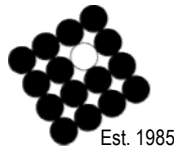


Municipal MS4 Training

Complying with Current Permit Requirements
and Preparing for Permit Changes



Lennon, Smith, Souleret
Engineering, Inc.

Civil Engineers and Surveyors

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

- **What is regulated by an NPDES MS4 Permit?**
 - Municipal Separate Storm Sewer System
 - Any storm sewer conveyance that is:
 - Used for collecting and/or conveying stormwater
 - Owned by a municipality or any other public body
 - Not used as a combined sewer
 - Not part of Publically Owned Treatment Works



2013 (CURRENT) NPDES MS4 PERMIT

● Current Permit Overview

- Issued Beginning March 16, 2013
- Issuance and effective dates were different for all permittees, extending through 2014
- Some permits never officially issued, though permittees were to continue implementation of compliance activities as though permit was issued
- When issued, all permits were intended to have a 5-year duration. General Permits will now all expire March 15, 2018, regardless of issuance date. Individual Permits will still have 5-year duration



CURRENT PERMIT ANNUAL TASKS – PLANS AND DOCUMENTATION

- **Stormwater Management Program (SWMP)**

- All permittees must have a written SWMP (written plan) that identifies the municipality's plan for compliance with permit requirements. This plan must be reviewed and updated annually.

- **Compliance Documentation**

- All compliance activities identified in the SWMP must be documented.
- Binders and GIS Asset Management Tools (Traiser) to be used to track and document all activities.
- Comprehensive documentation and tracking is critical to provide to DEP during MS4 Inspections and as part of annual or progress reports.



CURRENT PERMIT ANNUAL TASKS – COMPLIANCE WITH PERMIT MINIMUM CONTROL MEASURES (MCMS)

- **MCM #1 - Public Education and Outreach on Stormwater Impacts**
 - Maintain and Update Target Audience List
 - Distribute Information to Target Audiences via website, newsletter and other distribution methods
- **MCM #2 - Public Involvement/Participation**
 - Solicit public input on stormwater policy
 - Hold an annual public meeting regarding MS4
 - Organize or support public pollution prevention events such as stream cleanups and recycling events



CURRENT PERMIT ANNUAL TASKS – COMPLIANCE WITH PERMIT MINIMUM CONTROL MEASURES (MCMS)

- **MCM #3 - Illicit Discharge Detection and Elimination**

- Maintain comprehensive mapping of the entire MS4
- Complete annual screening of MS4 outfalls. Evaluate and eliminate illicit discharges discovered during screening program
- Resolve and track complaints and violations related to illicit discharges

- **MCM #4 - Construction Site Stormwater Runoff Control**

- Monitor active construction site for proper E&S Control
- Resolve and track complaints and violations related to construction site runoff



CURRENT PERMIT ANNUAL TASKS – COMPLIANCE WITH PERMIT MINIMUM CONTROL MEASURES (MCMS)

- **MCM #5 - Post-Construction Stormwater Management (PCSM) in New and Re-Development Activities**
 - Maintain an inventory of all PCSM BMPs (detention basins, rain gardens, underground tanks, etc.) located within the municipality
 - Annually inspect all PCSM BMPs
- **MCM #6 - Pollution Prevention/Good Housekeeping**
 - Maintain an inventory of all municipal facilities and activities
 - Maintain and implement standard operating procedures for all municipal activities to limit impact to stormwater runoff
 - Implement an annual training program



2018 NPDES MS4 PERMIT – PERMIT RENEWAL

● Permit Types

- Individual Permit (IP) – Required for permittees required to develop a TMDL Plan or permittees tributary to Special Protection (High Quality or Exceptional Value) waters
- General Permit (GP) – Municipalities not falling into the above category are eligible for coverage under the State General Permit.

● Permit Renewal

- GP – Notice of Intent (NOI) due September 16, 2017, regardless of date of issuance/expiration of current permit.
 - Fee - \$500 (New Permittee or Renewal Permittee)



2018 NPDES MS4 PERMIT – PERMIT RENEWAL

- **Items for Inclusion in Renewal Submittal**

- Notice of Intent (NOI)
- Renewal Fee
- SWMP (Written Plans)
- Stormwater Management Ordinance
- MS4 Map
- PRP Plan (if applicable)

- **Due Date**

- September 16, 2017



2018 NPDES MS4 PERMIT – POLLUTANT REDUCTION PLANS

- **Pollutant Reduction Plans (PRPs)**

- All permittees that discharge to waters impaired for the following pollutants require PRPs:
 - Nutrients (Nitrogen and Phosphorus)
 - Sediment
- The following reductions must be achieved within 5 years of permit issuance (March 2023 for General Permits):
 - Achieve 10% reduction in pollutant loading of sediment
 - Achieve 5% reduction in pollutant loading of total phosphorus



2018 NPDES MS4 PERMIT – POLLUTANT REDUCTION PLANS – 2017 REQUIREMENTS

- **Pollutant Reduction Plans (PRPs) are due with the NOI (September 16, 2017 for General Permittees)**
- **PRP Contents:**
 - Calculation of existing pollutant loadings based on DEP methodology
 - Identification of required reduction in each storm sewershed based on loading calculations



2018 NPDES MS4 PERMIT – POLLUTANT REDUCTION PLANS – 2017 REQUIREMENTS

- **PRP Contents (cont.):**

- Identification of BMPs to achieve pollutant reductions:
 - Construction of new BMPs by municipality
 - Retrofit of existing municipally owned BMPs
 - Construction of new BMPs by developers
 - Requires changes to Stormwater Ordinance to specifically required water quality improvements above typical NPDES Permit requirements
 - Retrofit of existing privately owned BMPs
 - May require municipality to take ownership of facility for future maintenance
 - Implementation of non-structural BMPs (i.e. street sweeping)
- Identification of funding sources for BMP implementation



2018 NPDES MS4 PERMIT – POLLUTANT REDUCTION PLANS – 2017 REQUIREMENTS

● Public Involvement for PRPs

- All PRPs must be publicly advertised at least 45 days prior to submission to PADEP
 - Latest Date for advertisement for GPs is August 2, 2017
- Once advertised, PRP must be on public display for comment. All comments are to be logged. Comments and permittee's response to comments must be submitted to DEP with the PRP.
- A public hearing will be held for comment on the.



2018 NPDES MS4 PERMIT – POLLUTANT REDUCTION PLANS – 2018-2023 REQUIREMENTS

- **BMPs identified in the PRP must be constructed and the required pollutant reduction achieved within 5 years of permit issuance (March 2023 for GPs)**
- **Municipal budget for each year must include funds for:**
 - Final Design of BMPs – PRP will provide only planning level design
 - Acquisition of property, if needed for BMP construction
 - Construction costs for installation of new BMPs or retrofit of existing BMPs, including bidding costs if constructed by a contractor
 - Annual maintenance of all BMPs
- **Each year's annual report will include documentation and supporting calculations for reductions achieved through implementation of the PRP.**



2018 NPDES MS4 PERMIT – POLLUTANT CONTROL MEASURES

- **Development and Implementation of Pollutant Control Measures (PCMs)**
 - Required for all General Permits that discharge to impaired waters, regardless of whether a TMDL has been approved
 - Causes of impairments are:
 - Metals and Acid Mine Drainage (AMD) – Permit Appendix A
 - Pathogens (Fecal Coliform) – Permit Appendix B
 - Priority Organic Compounds (PCBs or Pesticides) – Permit Appendix C



2018 NPDES MS4 PERMIT – POLLUTANT CONTROL MEASURES

- **Development and Implementation of Pollutant Control Measures (PCMs) - Continued**
 - PCMs must be developed for each applicable impairment conforming to the requirement in each noted Appendix
 - Within Permit Year 1 develop mapping and an inventory identifying all known and suspected pollutant sources for each impairment
 - Prior to the end of Permit Year 4, investigate each known and suspected pollutant source through stormwater sampling
 - Notify DEP of all Industrial Site contributors to Metals, AMD or Priority Organic Compound impairments
 - Remove all illicit and illegal discharges of sewage into the MS4 contributing to the Pathogen impairment. Enact an Ordinance requiring proper disposal of animal waste on permittee owned property by the end of Permit Year 3



2018 NPDES MS4 PERMIT – NEW STORMWATER MANAGEMENT ORDINANCE

- **Adoption of Stormwater Management Ordinance**
 - New Stormwater Management Ordinance to be adopted for submission with NOI
 - Ordinance to meet criteria of 2018 MS4 NPDES Permit
 - Ordinance to meet criteria of County Act 167 Plan Ordinance (if applicable)
 - Ordinance to address aspects of PRPs
 - Permittees may opt to require Land Developments to implement water quality improvements in excess of typical NPDES Permit requirements in impaired watershed. These reductions may be counted toward the permittee's required reductions.



SUMMARY – CURRENT AND FUTURE MS4 TASKS

- **Continued Compliance with Current Permit**

- Update and implement SWMP (Written Plans)
- Submit Progress Reports to DEP
- DEP Inspections, if not already done

- **Submit for Renewal for 2018 Permit**

- NOI
- PRPs, where applicable
- Adopt New Stormwater Management Ordinance

- **Beginning in 2018**

- Update and implement SWMP (Written Plans)
- Implement PRPs to achieve reductions by 2023
- Address PCM requirements
- Submit Annual Report with \$500.00 fee



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