

Renewal MS4 Permit Changes – What You Need to Know to Comply

MS4 Permit No.: 0400000
Page 1 of 2

MS4 Permit No.: 0400000
Page 1 of 2

MS4 Permit No.: 0400000
Issuance Date: January 20, 2008
Effective Date: January 20, 2008
Expiration Date: January 20, 2018

OHIO ENVIRONMENTAL PROTECTION AGENCY
**AUTHORIZATION FOR SMALL MUNICIPAL SEPARATE STORM
SEWER SYSTEMS TO DISCHARGE STORM WATER UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251-16) and
thereafter referred to as "the Act", and the Ohio Water Pollution Control Act (Revised Code Chapter 6111),
and the Ohio Statewide Stormwater Management System, as defined in Part 7 of this permit,
the Ohio Environmental Protection Agency, hereinafter referred to as "Ohio EPA", by discharge from
the permittee and the facility to the waters of the state hereby authorizes the permittee to discharge from
the facility to the waters of the state in accordance with the conditions specified in this permit.

It has been determined that a lowering of water quality of various waters of the state associated with growing
coverage under this permit is necessary to accommodate transportation and economic development in the state of
Ohio. In accordance with OAC 6111-1-02, the permittee was required only after submitting a notice of potential
alterations, including social and economic issues related to the expansion, and consistency of public and
intergovernmental commitments remained concerning the proposed

Issuance of general permit coverage is conditioned upon payment of applicable fees, submittal of a complete NPDES
Application Form and Statewide Discharge Statement (SDS), and written approval of coverage from the Director
of Ohio EPA.

John H. Powell

John H. Powell
Assistant Director

I verify this is for a true and accurate copy of the
official documents as filed in the records of the Ohio
Environmental Protection Agency.

John H. Powell

Kelvin Rogers

**Ohio EPA – Northeast District Office
Division of Surface Water**

**kelvin.rogers@epa.state.oh.us
330.963.1117**

New MS4 Permit Requirements

◆ Table of Organization

- ◆ Identify Primary Point of Contact**
- ◆ Others responsible for implementing or coordinating BMPs**
- ◆ Title and Contact Information**

New MS4 Permit Requirements

◆ Table of Organization

- ◆ Identify how implementation will occur across multiple positions, agencies, departments**
- ◆ Submit with Annual Report for 2009**
- ◆ Update Annually for personnel or position changes**

New MS4 Permit Requirements

- ◆ **Minimum Control Measures**
 - ◆ **Performance Standards**
 - ◆ **Annual Reporting Requirements**
 - Follow OEPA checklist or
 - Request use of alternate format

New MS4 Permit Requirements

◆ Higher Goals

- ◆ Can be set by MS4 for program**
- ◆ As long as minimum performance standards are satisfied**
- ◆ Identify these in Annual Report or attachment**

New MS4 Permit Requirements

◆ SWMP Updates

- ◆ Can add BMPs or other components with no justification**
- ◆ Identify these in Annual Report**
- ◆ Can request to replace ineffective or infeasible BMP**

New MS4 Permit Requirements

◆ BMP Replacement Requests

◆ Can be made with Annual Report or any time with this information:

- Analysis of why BMP is ineffective or infeasible (inc. cost-prohibitive)**
- Expectations on effectiveness of replacement BMP**
- Analysis of why replacement BMP is expected to achieve goals of BMP to be replaced**

MCMs 1 & 2 – Public Education & Outreach Public Involvement / Participation

- ◆ **Performance Standards**
 - ◆ 5 outreach themes or messages
 - ◆ 5 public involvement activities
 - ◆ 1 activity/theme targeting developers
 - ◆ “Reach” 50% of MS4 population

MCMs 1 & 2 – Public Education & Outreach Public Involvement / Participation

◆ Annual Reports

- ◆ Identify each activity, mechanism**
 - Education AND Involvement
 - Print, TV/Radio, Websites, Events, Programs
- ◆ Include theme, audience**
- ◆ Estimate #s reached**
- ◆ Evaluation of effectiveness**

MCMs 1 & 2 – Public Education & Outreach Public Involvement / Participation

- ◆ **Evaluation of Effectiveness**
 - ◆ **Difficult to measure**
 - ◆ **OEPA expects MS4s will to the maximum extent possible attempt to gauge effectiveness**

MCMs 1 & 2 – Public Education & Outreach Public Involvement / Participation

◆ Evaluation Mechanisms

- ◆ Citizen surveys**

- ◆ Increasing number of residents involved**

- ◆ Greater compliance with construction and post-construction regulations**

MCM 3 – Illicit Discharge Detection & Elimination (IDDE)

◆ Performance Standards

- ◆ Map entire MS4 system that is owned or operated by MS4
 - Catch basins, pipes, ditches, storm water outfalls, location of surface waters receiving discharges
 - Locations of all HSTS connected to MS4

MCM 3 – Illicit Discharge Detection & Elimination (IDDE)

- ◆ Map entire MS4 system
 - Including flood control facilities (retention/detention ponds)
 - Public and private post-construction BMPs that were installed per OEPA permit requirements (on map or inventory)

MCM 3 – Illicit Discharge Detection & Elimination (IDDE)

- ◆ **Work with local wastewater authorities to address HSTS discharges**
 - **Identify discharging HSTS that can be connected to sewers**
 - **Develop/implement O & M program to determine if HSTS need elimination, upgrade or replacement**

MCM 3 – Illicit Discharge Detection & Elimination (IDDE)

- ◆ **Work with local wastewater authorities to address HSTS discharges**
 - **Investigate sources of contamination identified in dry weather screening, if HSTS is source, identify appropriate course of action (elimination, upgrade, replacement)**

MCM 3 – Illicit Discharge Detection & Elimination (IDDE)

- ◆ **For discharging HSTS that cannot be eliminated**
 - **notify property owner of the requirement to pursue coverage under appropriate Ohio EPA general NPDES permit**

MCM 3 – Illicit Discharge Detection & Elimination (IDDE)

- ◆ **Dry weather screening of outfalls**
 - 100% completed
 - Prioritize based on local needs, conditions
- ◆ **Education plan for public employees, businesses, general public on hazards of illicit discharges and improper disposal of waste**

MCM 3 – Illicit Discharge Detection & Elimination (IDDE)

◆ Annual Reporting

◆ Updates on mapping

- Any additions (catch basins, pipes, ditches) to MS4**
- Any additionally connected HSTS**
- Any post-construction water quality BMPs (or inventory)**

MCM 3 – Illicit Discharge Detection & Elimination (IDDE)

◆ Annual Reporting

- ◆ #s of outfalls screened**
- ◆ #s of IDs D&E'ed**
- ◆ #s remaining (schedule)**

MCMs 4 & 5 – Construction and Post-Construction

◆ Performance Standards

- ◆ Ordinances consistent with renewal OEPA Construction General Permit
- ◆ Pre-construction Review of all ESC & post-construction plans (SWPPPs)

MCMs 4 & 5 – Construction and Post-Construction

- ◆ Initial site inspection, then...
- ◆ Conduct monthly inspections or
 - Prioritize based on local site conditions/requirements
 - Location of waterway
 - Amount of disturbed area
 - Site compliance

MCMs 4 & 5 – Construction and Post-Construction

- ◆ **Inspect all post-construction BMPs – as built**
 - **Public and private**
 - **Structural and non-structural**

MCMs 4 & 5 – Construction and Post-Construction

- ◆ Ensure long term O&M plans & agreements in place
 - Between the MS4 and another party (HOA, etc.)
 - Allow MS4 to be reimbursed for O&M if owner does not perform it

MCMs 4 & 5 – Construction and Post-Construction

- ◆ **Ensure long term O&M plans & agreements in place**
 - **Allow MS4 to enter property for inspection purposes**
 - **May specify property owner to submit periodic inspection reports**

MCMs 4 & 5 – Construction and Post-Construction

- ◆ Model maintenance agreements available from local entities or through OEPA website:

<http://www.epa.state.oh.us/dsw/storm/index.html>

MCMs 4 & 5 – Construction and Post-Construction

◆ Annual Reporting

- ◆ Track and report #s of
 - Sites developed
 - Pre-construction SWPPPs reviewed
 - Inspections, NOVs, enforcement
 - Complaints received, investigated
 - As built BMP inspections
 - O & M plans/agreements

MCM 6 – Pollution Prevention / Good Housekeeping

◆ Performance Standards

◆ Employee Training Program

- To prevent and reduce storm water pollution from MS4 activities**
 - Park and open space maintenance**
 - Fleet and building maintenance**
 - New construction and land disturbances**
 - Storm water system maintenance**

MCM 6 – Pollution Prevention / Good Housekeeping

◆ Performance Standards

◆ Employee Training Program

- Annual training (minimum)**
- Documentation of employees trained and topics covered**

MCM 6 – Pollution Prevention / Good Housekeeping

◆ Performance Standards

◆ SWPPPs for MS4 owned facilities

- Vehicle maintenance facilities**
- Bus terminals**
- Impoundment lots**
- Composting facilities**
- Waste transfer stations**

MCM 6 – Pollution Prevention / Good Housekeeping

◆ SWPPPs must include:

- Maintenance activities/schedules/long-term inspection procedures for controls to reduce floatables or other pollutants**
- Controls for reducing/eliminating pollutants from roads, parking lots maintenance/storage yards, salt storage yards**

MCM 6 – Pollution Prevention / Good Housekeeping

◆ SWPPPs must include:

- Description on materials used for road/parking lot winterization (salt, sand, bottom ash or combination)**
- Associated application rates**
- Rationale for selected application rates**
- Identify controls/practices for reducing pollutants from winterization activities**

MCM 6 – Pollution Prevention / Good Housekeeping

◆ SWPPPs must include:

- Procedures for proper waste disposal from municipal operations**
- Including dredge spoil, accumulated sediments, floatables, other debris**
- Procedures to ensure new flood management projects are assessed for impacts on water quality**

MCM 6 – Pollution Prevention / Good Housekeeping

◆ SWPPPs must include:

- Procedures to assess existing flood management projects for incorporation of additional water quality devices or practices**
- Identification of responsible official for overall management and implementation of PPGH program**

MCM 6 – Pollution Prevention / Good Housekeeping

◆ Annual Reporting

- ◆ Summary of Employee Training & List of attendees
- ◆ Summary of O & M Activities
 - Waste Disposal (street sweepings/catch basins)
 - Road Salt
 - Pesticide/Herbicide/Fertilizer Usage
 - Street Sweeping
 - Flood Management Projects

Upcoming Education Events – 2009

March 12, 13 – CESSWI Class & Exam – Cleveland

April 14 – Construction Workshop – Sediment & Erosion Control

April 23, 24 – CESSWI Class & Exam – Toledo Area

May – Post-Construction Workshop

May 14, 15 – Ohio Stormwater Conference – Mason

June – Construction Site - Field Session – NEORSD

June 11, 12 – CPESC Class & Exam – Cleveland Area

July – Post-Construction Site – Field Session – NEORSD

August – MS4 SWPPP for Municipal Facilities Workshop

August 13, 14 – CPESC Class & Exam – Akron Area

September – Long-Term Maintenance of Post Construction BMPs Workshop

October 22, 23 – CESSWI Class & Exam – Akron Area

November – Non-Structural Storm Water Management Workshop

For More Information

Ohio EPA Northeast District Office:

Dan Bogoevski (330) 963-1145

dan.bogoevski@epa.state.oh.us

Chris Moody (330) 963-1118

(Ashtabula, Geauga, Medina, & Trumbull Counties)

chris.moody@epa.state.oh.us

Kelvin Rogers (330) 963-1117

(Summit, Portage, Wayne, Holmes & Carroll Counties)

kelvin.rogers@epa.state.oh.us