

Summary of Major Changes between 2003 and 2008 Draft Small MS4 Permit¹

	2003 Final Permit	2008 Draft Permit
Permit Condition		
Public Education and Outreach	<ul style="list-style-type: none"> • Develop education program to distribute material to the community • Provide information to the community and steps the community can take to reduce the pollutants in runoff 	<ul style="list-style-type: none"> • Describes the objective for the measure: change in behavior and knowledge • Requires two targeted messages during the permit cycle for specific audiences: residential, business/commercial, developer/construction and industrial • Requires evaluation of the effectiveness of the educations messages
Public Involvement and Participation	<ul style="list-style-type: none"> • Comply with state public notice requirements • Provide opportunities for the public to participate in program development 	<ul style="list-style-type: none"> • Describes the objective for the measure: encourage and provide opportunities for public to participate in program development • Comply with state public notice requirements • Provide the public opportunities to participate in the review and implementation of the program
Illicit Discharge Detection and Elimination (IDDE) Program	<ul style="list-style-type: none"> • Develop implement and enforce a program to detect and eliminate illicit connections • Develop a map: receiving waters and outfalls • Develop an ordinance to prohibit non-storm water discharges • Develop and implement a plan to detect and address non-storm water discharges – 	<ul style="list-style-type: none"> • Describes the objective of the program: systematically find and eliminate sources of non-stormwater • Develop a map. Map must include: receiving waters, outfalls; catch basins, manholes, pipes and any treatment facilities associated with the separate storm sewer system. Must be completed by end of year 2.

¹ Disclaimer: This summary of permit requirements is provided as guidance only. This guidance has no regulatory significance and does not represent a comprehensive description of all permit requirements. Readers should refer to the draft permit for a complete description of all permit requirements.

	<p>including illegal dumping</p> <ul style="list-style-type: none"> • Identify priority areas; locate the discharge; local the source; remove and document • Inform the public • Address any allowable non-storm water discharges if they are a problem source to the MS4 	<ul style="list-style-type: none"> • Detailed elements of the IDDE program • Conduct an assessment of the system and rank the illicit discharge potential of each catchment in the MS4 this must be completed by the end of year 1 • Develop systematic procedure for locating and removing illicit discharges – this must be completed by year 2. • Procedure must include walking all stream miles; dry weather screening; and identification of the source • Locating source can be either top down or bottom up. Locating the source must begin no later than 27 months from the effective date of the permit and continue until complete • By year 1-must establish written procedures detailing responsibilities with regard to fixing illicit discharges and tracking the progress including a requirement to define indicators to be used to evaluate effectiveness. • Develop and implement mechanisms to prevent illicit discharges
<p>Construction Site Stormwater Runoff Control</p>	<ul style="list-style-type: none"> • Develop, implement and enforce a program to reduce pollutant from construction projects disturbing one or more acres • Develop an ordinance to require sediment and erosion control • Sanctions to ensure compliance with the 	<ul style="list-style-type: none"> • Describes object of the measure: maintain sediment on site and minimize or eliminate erosion. • Requires construction ordinance to effective on the effective date of the permit • Requires defining the municipality’s authority to

	<p>program</p> <ul style="list-style-type: none"> • Requirements for site operators to implement a sediment and erosion control program • Requirements for control of wastes • Procedures for site plan review including preconstruction review • Procedures for receipt and consideration of information submitted by the public • Procedures for inspections and enforcement of control measures at construction sites 	<p>impose sanctions</p> <ul style="list-style-type: none"> • Require for site operators to implement sediment and erosion control program including BMPs and encourages the use of design standards • Written procedures for site plan review; for consideration of water quality impacts; and for receipt and consideration of public inputs • Clear procedures for inspections and enforcement. • Reference to qualifying local program regulations
<p>Stormwater Management in New Development and Redevelopment (Post Construction Stormwater Management)</p>	<ul style="list-style-type: none"> • Develop, implement and enforce a program to address run off from new development and redevelopment projects which disturb one or more acres • Develop an ordinance to address post construction runoff in new development and redevelopment • Develop procedures to ensure long term operation and maintenance of best management practices • Procedures to ensure controls will prevent or minimize impacts to water quality 	<ul style="list-style-type: none"> • Describes the objective for the measure: attempt to maintain natural site hydrology • Requires the post construction ordinance to be effective on the effective day of the permit • Procedures to ensure new development and redevelopment minimize impacts to water quality • Submission of as-built plans and procedures to ensure long term operation and maintenance of stormwater BMPs. • Assess street and parking lot designs. Determine if changes can be made to support low impact design options • Assess the feasibility of making green infrastructure practices allowable when feasible • Estimate directly connected impervious cover and report on the number of acres added or removed.
<p>Good House</p>	<ul style="list-style-type: none"> • Develop program with goal of preventing 	<ul style="list-style-type: none"> • Describes the objective of this measure: prevent

<p>Keeping and Pollution Prevention</p>	<p>and/or reducing pollutant runoff from municipal operations</p> <ul style="list-style-type: none"> • Must train employees about storm water • Include the following activities in the program: parks and open space; fleets; buildings; and infrastructure • Develop maintenance schedules and inspection procedures 	<p>or reduce pollutant runoff from municipal operations</p> <ul style="list-style-type: none"> • Requires development by the end of year 1 written operations and maintenance procedures for the following municipal activities: parks (includes fertilizers, pesticides); building and facilities (storage and use of materials; waste management); vehicles and equipment (storage, repairs and fueling); road way and sewer systems (inspections and cleaning) Street sweeping 2 times per year • Winter activities (salt storage and usage and snow disposal) • Development of SWPPP for maintenance garages; public works facilities; transfer stations and other waste handling facilities by the end of year 1 • Develop inspection procedures for stormwater controls
<p>Program evaluation/ Reporting and record keeping</p>	<ul style="list-style-type: none"> • Annual evaluation of program compliance with the permit including evaluation of BMP appropriateness towards achieving defined measurable goals • All records must be kept for five years and be available to the public • Annual reports (effective date of permit) • Report contains: self assessment; BMP appropriateness assessment; progress towards goals; summary of data; activities for next reporting cycle; and discussion of 	<ul style="list-style-type: none"> • Annual evaluation of program compliance with the permit including evaluation of BMP appropriateness towards achieving defined measurable goals • All records must be kept for five years and be available to the public • Annual reports (due August 1) • Report contains: self assessment; BMP appropriateness assessment; progress towards goals; summary of data; activities for next reporting cycle; and discussion of planned

	<p>planned changes</p> <ul style="list-style-type: none"> • Annual report format allows for optional metrics 	<p>changes</p> <ul style="list-style-type: none"> • Additional reporting requirements to be added to better able the agency to assess permit compliance
Outfall Monitoring	<ul style="list-style-type: none"> • None required 	<ul style="list-style-type: none"> • Monitoring program a part of the IDDE program • Implementation begins in year 2 • Program includes dry weather screening and analytical monitoring. The small MS4 must screen 25 percent of outfalls each year. • The program also includes wet weather analytical monitoring. The small MS4 must monitor 25 percent of outfalls each year. • If the water is impaired, the municipality must monitor for the pollutant identified as the cause of the impairment
TMDLs and Impaired waters	<ul style="list-style-type: none"> • The SWMP must describe how the program will control the pollutant of concern for an impaired water • Comply with any WLA for an approved TMDL • Describe in the SWMP measures which will be implemented to meet the TMDL 	<ul style="list-style-type: none"> • Comply with specific terms of approved TMDL. Appendix F of the general permit details specific requirements • Discharges to impaired waters must comply with the water quality based effluent limits of the permit • New or increased discharges must comply with anti-degradation requirements