



Florida Department of Environmental Protection

Evaluating Stormwater Management Program Effectiveness

**NPDES Stormwater Program
2/9/2017**





Assessment Requirements

Assessment Requirements in Cycle 4 Phase I MS4 permits

- *Primary Change in Cycle 4:* Must have an assessment program which explains how monitoring data and/or load estimates will be used to evaluate SWMP (Stormwater Management Program) effectiveness.
- The purpose of the assessment program is to provide information for each permittee to determine the overall effectiveness of their SWMP in reducing Stormwater pollutant loadings from the MS4.
- *Submit an Assessment Program within 12 months of permit reissuance (Cycle 4).*



Assessment Requirements (cont.)

- Development of the assessment program shall address:
 - a) A water quality monitoring plan, intended to identify local sources where urban stormwater is impacting surface water resources; or
 - b) Pollutant Loadings/Event Mean Concentrations (EMCs) calculations.
- A description of how the data from a) and/or b) above will be used to:
 - Evaluate trends in pollutant loadings from the MS4 and in water quality; and
 - Identify portions of the MS4 which can be targeted for loading reduction / corrective action with additional pollutant reduction measures.



Annual Report Requirements

- *Primary Change:* Each permittee must evaluate the effectiveness of its SWMP using its assessment program.
- The Annual Report shall include the following:
 - Status of water quality monitoring plan implementation. Status may include sampling frequency changes, monitoring location changes, or sampling waiver conditions.
 - Brief discussion of the assessment program results to date, which includes a summary of the water quality monitoring data and/or stormwater pollutant loading changes from the reporting year. *Note: Analysis must be specific to each permittee's SWMP.*
 - An analysis of the data discussing changes in water quality and/or stormwater pollutant loading from previous reporting years. *Note: Analysis must be specific to each permittee's SWMP.*



Year 3 Requirements

- *Primary Change:* Comparing estimated loads during the current permit cycle with those generated in the previous cycle. Determine whether loads are increasing or decreasing; where increasing, suggested changes in the SWMP must be submitted in Year 4.
 - Each permittee shall provide a table of average annual pollutant loadings and EMCs. Each permittee shall compare the current cycle's average annual pollutant loadings with those from the previous cycle's Year 3 Annual Report.
 - If the total annual pollutant loadings for each parameter has not decreased since the issuance of the previous MS4 permit, each permittee shall re-evaluate its SWMP and identify and submit revisions to its SWMP, as appropriate, to reduce pollutant loadings, especially to impaired waters, in the Year 4 Annual Report.



Year 4 Requirements

- *Primary Change:* Requires identification of areas needing corrective action, including a timetable for implementation.
- The permittee shall attach to the Year 4 Annual Report and reapplication a summary of the SWMP evaluation, including the following:
 - An evaluation of the effectiveness of the SWMP in reducing pollutant loading from the MS4.
 - A description of whether stormwater pollutant loadings discharged from the MS4 have decreased, to include results and annual loadings from Part V.
 - Recommended SWMP revisions for each of the elements in Part III of the permit as a result of the SWMP evaluation. Based on an analysis of the assessment results, identify any areas or drainage basins within the boundaries of the MS4 that should be targeted for corrective actions(s). If applicable, specify what corrective actions should be completed and a timetable for implementation. Corrective actions(s) include retrofits, structural BMPs, and non-structural BMPs (e.g., public education, street sweeping).



Contact Information

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