



## State of New Jersey

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**TO** Tier A Municipalities  
**FROM** Benjamin L. Spinelli, Esq., Executive Director  
**SUBJECT** Guidance for requesting Highlands Council Funding to assist in MS4 Compliance  
**DATE** September 2023

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Dear Municipal Official/Stormwater Coordinator/Planning or Engineering Professional:

Behind this cover you will find guidance for developing a Scope of Work (SOW) to request grant funding from the Highlands Council to support compliance with the 2023-27 MS4 permit. Highlands Council grants can augment NJDEP funding to complete certain required components of the new/modified MS4 permit requirements. The attached document outlines specifically which components of the permit qualify for Highlands Council funding and suggests timelines for completion. It is recommended that municipalities submit SOWs for tasks that can be completed in a one-year time frame.

Additional details about Highlands Council grants:

- **Basic Parameters**
  - Noncompetitive.
  - No match required.
  - No funding cycle or deadline; applications accepted at any time.
  - Grants are reimbursement-based and require a pre-approved SOW.
- **Eligible Applicants.** Funding to support MS4 permit compliance is available to *all* Highlands municipalities, regardless of conformance status.
- **Funding Availability.** Funding is available on a first-come, first-served basis and priority will be given to municipalities that are already actively engaged in working with the Highlands Council.
- **Eligible Expenses.** Any planning, design, or engineering costs.

Please note that municipalities are not required to request funding for all components outlined in the attachment. Municipalities may choose to request funding for as few or as many as deemed necessary. Please reach out to your [Highlands Council staff liaison](#) for additional information and guidance.

Highlands Stormwater Grant Scope of Work  
Stormwater MS4 Permit  
Tier A Municipalities  
New Jersey Highlands Region

September 2023

## **Introduction**

Proper stormwater management is critical to the health and safety of all New Jersey residents. Stormwater discharges transmit pollutants into our waterbodies and water systems creating potential hazards to urban, suburban, and rural areas alike. Attention to stormwater management is particularly important in the New Jersey Highlands. Although the Highlands region accounts for less than 20% of the state's area, it is the source of drinking water for more than 70% of the state's residents.

## **Stormwater Program History/Updated requirements for Existing Tier A Municipalities**

In 2004, the New Jersey Department of Environmental Protection (NJDEP) adopted amendments to the New Jersey Pollutant Discharge Elimination System (NJPDES) regulations for the development and implementation of the Municipal Stormwater Regulation Program (NJAC 7:14A-25) and established two NJPDES general permits to authorize municipal stormwater discharges, known as Tier A and Tier B. This program was developed in response to the U.S. Environmental Protection Agency's (USEPA) Phase II Rules published in December 1999, which required municipalities to develop and implement a program to reduce discharges of pollutants entering waterbodies from stormwater systems to the maximum extent practicable. These are referred to as "municipal separate storm sewer systems" (MS4s).

The NJPDES MS4 permit was originally issued in 2004, renewed in 2009 and 2018, and most recently on January 1, 2023 (current permit). The 2023 MS4 permit renewal has been designed to comply with the National Pollutant Discharge Elimination System (NPDES) MS4 General Permit Remand Rule for **all** municipalities (the former Tier B designation is eliminated) due to the increase in flooding events that result in additional stormwater runoff discharging pollutants into the nation's waterways. Existing Tier A municipalities must now comply with new requirements under the new permit including:

- MS4 Mapping
- Watershed Improvement Plan
- MS4 Conveyance System (inspection/cleaning)
- Two new community-wide ordinances (salt storage & tree removal/replacement)
- Storm Drain Installation (enhanced BMP's)
- Excess De-icing Material Management
- Roadside Vegetative Waste Management
- Roadside Erosion Control
- Stormwater Infrastructure Inspection/Maintenance
- Storage Requirements for: bulk liquids, cold patch asphalt, scrap tires, inoperable vehicles/equipment

Numerous other requirements for existing Tier A municipalities have been modified for compliance under the new permit, requiring updates to existing plans and policies. A reference timetable is provided in this package that outlines the benchmarks and deadlines for these changes.

## Highlands Stormwater Grant Model Scope of Work Tier A Municipalities

This model scope of work and associated timetable has been prepared to help Highlands region municipalities achieve compliance with NJPDES Permit No. NJ0141852, the Tier A Permit Renewal Master Permit. Categories are noted as “new” or “requires update.” In some cases, a complete re-write of an existing plan/program is needed or desired. All deliverables are in electronic form for posting on the municipality’s dedicated storm water web page.

Included below is a list of permit-required tasks that are eligible for Highlands Council grant funding. (*Note: The scope does not need to include all tasks listed below*). Scopes should cover a one-year period. Adjustments can be made during the awarded term upon request. Discrete deliverables by task should be identified.

### Highlands Grant Eligible Items

#### 1. Stormwater MS4 Mapping/Inspections (new)

Municipal officials/consultants should review the permit for the detailed mapping and inspection requirements. It should be noted that the new permit makes a distinction between “drainage inlets” and “catch basins,” where the latter includes a mechanism, such as a sump, to collect solids in the runoff. A new requirement is that 100% of all drainage inlets and 20% of the catch basins must be inspected annually. Since there is often no reliable database that distinguishes between inlets and catch basins, an initial inspection will identify the catch basins for future inspection and cleaning work. In addition to the inlets/catch basins, all outfalls need to be located and inspected annually for their general operating condition.

The mapping requirement has a 3-year phase in. The scope of work for year 1 will be to analyze approximately 1/3 of the municipality using available topography to approximate the pipe network, with field verification. Municipalities should anticipate applying for additional grants in years 2 and 3 to reflect costs similar to those estimated for year 1.

The MS4 Infrastructure Map shall include:

- i. MS4 outfalls
- ii. MS4 ground water discharge points
- iii. MS4 interconnections
- iv. Storm drain inlets
- v. MS4 manholes
- vi. MS4 conveyance system
- vii. MS4 pump stations
- viii. Stormwater facilities
- ix. Property boundaries of maintenance yard(s) and other ancillary operations

Additionally, the MS4 Infrastructure map is required to be annually reviewed and updated, posted on the municipal webpage, and submitted annually to the NJDEP following initial filing in accordance with the

Tier A compliance schedule.

**Deliverables:** MS4 Infrastructure Map (GIS files and electronic copies of maps)

## **2. Outfall Scour Control Program (requires update)**

Municipalities are required to develop, update, and implement a program to detect, investigate, and control any localized stream scouring from municipally owned or operated stormwater outfalls. This work item includes the preparation of the written program.

**Deliverable:** Electronic copy of Outfall Scour Control Program Plan

## **3. Illicit Discharge Detection and Elimination Program (requires update)**

Municipalities are required to develop, update, implement and enforce an ongoing Illicit Discharge Detection and Elimination Program in accordance with permit guidelines. This work item includes the preparation of the written program.

**Deliverable:** Electronic copy of Illicit Discharge Detection and Elimination Program Plan

## **4. Preparation of a Stormwater Pollution Prevention Plan (SPPP) (requires update)**

The permit requires that the municipality develop a Stormwater Pollution Prevention Plan. The NJDEP has prepared a model SPPP ([NJDEP| Bureau of NJPDES Stormwater Permitting and Water Quality Management | Tier A MS4 Stormwater Permit](#)) as a basis for this document. This plan is required to be uploaded to the municipal website. The scope of work for this item includes the preparation of the SPPP in a form acceptable for posting on the website.

**Deliverable:** Electronic copy of SPPP

## **5. Preparation of a Municipal Stormwater Management Plan (MSWMP) (requires update)**

The permit requires that a Municipal Stormwater Management Plan be prepared. This plan is required to be adopted by the Planning/Land Use Board as an element of its Master Plan. Like the SPPP, this plan must be uploaded for public view on the municipal website. The work includes preparation of the MSWMP consistent with the NJDEP model ([Sample Municipal Stormwater Management Plan](#)). As with any Master Plan element, the amended document will need to be adopted by the Planning Board of the municipality consistent with the Municipal Land Use Law.

**Deliverable:** Electronic copy of MSWMP

**6. Stormwater Facility Inspection and Reporting (Detention Basins/Water Quality Units) (requires update)**

Stormwater management systems including detention basins, retention ponds, bio-retention systems/rain gardens, and infiltration basins that are municipally owned need to be inspected quarterly or according to timelines indicated in an associated Operations and Maintenance (O&M) manual with conditions recorded. The reports provided to the municipality will indicate any recommended or required maintenance.

For the purposes of the Highlands Council grant, the municipality will be reimbursed for the initial mapping and inspection of all municipally owned stormwater management facilities. The deliverable shall be a map with a corresponding inspection report detailing the condition of each stormwater facility.

**Deliverable:** Electronic map with copy of inspection report

**7. Municipal Stormwater Webpage (requires update)**

Municipalities are required to develop and maintain a dedicated stormwater webpage on its municipal website. This webpage shall make elements of the municipality's MS4 stormwater program available to the public by providing links to the latest, adopted versions of the following documents: Stormwater Pollution Prevention Plan (SPPP), Municipal Stormwater Management Plan (MSWMP), Stormwater Control Ordinance (SCO), ordinances regulating pet waste, wildlife feeding, litter control, waste disposal, yard waste collection, storm drain inlet retrofitting, illicit connections, tree removal/replacement, salt storage, as well as maps (MS4 outfall, infrastructure), and the municipal Watershed Improvement Plan. It is anticipated that consultants will work with the municipality to ensure the proper materials are posted and available to the public.

**Deliverable:** Link to dedicated municipal stormwater webpage

**8. Preparation of Municipal Best Management Practices (BMP) Manual (requires update)**

The 2023 permit contains a number of BMPs for operations in and around the municipality's maintenance yard(s). Some of these BMPs are modified from the prior permit. The municipal BMP manual will be specific to the municipality and take the requirements from the permit and make them accessible and understandable to the staff responsible for the actions.

**Deliverable:** Electronic copy of BMP Manual

**9. Watershed Improvement Plan (WIP) (new)**

The Watershed Improvement Plan is a five-year task. The municipality should outline the scope of work to be completed in the first year of the permit cycle.

**Deliverable:** Electronic copy of draft WIP chapters

## 10. Community-Wide Ordinances (new)

Two new ordinances are required for existing Tier A municipalities under the 2023 permit. It is a continuing requirement that municipalities adopt numerous new or revised ordinances to effectively mitigate stormwater pollution. These ordinances engage the public in the management of stormwater control by addressing practices that can adversely impact the environment. Enforcement provisions are critical to the success of these ordinances. As with the first round of community-wide ordinances, municipalities should review existing code for compliance under the new permit and amend, if needed, or adopt and implement new ordinances to address the subjects of salt storage and tree removal/replacement. The NJDEP provides model ordinances for the municipalities to assist in the development of their regulatory mechanism ([NJDEP| Bureau of NJPDES Stormwater Permitting and Water Quality Management | Example Ordinances](#)). It is anticipated that consultants and/or the municipal attorney will work with municipal staff in the development of these ordinances. *(Note: There are additional Highlands-specific standards that conforming Highlands municipalities are required adopt to their Stormwater Control Ordinance. Municipalities should contact their Highlands municipal liaison form more information on this [New Jersey Highlands Council | Liaisons \(nj.gov\)](#)).*

**Deliverables:** Electronic copies of ordinances

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.A.2. Stormwater Pollution Prevention Plan Requirements	Submit an updated SPPP electronically to the Department and post on your municipal website	Modified	7/1/2023
IV.B.1. Public Involvement, Participation, & Notice	Comply with applicable State and local public notice requirements	Unchanged	1/1/2023
IV.B.2. Municipal Stormwater Webpage	Develop a dedicated stormwater webpage that contains links to all materials listed in IV.B.2.a. in one place	Modified	4/1/2023
IV.C.1. Local Public Education and Outreach	Implement a Public Education and Outreach Program	Unchanged	1/1/2023
IV.D.1. Construction Site Stormwater Runoff	Obtain Construction Activity NJPDES Stormwater General Permit or individual permit for construction site stormwater runoff activities	Unchanged	1/1/2023



Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.E.1. Post Construction Stormwater Management in New Development and Redevelopment	Comply with N.J.A.C. 7:8 - develop, update, implement and enforce the following: a Stormwater Management Program to address post construction stormwater runoff, a Municipal Stormwater Management Plan (MSWMP), a Stormwater Control Ordinance (SCO), and if applicable, a Mitigation Plan; the same individual may not design AND review stormwater management projects	Modified	1/1/2023
IV.F.1.a. Community Wide Ordinances (pre- existing)	Adopt and enforce ordinances for proper management of Pet Waste, Wildlife Feeding, Litter Control, Improper Disposal of Waste, Yard Waste, Private Storm Drain Inlet Retrofitting, and Illicit Connection	Unchanged	1/1/2023
IV.F.1.b. Community Wide Ordinances (new)	Adopt and enforce ordinances for proper management of Salt Storage Ordinance and Tree Ordinance	New	1/1/2024

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.F.2.a.i. Triannual Street Sweeping	At least once every 4 months, sweep all asphalt/ concrete segments of roads owned or operated by the permittee and have storm drain inlets that discharge to surface water	Modified	1/1/2026
IV.F.2.a.ii. Annual Street Sweeping	At least once per year, sweep all asphalt/ concrete segments of roads owned or operated by the permittee, that do not have storm drain inlets, that discharge to surface water	Modified	1/1/2026
IV.F.2.a.iii. Storm Drain Inlet Labeling	Label all permittee owned or operated storm drain inlets that do not have permanent wording cast into the structure of the inlet if they are adjacent to municipal streets, within plazas, parking areas, maintenance yards or other permittee ancillary activities	Unchanged	1/1/2023
IV.F.2.a.iv. Storm Drain Inlet Retrofitting	Retrofit or replace all municipal storm drain inlets within the standards set forth in permit Attachment B	Modified	12/1/2027

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.F.2.a.v. Storm Drain Installation	All storm drain installations must include a catch basin or other BMP designed for solids collection as required by the permit	New	1/1/2023
IV.F.2.a.vi. Herbicide Application Management	Restrict application of herbicides to prevent them from being washed into the waters of the State and to prevent erosion caused by de-vegetation (previously 'Roadside Vegetative Management' in Tier A permit Attachment E)	Modified	1/1/2023
IV.F.2.a.vii. Excess De-icing Material Management	Within 72 hours after the end of storm events, conditions permitting, remove piles of excess salt and de-icing materials that have been deposited during spreading operations on all streets and parking areas owned or operated by the permittee	New	1/1/2023
IV.F.2.a.viii. Roadside Vegetative Waste Management	Ensure proper pickup, handling, storage, and disposal of wood waste and yard trimmings generated by the permittee	New	1/1/2023

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.F.2.a.ix. Roadside Erosion Control	Detect and repair erosion along roads owned or operated by the permittee and inspect and maintain the stability of shoulders, embankments, ditches, and soils along these roads to ensure that they are not eroding and contributing to the sedimentation of receiving waters	New	1/1/2024
IV.F.3.a.i. Storm Drain Inlet Inspection	At least once per year, inspect ALL storm drain inlets owned or operated by the permittee	Modified	1/1/2023
IV.F.3.a.ii. Storm Drain Inlet Cleaning and Maintenance	Develop, update, and implement a storm drain inlet cleaning and maintenance program	Modified	1/1/2023
IV.F.3.a.iii. Catch Basin Inspection	At least once per year, inspect 20% of the total number of catch basins rotating the schedule to ensure all catch basins are inspected at least once every 5 years	Modified	1/1/2023
IV.F.3.a.iv. Catch Basin Cleaning	Develop, update, and implement a catch basin cleaning and maintenance program	Modified	1/1/2023

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.F.3.a.v. MS4 Conveyance System Inspection and Cleaning	Develop, update, and implement an MS4 conveyance system inspection, cleaning, and maintenance program, e.g., ditches and pipes	New	1/1/2023
IV.F.3.a.vi. Stormwater Infrastructure Inspection	Inspect all stormwater infrastructure (excluding those in IV.F.3.a.i. through v. and IV.G.2.b.x.) at least 4x per year and after each rainstorm exceeding 1"	New	1/1/2023
IV.F.3.a.vii. Stormwater Infrastructure Maintenance	Perform maintenance on all stormwater infrastructure (excluding those in IV.F.3.a.i. through v. and IV.G.2.b.x.) per approved maintenance plans or more frequently as needed to ensure proper function and operation	New	1/1/2023
IV.F.4. Inspection and Maintenance of Stormwater Facilities Not Owned or Operated by the Permittee	Develop, update, implement, and enforce a program to ensure adequate long-term cleaning, operation, and maintenance of stormwater facilities not owned or operated by the permittee that are not subject to conditions of another NJPDES stormwater permit and constructed after February 7, 1984	Unchanged	1/1/2023

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.F.5.a. Municipal Maintenance Yard (MMY) and Other Ancillary Operations	For each yard, implement applicable BMPs for activities listed in permit section IV.F.5.b. through r at each municipal maintenance yard and ancillary operation site owned or operated by the permittee; include each site and corresponding materials and activities in the SPPP	Modified	1/1/2023
IV.F.5.b. Site Inspections	Conduct monthly site inspections and maintain logs	Unchanged	1/1/2023
IV.F.5.c. Inventory List	Maintain a list of all materials and machinery which could be a source of pollutants in a stormwater discharge	Unchanged	1/1/2023
IV.F.5.d. Container Labels	Properly label all containers	Unchanged	1/1/2023
IV.F.5.e. Spill Kits	Conduct cleanups of spills immediately after discovery using dry cleaning methods	Unchanged	1/1/2023
IV.F.5.f. Bulk Liquid Storage	Provide secondary containment of aboveground storage tanks containing bulk liquid materials	New	1/1/2024

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.F.5.g. Fueling Operations	Establish, maintain, and implement BMPs to address vehicle fueling, receipt of bulk fuel deliveries, and inspection and maintenance of storage tanks	Unchanged	1/1/2023
IV.F.5.h. Discharge of Stormwater from Secondary Containment	Discharge stormwater accumulated in a secondary containment area as needed following visual inspection for contaminants	Unchanged	1/1/2023
IV.F.5.i. Vehicle/Equipment Maintenance and/or Repair	Maintain vehicles and equipment to prevent exposure of pollutants to stormwater	Unchanged	1/1/2023
IV.F.5.j. Wash Wastewater Containment	Manage equipment and vehicle washing activities to prevent unpermitted discharges of wash wastewater to storm sewer inlets or to surface or ground waters of the State	Unchanged	1/1/2023
IV.F.5.k. Salt and Other Granular De-icing Material Storage and Handling	Store salt and other solid de-icing materials in a permanent structure; establish, maintain, and implement salt and de-icing material storage and handling BMPs	Unchanged	1/1/2023

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.F.5.l. Aggregate Material, Wood Chips, and Finished Leaf Compost Storage	Store aggregate materials, wood chips, and finished leaf compost in a manner that minimizes stormwater run-on and pollutant run-off	Modified	1/1/2023
IV.F.5.m. Cold Patch Asphalt Storage	Store cold patch asphalt in a permanent structure or on an impervious surface and covered	New	1/1/2023
IV.F.5.n. Street Sweepings and Storm Sewer Clean-out Material Storage	Store street sweepings, storm sewer and catch basin clean-out materials, stormwater basin clean-out materials and other similar materials up to 6 months in a manner that controls leachate and stormwater run-on or run through	Unchanged	1/1/2023
IV.F.5.o. Construction and Demolition Waste, Wood Waste, and Yard Trimmings	Store construction and demolition waste, wood waste, and yard trimmings, temporarily in a manner that minimizes stormwater run-on and pollutant run-off	Modified	1/1/2023
IV.F.5.p. Scrap Tires	Store scrap tires in a covered container, under cover or in an enclosure to prevent exposure to stormwater	New	1/1/2023



Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.F.5.q. Inoperable Vehicles or Equipment	Store inoperable vehicles or equipment provided control measures are utilized and monthly inspections are conducted for leaks and filled drip pans	New	1/1/2023
IV.F.5. r. Outdoor Refuse Containers and Dumpsters	Ensure dumpsters and refuse containers that are exposed to stormwater are covered in accordance with the permit	New	1/1/2023
IV.F.6. SPC Training	SPCs attend mandatory Department training once per permit cycle	New	1/1/2026
IV.F.7. Annual Employee Training	Train individuals responsible for implementation of the stormwater program permit conditions that apply to their job duties	Unchanged	1/1/2023
IV.F.8. Stormwater Management Design Review (SWMDR) Training	Ensure that all individuals that review and approve stormwater management designs for major development projects on behalf of the permittee for compliance with the Stormwater Management rules at N.J.A.C. 7:8 complete the training provided by the Department at least once every 5 years	Unchanged	1/1/2023

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.F.9. Stormwater Management Rule Amendment Training	Ensure that all individuals that have completed the Department SWMDR course also complete any Department training courses related to Stormwater Management rule amendments	New	Within 12 months from adoption of 7:8 rule amendment
IV.F.10. Municipal Board and Governing Body Member Training	Ensure that all individuals serving on the municipal board and governing body watch the Department training videos once per term	Unchanged	1/1/2023
IV.G.1. MS4 Mapping	Develop, update, and maintain an MS4 Infrastructure Map; review annually, update as needed, post on the permittee's stormwater webpage, and submit electronically to the Department	New	1/1/2026
IV.G.2. Stream Scouring	Develop, update, and implement a program to detect, investigate, and control localized stream scouring from stormwater outfalls owned or operated by the permittee via inspections of 20% of the total number of outfalls per year	Modified	1/1/2023

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.G.3. Illicit Discharge Detection and Elimination	Develop, update, implement and enforce an ongoing Illicit Discharge Detection and Elimination Program via inspections of outfalls owned or operated by the permittee via inspections of 20% of the total number of outfalls per year	Modified	1/1/2023
IV.H.1.d. Watershed Improvement Plan - Phase 1	Prepare the Watershed Inventory Report and submit it to the Department; conduct semi-annual public information sessions	New	1/1/2026
IV.H.1.e-f. Watershed Improvement Plan - Phase 2	Prepare the Watershed Assessment Report and submit it to the Department; conduct public information sessions	New	1/1/2027
IV.H.1.g. Watershed Improvement Plan - Phase 3	Prepare the Watershed Improvement Plan Report and submit it to the Department; conduct public information sessions; implement plan and review it every 2 years	New	12/1/2027

Permit Citation	Description	New, Modified, or Unchanged from 2018 MS4 Tier A Permit	Compliance Schedule for Existing Tier A's
IV.I. Additional Measures & Optional Measures	Incorporate measures the Department requires to address TMDLs, regional stormwater management plans, or Water Quality Management Plans. The permittee may also adopt measures beyond the requirements in the permit to improve their stormwater program if they so choose, for example, opting to adopt a Refuse Container & Dumpster Ordinance.	Unchanged	per NJDEP implementation schedule
IV.J. Recordkeeping	Retain copies of all records related to the MS4 permit for at least 5 years; make available to the Department upon request	Unchanged	1/1/2023
IV.K.a. Annual Report	Submit the Annual Report and Certification to the Department via the MSRP Annual Report service through the Regulatory Services Portal by May 1st each year	Unchanged	1/1/2023
IV.K.b. Supplemental Questionnaire	Submit the Supplemental Questionnaire to the Department by attaching it to the MSRP Annual Report by May 1st each year	Unchanged	1/1/2023