

Phase II DOD MS4 NPDES Draft Permit
Major Changes from the 2019 Permit
September 15, 2023

Page	Permit Section	Original Requirement from 2019	2024 Revision
6	Part 3.1.3	The permit instructed that a permittee must call the office of Nonpoint Source Program in order to obtain NOI form.	The text was revised to direct the permittee to the EPD website using a link to obtain the NOI form.
6	Part 3.1.4	The permit instructed permittee to mail completed NOIs and reports.	The mailing address for the Municipal Stormwater Team was updated.
6	Part 3.2.1	The permit required permittees to submit a new SWMP within 180 days after the effective date of the new permit if notified by the EPD.	The text was revised to remove the required notification to be received by the EPD so that the permittee will submit an updated SWMP without notification.
7	Part 4	The permit required the SWMP to be reviewed and approved by the EPD.	The text was revised to remove the phrase “and approve” so that regardless of approval status, the permittee is still responsible for implementing the activities described for each BMP in the SWMP.
7	Part 4.1.2	The permit required the permittee to list the BMP activities that will be implemented for each of the six stormwater minimum control measures in Part 4.1.1.	An addition was made to the text that will require the permittee to give a description of the activity for each BMP.
8	Table 4.2.1 (a), BMP #1	The permit requires that existing permittees have a public education program that includes BMPs from a list proposed by the EPD.	The text was revised to add more options to the list of BMPs.
9	Part 4.2.2	The permit encourages the permittee to make the approved SWMP accessible electronically or by other means.	The text was revised to remove wording that implies the SWMP must be approved.

Phase II DOD MS4 NPDES Draft Permit
Major Changes from the 2019 Permit
September 15, 2023

Page	Permit Section	Original Requirement from 2019	2024 Revision
10	Table 4.2.2 (a), BMP #1	The permit requires the permittee to have a public involvement/participation program that includes BMPs from a list proposed by the EPD.	The text was revised to add more options to the list of BMPs in 4.2.2 (a).
12	Table 4.2.3 (a)	The permit requires that existing permittees implement an Illicit Discharge Detection and Elimination (IDDE) program.	In BMP #1a, additions were made to text that specify a frequency for evaluation. BMP #3a changes the wording of “5-year period” to “5-year permit term”, and added language to provide minimum reporting requirements if inspections or stream walks are done by geographical area. The text in BMP #3b was revised to provide clarification on the type of information to be provided to EPD. BMP #5 was revised to require the date of investigation for each illicit discharge related complaint be provided to EPD.
14	Table 4.2.3 (b)	The permit requires that new permittees develop an IDDE plan that includes screening procedures, source tracing procedures and discharge elimination procedures along with examples forms.	In BMP #3a, an addition to the text was made that will include “enforcement letters” as a part of the example forms. BMP #3c provides guidance if inspections or stream walks are done by geographical area. The text in BMP #3d was revised to provide clarification on the type of information to be provided to EPD. BMP #5b was revised to require the date of investigation be provided to EPD.

Phase II DOD MS4 NPDES Draft Permit
Major Changes from the 2019 Permit
September 15, 2023

Page	Permit Section	Original Requirement from 2019	2024 Revision
17	Table 4.2.4 (a) BMP #1	The permit requires that existing permittees evaluate the existing E&S regulatory mechanism by which they will exercise Legal Authority.	Additions were made to text that will specify a frequency for evaluation.
19	Table 4.2.4 (b) BMP #2	The permit requires that new permittees develop site plan review procedures.	Additions were made to text that clarify when the procedures should be submitted to EPD.
24	Part 4.2.5.2	The permit provides weblinks for where additional GI/LID information can be found.	The weblinks have been updated.
24	Table 4.2.5(a)	The permit requires that existing permittees implement a program for post-construction development.	In BMP #1a, additions were made to text that will specify a frequency for evaluation. In BMP #3, the term “5-year period” was revised to “5-year permit term” and the text was updated to provide guidance if inspections are done by geographical area. In BMP #6, text was added to provide minimum reporting requirements if inspections are done by geographical area.
26	Table 4.2.5(b)	The permit requires that new permittees implement a program for post-construction development.	In BMP #3, additions were made to the text to provide guidance if inspections are done by geographical area. In BMP #6, text was added to provide minimum reporting requirements if inspections are done by geographical area.

Phase II DOD MS4 NPDES Draft Permit
Major Changes from the 2019 Permit
September 15, 2023

Page	Permit Section	Original Requirement from 2019	2024 Revision
29-33	Table 4.2.6 (a) and (b)	The permit requires permittees to develop a Pollution Prevention/Good Housekeeping Program.	<p>The word “control” was removed from the term “MS4 control structure” for clarification through these tables.</p> <p>In BMP #1.a., “water quality vaults” was added as a structure to be included in the inventory.</p> <p>In Table 4.2.6(a), BMPs #2, #8 and #9, the term “5-year period” was revised to “5-year permit term”.</p> <p>In BMPs #2 and #9, text was added to provide minimum reporting requirements if inspections are done by geographical area.</p> <p>In Table 4.2.6(a), BMP #4.b., the word “permittee” replaced the word “MS4” for clarification.</p> <p>BMP #7 was split into parts 7(a) and 7(b), and the language in 7(b) was updated to require the list include a note of which reviewed plans resulted in improved pollutant reduction.</p> <p>In Table 4.2.6(b), BMP #1.b., the word “annually” replaced “as necessary” to specify the expected frequency of inventory and map updates.</p>
33-34	Part 4.3.1	The permit requires a Monitoring and Implementation Plan for impaired water located within the MS4 jurisdictional area.	Updated the abbreviation of the Monitoring and Implementation Plan from “Plan” to “MIP”, to avoid confusion with other terminology in the permit.
44	Appendix A	General definitions in the permit.	Added a definition for GI/LID to this list.
	Throughout	The term “storm water” used.	The space between storm and water has been removed and replaced with “stormwater”.