage/Watershed Map feature labeling errors – 36 Letters**

Checklist Item 50 – Number 5 Error

"Location of Best Management Practices that are consistent with and no less…"

- 96 of 166 (58%) of Initial Deficiency Letters
- 34 of 137 (25%) of 2nd Deficiency Letters
- 20 of 47 (43%) of Subsequent Deficiency Letters

Frequent Deficiency Letter comments

- Comments directing the addition of a specific BMP or BMPs – 71 Letters
- Miscellaneous presentation comments (flow arrows, staged construction, alignment labeling, notes – 57 Letters
- Uniform Coding Symbol missing from BMP or BMP not shown correctly – 52 Letters
- Temporary BMPs and Cut/Fill limits not shown faded back in subsequent phases, and installed Permanent BMPs incorrectly shown faded back – 37 Letters
- Comments referring to location of or use of specific BMP or BMPs – 36 Letters

Checklist Item 34 – Number 6 Error

"Appendix B rationale for NTU values at all outfall sampling points where applicable."

- 88 of 166 (53%) of Initial Deficiency Letters
- 33 of 137 (24%) of 2nd Deficiency Letters
- 15 of 47 (32%) of Subsequent Deficiency Letters

Frequent Deficiency Letter comments

- Sampling table comments related to incorrect data entered or contradicting data in other sections of the ES&PC Plan – 72 Letters
- Watershed Map Site Monitoring Plan comments related to sampling locations identified and labeling – 58 Letters
- Specified Outfall sampling location is not a valid sampling location – 64 Letters
- Specified Appendix B Values incorrect or missing – 38 Letters

Checklist Item 46 – Number 7 Error

"Storm-drain pipe and weir velocities with appropriate outlet protection to accommodate discharges without erosion. Identify/Delineate all storm water …."

- 72 of 166 (43%) of Initial Deficiency Letters
- 35 of 137 (26%) of 2nd Deficiency Letters
- 11 of 47 (23%) of Subsequent Deficiency Letters

Frequent Deficiency Letter comments

- Outlet Protection table data errors or missing data – 56 Letters
- St-Rp BMP label missing from storm drain outlet protection riprap on plan sheets or incorrect label is used – 44 Letters
- Structure missing from Outlet Protection table or table is missing – 39 Letters
- Outlet Protection BMP labels/patterns not shown correctly on plan sheets (faded/not faded back) – 30 Letters

Checklist Item 41 – Number 8 Error

"Delineation of the applicable 25-foot or 50-foot undisturbed buffers adjacent to state waters …." "Clearly note and delineate all areas of impact."

- **75 of 166 (45%) of Initial Deficiency Letters**
- **16 of 137 (12%) of 2nd Deficiency Letters**
- **10 of 47 (21%) of Subsequent Deficiency Letters**

Frequent Deficiency Letter comments

- **State Waters Buffer Impact table has incorrect location data – 66 Letters**
- **State Waters Buffer not delineated or delineated incorrectly on the plan sheets – 44 Letters**
- **Non-Impacted Buffer incorrectly added to the table – 17 Letters**
- **Impacted State Waters Buffer missing from the table – 12 Letters**

Checklist Item 42 – Number 9 Error

"Delineation of on-site wetlands and all state waters located on and within 200 feet of the project site."

- **73 of 166 (44%) of Initial Deficiency Letters**
- **14 of 137 (10%) of 2nd Deficiency Letters**
- **9 of 47 (19%) of Subsequent Deficiency Letters**

Frequent Deficiency Letter comments

- **Incorrect entries on Section 51 State Waters Buffer Impacts table – 58 Letters**
- **State Waters/Buffers not delineated or delineated incorrectly – 31 Letters**
- **Impacted State Water not included on Impacts table – 12 Letters**
- **Non-Impacted State Water incorrectly included on Impacts table – 12 Letters**
- **Non-State Water feature incorrectly included on Impacts table – 7 Letters**

Checklist Item 29 – Number 10 Error

"Description and chart or timeline of the intended sequence of major activities which disturb soils for the major portions of the site (i.e. initial perimeter …."

- 57 of 166 (34%) of Initial Deficiency Letters
- 14 of 137 (10%) of 2nd Deficiency Letters
- 4 of 47 (9%) of Subsequent Deficiency Letters

Frequent Deficiency Letter comments

- Phase/Stage 1 (Initial Phase) description should only include reference to installation of perimeter controls and initial sediment storage – 47 Letters
- Required chart or timeline item missing – 21 Letters
- Incorrect, confusing, or missing information – 10 Letters

Subcommittee – Remaining Steps

Make Common Errors available to Designers

- Utilize GDOT's R.O.A.D.S website
- Determine best way to present the information
- Set a goal date for completion
- Possible two phase release

Our interaction with GPTQ Consultant Relations Committee (CRC)

- Continue to update CRC on progress made
- Present completed task to CRC
- Present recommendations to CRC

Georgia Department of Transportation

Thank You For Your Time!