

Municipal Stormwater Permit Requirements

Natural Areas Maintenance

Municipal Separate Storm Sewer System (MS4)

NPDES ILR40 Permit

- ▶ IEPA's General Permit for municipal stormwater discharges
- ▶ Part I. Coverage
- ▶ Part II. Notice of Intent
- ▶ Part III. Special Conditions
- ▶ Part IV. Stormwater Management Programs
- ▶ Part V. Monitoring, Recordkeeping, Reporting

Permit Effective Date:
March 1, 2016

Schedule of Updated Requirements

Implementation Action	Due Date	
File new Notice of Intent	May 30, 2016	✓
File Annual Report	June 1, 2016	✓
Implement new public education components		
Participate in watershed group		
Implement expanded training program		
Update storm sewer maps	August 28, 2016	✓
Implement dry weather screening program		
Implement monitoring program		
Construct permanent salt storage facilities	February 28, 2018	✓
Develop water quality assessment program for flood management projects	February 28, 2019	

Acronyms / Definitions

- ▶ **TMDL (Total Maximum Daily Load)** - A calculation of the maximum amount of a pollutant allowed to enter a waterbody so that the waterbody will meet and continue to meet water quality standards for that particular pollutant. A TMDL determines a pollutant reduction target and allocates load reductions necessary to the source(s) of the pollutant.
- ▶ **303(d) List** - List of impaired waters in Illinois prepared by the Illinois EPA. Section 303(d) of the Clean Water Act authorizes the EPA to assist states in listing impaired waters and developing TMDLs for these waterbodies.
- ▶ **Flood Management Project** - any project which is intended to control, reduce or minimize high stream flows and associated damage. This may also include projects designed to mimic or improve natural conditions in the waterway.
- ▶ **Environmental Justice** - fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, policies.
- ▶ **Environmental Justice Area** - a community with a low income and/or minority population greater than twice the statewide average.

Part I.

Coverage

- ▶ Further defines additional discharges which are excluded from coverage
- ▶ Added language from the ILR10 permit regarding dewatering

Part II.

Notice of Intent

- ▶ Required to submit new NOI within 90 days of the effective permit date
- ▶ Required to comply with new provisions within 180 days of the effective permit date
- ▶ Include in Annual Report a plan for compliance with new permit provisions
- ▶ Provide information regarding stream segments, whether they are listed on the **303(d) list**, and the status of **TMDL** development for each segment



Part III. Special Conditions

- ▶ TMDL requirements supersede MS4 requirements with regard to implementation of stormwater management plans
 - ▶ Waste load allocation monitoring shall be continued for two continuous NPDES permit cycles to ensure that waste load allocations are being met
- ▶ Permittees using road salts must participate in a watershed group which will implement chloride reduction measures

Part IV.

Stormwater Management Programs

- ▶ 1. Public Education & Outreach
 - ▶ Provide additional information (distribute materials) to the public about the impacts of climate change on precipitation and stormwater runoff
 - ▶ Handouts, website, newsletter, etc.
 - ▶ Information on effective pollution prevent measures
 - ▶ “Information about green infrastructure strategies such as: green roofs, rain gardens, bioswales, permeable piping, dry wells, and permeable pavement that mimic natural processes and direct storm water to areas where it can be infiltrated, evaporated or reused.”

Part IV.

Stormwater Management Programs

- ▶ 2. Public Involvement/Participation
 - ▶ Hold one public meeting annually for public to provide input on and learn about the MS4 program
 - ▶ Identify **environmental justice areas**: <https://www.epa.gov/ejscreen>
 - ▶ Include appropriate public involvement/participation

Part IV.

Stormwater Management Programs

- ▶ 3. Illicit Discharge Detection & Elimination
 - ▶ Required dry-weather inspections
 - ▶ Identify priority outfalls to inspect annually
 - ▶ Prioritization criteria determined by the permittee
 - ▶ Update storm sewer map to include any modifications to the sewer system



Part IV. Stormwater Management Programs

- ▶ 4. Post-Construction Stormwater Management
 - ▶ Consider the potential impacts and effects of climate change on stormwater controls / impacts to existing flood control measures
 - ▶ Not quantified
 - ▶ “The Illinois EPA does not intend for MS4 permittees to initiate immediate construction activities in response to climate change. The intent is to have communities begin to prepare initial planning efforts for extreme weather events and to educate the public on potential impacts of climate change.”



Part IV. Stormwater Management Programs

- ▶ Post Construction cont.
 - ▶ Requires long term operations & maintenance plans for developments
 - ▶ Develop water quality assessment program for existing and new flood control projects that discharge to the MS4. Consider the impacts and effects of climate change on flood management projects.

Part IV.

Stormwater Management Programs

- ▶ 5. Pollution Prevention / Good Housekeeping for Municipal Operations
 - ▶ Annual training required for employees and contractors
 - ▶ “Training should include how **flood management projects** impact water quality, non-point source pollution control, green infrastructure, and aquatic habitat”
 - ▶ Storage requirements for fertilizer, pesticides, other chemicals, and de-icing materials
 - ▶ Store road salts in permanent structure
 - ▶ Fertilizers, pesticides stored indoors

Part V.

Monitoring, Recordkeeping, Reporting

- ▶ Different monitoring options depending on community size
- ▶ Population less than 25,000:
 - ▶ Can perform visual monitoring
- ▶ Population greater than 25,000:
 - ▶ Variety of sampling methods
 - ▶ Work collaboratively with a watershed group
 - ▶ Sediment monitoring
 - ▶ Inventory BMPs and effectiveness per published reports
- ▶ Monitoring results must be used to evaluate the effectiveness of the chosen program



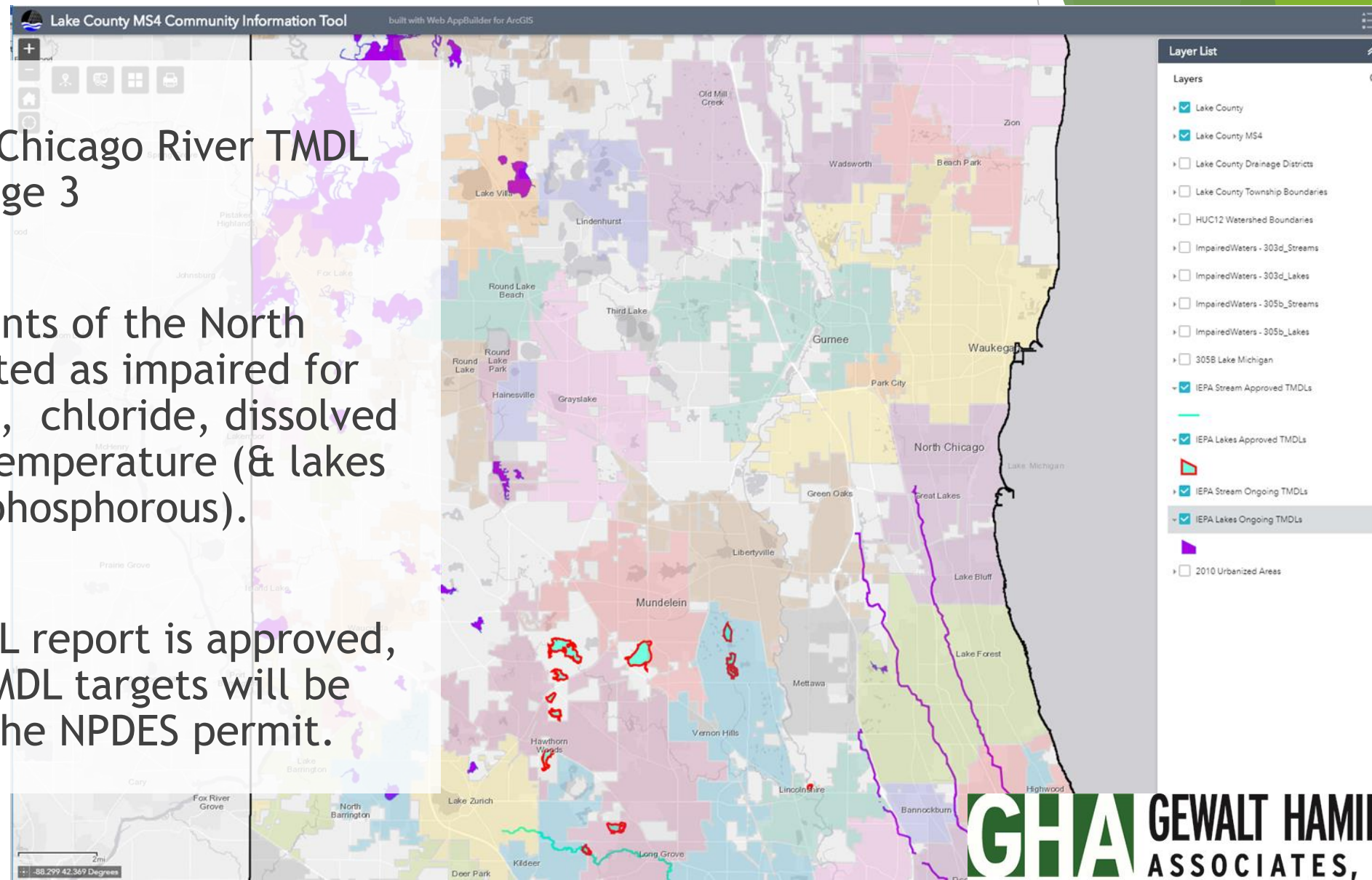
Part V.

Monitoring, Recordkeeping, Reporting

- ▶ Records must be kept for 5 years after expiration of the MS4 Permit
 - ▶ NOI, Stormwater Management Plan, Annual Reports, Monitoring Data
- ▶ Annual reports must be posted online for 5 years
- ▶ TMDL compliance measures (if applicable) must be reported
 - ▶ Waste load allocation monitoring shall be continued for two continuous NPDES permit cycles to ensure that waste load allocations are being met
- ▶ Hard copy and electronic report submittals required

TMDL: Total Maximum Daily Load

- ▶ North Branch Chicago River TMDL Study is in Stage 3
- ▶ Various segments of the North Branch are listed as impaired for fecal coliform, chloride, dissolved oxygen, and temperature (& lakes impaired for phosphorous).
- ▶ Once the TMDL report is approved, established TMDL targets will be enforced via the NPDES permit.



Questions?

Jodi McCarthy, PE, CPESC, CFM

Senior Engineer

jmccarthy@gha-engineers.com

Caitlin Burke, CWS

Environmental Consultant

cburke@gha-engineers.com

