

Quarterly Teleconference for Florida Phase I MS4s

Wednesday, June 29, 2022

Minutes

The next quarterly teleconference is scheduled for:

- October 5, 2022 @ 10:30 am
- Submit agenda topics to Sharon.Surita@FloridaDEP.gov
- [Subscribe to Phase I MS4 GovDelivery](#)

NOTES: 87 attendees

Minutes:

Non-Point Source Management Presentation – Nathan Jagoda, Amanda Peck

- gsi.floridadep.gov/
- Presentation attached

Legal Authority – Michelle Bull

We are clarifying the legal authority language in the Cycle 5 permit. DEP's expectations are that each permittee have a form of legal authority.

- Municipalities:
 - have their own ordinances to prohibit/control discharges and provide inspection and enforcement powers
 - adopt by reference the County ordinance
 - Have an Interlocal or agreements with the County (in the cases the county ordinance provides this power)
- For non-traditional permittees, such as improvement districts and FDOT, we expect other methods to be detailed in the SWMP. Acceptable methods include but are not limited to:
 - Policies
 - Permit conditions
 - Referrals to ordinances that cover discharges into permittee MS4 (in the cases the local ordinance provides this power)
 - judicial process, injunctive relief, sanctions
- The SWMP should include the type of method used and the process for referring matters for enforcement or escalating incidents, which may include having interlocal or interjurisdictional agreements with municipalities that have ordinances or pursuing civil penalties.

Q/A:

- Scott Browning, Manatee County: Senate Bill 60 prohibits anonymous complaints, how to handle online forms?

Michelle Bull: Permittees have been using the an imminent threat statement for complaints with potential environmental harm. [Phase I Quarterly Teleconference November 2021 Minutes](#)

- <http://laws.flrules.org/2021/167>
“This paragraph does not apply if the person designated as a code inspector has reason to believe that the violation presents an imminent threat to public health, safety, or welfare or imminent destruction of habitat or sensitive resources.”
- Scott: Should we remove the optional for submitter ID?
Michelle: that is a legal question you should discuss with counsel.

- Anne Cappelli, Mock Roos: Can you provide the list you mentioned of other methods of permit compliance by permittees that don't have the legal ability to pass ordinances and/or carry out enforcement activity? See list above.
- Alan Obaigbena, FDOT District 2: FDOT relies on FDEP for enforcement of illicit discharges into the MS4.
Steven Kelly (FDOT District 1) and agree with Alan. Fred Noble (FDOT Central) clarify Alan and Steven comments, FDOT has no statutory authority for enforcement; injunctive relief by courts only.
Borja: familiar with ILA with the City of Jacksonville and the District. We will schedule a discussion offline.
Cassidy Reichert, City of Jacksonville: clarified that they do not have Legal Authority for illicit discharges into FDOT MS4, only into City MS4.

Audit Updates – Anna Lomasney

See attached list for audits/field inspections due by Sept. 30, 2022

GIS Inventory Updates – Michelle Bull

All information gathered through data requests for Ponds has been provided to the contractor Atkins. The statewide database includes the following information:

- Phase I Major outfalls
- Phase II outfalls
- Phase I & II Ponds (Stormwater treatment systems: dry/wet, retention/detention)

Database Schema attached.

Next step – build a tool for permittees to view and update the database. The goal is to have a tool that can be used by the Cycle 5 permit Annual Report submittals and with eReporting (2025)

Q/A:

- Steve Peene: Would the GIS inventory be the sole inventory / does database belong to permittees or to DEP?
Michelle: The database is not permittee's official inventory, it is a copy that DEP maintains. We know it will be out of date. We will be able to provide the GIS data to permittees that submitted non-GIS data.

BPCP Review Checklist – Michelle Bull

Matt & Anna developed a BPCP checklist based on the requirements of the permit and the Fecal Indicator Toolkit. It includes all possible elements, but it is not necessary to have all elements in each BPCP. See checklist attached.

Data sources for WQ assessments – Michelle Bull

How many permittees uploading to WIN?

- Mark Heidecker, City of Tallahassee – Class III surface waters
- Cassidy Reichert, City of Jacksonville uploads WQ data into WIN
- Scott Browning, Manatee County is uploading its data to WIN

- Ashok Raichoudhury, Broward County RED lab uploads ambient water quality data
- Emily Lawson, Orange County uploads ambient data to WIN
- David Glicksberg, Hillsborough County uploads to WIN
- Gregory Knothe, Polk County uploads to WIN monthly
- Leigh Simmons Lee County uploads
- Wayne Toothman, Leon County uploads to WIN
- Anne Cappelli (Mock Roos), Palm Beach County uploads
- John McGee, Plant City updates to WIN
- Mallika Muthiah, Miami-Dade County uploads to WIN
- Janet Hearn, Pasco County uploads ambient data to WIN

Q/A:

- Mike Perry: requirements for type of waterbody?
Michelle: Only ambient water quality data should be uploaded, not stormwater monitoring data.

SB712 Clean Waterways Act Rulemaking – Borja Crane-Amores

Applicant Handbook Vol. 1, Part 5, Section 12: operations & maintenance requirements

For HOAs, other that own an ERP-permitted stormwater system, what happens when an association dissolves? Who generally takes over the inventory and ownership?

Please email info in your area to [Borja](#).

Open Discussion

- Aleah Ardelean, Palm Beach County (also Cassidy Reichert, Anne Cappelli): Curious when the new Cycle 5 NPDES Permit will be issued and if there will be any changes?
Michelle: We are Meeting internally, have gotten last round of workgroup comments and EPA comments. Target for internal revisions = mid-August. Will share the draft and a list of changes at next quarterly teleconference before permit issuance process.
- David Glicksburg, Hillsborough County: Are any attachments required for the current annual report submittal?
No additional attachments are required for Year 5. Assessment program and TMDL implementation status updates should be provided.

List of permittees required to be audited by September 30, 2022

*not inclusive of all audits that will be conducted

*permittees already audited are struck through

Broward County Co-permittees Audits:

(Anna Lomasney)
Coconut Creek
Cooper City
Coral Springs
Deerfield Beach
Hallandale Beach
Lauderdale by the Sea
~~West Park~~
Weston
Wilton Manors

Broward County Co-permittees Field Inspections:

(Anna Lomasney)
Dania Beach
~~Margate~~
~~Miramar~~
Parkland
~~Pembroke Park~~
~~Pembroke Pines~~
~~Plantation~~
Pompano Beach
~~Oakland Park~~
Southwest Ranches
Tamarac

Miami-Dade County

(Jason Maron)
Coral Gables
Cutler Bay
~~Doral~~
~~Hialeah Gardens~~
Homestead
Key Biscayne
~~Medley~~
~~Miami Lakes~~
Miami Shores
~~Miami Springs~~
South Miami
Sunny Isles Beach
Surfside
~~Virginia Gardens~~
West Miami

Palm Beach County Co-permittees

(Matt Irwin)
Atlantis
Belle Glade
Greenacres
Jupiter
Lake Worth
Manalapan
Mangonia Park
South Bay

Pinellas County Co-permittees

(Matt Irwin)
~~Madeira Beach~~
~~North Redington Beach~~
~~Oldsmar~~
~~Safety Harbor~~

FDOT (Michelle Bull)

Turnpike (Broward, Palm Beach, Polk)
District 6, Miami-Dade
Miami-Dade Expressway Authority

Permittee's Respective Coordinator Contact		
Permit #	Permit Name	MS4 Coordinator
FLS000002	City of Miami	Jason Maron
FLS000003	MIAMI-DADE COUNTY	Jason Maron
FLS000004	SARASOTA COUNTY	Jason Maron
FLS000005	PINELLAS COUNTY	Matt Irwin
FLS000006	HILLSBOROUGH COUNTY	Anna Lomasney
FLS000007	City of St. Petersburg	Matt Irwin
FLS000008	City of Tampa	Anna Lomasney
FLS000009	City of Temple Terrace	Anna Lomasney
FLS000010	Reedy Creek Improvement District	Jason Maron
FLS000011	ORANGE COUNTY	Jason Maron
FLS000012	City of Jacksonville	Matt Irwin
FLS000013	City of Jacksonville Beach	Matt Irwin
FLS000014	City of Orlando	Jason Maron
FLS000015	POLK COUNTY	Anna Lomasney
FLS000016	BROWARD COUNTY	Anna Lomasney
FLS000017	City of Ft. Lauderdale	Anna Lomasney
FLS000018	PALM BEACH COUNTY	Matt Irwin
FLS000019	ESCAMBIA COUNTY	Matt Irwin
FLS000020	City of Hollywood	Anna Lomasney
FLS000023	City of Hialeah	Jason Maron
FLS000032	PASCO COUNTY	Jason Maron
FLS000033	LEON COUNTY	Matt Irwin
FLS000034	City of Tallahassee	Matt Irwin
FLS000035	LEE COUNTY	Anna Lomasney
FLS000036	MANATEE COUNTY	Jason Maron
FLS000037	City of Bradenton	Jason Maron
FLS000038	SEMINOLE COUNTY	Jason Maron
	FDOT	Michelle Bull

**Excerpt from Technical Memorandum:
Schema Review and Recommendation
25 March 2021**

Table 1 - Recommended FDEP MS4 Outfall Schema

Field Name	Alias (Description)	Field Type	Field Length	Domain
FDEP_OUTFALL_ID	Unique FDEP ID	Text	25	N
OBJECT_ID	Local Outfall ID	Text	25	N
PERMIT_ID	MS4 permit #	Text	15	N
OUTFALL_TYPE	Predefined outfall type (Major/Non-major)	Text	6	Y
OUTFALL_DESC	Outfall description (Circular pipe, box culvert, etc.)	Text	5	Y
OUTFALL_DIAM	Outfall diameter (sq in)	Double		N
OUTFALL_HT	Outfall height (in)	Double		N
OUTFALL_WT	Outfall width (in)	Double		N
OUTFALL_MAT	Outfall material	Text	5	Y
OUTFALL_YR	Year outfall constructed	Text	4	N
OWNED_BY	Entity that owns outfall	Text	25	N
MAINTAINED_BY	Permittee responsible for maintenance	Text	25	N
LAND_USE	Land use (industrial or other)	Text	6	Y
DRAINAGE_AREA	Area comprising outfall drainage basin (ac)	Double		N
RECEIVING_SURFACE_WATER_NAME	Name of water body outfall drains to	Text	100	N
RECEIVING_SURFACE_WATER_TYPE	Type of water body outfall drains to	Text	5	Y
INSPECTION_SCHEDULE	Inspection schedule (time interval)	Text	5	Y
NOTES	Notes from Local entity	Text	255	N
DATA_SOURCE	Creator of outfall database	Text	25	N
DATA_SOURCE_LINK	Link to original entity outfall data	Text	255	N

Table B-1 – Outfall Type Domain

Domain	Code	Description
Outfall Type	MAJ	Major
	MIN	Non-Major

Table B-2 – Outfall Description Domain

Domain	Code	Description
Outfall Description	CV	Culvert
	ES	Endsection
	EW	Endwall
	HW	Headwall
	IN	Inlet
	MH	Manhole
	PP	Projecting Pipe
	OP	Open
	OTH	Other

Table B-6 – Outfall & Conveyance Material Domain

Domain	Code	Description
Outfall Material	ASRP	Aluminum Spiral Rib Pipe
	ACCOMP	Asphalt Coated Corrugated Metal Pipe
	BCCMP	Bituminous Coated Corrugated Metal Pipe
	CIP	Cast Iron Pipe
	CONC	Concrete
	CMP	Corrugated Metal Pipe
	HDPE	High Density Polyethylene
	PVC	Polyvinyl Chloride (PVC) Pipe
	RCP	Reinforced Concrete Pipe
	STR	Stream
	SPP	Structural Plate Pipe
	TCP	Terracotta Pipe
	UNK	Unknown
	VC	Vitrified Clay
	OTH	Other

Table 4 - Recommended FDEP MS4 Pond Schema

Field Name	Alias (Description)	Field Type	Field Length	Domain
FDEP_PND_ID	Unique FDEP ID	Text	25	N
OBJECT_ID	Local Pond ID	Text	25	N
PERMIT_ID	MS4 permit #	Text	15	N
PND_DESC	Pond description (Dry detention, Wet detention, etc.)	Text	5	Y
PND_YR	Year Pond constructed	Text	4	N
OWNED_BY	Entity that owns Pond	Text	25	N
MAINTAINED_BY	Permittee responsible for maintenance	Text	25	N
INSPECTION_SCHEDULE	Inspection schedule (time interval)	Text	5	Y
NOTES	Notes from Local entity	Text	255	N
DATA_SOURCE	Creator of Pond database	Text	25	N
DATA_SOURCE_LINK	Link to original entity Pond data	Text	255	N

Table B-5 – Pond Description Domain

Domain	Code	Description
Pond Description	DT	Dry Detention
	WT	Wet Detention
	DR	Dry Retention
	WR	Wet Retention
	OTH	Other

Table B-7 – Inspection Schedule Domain

Domain	Code	Description
Inspection Schedule	M	Monthly
	Q	Quarterly
	B	Bi-annually
	1	1 Year
	2	2 Year
	3	3 Year
	4	4 Year
	5	5 Year
	6	6 Year
	7	7 Year
	8	8 Year
	9	9 Year
	10	10 Year

Table B-8 – Land use Domain

Domain	Code	Description
Land use	IND	Industrial
	OTH	Non-industrial

Table B-9 – Receiving Surface Water Domain

Domain	Code	Description
Receiving Surface Water	STR	Stream
	EST	Estuary
	TRI	Tributary
	RIV	River
	LK	Lake
	PND	Pond
	WET	Wetland
	OCN	Ocean
	BAY	Bay
	CAN	Canal
	OTH	Other



Nonpoint Source Management GSI Initiatives and Funding Opportunities





GSI Website

GSI.FloridaDEP.gov

A FLORIDA DEP INITIATIVE

Green Stormwater Infrastructure

Preserving local water quality through smart stormwater management.

What is GSI?



GSI WEBSITE: RESOURCES

TECHNICAL RESOURCES

- General GSI Information.
- Design manuals and modeling tool.
- Maintenance manuals and trainings.

EPA RESOURCES

- EPA GSI resources.
- EPA LID resources.

REGIONAL GI/LID MANUALS

- List of region specific GSI/LID manuals.

COMMUNITY ENGAGEMENT RESOURCES

- GSI PowerPoint.
- GSI brochure.



GSI WEBSITE: COMMUNITY ENGAGEMENT

Suggestions for how to discuss GSI with different groups:

City and County Leadership



Business Leaders and Commercial Property Owners



Commercial and Residential Developers



Neighborhood Leaders and Homeowners



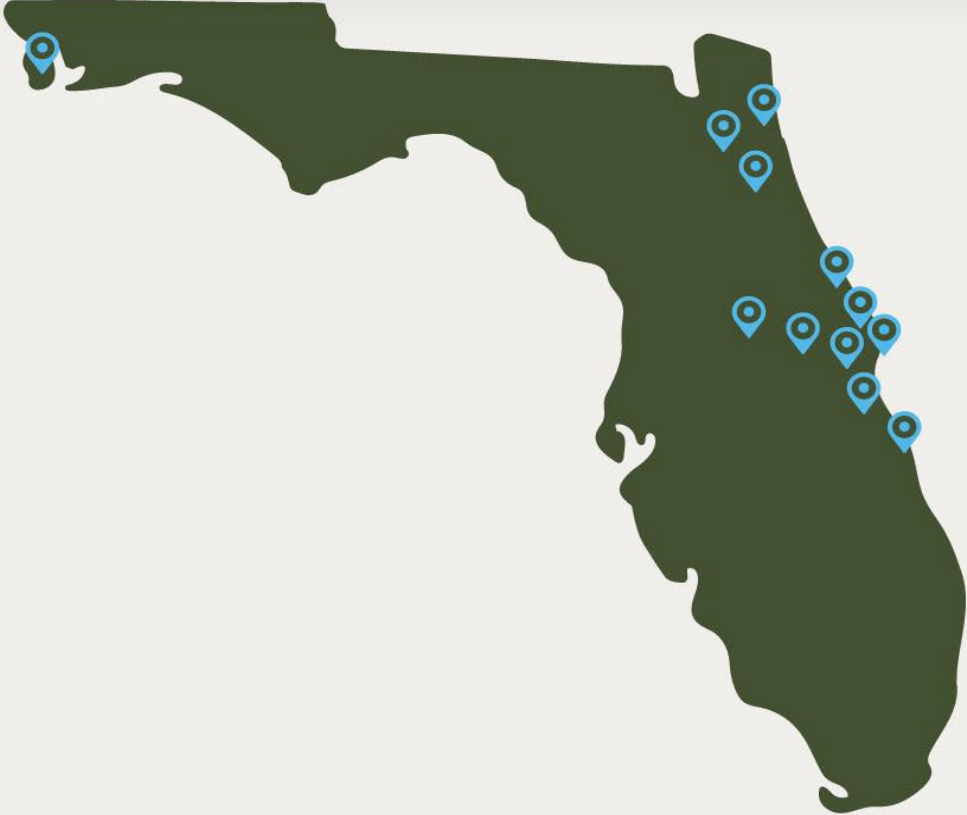
General Public





GSI WEBSITE: SUCCESS STORIES

Examples of successful GSI projects throughout the state.

A map of the state of Florida is shown in a dark green color. Several blue location pins are placed across the state, indicating the locations of various GSI projects. The pins are concentrated in the northern and central parts of the state, with a few in the south.

Success Stories

Filter by Infrastructure Types

Select Type ▼

CCUA Stormwater Harvesting Project

Project Location: Clay County

STORMWATER HARVESTING

SUBMERSIBLE PUMP

WET WELL

View Full Report

Clermont Victory Pointe Stormwater Treatment Area

Project Location: Clermont, Lake County

BIOSWALE

ENHANCED STORMWATER TREATMENT POND

FILTER MARSH

View Full Report



UF/IFAS Ordinance Audit Tool

Tool to lead users through the process of evaluating local ordinances.

- Currently under development by Dr. Eban Bean at UF in partnership with TNC.
- Compatibility with LID/GSI.
- Barriers to implementation.
- Walk through sections of code.
- Pilot audits.
- Anticipated release in late 2022



PUBLICATION TOOL



NPS Publication Tool

Brought to you by the Florida Department of Environmental Protection

[Dashboard](#)[Instructions](#)[NJ](#)[Nathan Jagoda](#)Nathan.Jagoda@floridadep.gov

4 Customize (English)

Rain gardens are shallow depressions in a landscape that are planted with drought...

Green stormwater infrastructure mimics natural processes by using porous surfaces...

Permeable pavements infiltrate, treat, and/or store rainwater where it falls. This practice...

Green stormwater infrastructure can be used to create or enhance amenities in parks...

Green stormwater infrastructure can create or enhance amenities in parks...

Green stormwater infrastructure can create or enhance amenities in parks...

Green stormwater infrastructure can create or

[EN](#)

Green Stormwater Infrastructure

Green Stormwater Infrastructure

[Preview full content](#)

Front



1080px

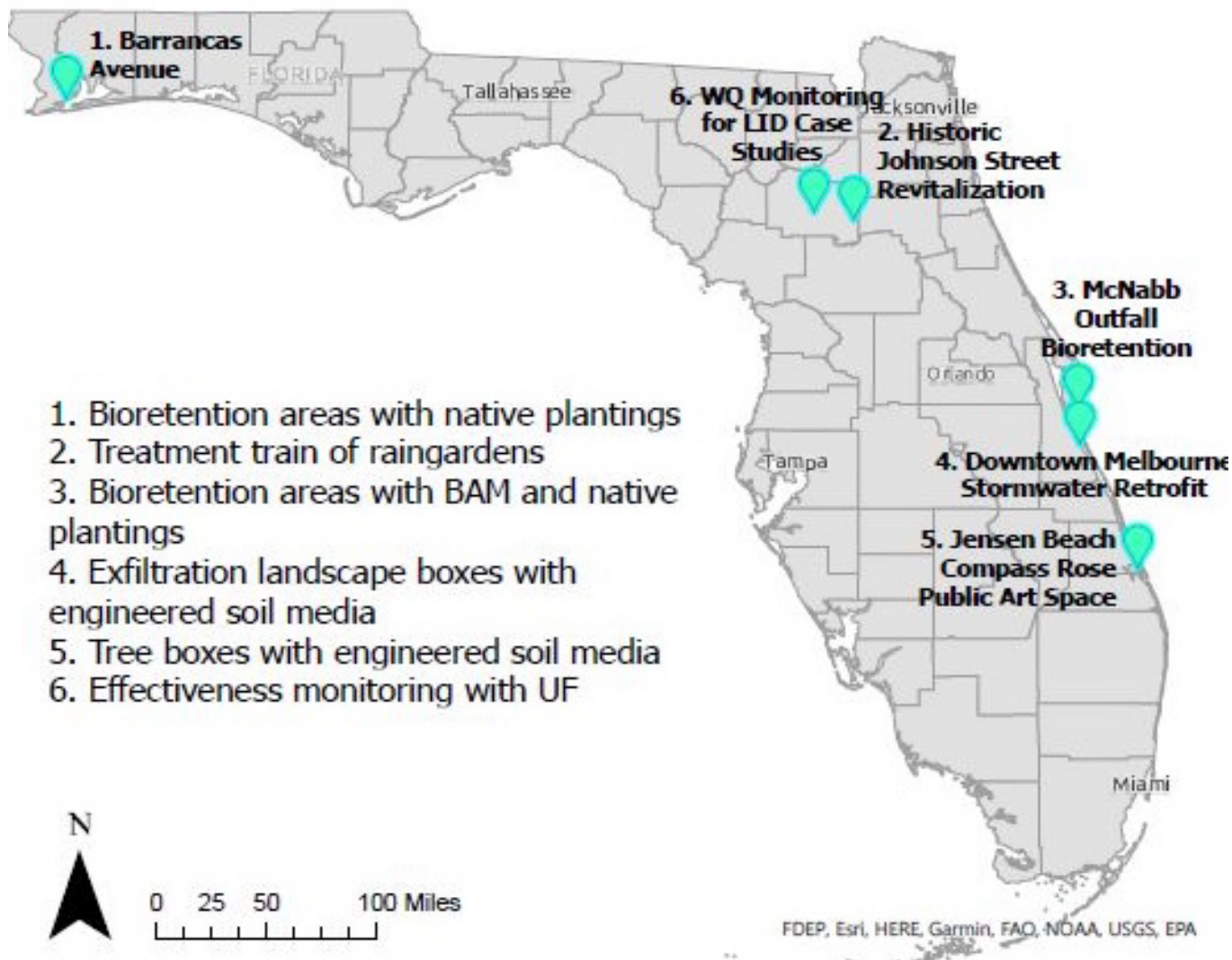
Green stormwater infrastructure mimics natural processes by using porous surfaces and plants to protect water quality and manage stormwater as close to its source as possible.

1080px

[Save and Continue Later](#)[Continue →](#)



GRANT FUNDED GSI PILOT PROJECTS





EPA 319(H) NONPOINT SOURCE GRANT

Federal Grant through the U.S. EPA

- Construction, education and monitoring.
- 40% match requirement, may use state grant/loans towards match.
- Planning and design may be eligible for match.
- May take two years to receive grant award.

Also Eligible

- Water quality improvement.
- Groundwater protection.
- Water quality restoration.
- Stormwater treatment best management practices (BMP).
- Nonpoint source education.
- Septic to sewer.





STATE WATER QUALITY ASSISTANCE GRANT (SWAG)

State grant for projects that reduce stormwater pollutant loadings in impaired waterbodies.



- “Shovel ready” construction projects.
- No **required** Match.
- No **required** water quality monitoring.
- Fast application to grant award date.

Also Eligible:



- Water quality improvement.
- Groundwater protection.
- Water quality restoration.
- Best management practices (BMP).
- Reuse water.



HOW TO SUBMIT A PROPOSAL?

Grant proposals are accepted throughout the year:

- Contact Connie Becker for a copy of the latest grant proposal form.
- Department review and evaluation periods are expected to occur in September/October and March/April of each year.
- If funding is available, grant awards may be awarded out of cycle.

Questions:

- If you are considering a grant application, contact Connie to discuss eligible grant components, funding available, match requirements, etc.



QUESTIONS?

Nonpoint Source Management Grants

- Connie.L.Becker@dep.state.fl.us

GSI Website Specific Questions

- NonpointSource@FloridaDEP.gov

Ordinance Audit Questions

- ezbean@ufl.edu

Publication Tool Questions

- NonpointSource@FloridaDEP.gov

Success Story Submissions

- Nathan.Jagoda@FloridaDEP.gov

GSI Website: GSI.FloridaDEP.gov

Background Info

TMDL DEP / EPA

Year adopted by DEP

WBID # 738

Waterbody Bayou Texar

WLA

Comments on permittee SWMP effectiveness

Element #	BPCP Element	Required Improvements
1	Identification of potential sources of bacteria discharged from the MS4. References: FIB Toolkit, 2.0 – 2.3 Understanding the Basin Gather, evaluate, interpret data	
1.1	Does it describe the impairment?	
1.1.1	length of time impaired	
1.1.2	surrounding impairments	
1.1.3	sampling locations used to determine impairment	
1.1.4	WLA or the required reductions to meet WQS	
1.2	Does it describe characteristics of the MS4 service area/watershed?	
1.2.1	points of MS4 discharges into the waterbody	
1.2.2	drainage area served by the MS4	
1.2.3	land use types within the MS4 drainage area(s)	
1.2.4	hydrologic characteristics of the MS4	
1.3	Does it describe how the impairment details relate to the MS4?	
1.3.1	sampling sites relative to MS4 outfalls	
1.4	Does it identify potential sources within the MS4 watershed?	
1.4.1	areas with higher exceedances	
1.4.2	areas with repetitive & persistent exceedances (i.e. hot spots)	
1.4.3	aging storm sewer infrastructure	
1.4.4	areas with no SW treatment, flooding	
1.4.5	sanitary issues such as private lift stations, failing septic systems, chronic SSOs, aging sanitary infrastructure	
1.4.6	areas with chronic illicit discharges, connections, dumping	
1.4.7	food processing; other industry	
1.4.8	livestock, animal centers	
1.4.9	areas of high pet waste, recreational areas	
1.4.10	food service, high pedestrian traffic area	
1.4.11	Homeless camps	
1.6	Does it include the identification of restoration partners?	
1.6.1	stakeholder engagement / collaboration	
1.6.2	Other public entities/MS4s?	

2	Bacteria source tracking including monitoring to better identify sources of bacteria in the MS4 and to prioritize activities to reduce bacteria loadings. References: Requirement informed by “Understanding the Basin” Tools for Source Identification (FIB Toolkit, 2.4)	
2.1	Does it include a Walk the WBID exercise?	
2.1.1	Has a WTW or other occurred?	
2.1.2	Does the Maps on the Table evaluate potential sources within WBID (see above)?	
2.1.3	Did the WTW confirm sources (see above)?	
2.1.4	Did responsible entities conduct corrective action / source elimination?	
2.1.5	Does it identify a follow-up WTW, or a frequency of occurrences?	
2.2	Does it identify a monitoring plan? References: Pollution Assessment Monitoring and Field Work (FIB Toolkit, 2.4.2)	
2.2.1	goals and objectives (e.g. identify sources, determine success in reductions)	
2.2.2	type of monitoring (visual and/or sampling), (ambient and MS4)	
2.2.2.1	frequency of sampling and monitoring	
2.2.3	sampling parameters (ambient or MS4)	
2.2.3.1	FIB indicators and field parameters	
2.2.3.2	MST, PCR	
2.2.3.3	Chemical analytes	
2.2.4	sampling stations (site locations)	
2.2.4.1	ambient or outfall	
2.2.4.2	justification for the locations	
2.2.4.3	level of specificity (waterbody, sub-watersheds, contributing drainage area, parcel specific)	
2.2.4.4	trend sampling	
2.2.4.5	triggered monitoring	
2.2.6	thresholds for triggered sampling and follow-up actions	
2.2.6.1	locations and frequency of re-sampling	
2.2.6.2	triggered source tracking techniques, including sampling in the MS4 and upstream of exceedances	

3	Implementation of a pet waste management ordinance or program References: Requirement informed by “Understanding the Basin” and “Tools for Source Identification”	Review: and/or
3.1	Does it include a pet waste ordinance?	
3.1.1	schedule of adoption of ordinance	
3.1.2	how will ordinance be enforced within the target WBID	
3.2	Does it provide a description of a pet waste program?	
3.2.1	goals and objectives	
3.2.2	describe how program will be implemented within the target WBID	
3.2.3	evaluation of program effectiveness	
3.2.4	schedule of implementation	

4	Implementation of an education program directed at reducing bacterial pollution References: Requirement informed by “Understanding the Basin” and “Tools for Source Identification” Social Marketing (FIB Toolkit, 3.1.2.2)	
4.1	Does it provide a description of an educational program?	
4.2	Is the program oriented on, or does it describe how it will be focused on, the target WBID?	
4.2.1	goals and objectives	
4.2.2	target audience(s) based on source tracing findings	
4.2.3	delivery method(s)	
4.2.4	relevant messaging/material	
4.2.5	evaluation of program effectiveness	
4.2.6	schedule of implementation	

5	Identification of additional structural or nonstructural BMPs or activities to reduce bacteria loadings discharged from the MS4 to the MEP. References: Requirement informed by “Understanding the Basin” and “Tools for Source Identification” Management Actions (FIB Toolkit, 3.0)	
5.1	Does it include an assessment of existing efforts within the target WBID (i.e. structural and non-structural BMPs)?	
5.2	Does it identify additional management actions and a timeline for completion? This may include:	
5.2.1	structural: flood control projects – reduces NPS / septic issues / SS issues	
5.2.2	structural: stormwater treatment BMPs	
5.2.3	structural: sanitary sewer upgrades	
5.2.4	structural: OSTDS repairs / enhancements; sanitary connect	
5.2.5	non-structural: targeted inspections: MS4, private lift stations, sanitary system, OSTDS, FOG, waste transfer stations (public and private)	
5.2.6	non-structural: targeted maintenance: more frequent trash collection	
5.2.7	non-structural: social marketing / education and outreach	
5.2.8	non-structural: target audience	
5.2.9	non-structural: tailored messaging	
5.2.10	non-structural: measure of effectiveness	
5.2.11	non-structural: adopt and/or review and update ordinances	
5.2.12	non-structural: private lift station minimum standards and maintenance requirements	
5.2.13	non-structural: outreach/enforcement of OSTDS requirements (coordination with DOH on septic inspections)	
5.2.14	non-structural: pet waste	
5.2.15	non-structural: including adoption schedule, and/or implementation and enforcement	
5.2.16	Plan to adopt ordinances (higher sanctions for ID in impaired WBID, etc.)	
5.3	Does it identify dedicated resources/funding for projects?	
5.3.1	continuation of investigation/tracing activities	
5.3.2	working with stakeholders on reducing sources	
5.3.3	response to specific local issues (See 1.4 above)	
5.3.4	Long-term plan to prevent future sanitary discharges: sanitary sewer upgrades, septic to sewer, etc.	
5.4	Does it include program evaluation criteria?	
5.4.1	estimated load reductions of each BMP or activity	
5.4.2	measurable interim milestones such as WQ targets	