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?







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



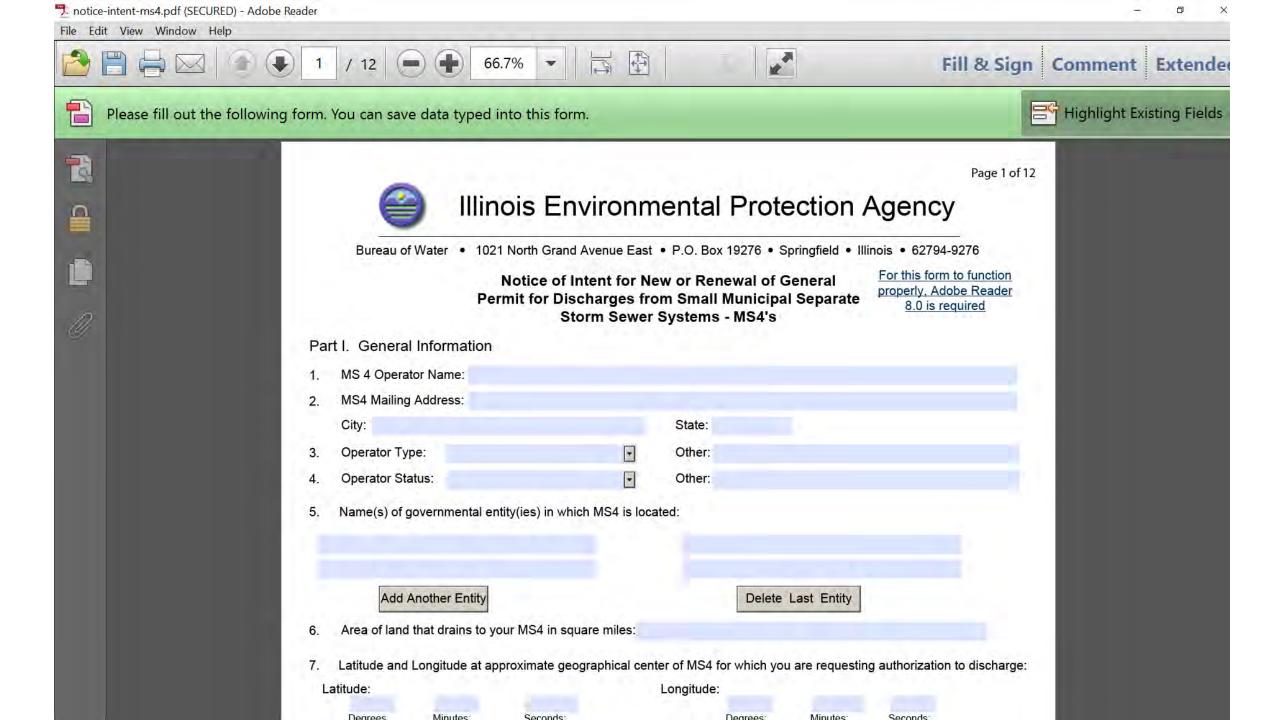
- Watershed plans
- Watershed group initiatives
- Reasonable level of searching
 - Local knowledge
 - IEPA knowledge
 - Web search





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







Shared Services

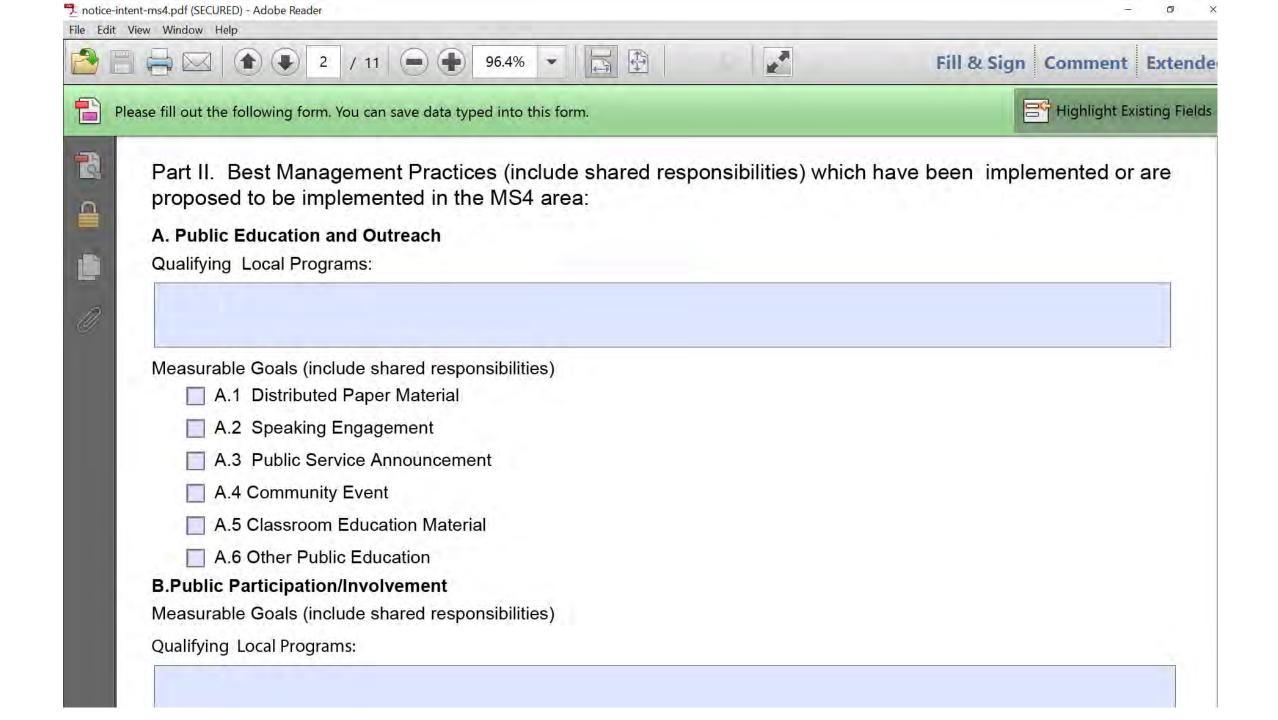
- When someone takes care of one or more of your requirements for you
- Needs documentation

Qualifying Local Programs

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









Best Management Practices (BMPs)

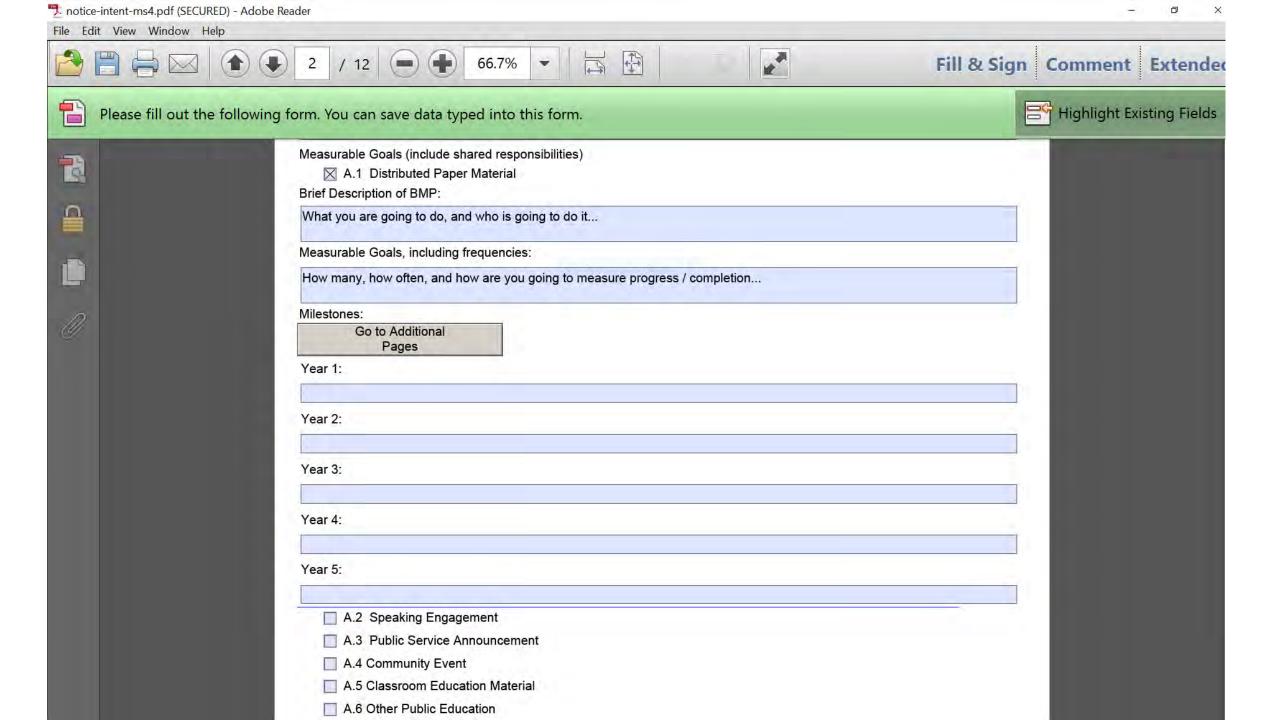
- Programmatic
- Site design
- Source control
- Treatment control

Set reasonable expectations

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







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





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)



- <u>Document</u> 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 <u>contractors</u> 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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