# Tighe&Bond Engineers | Environmental Specialists



# **MS4 YEAR 2 OVERVIEW**

Presentation to COST October 23, 2018

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#### **MS4 - WHAT DOES IT STAND FOR?**

Not to be confused with the much cooler MI6





General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems

#### **MS4 BACKGROUND**

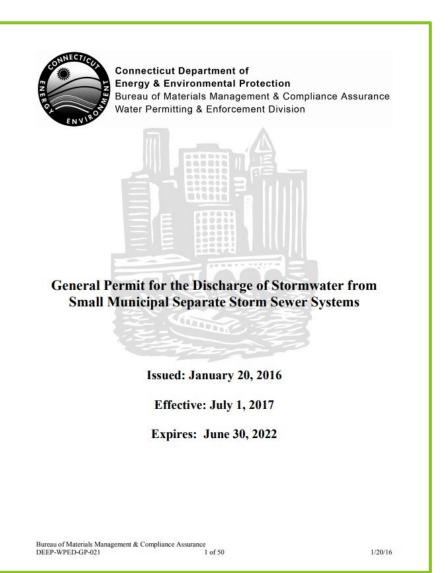
- Rooted in 1972 Clean
   Water Act
- 1990 ruling required stormwater to be regulated in two phases
  - Phase 1 (1990)
    - -Cities over 100,000
    - Construction over 5 acres
  - Phase 2 (1999)
    - Urbanized Areas
    - Construction 1-5 acres





#### **MS4 BACKGROUND**

- EPA developed initial guidelines
- EPA delegates
   stormwater authority
   to most states,
   including
   Connecticut
- First CT MS4 permit issued in 2004
- Reissued in 2017



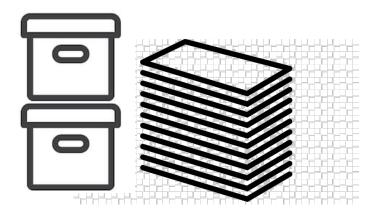
## **MS4 BACKGROUND**

2004 Permit

2017 Permit



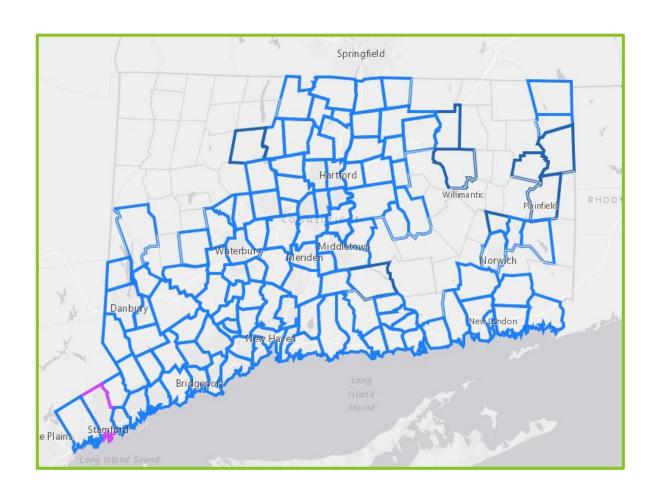
21
pages



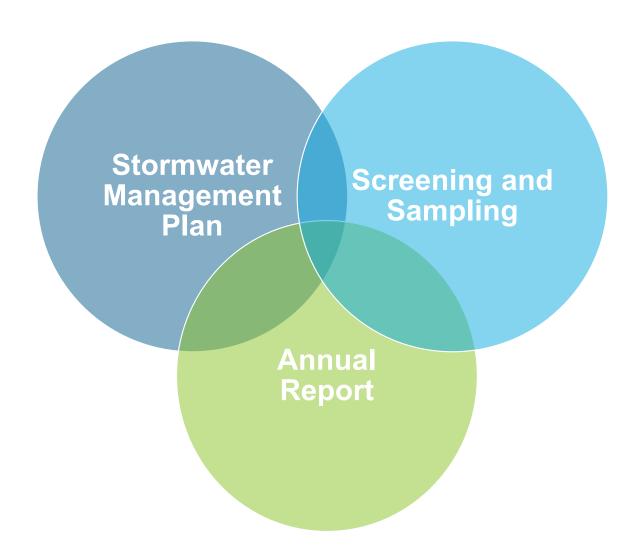
68
pages

# YOU'RE NOT ALONE

- 2004 Permit
  - 113 communities
- 2017 Permit
  - 121 communities



# **BASIC REPORTING REQUIREMENTS**



## **BASIC REPORTING REQUIREMENTS**

 Plan required once at beginning of permit, unless amended

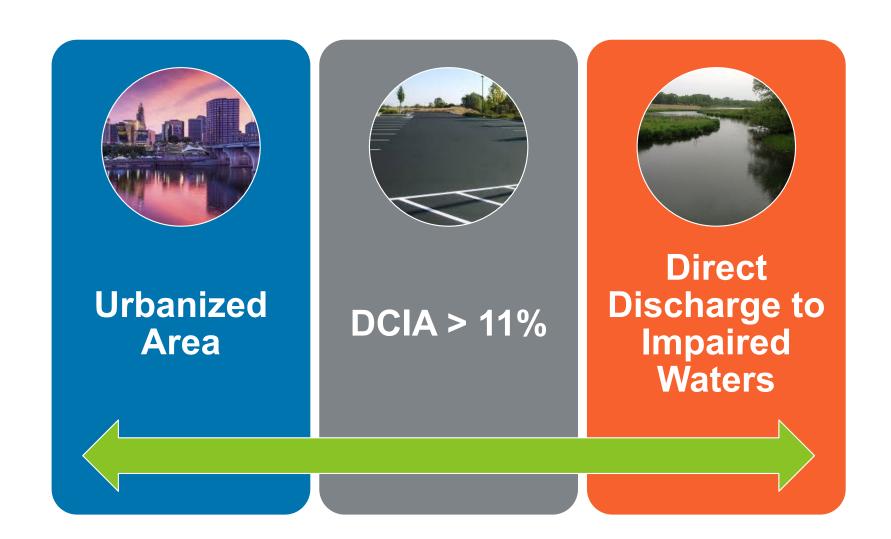


- Post electronically, and hardcopy for public review and comment
- "Reasonable efforts" to inform public
- Minimum 45 day comment period
- Due by April 1 of following year.

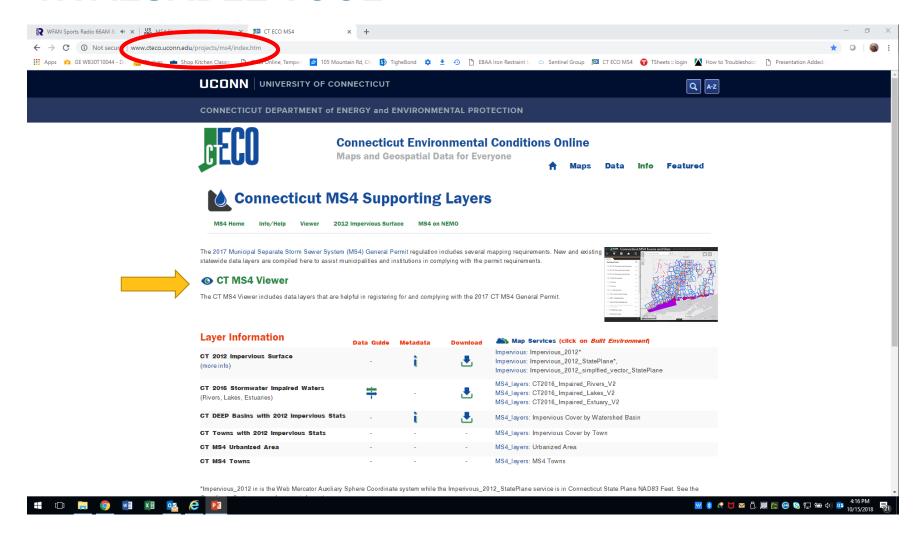




# WHERE IT APPLIES - "PRIORITY AREAS"



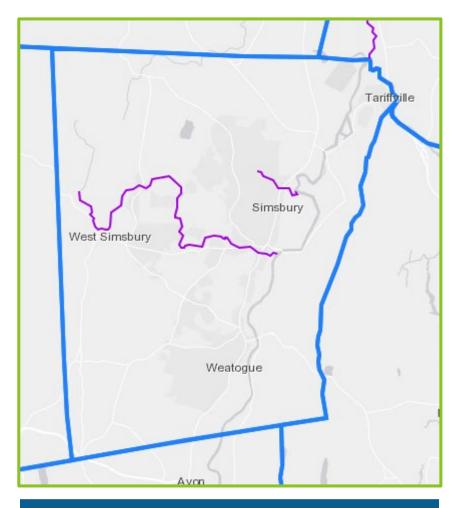
#### **INVALUABLE TOOL**



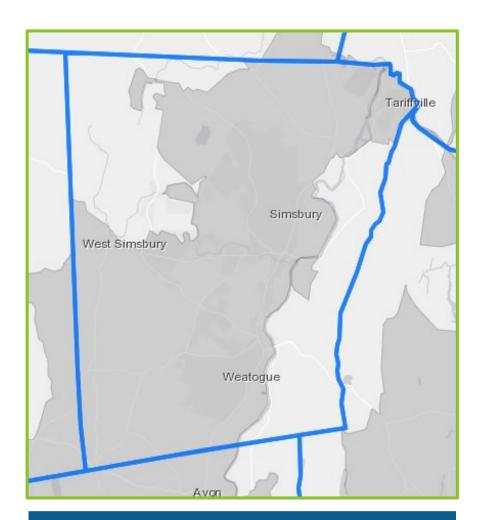
www.cteco.uconn.edu/projects/ms4/index.htm



# **PRIORITY AREAS**

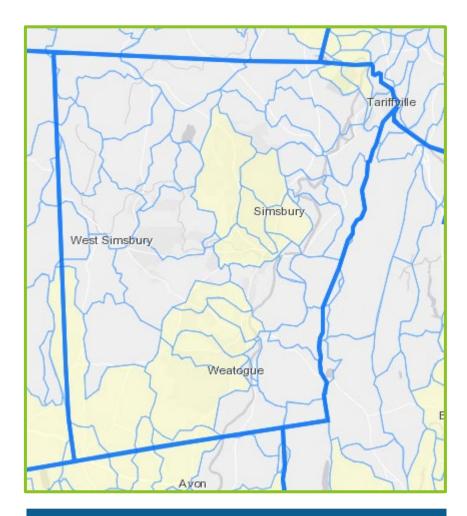


**Impaired Waters** 



**Urbanized Areas** 

#### **PRIORITY AREAS**



Watersheds DCIA > 11%

- Dry weather screening and wet weather sampling to take place in "Priority Areas"
- One or more of the following
  - Urbanized Area
  - Impaired Waters
  - Watershed DCIA > 11%

#### SIX MINIMUM CONTROL MEASURES

Public Education and Outreach Construction Site Stormwater Controls Public Involvement and **Post-Construction Site Participation** Stormwater Controls Illicit Discharge Detection and Municipal **Operations** Elimination



Public Education and Outreach



2004 Permittees	2017 Permittees
<ul> <li>Implement Public</li> <li>Education Program</li> <li>Target pollutants of concern</li> </ul>	<ul> <li>Implement Public</li> <li>Education Program</li> <li>Target pollutants of concern</li> </ul>

2

Public Involvement and Participation



2004 Permittees	2017 Permittees
<ul> <li>Comply with Public</li></ul>	<ul> <li>Comply with Public</li></ul>
Notice Requirements	Notice Requirements
for Annual Report	for Annual Report

Illicit Discharge Detection and Elimination



2004 Permittees	2017 Permittees
Track illicit discharges	
Maintain citizen reporting program	Maintain citizen reporting program
System mapping	
<ul> <li>Record IDDE abatement activities</li> </ul>	<ul> <li>Record IDDE abatement activities</li> </ul>
Maintain SSO Inventory	Maintain SSO Inventory
	IIdue x R



Construction Site Stormwater Controls



2004 Permittees	2017 Permittees
<ul> <li>Continue following Interdepartmental Coordination Plan</li> </ul>	<ul> <li>Continue following Interdepartmental Coordination Plan</li> </ul>
<ul> <li>Conduct site inspections / plan reviews</li> </ul>	<ul> <li>Conduct site inspections / plan reviews</li> </ul>
Citizen reporting mechanism	Citizen reporting mechanism
<ul> <li>Notify developers of CTDEEP Construction General Permit</li> </ul>	<ul> <li>Notify developers of CTDEEP Construction General Permit</li> </ul>



Post-Construction Site Stormwater Controls



# **2004 Permittees**

 Enforce stormwater management requirements

#### 2017 Permittees

Enforce stormwater management requirements

6 Municipal Operations



#### 2017 Permittees **2004 Permittees Annual training** Municipal property and Municipal property and operations best practices operations best practices **DCIA Tracking DCIA Tracking** Street sweeping, priority Street sweeping, priority areas areas Catch basin inspection, Catch basin inspection and cleaning, and schedule cleaning Snow / Ice SOP Snow / Ice SOP



2004 Permittees	2017 Permittees
• MCM 3	
<ul> <li>Develop Written IDDE Plan</li> </ul>	
<ul> <li>Establish IDDE Legal Authority</li> </ul>	
• MCM 6	• MCM 6
<ul> <li>Establish catch basin inspection and cleaning schedule</li> </ul>	Establish catch basin inspection and cleaning schedule
<ul> <li>Develop plan for street sweeping in non-priority areas</li> </ul>	<ul> <li>Develop plan for street sweeping in non-priority areas</li> </ul>

3 Illicit Discharge Detection and Elimination



## **2004 Permittees**

- Map all outfalls and interconnection
- Complete outfall categorization and prioritization
- Follow up on identified illicit discharges



## **2017 Permittees**

- Develop written IDDE program
- Establish IDDE legal authority



Construction Site Stormwater Controls



# **2004 Permittees**

#### Implement and upgrade land use regulations to meet MS4 requirements



# **2017 Permittees**



Post-Construction Site Stormwater Controls



# **2004 Permittees**

 Implement maintenance plan for stormwater ponds and treatment structures

# **2017 Permittees**







# 2004 Permittees



# **2017 Permittees**

 Develop employee stormwater management training program



# **QUESTIONS?**

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