

Summary of Modifications to MS4 Permit

Section	Public Noticed Draft Permit	Modified Draft Permit
3(b)(9) Requirements for Authorization	Plan requires review by independent Qualified Professional Engineer	No independent review required – equivalent to EPA
6(a)(2) Public Involvement	Requires an annual public meeting to solicit comments on Plan and Annual Report	Eliminates requirement for public meeting – equivalent to EPA
6(a)(3) Illicit Discharge (IDDE)	Require IDDE plan by start of permit for existing MS4s and 1 year for new MS4s	Change deadlines to 1 year existing/2 years new – equivalent to EPA
6(a)(3)(B) IDDE legal authority	Develop legal authority to prohibit illicit discharges by start of permit for existing MS4s and 1 year for new	Change deadlines to 1 year existing/2 years new – equivalent to EPA
6(a)(3)(C) IDDE outfall inventory & mapping	Existing permittees have inventory & mapping by start of permit	Change deadline to 1 year – equivalent to EPA
6(a)(5)(A) Post-construction legal authority	Eliminate regulatory barriers to Low Impact Development within 2 years for existing MS4s and 3 years for new MS4s	Change deadlines to 4 years existing/5 years new – equivalent to EPA
6(a)(6)(C) Street sweeping	Sweep streets weekly/monthly/annually according to table	Sweep street annually – equivalent to EPA
6(a)(6)(C) Catch basin cleaning	Inspect twice a year for 2 years for impaired waters to determine frequency. For all others, inspect once in 2 years. Clean if >50% full.	Inspect once in first 3 years to determine frequency. Clean if >50% full. EPA has no inspection req't. MS4 decides if/when.
6(a)(6)(C) Leaf management	Requires town-wide leaf pickup once a year	Change to leaf management. Town may or may not pickup. Residents required to manage leaves appropriately – equivalent to EPA
6(j)(1) In-stream monitoring	Requires dry & wet weather in-stream monitoring	Eliminates in-stream monitoring – equivalent to EPA
6(j)(2) Wet weather outfall monitoring	Requires annual rotating outfall monitoring of 22 parameters for 4 – 12 outfalls based on population	For impaired waters only, conduct outfall screening for indicator pollutant using field meters. Follow-up if significant contributor to impairment. EPA has no impaired waters monitoring unless they also show evidence of illicit discharges.