

MS4 General Permit Reissuance Technical Advisory Committee

Regional Environmental Committee

February 2, 2017

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Timeline for the GP Reissuance

Step	Date
TAC Meetings*	October 2016 – April 2017
EPA Review of New Draft	May - July 2017
New Draft to SWCB	September 2017
Public Comment Period	October 2017
Registration Statement Due	March 30, 2018
Current Permit Expires	June 30, 2018
New Permit Effective Date	July 1, 2018

* Upcoming TAC meetings – Feb 24, Mar 3, Mar 29, and Apr 26

EPA Remand Rule

- Requires “clear, specific, and measurable” permit requirements
- Emphasis on public participation
- Likely to impact the Local TMDL Action Plan requirements
- Role of Program Plan

MS4 Program Plan

- DEQ intends to put all of the permit requirements in the permit so that the Program Plan is not subject to a public review process and is easier to revise
- DEQ will review Program Plans for completeness but not approval

MCM 1 – Public Educ and Outreach

- Permittees identify 3 high priority SW issues and use diverse strategies to increase the public's knowledge
- Choose strategies from list of categories:
 - Electronic messaging
 - Publications
 - Community events
 - Talks/presentations
 - Training materials
- Removed requirement to reach 20% of target audience for each high priority issue

MCM 2 – Public Involvement

- Implement procedures for public to report complaints and provide input on MS4 program
- Track public input and responses
- Develop a webpage dedicated to the MS4 program
- Permittee implements 4 diverse public involvement opportunities from list of categories:
 - Monitoring/cleanup/restoration
 - Education
 - Disposal/pollution prevention
 - Promote or sponsor local environmental events that help protect water quality

MCM 3 - IDDE

- Burdensome new mapping requirements:
 - “points of discharge” in cases where the outfall is beyond the MS4
 - “points of interconnection” with other MS4s
- Address versus eliminate illicit discharges
- Maintain requirement for 50 dry weather screenings

MCM 4 – Construction Site Stormwater Runoff Control

- Instead of repeating language from Erosion and Sediment Control law, the law and regulations are referenced; there is concern regarding regulations for consolidated VESMP

MCM 5 – Post-Construction SW Mgmt

- All SWMFs owned by MS4 inspected annually
- Unrealistic maintenance requirements:
 - 30 days to complete maintenance that does not require capital expenditure
 - 6 months to complete maintenance that does require capital expenditure
 - Report total number of maintenance activities on SWMFs
- Report all SWMFs constructed on sites with CGP through DEQ Construction SW Database
- Report all new BMPs that are not listed in the Construction Database in the DEQ BMP Warehouse

Next Steps

- MCM 6 – Pollution prevention/ good housekeeping
- Bay TMDL / Local TMDLs
- 4 more TAC meetings scheduled so far