

Phase I Large MS4 NPDES Stakeholder Draft Permit
Major Changes from the 2019 Permit
September 15, 2023

Page	Permit Section	Original Requirement from 2019	2024 Revision
4	Part 2.1	The permit referenced the water quality standards from the State Rules.	The text was revised to clarify that the numeric water quality standards in Rules 391-3-6-.03(5) are not applicable.
6	Table 3.3.1, BMP #1	The permit referred to MS4 Control Structures and did not include water quality vaults as one of the MS4 structures.	In BMP #1, the word “control” was removed for clarity and water quality vaults were added as one of the MS4 structures to be included in the inventory.
8	Table 3.3.1, BMP #5	The permit required permittees to reassess existing flood management projects every permit cycle.	Clarifications to the schedule were made. Additions were made to the text to provide clarity that existing flood management projects are not required to have a full reassessment for water quality impacts with each permit reissuance.
15	Table 3.3.4, BMPs #2, #3, #4, #5	The permit did not address how permittees should implement procedures for construction site management if they are not a Local Issuing Authority.	Additions were made to the text that specify how a permittee should implement procedures for construction site management if they are not LIAs.
19	Part 3.3.7	The permit requires that permittees with Impaired Waters that are non-supporting for fecal coliform revise their IWP and sample for <i>E. Coli</i> upon EPA approving the standard.	US EPA approved Georgia’s <i>E. coli</i> standard in August 2022. Therefore, the sentence no longer applies.
19	Part 3.3.7	The permit requires that permittees with populations greater than 10,000 follow a specific bacterial monitoring protocol.	Language has been added to clarify that permittees with a population of less than 10,000 are exempt from the collection of four geometric means but are still required to address bacteria impairments in their Impaired Waters Plan (including conducting monitoring for that pollutant of concern).
23	Part 3.3.11	The permit allowed the permittees two options to achieve compliance with the stormwater runoff water quality/reduction performance standard.	The phase-in period to implement runoff reduction in the 2019 permit iteration has passed. All permittees must now use what was option (a) in the 2019 permit.

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25	Table 3.3.11(b)(2)	The permit required permittees to continue to review and revise regulations to ensure they do not prohibit or impede the use of GI/LID practices.	The permit has been revised to specify the timing of the regulatory reviews.
26	Table 3.3.11(b)(2) BMP #4(a) and BMP #4(c)	The permit did not include wording that accounted for GI/LID structures that were publicly-owned by other entities.	In BMP #4(a) the text was revised to remove wording in order to make sure all three ownership types were inspected. In BMP #4(b) additions were made to the text to ensure the permittee had procedures to ensure the maintenance of GI/LID structures not owned by the MS4.
39	Appendix B	The permit included a list of permittees by population count.	The permit was updated based on the 2020 Census.