

Comparison of major MS4 permitting requirements among selected COG jurisdictions

COG staff document Jan. 31, 2014

Jurisdiction	Montgomery County (permit issued 2010)	Prince George's County (permit issued January 2014)	Arlington County (permit issued June 2013)	District of Columbia (permit issued November 2012)
Provision				
Permit Area	Full geographic area of the county, with the exception of areas otherwise covered by other stormwater permits, such as state and federal property, municipalities within the county, and certain industrial facilities.	Full geographic area of the county, with the exception of areas otherwise covered by other stormwater permits, such as state and federal property, municipalities within the county, and certain industrial facilities.	Those areas of the county that are drained by municipal stormwater outfalls that are owned and operated by the county.	Full geographic area of the city, with the exception of areas otherwise covered by other stormwater permits, such as federal property and certain industrial facilities, as well as the area drained by the city's combined sewer system, which is subject to its own consent decree to address runoff.
Retrofit Requirements	Within 1 year, submit impervious area assessment of all acres not already restored to the MEP; by end of 5-year permit term, achieve retrofit of 20 percent of the acreage identified in the assessment	Within 1 year, submit impervious area assessment of all acres not already restored to the MEP; by end of 5-year permit term, achieve retrofit of 20 percent of the acreage identified in the assessment.	* Plant a minimum of 2,000 trees on County property, and distribute minimum of 2,000 trees to private property owners. * Implement a minimum of 7 retrofit projects from the County's completed retrofit studies.	* Install a minimum of 350,000 square feet of green roofs; * Plant 4,150 trees annually, and provide a District-wide urban tree canopy coverage of 40 percent by 2035. * Retrofit a minimum of 18 million square feet of impervious surface, including at least 1.5 million square feet of this in transportation right of ways.
TMDL Implementation Plan – Bay TMDL	Bay TMDL not in place at time of permit issuance, but implementation plan for the Bay TMDL is required under the general TMDL requirement, i.e. during the current	Within 1 year, submit a restoration plan for meeting the county's stormwater WLA for the Bay TMDL. During the current permit term, compliance toward progress in meeting	Within 24 months, develop a Bay TMDL implementation action plan with measurable milestones for achieving required reductions. By the end of the permit	Within 30 months of the permit taking effect, develop an implementation plan for the Bay TMDL that includes a schedule for attainment of the District's nutrient and

	<p>permit term, compliance toward progress in meeting the TMDL can be achieved through meeting the 20-percent retrofit requirement.</p>	<p>the TMDL can be achieved through meeting the 20-percent retrofit requirement. (Permit assumes the Bay TMDL achievement date will be 2025.)</p>	<p>term” a) achieve 5 percent of the nutrient and sediment reductions that the state has calculated are needed to be achieved by urban sources in the Virginia portion of the Potomac River basin. b) develop an extended TMDL action plan to address an additional 35-percent reduction in the next 5-year permit term.</p>	<p>sediment wasteload allocations for the urban sector, with numeric benchmarks and interim milestones. EPA will consider elements of this plan as “enforceable permit provisions.”</p>
<p>TMDL Implementation Plan – in General</p>	<p>Within 1 year, submit implementation plans for meeting the stormwater WLA for every applicable TMDL in the county; the plans must document “the actions necessary to meet the required pollutant load reduction benchmarks within a specified time frame.”</p>	<p>Within 1 year, submit implementation plans for meeting the stormwater WLA for every applicable TMDL in the county; the plans must include a “final date” for meeting the WLA and a detailed schedule for implementation of measures.</p>	<p>Within 2 years, submit a TMDL action plan for meeting the stormwater WLA for every applicable TMDL in the county. The plans shall identify interim milestones and an “estimated end date” for achieving the applicable WLAs.</p>	<p>Within 30 months, submit a TMDL implementation plan for meeting the stormwater WLA for every applicable TMDL in the county. The plan shall identify interim milestones, numeric benchmarks and a “final attainment date” for achieving the applicable WLAs.</p>
<p>Trash and Litter Requirements</p>	<p>Originally, take a number of steps to meet the county’s obligations under the Potomac River Watershed Trash Treaty. (Since updated to conform with county’s Anacostia trash TMDL reduction target.)</p>	<p>Within 1 year, develop a work plan to achieve the Anacostia trash TMDL-based reduction target as well as accounting methods to quantify trash reductions; achieve the annual reduction rate by year 5 of the permit.</p>	<p>No special provisions.</p>	<p>Within 1 year, develop a trash reduction calculation methodology; achieve the annual reduction rate under the Anacostia trash TMDL by year 5 of the permit.</p>