



## **NPDES Small MS4 General Permit Renewal Early Stakeholder Outreach In-Person/Virtual Meeting**

The Ohio EPA Division of Surface Water will be holding an Early Stakeholder Outreach meeting to identify potential changes to the National Pollutant Discharge Elimination System (NPDES) Small MS4 general permit renewal and to invite input. The current general permit expires on March 31, 2026. Early stakeholder input will assist in formulating the official draft general permit for public comment.

**Date:** June 26, 2025

**Location:** State Library of Ohio  
274 E. 1<sup>st</sup> Avenue  
Columbus, Ohio 43201

**Time:** 2:00 pm – 3:30 pm

**Virtual Meeting Link:** <https://events.gcc.teams.microsoft.com/event/1e31e05d-9744-4d8c-9965-5b035413b90f@50f8fcc4-94d8-4f07-84eb-36ed57c7c8a2>

Early stakeholder input will be accepted through **July 18, 2025**, and any input should be emailed to [Jason.Fyffe@epa.ohio.gov](mailto:Jason.Fyffe@epa.ohio.gov).

The current Small MS4 general permit can be viewed here:

[https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/Small Municipal Seprt Storm Sewer Sys/OHQ000004.pdf](https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/Small_Municipal_Seprt_Storm_Sewer_Sys/OHQ000004.pdf)

Ohio EPA is requesting input on all current permit conditions but is specifically requesting input on the following potential changes being considered for the renewal.

### **Notice of Intent (NOI)**

1. Update the Notice of Intent (NOI) form to conform with U.S. EPA's [NPDES electronic reporting rule](#), a.k.a. NPDES eRule. See 80 FR 64064.
  - Possible changes include providing: the boundaries of the regulated MS4 drainage area; the status of MS4 map (example responses: Complete and Updated/Not Complete/Not Started); whether Illicit Discharge Detection and Elimination, Construction Runoff Management, Post Construction Stormwater Management, and Industrial ordinances and/or regulatory mechanisms exist and if they need to be revised to meet the renewed permit; the status of the applicant's programs for SWP3 approval, site inspections and enforcement; the status of

applicant's program to ensure adequate long term operation and maintenance of post construction stormwater management facilities.

2. Add a table to MS4's authorization letter listing the approved TMDLs and applicable pollutants for that MS4 from Appendix A of permit.

### **Miscellaneous**

3. Change the word "storm water" to "stormwater" throughout the permit to be consistent with Ohio EPA's current Style Manual.

### **Permit Area**

4. Part I.A. Update to reflect federal definition: "Urban Area with a Population of 50,000 or more people".

### **Reporting**

5. Changes to MS4 annual report content to better assess permit compliance and to conform to U.S. EPA's electronic reporting rule. This impacts language throughout the permit.
  - a. Examples: Report the total number of catch basins and the number of catch basins cleaned that year. Clarify that the reported number of cleaned catch basins for that calendar year may not include those catch basins cleaned during prior years of this permit cycle. Report the total number of curbed street miles and the total number of curbed street miles swept twice that year.
6. Part III.B.3.j.v. Require notification to be submitted via STREAMS when the permittee has detected an illicit sanitary cross connection from industrial, commercial, or multi-family sources, or leaking or broken sanitary lines that are actively contributing sewage to the MS4. Reason: Comply with U.S. EPA eRule.

### **Public Education and Outreach**

7. Part III.B.1.c.ii. Add language that one of the five messages must target residential or commercial salt application.
  - a. E.g. "Provide educational outreach to commercial/institutional facility operators on proper salt storage, handling, and application practices to minimize environmental impacts."

### **Illicit Discharge Detection and Elimination**

8. Add language that the MS4 will develop and enforce standards for the storage and handling of salt/deicing/brine to prevent and minimize discharges to the MS4.

- a. E.g. “For commercial and institutional facilities within your jurisdiction that store salt or other deicing materials, you shall:
  - i. Develop and implement an ordinance or other regulatory mechanism that requires the following salt storage and handling BMPs:
    1. Storage piles must be covered or enclosed to prevent exposure to precipitation
    2. Liquid deicing materials must be stored in tanks with secondary containment or alternatively bollard or barrier protection
    3. Loading and unloading of salt/deicing materials must occur in designated, contained areas
    4. Spills must be cleaned up by the end of the storm event.
  - ii. Include a list of the commercial and institutional facilities within your jurisdiction that store salt or other deicing materials in your annual report, along with a summary of inspection findings and any enforcement actions taken.”
- b. Reason: These requirements are intended to ensure that commercial and institutional users of the MS4 system implement proper salt storage and handling practices to prevent or minimize the discharge of salt and other deicing pollutants to surface waters. The MS4 operator is responsible for developing the regulatory mechanism, conducting inspections, and providing outreach to achieve compliance within their jurisdiction.

### **Construction Site Stormwater Runoff Control and Post-Construction Stormwater Management**

9. Performance Standards. Add language requiring the MS4 to train staff conducting SWP3 review and compliance inspections.
  - a. Example from Washington’s MS4 permit: “Each Permittee shall ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training must be provided as needed to address changes in procedures, techniques or staffing. Permittees shall document and maintain records of the training provided and the staff trained.”
10. Part III.B.4.c.ii. and 5.f.ii. Performance Standards. Add language that SWP3 review and approval shall include a letter or email documenting final approval of the plan.
11. Part III.B.4.c.iii. Performance Standards. Add the following clarifying language “To ensure compliance, all applicable sites shall have an initial inspection within 14 days of the start of earth disturbance.”
12. Part III.B.4.c.iii. Performance Standards. Add language to clarify that an MS4 permittee shall always transmit inspection findings to the site operator and document this transmittance (e.g., emails; letters; or via phone log with date, time, participants’ names and discussion summary).

13. Part III.B.5.f.v.c. TMDL Performance Standard. Provide improved guidance on the design of Stream Restoration projects installed to meet TMDL Performance Standard.
14. Part III.B.5.f.v. TMDL Performance Standard. Include two additional options: 1) An outfall stabilization program. Propose a number that would be equal in cost/benefit as implementing one of the other Performance Standard Options, 2) A forested/riparian buffer restoration program.

#### **Pollution Prevention/Good Housekeeping for Municipal Operations**

15. Part III.6.e.i. Add language that permittee shall complete pollution prevention/good housekeeping training at least once per year for existing employees and within the first three months of hire for new employees.
16. Part III.B.6.c. Clarify the required inspection frequency for facilities located outside a TMDL area. Suggested language: “For your municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including vehicle maintenance facilities, bus terminals, composting facilities, impoundment lots and waste transfer stations, a Storm Water Pollution Prevention Plan (SWPPP) shall be developed and implemented in accordance with the SWP3 requirements of OHR000006. At a minimum, you shall conduct an annual comprehensive inspection of these facilities.”

#### **TMDL**

17. Appendix A. Update to include new MS4s regulated due to the results of the 2020 Census, to include new approved TMDLs and to reflect changes to existing TMDLs.