Summary of Public Meeting on 2016 Edition of GSWCC Manual on Erosion and Sediment Control Thursday, October 1, 2015 Georgia Environmental Protection Division Tradeport Training Room

The meeting to accept public comment on the draft 2016 Edition of the Manual for Erosion and Sediment Control in Georgia began at 1:00 pm. Brent Dykes, Executive Director of the Georgia Soil and Water Conservation Commission (GSWCC), opened the meeting and introduced Glen Behrend, Manager of the Nonpoint Source Program at the Georgia Environmental Protection Division (EPD), and Marc Mastronardi, State Construction Engineer at the Georgia Department of Transportation (GDOT), who were present to answer questions about the revision process. He also introduced Shana Jones, Leigh Elkins, and Yee Huang who were representing the Carl Vinson Institute of Government (CVIOG) at the University of Georgia.

Mr. Dykes then gave a brief presentation (slides attached) about the draft 2016 Edition of the Manual, the revision process, and the major changes. Mr. Dykes emphasized the following points:

- The 2016 Edition for public comment contains blurry images that will be cleaned up before the final Manual goes into effect on January 1, 2016.
- One of the major changes in the 2016 Edition is the absence of performance-based testing for erosion and sediment control practices. Mr. Dykes emphasized that, in the Sixth Edition (2014), the GSWCC was "a little ahead of the curve." The decision to remove the performance-based standards was based on the need to move forward with a single Manual for the entire state and the inability to agree on performance standards right now.
- Mr. Dykes then discussed the Equivalent Best Management Practices (BMP) List requirements and process. The new list will be available on January 1, 2016, and will include (1) products on the Georgia Department of Transportation's Qualified Product List (QPL), categorized by relevant best management practice, and (2) any products listed in the Fifth Edition. A draft Equivalent BMP List will be available the week of October 5, 2015. GSWCC will notify the public by email and will hold a comment period for the draft list.
- Mr. Dykes emphasized that the 2016 Edition of the Manual applies to all types of construction sites, so all BMP applicants must first undergo the GSWCC approval process. The applicant may then apply to DOT to be approved for the QPL, but the two lists are independent. Products included on the Equivalent BMP List may not necessarily be included on GDOT's QPL after January 1, 2016.

After the presentation ended, Leigh Elkins of the CVIOG began the public comment part of the meeting. The public comments are summarized below:

- David Knight, State Representative, requested that the 2016 Edition of the Manual expressly state, "GSWCC will not recognize NTPEP testing or standards for the state of Georgia." He cited concerns with errors, inconsistencies, and faulty testing that were apparent in videos of the testing process for establishing performance standards in the Sixth Edition of the Manual.
- Wayne Seabolt raised his concern about a specification under "Filter Media Sock" that states, "Non-composted products will not be accepted." He said that this statement would eliminate the use of wood mulch in the sock, even though wood mulch is a useful

product. Mr. Seabolt commented that he has yet to see a study that justifies the requirement for compost, where the idea is that the compost helps to break down pathogens in the sediment. He also commented about the size requirements for the sock material, noting that a larger hole size takes away from the three-dimensional properties of the practice.

- Robert Page commented that the silt fence check dam is missing and that a compost filter sock is allowed for the Check Dam practice without a size. The typical size is 12-inches. Regarding the Equivalent BMP List, he commented that any decision for accepting and removing items from the List should be made by a multi-agency committee, and the ultimate decision should be enforced by the Erosion and Sediment Control Overview Council. Mr. Page also commented that, among the photographs of alternative BMPs in the Manual, there should be a photograph of the GDOT C-system alternative for a wire-backed system.
- Larry Booth commented that, in addition to his emailed comments, the 2016 Manual should specify ASTM 4355 standards, or whatever the group feels is appropriate, for the photo- or biodegradability of a sock. The standards should be written down and tested so they can be understood.
- Owen T. Hand commented that C-pop is a good product, but there should be certain parameters on the post or on the wire for stronger materials. He said that 14-gauge is a very cheap product and the 2016 Edition should specify what is a qualified product. The responsibility for a bad product should fall to the installer.
- One attendee asked about how the public comments will be addressed. Mr. Dykes replied that the workgroup will meet to decide which comments are included in the 2016 Edition, which will then be reviewed by the GSWCC State Board and Overview Council. Comments that are accepted will be included in the final 2016 Edition. GSWCC will publish all submitted public comments in a chart that indicates the final action taken for each comment. Mr. Dykes added that commenters may seek a meeting for further explanation of why their comments were or were not included.

The meeting concluded with Mr. Mastronardi thanking the industry for their patience and support throughout the process. He emphasized that GDOT has heard the industry and is open to future innovations to get the additional protections needed. Mr. Dykes thanked the attendees and emphasized that the Manual will not ever be perfect, but GSWCC aims for continual progress. The meeting adjourned at 1:50 pm.

Georgia Soil and Water Conservation Commission 2016 Edition of the Manual for Soil and Erosion Control in Georgia

PUBLIC MEETING October 1, 2015

October 1, 2015

GSWCC 2018 Edition

Why Revise the Manual

- · Part of a continuing process of revisions
- On December 18, 2014, the GSWCC State Board took no official action on the Sixth Edition (2014) of the Manual because of areas of concern and uncertainty
- For the calendar year 2015, both the Fifth (2013) and Sixth Editions of the Manual were available for use

October 1, 2015

GSWCC 2016 Edition

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GSWCC 2016 Edition

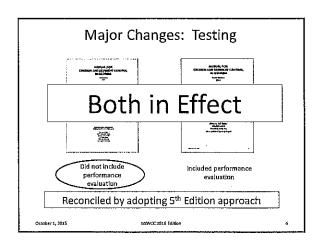
The Revision Process

The Carl Vinson Institute of Government at the University of Georgia was brought in this summer to help consolidate and reconcile the Fifth and Sixth editions, along with a representative from:

> EPD GSWCC GDOT

October 1, 201

SSWCC 2016 6dition



Major Changes: The Equivalent BMP List

- A new process for inclusion on and removal from the Equivalent BMP List.
- List will consist of BMPs that:
 - have demonstrated success at least three times in the field under the NPDES permit Guidelines for the Alternative BMP process.
 - have been bench tested, and
 - have been approved for inclusion by the GSWCC.
- The Equivalent BMP List will be similar to the Georgia Department of Transportation's (GDOT) Qualified Products List, which consists of materials approved by GDOT and was recognized by the Fifth Edition of the Manual.
- Refer to Appendix A-2 for more information on the process

October 1, 2015

GSWCC 2015 Edition

Major Changes: The Equivalent BMP List

- · GSWCC and GDOT are coordinating on developing the Equivalent BMP list based on existing GDOT QPL's and GSWCC Board previously approved products as found in the 5th Edition of the manual.
- The **DRAFT** Equivalent BMP List will be posted on the GSWCC website next week and an email will be sent to the Manual Listserv at that time.
- Comments will be taken on the DRAFT List.

October 1, 2015

GSWCC2016 Edition

Major Changes: The Equivalent BMP List -- Transition Period

- · The Manual will become effective January 1, 2016.
- The Equivalent BMP List will be made available January 1, 2016.
- BMPs included in the 5th Edition of the Manual and GDOT's QPL list will be recognized by GSWCC and included on the Equivalent BMP
- Applications for BMPs to be included on the Equivalent BMP list will be based on NOI'S submitted on or after January 1, 2016.
- As of January 1, 2016, any product that seeks to be on the GDOT QPL List must first go through the Equivalent BMP process.
- GSWCC's approval of a BMP, however, does not ensure GDOT's adoption of that item into their QPL, design policies, or procedures.
- The first update to the Equivalent BMP list will occur on or after

March 31, 2016. GSWCC 2016 Edition

Major Changes: **Revised or Combined Practices**

Some practices from the Fifth and Sixth Editions of the Manual have been revised or combined in the 2016 Edition, including:

Tree Protection (Tr) Floating Surface Skimmer (Sk) Turbidity Curtain (Tc) Construction Exit (Co) Seep Berm (SpB) Channel Stabilization (Ch) Sediment Barrier (Sd1) • Checkdam (Cd) Inlet Sediment Trap (Sd2) Flocculants and Coagulants Temporary Sediment Trap -(Fl-Co) Slope Stabilization (Ss) (Sd4) Retrofit (Rt) Tackifiers (Tac).

October 1 2015

GSWCC 2016 Edition

Major Changes: Sediment Barriers (Sd1)

- Clarifies the use of Types A, B, and C silt fences in Non-sensitive and Sensitive areas.
 - Type A and Type B Non-sensitive
 - Type C Sensitive

Major Changes: Erosion, Sedimentation, and Pollution Control (ES&PC) Plan

Updated guidance for ES&PC Plans

Public Comment Process

- Began September 21 and ends October 9, 2015
- · Today's Public Meeting
- Submit written comments via email to GreenBookComments@gaswcc.org

October 1, 2015

GSWCC 2016 Edition

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Going Forward

Oct. 9, 2015 Nov. 3, 2015 Nov. 19, 2015

Jan. 1, 2016

Public comment period ends GSWCC State Board Meeting ESC Overview Council Meeting 2016 Manual goes into effect

October 1, 2015

GSWCC 2016 Edition

The draft 2016 Manual is available here: https://gaswcc.georgia.gov/2016-edition-manual-erosion-and-sediment-control

Please submit your comments via email to: <u>GreenBookComments@gaswcc.org</u>

*Note that some of the images are blurry and are currently being updated.

Please direct comments to the text of the document.

The public comment period ends on Friday, October 9, 2015.

October 1, 2015

GSWCC2016 Edition

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Please submit your comments via email to: <u>GreenBookComments@gaswcc.org</u>



October I, 2015

GSWCC 2016 Edition