



Response to Comments

For The
2026 Re-Authorization of the
NPDES Permit for
Discharges from Greenville County
(SCS230001)

Introduction:

The following is South Carolina's Department of Environmental Services (SCDES) "Response to Comments" to the comments received during the Public Notice of the Draft NPDES Permit for Discharges from Greenville County, which was on public notice May 1st, 2026, until June 1st, 2026.

The Department has prepared written responses to all substantive public comments prior to issuance of the final permit. Where appropriate and within the scope of the Department's statutory and regulatory authority, the Department has considered incorporating revisions or clarifications into the final Medium MS4 Permit. Any changes adopted will be supported by the Department's legal authority and programmatic consistency with applicable state and federal requirements. The NPDES Permit for Discharges from Greenville County is hereby issued, as of **July 1st, 2026**.

Due to the sheer number of comments received on this permit, the comments were organized in a fashion that presented all comments for a particular section of the permit within a table, called a **Comment Group**. Each Comment Group is listed in order based upon time received during the reissuance process. The template used for each Comment Group can be seen in **Table 1**. Each Comment Group will show the permit section, the topic addressed, the commenter, a summary of the comments received, and the Department's response.

Table 1: Example of Comment Group

Permit Section(s) & Topic: (Section Reference – Topic Addressed)	Commenter(s): (Name of Commenter)
Comment(s) Received: 1. (Summary of Comments)	
Department's Response to Comments	
SCDES's Response to comments and revised permit language where applicable.	

Thank you for participating in the reissuance process of the 2026 South Carolina National Pollutant Discharge Elimination System (NPDES) Permit for Discharges from Greenville County.

<i>Permit Section & Topic:</i> Part II, Section B: SWMP Requirements	<i>Commenter(s):</i> Greenville County
Comments: This comment states the language is redundant to Part II, Section A: Introduction. The County provides limited oversight of Industrial General Permit holders to assist SCDES but does not have regulatory authority over these entities. The duplicate language adds confusion as to whether this is a more important aspect of the permit than other portions of the permit. This comment is requesting the removal of the language in Part II, Section B which states: "Where applicable, all active sites, projects, and outfalls must meet the minimum requirements established within the South Carolina NPDES General Permit for Stormwater Discharges from Construction Activities, the South Carolina NPDES General Permit for Stormwater Discharges Associated with Industrial Activities, and all pertinent requirements listed within R.61-9 and R.72-300."	
Response	
The Department will not implement revisions based upon this comment. All active sites, projects, and outfalls must comply with all minimum requirements outlined in both the South Carolina National Pollutant Discharge Elimination System (NPDES) General for Stormwater Discharges from Construction Activities and the NPDES General Permit for Stormwater Discharges Associated with Industrial Activities if land disturbing activities qualify for coverage under these general permits. Part II, Section A: Introduction states "The SWMP shall continue to be implemented in accordance with Section 402(p)(3)(B) of the Clean Water Act and South Carolina (SC) Regulation 61-9, Part 122.26; and be consistent with: SC Water Classifications and Standards (SC Regulation 61-68), SC Classified Waters (SC Regulation 61-69) Sections 48-1-10, et seq. of the 1976 Code, and, with Storm Water Management and Sediment Reduction Act (SC Regulation 72-300) Chapter 14, Title 48, 1976 SC Code, as amended, or similarly applicable statute or County ordinance." The Introduction outlines regulations designating authority and implementation requirements to ensure pollution prevention, treatment, and control storm water quality discharged from the MS4. Industrial Runoff must be included within the Storm Water Management Program, therefore, qualifies for the minimum requirements in the NPDES General Permit for Stormwater Discharges Associated with Industrial Activities.	

<i>Permit Section & Topic:</i> Part II, Section B: SWMP Requirements	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B "Structural Controls and Storm Water Collection System Operation is missing. This comment states "Number '1' was erroneously removed from Element 1 and this throws off all future Element numbering. This impacts all Element numbering throughout the permit." This comment recommends revising the numbering system to the previous iteration to avoid confusion.	
Response	
The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Table II.B.1.d	<i>Commenter(s):</i> Greenville County
Comments: This comment is requesting removal of revised language in Table II.B.1.d stating “any private structure found to be deficient or in need of maintenance shall be identified and the Permittee shall contact the owner or responsible party so that the structure can be brought into compliance as quickly as possible, with a goal of no later than thirty (30) days after notification was provided. For any deficiency which cannot be corrected within thirty (30) days, the owner or operator must provide a schedule for corrective action.” The County strives to have all deficiencies corrected as quickly as possible but tracking schedules for corrective action for private structures that take longer than thirty (30) days for corrections would require an unreasonable amount of staff time without corresponding benefit. Cityworks is not configured to handle this information and would require re-programming. The staff time and costs to reconfigure Cityworks are in conflict with the President’s Executive Order 14394 issues in March 2026 as these requirements would directly increase home construction costs. The County’s current post construction BMP inventor already contains over 5,500 structures, and continues to grow, making tracking information outside of Cityworks impractical.	
Response Section 122.43(a) establishes the State's authority to determine schedules of compliance, monitoring, and reporting. Section 122.43. Establishing permit conditions states: (a) In addition to conditions required in all permits (sections 122.41 and 122.42), the Department shall establish conditions, as required on a case-by-case basis, to provide for and ensure compliance with all applicable requirements of CWA and PCA and regulations. These shall include conditions under section 122.46 (duration of permits), section 122.47(a) (schedules of compliance), and section 122.48 (monitoring), and electronic reporting requirements of 40 CFR Part 3 (Cross-Media Electronic Reporting Regulation) and 40 CFR Part 127 (NPDES Electronic Reporting). Section 122.26(d)(2)(iv)(C) states the Permittee is required to perform a fiscal analysis of necessary capital operation and maintenance expenditures necessary to accomplish the activities of the programs under paragraphs (d)(2)(iii) and (iv). These accounted activities include, but are not limited to, sampling, major outfall identification and scheduling, monitoring program for field screening, and the overall management program which may impose controls on a systemwide basis, watershed basis, a jurisdictional basis or individual outfalls. The President’s Executive Order 14349 states “the Secretary of Agriculture, the Secretary of Housing and Urban Development, the Secretary of Transportation, and the Administrator of the Environmental Protection Agency” shall “take steps to revise applicable law, regulations, guidance, grant applications and requirements, and technical assistance” applicable to stormwater, wetlands, lakes and other waters and streamlining processes for federally issued Construction General Permits and Residential Developments. South Carolina state regulations 61-9 incorporates federal NPDES standards which the EPA may revise under this order. If the EPA revises applicable requirements, South Carolina may update state regulations to remain compliant with federal standards. Executive Order 14349 directly affects federal agencies, not state regulations; SC R.61-9 remains in force as written. Language stating “for any deficiency which cannot be corrected within (30) days, the owner or operator must provide a schedule for corrective action” has been removed as it may lead to misinterpretation. The permittee will maintain this standard within their Stormwater Management Plan.	

<i>Permit Section & Topic:</i> Part II, Section B: Areas of New Development & Significant Redevelopment	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B Areas of New Development and Significant Redevelopment has been adjusted to reference '1' rather than '2.' This comment recommends revising the numbering system to the previous iteration to avoid confusion.	
Response	
The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Table II.B.2.a	<i>Commenter(s):</i> Greenville County
Comments: This comment recommends removing language in Table II.B.2.a as it reflects the same language in Section II.B (2). Redundant language that is specifically covered in Table II.B.2.a adds confusion as to whether this is a more important aspect of the permit than other portions of the permit.	
Response	
The Department concurs. <i>Areas of New Development and Significant Redevelopment</i> now states "Continue to implement a comprehensive master planning process (or equivalent) to achieve the "effective prohibition" and "MEP" standards from Section 402(p)(3)(B) of the Clean Water Act to reduce the discharge of pollutants, after construction is completed, from MS4s which receive discharges from areas of new development and significant redevelopment." Table II.B.2.a will continue to house the requirement to annually update, review and record all processes, procedures and ordinance accordingly.	

<i>Permit Section & Topic:</i> Table II.B.2.g	<i>Commenter(s):</i> Greenville County
Comments: This comment recommends removing the duplicate language in Table II.B.2.g which states "Annually update the inventory and report on the number of inspections and engineering certifications of post-construction structural BMPs performed during final close-out site inspections added to the post-construction structural BMP database. Ensure the inventory is updated annually and reported in the Annual Report."	
Response	
The Department concurs. Revisions to language have been made to Part g of Table II.B.2; language now reads "Maintain and update the inventory and report on the number of inspections and engineering certifications of post-construction structural BMPs performed during final close-out site inspections added to the post-construction structural BMP database. All updates to the inventory shall be reported in the Annual Report."	

<i>Permit Section & Topic:</i> Table II.B.2.g	<i>Commenter(s):</i> Greenville County
Comments: This comment recommends removing additional requirements to document inspections during the permit term and provide reasoning for missed inspections. The County strives to inspect all post construction BMPs once per permit term and tracks and prioritizes those that don't get inspected within the permit term, however Cityworks does not have input data for entries to track the explanation for each inspection that is not completed within the permit term. This would require an unreasonable amount of additional staff time and customized software configuration without corresponding benefit. The staff time and costs to reconfigure Cityworks are in conflict with the President's Executive Order 14394 issued in March 2026 as these requirements would indirectly increase home construction costs. The County's current post construction BMP inventory already contains over 5,500 structures, and continues to grow, making tracking information outside of Cityworks impracticable.	
Response Section 122.43(a) establishes the State's authority to determine schedules of compliance, monitoring, and reporting. Section 122.43. Establishing permit conditions states: (a) In addition to conditions required in all permits (sections 122.41 and 122.42), the Department shall establish conditions, as required on a case-by-case basis, to provide for and ensure compliance with all applicable requirements of CWA and PCA and regulations. These shall include conditions under section 122.46 (duration of permits), section 122.47(a) (schedules of compliance), and section 122.48 (monitoring), and electronic reporting requirements of 40 CFR Part 3 (Cross-Media Electronic Reporting Regulation) and 40 CFR Part 127 (NPDES Electronic Reporting). Section 122.26(d)(2)(iv)(C) of Title 40 Code of Federal Regulations states the Permittee is required to perform a fiscal analysis of necessary capital operation and maintenance expenditures necessary to accomplish the activities of the programs under paragraphs (d)(2)(iii) and (iv). These accounted activities include, but are not limited to, sampling, major outfall identification and scheduling, monitoring program for field screening, and the overall management program which may impose controls on a systemwide basis, watershed basis, a jurisdictional basis or individual outfalls. The President's Executive Order 14349 states "the Secretary of Agriculture, the Secretary of Housing and Urban Development, the Secretary of Transportation, and the Administrator of the Environmental Protection Agency" shall "take steps to revise applicable law, regulations, guidance, grant applications and requirements, and technical assistance" applicable to stormwater, wetlands, lakes and other waters to streamlining processes for federally issued Construction General Permits and Residential Developments. South Carolina state regulations 61-9 incorporate federal NPDES standards which the EPA may revise under this order. If the EPA revises applicable requirements, South Carolina may update state regulations to remain compliant with federal standards. Executive Order 14349 directly affects federal agencies, not state regulations; SC R.61-9 remains in force as written. Revisions will not be made based upon this comment.	

<i>Permit Section & Topic:</i> Table II.B.2.i	<i>Commenter(s):</i> Greenville County
Comments: This comment is requesting removal of the language in Table II.B.2.i which states “The Permittee must notify the appropriate owner or operator of any found deficiencies or illicit discharges and must require that all be corrected as quickly as possible, but no later than thirty (30) days after notification was provided. For any deficiency which cannot be corrected within thirty (30) days, the owner or operator must provide a schedule for corrective action. Ensure the inventory is updated annually and reported in the Annual Report.” This comment states the language for inventory data and illicit discharges is covered in a separate section and is requesting removal of redundancy between sections.	
Response The Department concurs. Revisions have been made based upon this comment. The language now states “Education and guidance documents will summarize the existing inspection and maintenance requirements for post-construction structural BMPs and the storm water collection system. They describe the BMPs to be inspected and the maintenance activities to be undertaken to maintain the proper operation of structural controls and storm water collection systems. The maintenance program includes an internal record keeping system to track inspections and maintenance activities submitted during the permit term by private owners. Any updates to the maintenance program and guidance documents shall be updated in the Annual Report.”	

<i>Permit Section & Topic:</i> Section II, Part B: Existing Roadways	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B: Existing Roadways has been adjusted to reference ‘2’ rather than ‘3.’ This comment recommends revising the numbering system to the previous iteration to avoid confusion.	
Response The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Section II, Part B: Flood Control Projects	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B: Flood Control Projects has been adjusted to reference ‘3’ rather than ‘4.’ This comment recommends revising the numbering system to the previous iteration to avoid confusion.	
Response The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Section II, Part B: Municipal Waste Treatment, Storage, or Disposal Facilities	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B: Municipal Waste Treatment, Storage, or Disposal Facilities has been adjusted to reference '4' rather than '5.' This comment recommends revising the numbering system to the previous iteration to avoid confusion.	
Response	
The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Section II, Part B: Municipal Waste Treatment, Storage, or Disposal Facilities	<i>Commenter(s):</i> Greenville County
Comments: Language duplicates information in Table II.B.5 and introduction on page 3 and it is not appropriate to note that "All active County-owned sites, projects, and outfalls must meet the minimum requirements established within the South Carolina NPDES General Permit for Stormwater Discharges Associated with Industrial Activities" since not all County sites fall under Element 5 and even some that do fall under Element 5 are not covered under the IGP. Additionally, adding this redundant language outside of the table adds confusion as to whether this is a more important aspect of the permit. This comment is requesting the removal of duplicate language and additional requirements established in the IGP for all sites, projects, and outfalls.	
Response	
Section 122.26(d)(2)(iv)(C) of Title 40 Code of Federal Regulations states the management program must include a program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III, Superfund Amendments and Reauthorization Act (SARA), and industrial facilities that are the municipal permit applicant determines are contributing substantial pollutant loading. Language has been revised to state "Where applicable, all active County-owned sites, projects, and outfalls must meet the minimum requirements established within the South Carolina NPDES General Permit for Stormwater Discharges Associated with Industrial Activities, and all pertinent requirements listed within R.61-9 and R.72-300."	

<i>Permit Section & Topic:</i> Table II.B.5.e	<i>Commenter(s):</i> Greenville County
Comments: Language in Table II.B.5.e Municipal Waste Treatment, Storage, or Disposal Facilities complicates readability. The County only has 6 municipal waste collection centers and inspects each of these during the permit term. This comment recommends revising the language to remove "The County shall aim to inspect at least 20% ± 5% of the total sites annually to meet the goal of 100% during the 5-year permit cycle."	
Response State Regulation (R. 61-9. 122.41) allows for the inclusion of specific limitations, schedules, and reporting as necessary to meet all applicable requirements of the CWA and PCA. Section 122.43(a) also establishes the State's authority to determine schedules of compliance, monitoring, and reporting. (122.43. Establishing permit conditions. (a) In addition to conditions required in all permits (sections 122.41 and 122.42), the Department shall establish conditions, as required on a case-by-case basis, to provide for and ensure compliance with all applicable requirements of CWA and PCA and regulations. These shall include conditions under section 122.46 (duration of permits), section 122.47(a) (schedules of compliance), and section 122.48 (monitoring), and electronic reporting requirements of 40 CFR Part 3 (Cross-Media Electronic Reporting Regulation) and 40 CFR Part 127 (NPDES Electronic Reporting). Revisions will not be made based upon this comment.	

<i>Permit Section & Topic:</i> Section II, Part B: Pesticide, Herbicide and Fertilizer (PHFs)	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B: Pesticide, Herbicide and Fertilizer (PHFs) has been adjusted to reference '5' rather than '6.' This comment recommends revising the numbering system to the previous iteration to avoid confusion.	
Response The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Section II, Part B: Illicit Discharge and Improper Disposal	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B: Illicit Discharge and Improper Disposal has been adjusted to reference '6' rather than '7.' This comment recommends revising the numbering system to the previous iteration to avoid confusion.	
Response The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Table II.B.7.d.vi	<i>Commenter(s):</i> Greenville County
Comments: This comment is requesting removal of the language in Table II.B.7.d.vi as it is redundant to language in section Table II.B.7.c.i and II.B.7.c.ii.	
Response	
Table II.B.7.d.vi now states "The number of investigations conducted, improper disposals, and types of enforcement actions taken are inventoried and reported in each Annual Report."	

<i>Permit Section & Topic:</i> Section II, Part B: Industrial Runoff	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B: Industrial Runoff has been adjusted to reference '7' rather than '8.' This comment recommends revising the numbering system to the previous iteration to avoid confusion.	
Response	
The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Section II, Part B: Industrial Runoff	<i>Commenter(s):</i> Greenville County
Comments: This comment recommends removing the language "All active SCDES permitted industrial facilities sites, projects, and outfalls must meet the minimum requirements established within the South Carolina NPDES General Permit for Stormwater Discharges Associated With Industrial Activities, and all pertinent requirements listed within R.61-9 and R.72-300 and when the Permittee discovers facilities that are not in compliance, those facilities will be reported to SCDES" from Section II, Part B: Industrial Runoff.	
Response	
Language has been revised to state "Where applicable, all active sites, projects, and outfalls must meet the minimum requirements established within the South Carolina NPDES General Permit for Stormwater Discharges Associated with Industrial Activities, and all pertinent requirements listed within R. 61-9 and R. 72-300." Language has been reverted to reflect the Department's draft prior to modifications performed by County staff.	

<i>Permit Section & Topic:</i> Table II.B.8.a.v	<i>Commenter(s):</i> Greenville County
Comments: This comment is requesting removal of part 'v' from Table II.B.8.a or revise wording to state "An inventory of all SCDES permitted Industrial sites within the MS4 must be maintained and updated annually based on information provided from SCDES. Inspections performed by the County will be maintained." This comment also states "commercial" does not belong in this section as there is no enabling legislation or regulation to add this to the County's permit. SCDES as the permitting authority for industries should maintain an inventory of industrial sites. The statement "to include all inspection reports" is vague and confusing and could be incorrectly interpreted as to include SCDES or the industries own inspection reports.	
Response	
The industrial runoff program is intended to identify industrial facilities that may discharge pollutants to the MS4 and to reduce pollutant loading from those sources. Maintaining an inventory of industrial facilities within the MS4 service area allows the permittee to prioritize inspections, conduct source identification activities, investigate potential illicit discharges, and evaluate the effectiveness of BMPs implemented to protect the MS4. The required inspections are municipal source-control inspections conducted pursuant to the MS4 permit and are not intended to replace or duplicate industrial stormwater compliance inspections performed by SCDES under separate NDPES industrial stormwater permits. Table II.B.8.a.v language has been revised to state "An inventory of all SCDES permitted industrial sites operating with a qualified SIC/NAICS code discharging to the MS4 must be maintained and updated annually. This inventory shall include all MS4 conducted industrial inspection reports."	

<i>Permit Section & Topic:</i> Section II, Part B: Construction Site Runoff	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B: Construction Site Runoff has been adjusted to reference '8' rather than '9.' This comment recommends revising the numbering system to the previous iteration to avoid confusion.	
Response	
The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Table II.B.9.a.v-x	<i>Commenter(s):</i> Greenville County
Comments: This comment is requesting removal of parts v-x in Table II.B.9.a. Items v-x were not intended, and this changed the meaning of this section, adds confusion and furthermore, examples of items that may be required for a site plan under the CGP are not appropriate to include in the County's permit. A simple reference to the CGP is sufficient.	
Response State Regulation (R. 61-9. 122.41) allows for the inclusion of specific limitations, schedules, and reporting as necessary to meet all applicable requirements of the CWA and PCA. Specific language states: All conditions applicable to NPDES permit shall be incorporated into the permits either expressly or by reference. Until this point, it has been by reference of the SWMP. Sediment and erosion control minimum requirements derived from the NPDES CGP were added to establish clear and measurable goals for Construction Site Runoff.	

<i>Permit Section & Topic:</i> Table II.B.9.b.v	<i>Commenter(s):</i> Greenville County
Comments: This comment recommends removal of part v entirely as these items are already covered in Table II.B.9. During times when these minimums cannot be met, sites that were not inspected shall take priority during the next inspection cycle. Records of the delayed inspections must be reported in each subsequent Annual Report. The County strives to inspect all active construction sites permitted by the County under the CGP once per month and manages the large and changing inventory with approximately 300 new submittals per year and over 550 active sites at any time. The County tracks and prioritizes those that don't get inspected within the month, however within Cityworks we do not have a method to track the explanation for each inspection that is not completed within the specific timeline. Tracking explanations like this would add an unreasonable administrative burden and require tracking software re-configuration without corresponding benefits. The staff time and costs to reconfigure Cityworks are in conflict with the President's Executive Order 14394 issues in March 2026 as these requirements would directly or indirectly increase home construction costs. Furthermore item 'v' duplicates other language already in Table II.B.9 and there is not clear language documenting that these inspection requirements are for sites permitted by the County (versus SCDES) under the CGP. Additionally, adding this redundant language outside of the Table adds confusion as to whether this is a more important aspect of the permit.	
Response	

State Regulation (R. 61-9. 122.41) allows for the inclusion of specific limitations, schedules, and reporting as necessary to meet all applicable requirements of the CWA and PCA. Specific language states: All conditions applicable to NPDES permit shall be incorporated into the permits either expressly or by reference. Until this point, it has been by reference of the SWMP. Section 122.43(a) also establishes the State's authority to determine schedules of compliance, monitoring, and reporting. The Department shall establish conditions, as required on a case-by-case basis, to provide for and ensure compliance with all applicable requirements of CWA and PCA and regulations (122.43. Establishing permit conditions. (a) In addition to conditions required in all permits (sections 122.41 and 122.42). These shall include conditions under section 122.46 (duration of permits), section 122.47(a) (schedules of compliance), and section 122.48 (monitoring), and electronic reporting requirements of 40 CFR Part 3 (Cross-Media Electronic Reporting Regulation) and 40 CFR Part 127 (NPDES Electronic Reporting). Section 122.26(d)(2)(iv)(C) of Title 40 Code of Federal Regulations states the Permittee is required to perform a fiscal analysis of necessary capital operation and maintenance expenditures necessary to accomplish the activities of the programs under paragraphs (d)(2)(iii) and (iv). These accounted activities include, but are not limited to, sampling, major outfall identification and scheduling, monitoring program for field screening, and the overall management program which may impose controls on a systemwide basis, watershed basis, a jurisdictional basis or individual outfalls. The President's Executive Order 14349 states "the Secretary of Agriculture, the Secretary of Housing and Urban Development, the Secretary of Transportation, and the Administrator of the Environmental Protection Agency" shall "take steps to revise applicable law, regulations, guidance, grant applications and requirements, and technical assistance" applicable to stormwater, wetlands, lakes and other waters to streamlining processes for federally issued Construction General Permits and Residential Developments. South Carolina state regulations 61-9 incorporate federal NPDES standards which the EPA may revise under this order. If the EPA revises applicable requirements, South Carolina may update state regulations to remain compliant with federal standards. Executive Order 14349 directly affects federal agencies, not state regulations; SC R.61-9 remains in force as written. Table II.B.9.b.v language has been revised to state "New sites subject to coverage under the South Carolina CGP should be inspected with a goal of initial inspections within the first two weeks of commencement of land disturbing activities. All active construction sites should be inspected with a goal of at least once a month. If this goal cannot be attained, the Permittee shall have a goal to maintain documentation describing the reason for which the inspections could not be performed (i.e., an act of God, strike, flood, etc. (R. 61-9)). All justifications shall be documented and reported in each Annual Report. Justifications for missed inspections are for record-keeping purposes and will not constitute enforcement actions taken by the Department."

Permit Section & Topic: Table II.B.9.b.viii	Commenter(s): Greenville County
Comments: This comment is requesting the rewording of Table II.B.9.b.viii to "The Permittee must notify the appropriate owner of operator of any found deficiencies and must require that all be corrected as quickly as possible, but no later than the timelines supported by the South Carolina General Permit for Stormwater Discharges from Construction Activities (CGP)."	
Response	
State Regulation (R. 61-9. 122.41) allows for the inclusion of specific limitations, schedules, and reporting as necessary to meet all applicable requirements of the CWA and PCA. Specific language states: All conditions applicable to NPDES permit shall be incorporated into the permits either expressly or by reference. Until this point, it has been by reference of the SWMP. Section 122.43(a) also establishes the State's authority to determine schedules of compliance, monitoring, and reporting. Section 122.47(a) (schedules of compliance) states the permit may specify a schedule of compliance leading to compliance with CWA regulations and any schedules of compliance under this section shall require compliance as soon as possible, but no later than the applicable statutory deadline under the CWA (122.41(a)(1)). Referring to the SCDES CGP in Table II.B.9.b.viii restricts the response time for illicit discharges to those only associated with BMP failures and BMP maintenance at a maximum of seven (7) days. The Department has removed illicit discharge language from Table II.B.9 <i>Construction Site Runoff</i> based upon this comment. Element 7: <i>Illicit Discharged and Improper Disposal</i> has been revised to state "[the] Permittee shall continue to implement a program to detect and remove (or require the discharger to the MS4 to obtain a separate NPDES permit for) illicit discharges and improper disposals identified in R. 61-9 and not allowed by the NPDES General Permit for Stormwater Discharged from Construction Activities (CGP) or by the NPDES General Permit for Stormwater Discharged Associated with Industrial Activities (IGP) into the storm sewer, to the MEP."	

Permit Section & Topic: Part II, Section B: Monitoring Program	Commenter(s): Greenville County
Comments: The numbering system for Part II, Section B: Monitoring Program has been adjusted to reference '9' rather than '10.' This comment recommends revising the numbering system to the previous iteration to avoid confusion	
Response	
The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Part II, Section B: Monitoring Program	<i>Commenter(s):</i> Greenville County
Comments: This comment recommends removing the language "The Permittee must maintain an active inventory of all monitoring locations and related data with any changes made reported in the subsequent Annual Report."	
Response	
State Regulation (R. 61-9. 122.41) allows for the inclusion of specific limitations, schedules, and reporting as necessary to meet all applicable requirements of the CWA and PCA. Specific language states: All conditions applicable to NPDES permit shall be incorporated into the permits either expressly or by reference. Section 122.43(a) also establishes the State's authority to determine schedules of compliance, monitoring, and reporting. The Department shall establish conditions, as required on a case-by-case basis, to provide for and ensure compliance with all applicable requirements of CWA and PCA and regulations (122.43. Establishing permit conditions. (a) In addition to conditions required in all permits (sections 122.41 and 122.42). These shall include conditions under section 122.46 (duration of permits), section 122.47(a) (schedules of compliance), and section 122.48 (monitoring), and electronic reporting requirements of 40 CFR Part 3 (Cross-Media Electronic Reporting Regulation) and 40 CFR Part 127 (NPDES Electronic Reporting). Language has been revised to state "the permittee must maintain an active inventory, throughout the permit term, of all program areas and report all updates annually in the Annual Report."	

<i>Permit Section & Topic:</i> Part II, Section B: Public Education	<i>Commenter(s):</i> Greenville County
Comments: The numbering system for Part II, Section B: Public Education has been adjusted to reference '10' rather than '11.' This comment recommends revising the numbering system to the previous iteration to avoid confusion	
Response	
The Department concurs. Revisions have been made to address this comment.	

<i>Permit Section & Topic:</i> Table II.B.11.a	<i>Commenter(s):</i> Greenville County
Comments: This comment recommends removing the language "Each year the permittee must develop or utilize existing outreach tools (i.e. brochures, posters, website, plan notes, manuals etc.) aimed at educating construction operators on appropriate selection, installation, implementation, and maintenance of stormwater controls, as well as overall program compliance." The County has a robust public education program and does not believe that the addition of this language is necessary and that it puts too much focus on one group. The County specifically performs a sediment and erosion control audit once per permit term to help inform the education provided to design engineers, site operators, and site inspectors.	
Response	
A program containing a description of appropriate educational training and training measures for construction site operators is required by 40 CFR 122.26(d)(2)(iv)(D)(4). This addition of examples was derived from the County's submitted Storm Water Management Program (SWMP).	

<i>Permit Section & Topic:</i> Table II.f.i	<i>Commenter(s):</i> Greenville County
Comments: This comment recommends removing the term "inventory" from Table II.f part i. Language requesting to be removed states "Use a tracking inventory system" and reworded to state "Use a tracking system to compare the assessment and imposition of penalties during the permit period. Report the findings."	
Response	
The Department concurs. Redundant language has been removed.	

<i>Permit Section & Topic:</i> Table II.B.1.d	<i>Commenter(s):</i> Richland County
Comments: This comment recommends removing the language "For any deficiency which cannot be corrected within thirty (30) days, the owner or operator must provide a schedule for corrective action." MS4s make every effort to ensure prompt correction of structural deficiencies. However, mandating that MS4s monitor and track long-term corrective action schedules for private owners imposes an excessive administrative burden. Most municipal asset management systems are not built to track these extended schedules and would require costly software reprogramming.	
Response	
The Department concurs. The language "For any deficiency which cannot be corrected within thirty (30) days, the owner or operator must provide a schedule for corrective action" has been removed. Table II.B.1.d now states "Any private structure found to be deficient or in need of maintenance shall be identified and the Permittee shall contact the owner or responsible party so that the structure can be brought into compliance as quickly as possible, with a goal of no later than thirty (30) days after notification was provided."	

Permit Section & Topic: Table II.B.2.g	Commenter(s): Richland County
Comments: This comment is requesting the language in Table II.B.2.g to be revised to state "With records kept for any which could not be inspected during the term and reported during each Annual Report" in place of "With records kept for any which could not be inspected during the term with explanation of why the inspection could not be completed reported during each Annual Report." While MS4s aim to inspect all post-construction BMPs during the 5-year permit term, standard municipal tracking software typically lacks data fields to log narrative explanations for uncompleted inspections. Adding this tracking capability would require customized software updates and unnecessary staff time.	
Response Section 122.43(a) establishes the State's authority to determine schedules of compliance, monitoring, and reporting. Section 122.43. Establishing permit conditions states: (a) In addition to conditions required in all permits (sections 122.41 and 122.42), the Department shall establish conditions, as required on a case-by-case basis, to provide for and ensure compliance with all applicable requirements of CWA and PCA and regulations. These shall include conditions under section 122.46 (duration of permits), section 122.47(a) (schedules of compliance), and section 122.48 (monitoring), and electronic reporting requirements of 40 CFR Part 3 (Cross-Media Electronic Reporting Regulation) and 40 CFR Part 127 (NPDES Electronic Reporting). Section 122.26(d)(2)(iv)(C) of Title 40 Code of Federal Regulations states the Permittee is required to perform a fiscal analysis of necessary capital operation and maintenance expenditures necessary to accomplish the activities of the programs under paragraphs (d)(2)(iii) and (iv). These accounted activities include, but are not limited to, sampling, major outfall identification and scheduling, monitoring program for field screening, and the overall management program which may impose controls on a systemwide basis, watershed basis, a jurisdictional basis or individual outfalls. Revisions will not be made based upon this comment.	

<i>Permit Section & Topic:</i> Table II.B.2.i	<i>Commenter(s):</i> Richland County
Comments: This comment is requesting the removal of the language “The Permittee must notify the appropriate owner or operator of any found deficiencies or illicit discharges and must require that all be corrected as quickly as possible, but no later than thirty (30) days after notification was provided. For any deficiency which cannot be corrected within thirty (30) days, the owner or operator must provide a schedule for corrective action. Ensure the inventory is updated annually and reported in the Annual Report.” This language duplicates inventory requirements already established Tables II.B.1.d and II.B.2.g. Furthermore, referencing illicit discharges here is inappropriate, as they are fully addressed under Element 7.	
Response The Department concurs. Revisions have been made based upon this comment. The language now states “Education and guidance documents will summarize the existing inspection and maintenance requirements for post-construction structural BMPs and the storm water collection system. They describe the BMPs to be inspected and the maintenance activities to be undertaken to maintain the proper operation of structural controls and storm water collection systems. The maintenance program includes an internal record keeping system to track inspections and maintenance activities submitted during the permit term by private owners. Any updates to the maintenance program and guidance documents shall be updated in the Annual Report.”	

<i>Permit Section & Topic:</i> Section II, Part B: Municipal Waste Treatment, Storage, or Disposal Facilities	<i>Commenter(s):</i> Richland County
Comments: It is inappropriate to mandate that all municipally-owned "sites, projects, and outfalls" meet IGP requirements because not all MS4 sites fall under Element 5, and even some that do are not covered under the IGP. Only facilities that currently require and hold an IGP should be subject to IGP standards. Furthermore, the terms "projects" and "outfalls" are ambiguous in this context and are already regulated under other parts of the MS4 permit. Placing this redundant, blanket language outside the specific Element tables also creates confusion about its regulatory priority relative to other permit requirements. This comment is recommending removing this statement entirely.	
Response Section 122.26(d)(2)(iv)(C) of Title 40 Code of Federal Regulations states the management program must include a program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III, Superfund Amendments and Reauthorization Act (SARA), and industrial facilities that are the municipal permit applicant determines are contributing substantial pollutant loading. Language has been revised to state “Where applicable, all active County-owned sites, projects, and outfalls must meet the minimum requirements established within the South Carolina NPDES General Permit for Stormwater Discharges Associated with Industrial Activities, and all pertinent requirements listed within R.61-9 and R.72-300.”	

<i>Permit Section & Topic:</i> Table II.B.8.a.v	<i>Commenter(s):</i> Richland County
Comments: MS4s do not have the legal authority or enabling legislation to regulate or inventory all "commercial" sites. SCDES is the proper authority for tracking industrial sites. Additionally, requiring MS4s to retain "all inspection reports" is vague and could erroneously imply that MS4s must retain industries' internal reports. This comment recommends modifying the requirement to: "An inventory of all SCDES permitted industrial sites within the MS4 must be maintained and updated annually based on information provided by SCDES. Inspections performed by the MS4 will be maintained."	
Response The industrial runoff program is intended to identify industrial facilities that may discharge pollutants to the MS4 and to reduce pollutant loading from those sources. Maintaining an inventory of industrial facilities within the MS4 service area allows the permittee to prioritize inspections, conduct source identification activities, investigate potential illicit discharges, and evaluate the effectiveness of BMPs implemented to protect the MS4. The required inspections are municipal source-control inspections conducted pursuant to the MS4 permit and are not intended to replace or duplicate industrial stormwater compliance inspections performed by SCDES under separate NDPES industrial stormwater permits. Section 122.26(d)(2)(iv)(C) of Title 40 Code of Federal Regulations states the management program must include a program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III, Superfund Amendments and Reauthorization Act (SARA), and industrial facilities that are the municipal permit applicant determines are contributing substantial pollutant loading. Table II.B.8.a.v language has been revised to state "An inventory of all SCDES permitted industrial sites operating with a qualified SIC/NAICS code discharging to the MS4 must be maintained and updated annually. This inventory shall include all MS4 conducted industrial inspection reports."	

Permit Section & Topic: Table II.B.9.b.v	Commenter(s): Richland County
Comments: Current Phase I permits typically limit this strict 2-week initial inspection timeline to large sites (e.g., 5 acres or larger). Mandating that MS4s inspect <i>every single</i> new active site within the first two weeks of commencement, regardless of size, creates a severe logistical bottleneck. This comment recommends revise the current language to state: "New sites 5 acres or larger must be inspected initially within the first two weeks of commencement of land disturbing activities."	
Response State Regulation (R. 61-9. 122.41) allows for the inclusion of specific limitations, schedules, and reporting as necessary to meet all applicable requirements of the CWA and PCA. Specific language states: All conditions applicable to NPDES permit shall be incorporated into the permits either expressly or by reference. Until this point, it has been by reference of the SWMP. Section 122.43(a) also establishes the State's authority to determine schedules of compliance, monitoring, and reporting. The Department shall establish conditions, as required on a case-by-case basis, to provide for and ensure compliance with all applicable requirements of CWA and PCA and regulations (122.43. Establishing permit conditions. (a) In addition to conditions required in all permits (sections 122.41 and 122.42). These shall include conditions under section 122.46 (duration of permits), section 122.47(a) (schedules of compliance), and section 122.48 (monitoring), and electronic reporting requirements of 40 CFR Part 3 (Cross-Media Electronic Reporting Regulation) and 40 CFR Part 127 (NPDES Electronic Reporting). Revisions have been made based upon this comment. Table II.B.9.b.v language has been revised to state "New sites subject to coverage under the South Carolina CGP should be inspected with a goal of initial inspection within the first two weeks of commencement of land disturbing activities."	

Permit Section & Topic: Table II.B.9.b.v	Commenter(s): Richland County
Comments: MS4s inspect their locally permitted active construction sites regularly, but typical tracking software cannot currently capture narrative "causes for delays". Building this out adds severe administrative weight. Additionally, this section lacks clarity on whether these rules apply to state-permitted (SCDES) sites or only to locally permitted ones. This comment recommends removing item v. as it is redundant or limit the requirement to simply logging the delayed inspections without needing to explicitly document the "causes for delays."	
Response State Regulation (R. 61-9. 122.41) allows for the inclusion of specific limitations, schedules, and reporting as necessary to meet all applicable requirements of the CWA and PCA. Specific language states: All conditions applicable to NPDES permit shall be incorporated into the permits either expressly or by reference. Until this point, it has been by reference of the SWMP. Section 122.43(a) also establishes the State's authority to determine schedules of compliance, monitoring, and reporting. The Department shall establish conditions, as required on a case-by-case basis, to provide for and ensure compliance with all applicable requirements of CWA and PCA and regulations (122.43. Establishing permit conditions. (a) In addition to conditions required in all permits (sections 122.41 and 122.42). These shall include conditions under section 122.46 (duration of permits), section 122.47(a) (schedules of compliance), and section 122.48 (monitoring), and electronic reporting requirements of 40 CFR Part 3 (Cross-Media Electronic Reporting Regulation) and 40 CFR Part 127 (NPDES Electronic Reporting). Revisions have been made based upon this comment. Table II.B.9.b.v language has been revised to state "New sites subject to coverage under the South Carolina CGP should be inspected with a goal of initial inspections within the first two weeks of commencement of land disturbing activities. All active construction sites should be inspected with a goal of at least once a month. If this goal cannot be attained, the Permittee shall have a goal to maintain documentation describing the reason for which the inspections could not be performed (i.e., an act of God, strike, flood, etc. (R. 61-9)). All justifications shall be documented and reported in each Annual Report. Justifications for missed inspections are for record-keeping purposes and will not constitute enforcement actions taken by the Department."	

Permit Section & Topic: Table II.B.9.b.viii	Commenter(s): Richland County
Comments: Referencing illicit discharges in the construction element causes confusion, as they belong in Element 7. Furthermore, a strict 30-day corrective schedule contradicts the timeline requirements already established by the statewide Construction General Permit (CGP). This comment recommends revising the language to state "The Permittee must notify the appropriate owner or operator of any found deficiencies and must require that all be corrected as quickly as possible, but no later than the timelines supported by the South Carolina General Permit for Stormwater Discharges from Construction activities (CGP)." 	
Response	
State Regulation (R. 61-9. 122.41) allows for the inclusion of specific limitations, schedules, and reporting as necessary to meet all applicable requirements of the CWA and PCA. Specific language states: All conditions applicable to NPDES permit shall be incorporated into the permits either expressly or by reference. Until this point, it has been by reference of the SWMP. Section 122.43(a) also establishes the State's authority to determine schedules of compliance, monitoring, and reporting. Section 122.47(a) (schedules of compliance) states the permit may specify a schedule of compliance leading to compliance with CWA regulations and any schedules of compliance under this section shall require compliance as soon as possible, but no later than the applicable statutory deadline under the CWA (122.41(a)(1)). Referring to the SCDES CGP in Table II.B.9.b.viii restricts the response time for illicit discharges to those only associated with BMP failures and BMP maintenance at a maximum of seven (7) days. The Department has removed illicit discharge language from Table II.B.9 <i>Construction Site Runoff</i> based upon this comment. Element 7: <i>Illicit Discharged and Improper Disposal</i> has been revised to state "[the] Permittee shall continue to implement a program to detect and remove (or require the discharger to the MS4 to obtain a separate NPDES permit for) illicit discharges and improper disposals identified in R. 61-9 and not allowed by the NPDES General Permit for Stormwater Discharged from Construction Activities (CGP) or by the NPDES General Permit for Stormwater Discharged Associated with Industrial Activities (IGP) into the storm sewer, to the MEP." 	

Permit Section & Topic: Table III.D.1.a	Commenter(s): Richland County
Comments: For MS4s that contain extensive sensitive water boundaries—such as bordering National Parks, large lakes, or long stretches of Outstanding Resource Waters (ORWs)—mandating a field inspection for 100% of outfalls discharging to these waters within a 5-year term is an immense logistical burden. This comment recommends revising the language to allow MS4s to inspect a representative percentage of outfalls (e.g., 20%) or limit the requirement to "major outfalls" discharging to sensitive waters. MS4s with large sensitive watersheds would be forced to divert immense staff time to hiking and inspecting every single minor pipe or ditch, sacrificing other critical IDDE or maintenance activities.	
Response The Department is maintaining the requirement from the previous iteration of the NPDES Permit for Discharges to Surface Waters for Greenville County that states the Permittee must conduct one field inspection and evaluation during the permit term for each outfall located within or near sensitive waters. Clean Water Act § 402(o) – Statutory Prohibition Anti-Backsliding states “In the case of effluent limitations established on the basis of subsection (a)(1)(B) of this section, a permit may not be renewed, reissued, or modified on the basis of effluent guidelines promulgated under section 1314(b) of this title subsequent to the original issuance of such permit, to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit. In the case of effluent limitations established on the basis of section 1311(b)(1)(C) or section 1313(d) or (e) of this title, a permit may not be renewed, reissued, or modified to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit except in compliance with section 1313(d)(4) of this title.” To remove this requirement would be considered back-sliding. The Department will not consider revisions based upon this comment.	

<i>Permit Section & Topic:</i> Part IV.A.1	<i>Commenter(s):</i> Richland County
Comments: Mandating "automated" wet weather monitoring stations imposes a significant capital cost on MS4s for purchasing, securing, and maintaining continuous automated sampling equipment. MS4s should retain the flexibility to use manual grab/discrete sampling or other approved methods that fit their budgets and existing ambient monitoring programs. This comment recommends revising the language to state "...the permittee will annually select one stream/river for wet weather monitoring." (Remove the word "automated")." MS4s would face expensive, unfunded mandates to purchase and maintain automated sampling equipment, unnecessarily straining municipal stormwater budgets	
Response Section 122.26(d)(2)(iv)(C) states the Permittee is required to perform a fiscal analysis of necessary capital operation and maintenance expenditures necessary to accomplish the activities of the programs under paragraphs (d)(2)(iii) and (iv). These accounted activities include, but are not limited to, sampling, major outfall identification and scheduling, monitoring program for field screening, and the overall management program which may impose controls on a systemwide basis, watershed basis, a jurisdictional basis or individual outfalls. Revisions will not be made based upon this comment. The addition of automated sampling techniques and equipment was proposed by the Permittee due to their continuous monitoring stations in place. The Department will not make any revisions based upon this comment.	

<i>Permit Section & Topic:</i> Table II.B.2.i	<i>Commenter(s):</i> City of Columbia
Comments: This comment is requesting removal of the language in Table II.B.2.i which states "The Permittee must notify the appropriate owner or operator of any found deficiencies or illicit discharges and must require that all be corrected as quickly as possible, but no later than thirty (30) days after notification was provided. For any deficiency which cannot be corrected within thirty (30) days, the owner or operator must provide a schedule for corrective action. Ensure the inventory is updated annually and reported in the Annual Report." This comment states this language is redundant with requirements already specified in Tables II.B.1.d and II.B.2.g. Furthermore, the reference to illicit discharge is misplaced in this section, as these are fully addressed under Element 7.	
Response The Department concurs. Revisions have been made based upon this comment and comments alike. The language now states "Education and guidance documents will summarize the existing inspection and maintenance requirements for post-construction structural BMPs and the storm water collection system. They describe the BMPs to be inspected and the maintenance activities to be undertaken to maintain the proper operation of structural controls and storm water collection systems. The maintenance program includes an internal record keeping system to track inspections and maintenance activities submitted during the permit term by private owners. Any updates to the maintenance program and guidance documents shall be updated in the Annual Report." The illicit discharge language has been removed from II.B.2.i.	

<i>Permit Section & Topic:</i> Section II, Part B: Municipal Waste Treatment, Storage, or Disposal Facilities	<i>Commenter(s):</i> City of Columbia
Comments: This comment states the language “The permittee must maintain an active inventory, throughout the permit term, of all program areas and report all updates annually in the Annual Report. All active County-owned sites, projects, and outfalls must meet the minimum requirements established within the South Carolina NPDES General Permit for Stormwater Discharges Associated with Industrial Activities, and all pertinent requirements listed within R.61-9 and R.72-300. Specific activities to be completed under this item are:” is duplicative information already included in Table II.B.5 and introductory section. It is inappropriate to mandate that all municipally owned “sites, projects, and outfalls” comply with IGP requirements, as not all MS4 sites fall under Element 5, and some applicable sites are not subject to the IGP. Furthermore, the terms, “projects” and “outfalls” are unclear in this context and are already regulated elsewhere in the MS4 permit. Including this redundant language outside the element tables may create confusion regarding its applicability and regulatory importance.	
Response Section 122.26(d)(2)(iv)(C) of Title 40 Code of Federal Regulations states the management program must include a program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III, Superfund Amendments and Reauthorization Act (SARA), and industrial facilities that are the municipal permit applicant determines are contributing substantial pollutant loading. Language has been revised to state “Where applicable, all active County-owned sites, projects, and outfalls must meet the minimum requirements established within the South Carolina NPDES General Permit for Stormwater Discharges Associated with Industrial Activities, and all pertinent requirements listed within R.61-9 and R.72-300.”	

<i>Permit Section & Topic:</i> Table II.B.8.a.v	<i>Commenter(s):</i> City of Columbia
Comments: The inclusion of “commercial sites” in this provision is not appropriate and is inconsistent with the scope of SCDES-permitted industrial stormwater programs. MS4 permits typically require tracking of regulated industrial facilities, extending this requirement to commercial sites introduces ambiguity and may create expectations beyond the MS4’s regulatory authority. In addition, the phrase “to include all inspection reports” is overly broad and unclear. As written, it could be interpreted to require documentation of inspections conducted by entities other than the County, including SCDES or facility self-inspections. This would impose requirements outside the County’s control and responsibility under the MS4 permit. The City of Columbia is making this comment as similar provisions may be carried forward or applied in future MS4 permit renewals.	
Response The industrial runoff program is intended to identify industrial facilities that may discharge pollutants to the MS4 and to reduce pollutant loading from those sources. Maintaining an inventory of industrial facilities within the MS4 service area allows the permittee to prioritize inspections, conduct source identification activities, investigate potential illicit discharges, and evaluate the effectiveness of BMPs implemented to protect the MS4. The required inspections are municipal source-control inspections conducted pursuant to the MS4 permit and are not intended to replace or duplicate industrial stormwater compliance inspections performed by SCDES under separate NDPES industrial stormwater permits. 40 CFR 122.26(d)(2)(iv)(C) states the industrial runoff program must include municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 title III SARA, and industrial facilities that the municipal permit applicant determines are contributing substantial pollutant loading to the MS4. Table II.B.8.a.v language has been revised to state “An inventory of all SCDES permitted industrial sites operating with a qualified SIC/NAICS code discharging to the MS4 must be maintained and updated annually. This inventory shall include all MS4 conducted industrial inspection reports.”	