

District of Columbia Municipal Separate Storm Sewer System (MS4)
Summary of Changes from the 2004 MS4 Permit to the 2010 MS4 Permit

2004 Permit	2010 Permit
General Changes	
Incorporated minimal Low Impact Development (LID) practices.	Modified and improved for implementing a sustainable and enforceable approach focusing on promotion of LID practices and green infrastructure for retrofits in new and redevelopment areas.
Relied on effluent limitations expressed in terms of BMPs and WLAs.	Establishes criteria for compliance with discharge limitations and performance standards for managing and enforcing a comprehensive stormwater management program.
Established an administrative Task Force and cooperative agreements.	Facilitates increased collaborative efforts with District agencies and the public in implementing the provisions of the Permit.
Contained had multiple annual reporting requirements.	Continues annual reporting through prescriptive report consolidation for evaluating an effective stormwater management program.
Developed a baseline multi-site monitoring stormwater program.	Continues with the subwatershed comprehensive monitoring program by reducing the number of stations to allow for increased monitoring of total maximum daily loading (TMDL) compliance of impaired waters.

Specific Changes

<p>Did not contain numeric performance standards for stormwater retention.</p>	<p>Contains the following numeric performance standards for stormwater retention:</p> <p><u>Non-Federal Facilities:</u> Choice between: (1) an on-site retention standard of 1.2 (90% capture); or (2) design to achieve retention of the predevelopment runoff volume of stormwater from a 24-hour storm for the 1, 2, 10 and 100 year storm events.</p> <p><u>Federal Facilities:</u> Choice between: (1) an on-site retention standard of 1.7" (95% capture); or (2) design to achieve retention of the predevelopment runoff volume of stormwater from a 24-hour storm for the 1, 2, 10 and 100 year storm events.</p>
<p>Used water quality based BMP practices to the maximum extent practicable and waste load allocations (WLA) as standards.</p>	<p>Uses the more stringent of either the water quality standards or the TMDL waste load allocations for enforcing the stormwater management program</p>
<p>Introduced implementation of various stormwater practices.</p>	<p>Establishes minimum performance measures for green technology stormwater management practices (i.e., tree canopy [4,150 trees planted annually], green roofs [120,000 square feet annually], impervious surface [13,500,000 square feet over Permit term], highway projects [enhanced street sweeping frequency]).</p>
<p>Required an enhanced District-wide construction inspection and enforcement program.</p>	<p>Establishes on-site retention standards for non-Federal and Federal properties to control construction stormwater runoff.</p>
<p>Required technical manual and education measures for construction site operators.</p>	<p>Addresses restoring post-development of new and redevelopment construction projects to predevelopment conditions unless the discharge is fully compensated for by</p>

	an offset credit program.
Initiated field studies to investigate illicit discharges District-wide.	Continues to expand on the enforcement of the illicit discharge and improper disposal program.
Monitored only for chemical and conventional pollutants.	Adds biological monitoring to the District-wide program.
Continued ongoing monitoring protocol.	Requires Revised Monitoring Plan for limited number of parameters.
Required development of TMDL implementation plans for the Anacostia River and Rock Creek.	Adds development of TMDL implementation plans for the Potomac River and for trash in the Anacostia watershed and expanded criteria for EPA approval of updated and new plans.
Piloted Hickey Run BMP Compliance and Monitoring Program for the oil and grease TMDL to “delist” the stream for the impairment.	Continues with Hickey Run restoration plans for addressing trash issues.
Recommended retrofit project consideration as an option in highway construction projects.	Specifically targets any new or redevelopment projects for identifying retrofit opportunities for stormwater control.