

Comparison Proposed CT-MS4, Modified CT-MS4 and MA-MS4

	Public Noticed Draft Connecticut	Modified Draft Connecticut	Proposed EPA/Massachusetts
Who is covered	Municipalities & institutions with >1,000 Urbanized Areas (DOT to be covered by separate future MS4 permit) Proposed Tier 2 for munis with <1,000 UA	No change	Municipalities, institutions & DOT with >1,000 Urbanized Areas
Permit Type	General permit first issued 2004 Never updated – hearing held for 12/17/14	No change	General permit first issued 2003 Drafts in 2008 & 2010 but never updated. Current draft public noticed – hearing 11/19/14
6 Minimum Control Measures			
Public Education & Outreach	No specific targeting required	No change	Must target 4 groups – Residential, business/institution/commercial, developers (construction), and industrial facilities – with at least 2 educational messages for each group
	Specific topics for outreach	No change	Specific topics for each group
	No requirement to evaluate effectiveness	No change	Must evaluate program effectiveness in changing behavior
	Additional or emphasized measures for impaired waters	No change	Impaired waters measures in separate section. Similar added measures.
Public Involvement	Comply with CT public notice & FOIA requirements and inform public of Plan and Annual Report.	No change	Comply with MA public notice and inform public of Plan and Annual Report.
	Annual public meeting required	Remove public meeting req't	No public meeting required

Illicit Discharge Detection & Elimination (IDDE)	Must develop program and legal authority to prohibit illicit discharges by the start of the permit for existing MS4s (old permit requirement) and within 1 year for new MS4s	Change deadlines to same as EPA/MA	Must have written IDDE plan and legal authority within 1 year for existing MS4s and 2 years for new MS4s
	No specific targeting of Sanitary Sewer Overflows (SSO)	Target SSOs per EPA/MA protocol	Specific identification, inventory, targeting and elimination of SSOs
	Existing MS4s inventory and map outfalls by start of permit (old permit requirement)	Change deadlines to same as EPA/MA	Existing MS4s have mapping by start of permit and inventory outfalls within first year
	New MS4s inventory and map outfalls within 5 years	No change	New MS4s complete inventory in 2 years and mapping in 4 years
	Existing MS4s map entire drainage system within 3 years	Change deadlines to same as EPA/MA	Existing MS4s map entire system within 2 years for new permittees
	New MS4s map entire drainage system within 3 years	Change deadlines to same as EPA/MA	New MS4s map entire system within 4 years
	Detailed IDDE protocol based on Stamford & 2010 EPA/MA draft	Change protocol to match EPA/MA	Similar protocol but emphasis on SSOs, more detailed prioritization
	Complete all areas within 5 to 15 years depending on population	Change protocol to match EPA/MA	Complete priority areas within 5 years and all areas within 10 years
	Dry weather screening & field kits	Change protocol to match EPA/MA	Dry & wet weather screening & field kits
	Investigate outfall drainage area only if evidence of illicit discharge	Change protocol to match EPA/MA	Investigate all drainage areas regardless of illicit discharge evidence
	Provides detailed methodology from outfall up through system	Change protocol to match EPA/MA	Requires MS4 to develop their own methodology (likely requires consultant)

Construction	Update land-use regs to include Erosion & Sedimentation Guidelines and Stormwater Quality Manual	No change	Similar regulatory requirement
	Implement inspection program	No change	Same
Post-Construction	Require retention of Water Quality Volume (<1")	No change	Require 1" runoff retention
	Map & estimate impervious cover within 4 years. Track additions/subtractions.	No change	Same but within 1 year
	Evaluate drainage system and commence modification/retrofit but no deadlines	No change	Evaluate & prioritize town impervious area for modification/retrofit within 4 years
	Eliminate barriers to Low Impact Development (LID) and include LID measures within 2 years	Change to 4 years for existing MS4s and 5 years for new MS4s	Same but within 4 years
	Require inclusion of long-term maintenance in development	No change	Same
	No street design evaluation required	No change	Evaluate local regs for street/parking design to reduce impervious cover
Pollution Prevention/Good Housekeeping	Develop operation & maintenance program to address municipal operations	No change	Same
	Table of road, sidewalk, parking lot sweeping dependent on population. Large towns weekly thru semi-annual, small towns monthly thru annual.	Change to EPA protocol	Minimum once per year and evaluate for more frequent. Uncurbed rural roads inspect and develop program within 1 year.

	For impaired, inspect catch basins every 6 months for 2 years to develop schedule. All others, inspect at least once in first 2 years to develop schedule. If found >50% full, reinspect within 6 months.	Change to EPA protocol but require inspection once in first 3 years.	“Optimize routine inspections” and establish schedule. Priority near construction sites. No discussion of inspection frequency. Investigate if >50% full for 2 inspections.
	Conduct annual leaf pickup	Change to leaf management	Leaf management program as part of impaired waters provision
Other Permit Requirements			
Impaired waters	General requirements addressing most common impairments included in each minimum control measure	Same as Public Noticed	Detailed impaired waters provisions provided for specific watersheds including development of a plan to track reductions, utilize models and track effectiveness
Monitoring	Dry and wet weather in-stream monitoring*	Eliminate dry & wet weather in-stream monitoring	No in-stream monitoring
	Annual wet weather outfall monitoring apart from IDDE	Conduct outfall monitoring only as part of impaired waters using field kits	No dry or wet weather outfall monitoring apart from IDDE. Nothing specific to impaired waters unless they show illicit discharges.

Blue highlight denotes more stringent requirement

Red denotes modification to proposed CT permit