

# Developing Your Local MS4 Program

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# My goal today...



- Provide some MS4 program perspective
- Help you think about what's most important for your community
- Show you some ways to prioritize your resources
- Equip you for future NOI development/program commitments
- Tell you where the help is



# What I've Been Hearing Regarding MS4...



- Another unfunded mandate
- The six minimum controls don't look very "minimum" to me
- Don't have the resources to implement all this
- We're going to do the bare minimum
- How beneficial is this program anyway? Improved water quality?
- Requirements are vague/difficult to understand
- I just started here, I don't know where to begin / what's been done
- Do I have to do this program given the recent election results?

# What I've Learned Through 20+ years...



- MS4 implementation resources are limited, and competed for
- MS4 program is a Clean Water Act program
  - No regulatory difference between this permit and other NPDES permit
- Urban runoff is a significant contributor of pollutants
  - The way we develop land and manage activities makes a difference
  - Municipal staff are the local example

# What I've Learned Through 20+ years...



- Everyone wants to do the right thing
  - More education is necessary, public and public officials
- Demonstrating improvement to water quality is difficult
- IEPA has offered flexibility/options
  - BMP to the MEP program, you get to set your priorities
- Not alone – over 440 permittees in Illinois

# Program Challenges



- Available resources
  - Funding, staff
- Six minimum controls
  - There's a lot in them
- Not a one-department program
  - Public works, engineering, planning, fire dept, code enf, admin, etc.
- Not one size fits all
  - River? Lake? Neither?
  - General fund? Stormwater utility?



# NOI Preparation



Take all these realities, challenges, and considerations into your NOI development process

- Local water quality priorities / concerns
- Available resources
- Unique challenges
- Unique opportunities
- Environmental justice areas
- Prioritization



# Form a MS4 Committee



- Share the joy – not a one department program
- Find a champion, put them in charge
  - Lead department, MS4 Coordinator
- Designate a representative from other departments
- Meet twice per year
  - Assessment time - annual report, changes for next year
  - Check in time - mid year evaluation, checking in on those responsible
- Include the mayors / administrators office
  - Direction, buy-in, additional resources





# TMDL Requirements

- Specific requirements for MS4s discharging to waterbodies where Total Maximum Daily Load (TMDL) analysis has been completed
- Must review the TMDL to determine any requirements for control of storm water discharges
- Determine if TMDL is for a pollutant likely to be found in stormwater discharges
- Must modify MS4 program to implement the TMDL within eighteen months of notification by the Agency
- Modify existing stormwater control measures and monitoring if necessary



# Other Water Quality Studies



- Watershed plans
- Watershed group initiatives
- Reasonable level of searching
  - Local knowledge
  - IEPA knowledge
  - Web search



# NOI Preparation

- Now you are ready to fill out the NOI form
  - Water quality concerns / goals
  - Current efforts
  - Needed efforts
  - Responsible departments / persons
  - Available recourses





Please fill out the following form. You can save data typed into this form.



Highlight Existing Fields



## Illinois Environmental Protection Agency

Bureau of Water • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

### Notice of Intent for New or Renewal of General Permit for Discharges from Small Municipal Separate Storm Sewer Systems - MS4's

[For this form to function  
properly, Adobe Reader  
8.0 is required](#)

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#### Part I. General Information

1. MS 4 Operator Name:
2. MS4 Mailing Address:   
City:  State:
3. Operator Type:   Other:
4. Operator Status:   Other:
5. Name(s) of governmental entity(ies) in which MS4 is located:

<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

6. Area of land that drains to your MS4 in square miles:
7. Latitude and Longitude at approximate geographical center of MS4 for which you are requesting authorization to discharge:

Latitude:

Longitude:

Degrees:

Minutes:

Seconds:

Degrees:

Minutes:

Seconds:

# NOI Preparation



## Shared Services

- When someone takes care of one or more of your requirements for you
- Needs documentation

## Qualifying Local Programs

- When you are following the requirements of another program instead of the permit requirements
- Needs documentation







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Part II. Best Management Practices (include shared responsibilities) which have been implemented or are proposed to be implemented in the MS4 area:

**A. Public Education and Outreach**

Qualifying Local Programs:

Measurable Goals (include shared responsibilities)

- ☐ A.1 Distributed Paper Material
- ☐ A.2 Speaking Engagement
- ☐ A.3 Public Service Announcement
- ☐ A.4 Community Event
- ☐ A.5 Classroom Education Material
- ☐ A.6 Other Public Education

**B. Public Participation/Involvement**

Measurable Goals (include shared responsibilities)

Qualifying Local Programs:

# NOI Preparation



## Best Management Practices (BMPs)

- Programmatic
- Site design
- Source control
- Treatment control

## Set reasonable expectations

- What is the goal?
- Yearly steps / progress
- How will progress be tracked / measured?
- Don't forget what you are already doing!





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Measurable Goals (include shared responsibilities)

☒ A.1 Distributed Paper Material

Brief Description of BMP:

What you are going to do, and who is going to do it...

Measurable Goals, including frequencies:

How many, how often, and how are you going to measure progress / completion...

Milestones:

Go to Additional  
Pages

Year 1:

Year 2:

Year 3:

Year 4:

Year 5:

- ☐ A.2 Speaking Engagement
- ☐ A.3 Public Service Announcement
- ☐ A.4 Community Event
- ☐ A.5 Classroom Education Material
- ☐ A.6 Other Public Education



# Implement to the Maximum Extent Practicable (MEP standard)



Not defined, so who gets to decide?

- Municipality, regulator, third party group?

Should consider

- Community size, budget
- Condition of receiving waters
- Watershed plan goals
- Local concerns
- Implementation schedule
- O&M requirements

MEP?

# Prioritize Your Resources



- Focus on your primary water quality issues
  - Target those which you can make an impact on
- Do a spatial analysis
  - Where are the pollutants of concern (hot spots)?
  - Where do those areas drain?
  - Where can we reprioritize the overall effort?
- What can others do, or are already doing for you?
- What can you borrow, or cost share?
- Tailor your efforts for the greatest positive impact

# Stormwater Management Program Plan (SMPP)



- Document that describes the overall organization of the MS4 program
- Responsible parties (departments) and roles within the program
- Commitments and program administration
- Posted to community website

Not just a  
summary of the  
NOI

# Annual Program Review



## Required

- ...and it's a good idea

## Committee Input

## What's Working

- Enhance it?

## What's Not

- Change it!

# Training – Set the Example



## Annual employee training

- Park and open space maintenance, fleet and building maintenance
- Operation of storage yards, snow disposal, deicing material storage and use
- Storm water system maintenance procedures, proper disposal of street cleaning debris and catch basin material
- How flood management projects impact water quality, non-point source pollution control, green infrastructure controls, and aquatic habitat



# Training – Set the Example



- Annual green infrastructure training - for all employees who manage or are directly involved in the routine maintenance, repair, or replacement of public surfaces
- Annual training for all contractors retained, may provide their own
- IDDE training – recognizing and hazards associated with illicit discharges



# Where's the Help?



# The Take Home...



- Determine your local water quality impacts / goals
- Assess your resource capabilities
- Prioritize!
- Set realistic expectations
- Look at examples
- Ask for help
- Reassess





# Questions and Discussion

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