

# New Illinois Municipal Separate Storm Sewer System (MS4) Permit

## Overview of Changes to the New Permit

Presentation for DRWW

August 21, 2025



# MS4 Permit Revision Timeline

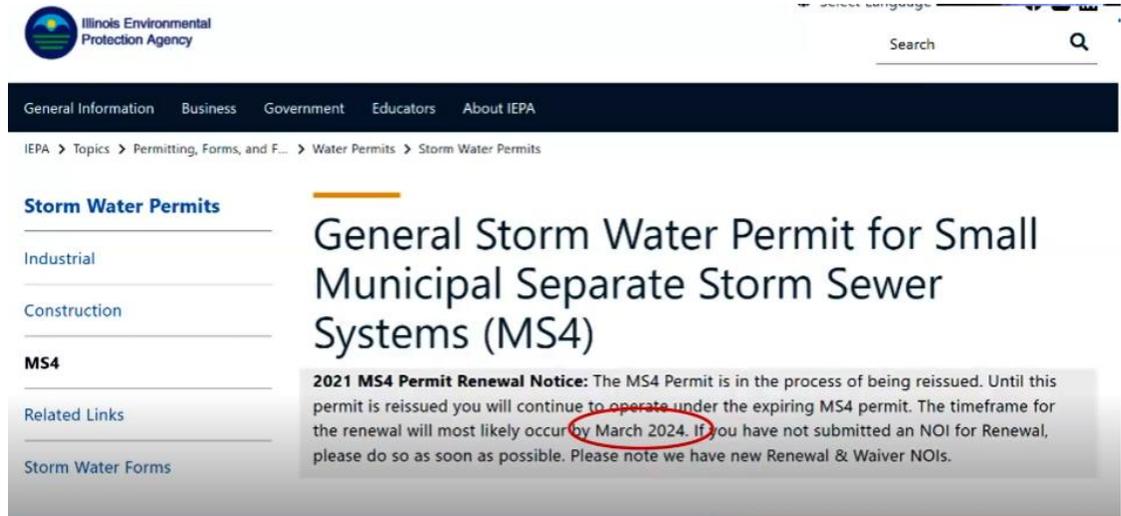


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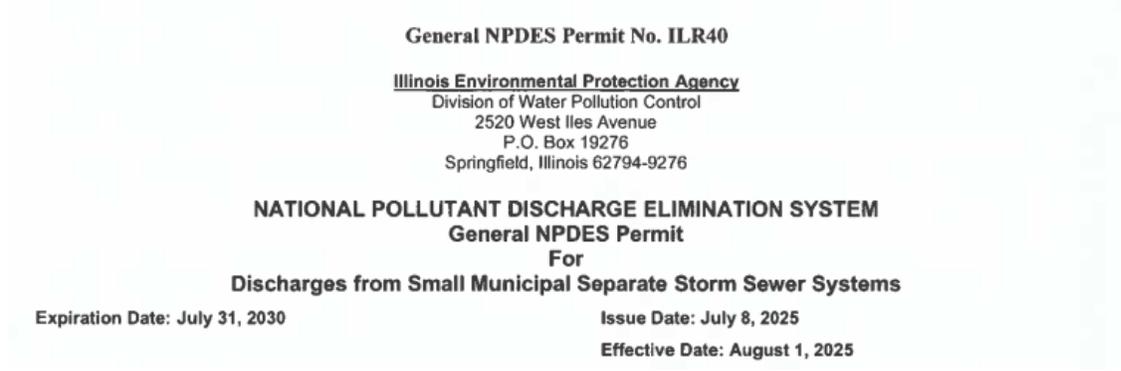
 **Previous Permit**  
February 2016 to February 2021

 **Illinois EPA Draft Public Notice**  
September 2021

 **New Permit effective August 1, 2025**  
Expires July 31, 2030



The screenshot shows the Illinois Environmental Protection Agency website. The main heading is "General Storm Water Permit for Small Municipal Separate Storm Sewer Systems (MS4)". A notice states: "2021 MS4 Permit Renewal Notice: The MS4 Permit is in the process of being reissued. Until this permit is reissued you will continue to operate under the expiring MS4 permit. The timeframe for the renewal will most likely occur by March 2024. If you have not submitted an NOI for Renewal, please do so as soon as possible. Please note we have new Renewal & Waiver NOIs." The date "March 2024" is circled in red.



General NPDES Permit No. ILR40  
Illinois Environmental Protection Agency  
Division of Water Pollution Control  
2520 West Iles Avenue  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
General NPDES Permit  
For  
Discharges from Small Municipal Separate Storm Sewer Systems  
Expiration Date: July 31, 2030 Issue Date: July 8, 2025  
Effective Date: August 1, 2025

# MS4 Permit Notice of Intent (NOI)



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If an MS4 submitted an NOI in 2021, MS4 permittees do not need to submit another NOI for the reissued permit

- **MS4s who did not submit an NOI in 2021 will have to submit an NOI before October 29, 2025**

Permit requires compliance with new permit requirements within 12 months

- MS4 Permittee's must update their Storm Water Management Plan (SWMP) document to incorporate all additional permit requirements

Electronic Reporting Rules

- Central Data Exchange (CDX) platform
- Starting December 21, 2025 all MS4 reports shall be required to be submitted through CDX

# MS4 Special Conditions



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## TMDL Compliance

- MS4s have 12 months to implement the TMDL
- 2016 Permit allowed 18 months

## Watershed Workgroup Participation

- MS4 Permittee's who perform deicing activities shall participate in a watershed group(s), where feasible.

## Waiver from Electronic Reporting

- IEPA will approve or deny within 120 days.
- Waiver may not exceed 5 years.

# Minimum Control Measures (Program Areas)



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New permit contains new requirements in each program area:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

# Public Education and Outreach on Storm Water Impacts



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## Additional SWMP requirements :

- Identify and analyze the target audience(s)
- Develop appropriate messages based on at least 3 targeted residential issues and 3 targeted industrial/commercial issues
- Permittee shall annually assess changes in public awareness and behavior



# Public Participation/Involvement



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## Additional SWMP requirements :

- Utilize public input in the development of the SWMP
- Identify any watershed workgroups within jurisdiction and participate with other stakeholders
- Must join a watershed work group, where feasible, if winter deicing activities are performed



# Illicit Discharge Detection and Elimination (IDDE)



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## Additional SWMP requirements :

- Enforceable requirement for the prompt reporting to the MS4 of releases and a program to respond to reports in 30 days
- Written IDDE procedures included within the SWMP document
- Within 7 days, the permittee shall remove the illicit discharge or notify the appropriate MS4 jurisdiction where the source of the pollution is occurring



# Construction Site Storm Water Runoff Control



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## Additional SWMP requirements :

- Maintain an inventory of all active public and private construction sites that result in 1 or more acres of disturbance
- Track the number of inspections
- The permittee shall ensure that all staff implementing the construction storm water program are qualified and trained
- Develop outreach tools to construction operators on storm water controls



# Post-Construction Storm Water Management in New Development and Redevelopment



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New SWMP requirements :

- During the annual evaluation of post-construction storm water management best management practices (BMPs) implemented provide an estimated percent reduction in storm water runoff and pollutants



Removed from 2016 Permit: The requirement to train contractors managing green infrastructure in proper care and management

# Pollution Prevention/Good Housekeeping for Municipal Operations



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## New SWMP requirements :

- Develop a Municipal Facility and Stormwater Control Inventory, with a map
- Map must include storm water outfalls, receiving waters, and identify the manager of each facility with contact information
- Each facility in the inventory:
  - Quarterly visual inspections of facilities (dry weather)
  - Quarterly visual observation of storm water discharges (wet weather)



# Pollution Prevention/Good Housekeeping



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## **Municipal Facility Inventory:**

- Composting facilities
- Equipment storage and maintenance facilities
- Fuel farms
- Hazardous waste disposal facilities
- Hazardous waste handling and transfer facilities
- Incinerators
- Landfills
- Landscape maintenance on municipal property
- Materials storage yards
- Pesticide storage facilities
- Public buildings, including schools, libraries, police stations, fire stations, municipal buildings, and similar buildings
- Public parking lots
- Public golf courses
- Public swimming pools
- Public works yards
- Recycling facilities
- Salt storage facilities
- Solid waste handling facilities and solid waste transfer facilities
- Street repair and maintenance sites
- Vehicle storage and maintenance yards
- Municipally-owned and/or maintained structural storm water controls

# Pollution Prevention/Good Housekeeping for Municipal Operations



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## New SWMP requirements :

- Catch Basin Maintenance
  - Assess and prioritize catch basins
  - Develop a cleaning schedule
- Annual evaluation of street sweeping and cleaning programs



# MS4 Monitoring, Recordkeeping, and Reporting



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## Monitoring

- No change

## Recordkeeping

- No change

## Reporting

- Report shall cover the period from March 31st of the previous year through March 31st of the current year.

# MS4 Reporting – Additional Annual Reporting



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## **Public Education and Outreach:**

- Number of education materials produced and percent of MS4 population reached
- Number of education materials posted in public areas
- Number of presentations to HOA's, education groups, professional/commercial associates, and other public groups

## **Public Participation/Involvement:**

- Number of public forums to notify and solicit public comment on SWMP
- Number of park or stream cleanup events
- Number of training activities to educate volunteers on recognizing illicit discharge

## **Illicit Discharge Detection and Elimination (IDDE):**

- Submit a storm sewer system map
- Number of dry weather inspections conducted
- Number of illicit discharges eliminated
- Number of educational presentations or information provided to commercial/industrial groups

## **Construction Site Storm Water Runoff Control:**

- Number of pre-construction meetings
- Number of site inspections
- Number of violations
- Number of enforcement/corrective actions
- Number of attendees at training classes for contractor, developers, and others

## **Post-Construction Storm Water Management:**

- Annual Training conducted
- BMPs implemented and the estimated percent reduction in storm water runoff and pollutants

## **Pollution Prevention/Good Housekeeping:**

- Annual Training conducted
- Number of pollution prevention inspections of the MS4's facilities
- Street sweeping activities
- Catch basin cleaning activities
- Landscape material reduction activities and material disposed of

# Next Steps for Permittees



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- Permittees- reach out to IEPA to determine NOI status
  - SMC has updated NPDES resources on the website.
- Permittees will have 12 months to implement the new provisions from the date on the coverage letter.

A screenshot of the Stormwater Management Commission website. The page has a blue header with navigation links: "Lake County Home Page", "Contact Us", "Select Language", and a search bar. Below the header is a navigation menu with "About Us", "Permits", "For Landowners", "For Local Government", and "How Do I...". The main content area features a large banner image of a construction site. On the left, there is a sidebar menu with links to "Annual Reporting Template", "Notice of Intent (NOI)", "Stormwater Management Program Plan (SMPP)", "Total Maximum Daily Loads (TMDL)", "Lake County NPDES MS4 Program", "Lake County MS4 Community Information WebMap", "LCDOT Construction Permit Documents", and "LC Public Works Construction Permit Documents". The main content area has a breadcrumb trail: "Home &gt; Government &gt; Departments &amp; Offices (A-Z) &gt; Stormwater Management &gt; For Local Government &gt; NPDES Phase II". The main heading is "National Pollution Discharge Elimination System (NPDES) Phase II". Below the heading is a paragraph of text explaining the NPDES program. To the right of the main content is a "Contact Us" section with the commission's name, email address, physical address, and phone number. Below that is a "Quick Links" section with links to "Annual Facility Inspection Template", "Checklists and Guidance", "NASA Climate Change", and "IEPA Total Maximum Daily Loads".

# SMC Resources for Permittees



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- SMC is the Qualifying Local Program (QLP) for Lake County
  - Performs activities related to each MS4 program area
  - Also provides technical assistance to Lake County MS4's
- SMC is partnering with IWEA and APWA to host an in-person MS4 Workshop this fall
- Lake County Central Permit Facility: October 10, 2025
  - Deeper dive into the new Permit requirements
  - IEPA staff planning to attend
  - Opportunities to discuss MS4 compliance with other permittees

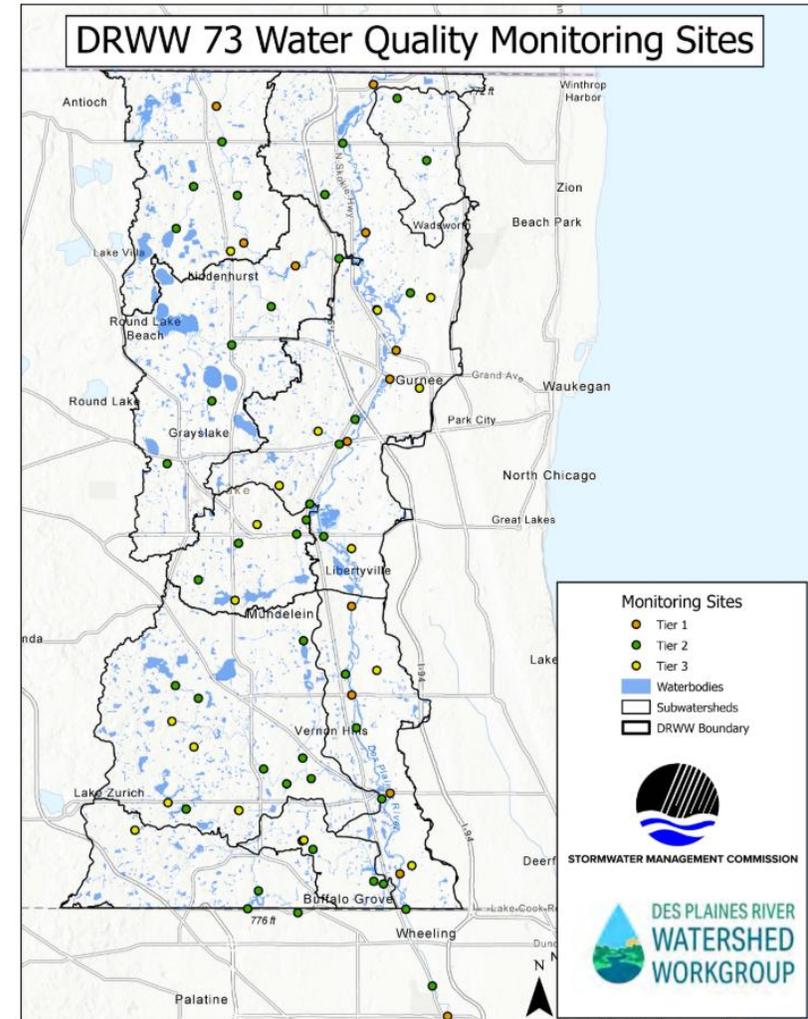


# DRWW Resources for Permittees



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- Fulfills the NPDES MS4 Monitoring and Program requirements
- All Board and Committee meetings are open to the public
- Offers opportunities for public participation and stakeholder engagement through public meetings
- Provides education and outreach materials
- Provides opportunities to fulfill MS4 training requirements





## **STORMWATER MANAGEMENT COMMISSION**

Thank you!

Questions?

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