

2009 NPDES General Permit for Storm Water Discharges from Small MS4s

(Draft Pending)

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Horsley Witten Group
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NPDES Stormwater Program for Small MS4s

- Pursuant to Clean Water Act
- Regulates point sources that discharge pollutants into waters of the US

Phase I:
Large/medium systems

Phase 2:
Small systems



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2003 NPDES Phase II General Permit

- “Five-year” general permit
- 6 Minimum Measures:
 - Public education and outreach
 - Public participation
 - Illicit discharge detection and elimination
 - Construction site stormwater controls
 - Stormwater controls in new/redevelopment
 - Pollution prevention and good housekeeping
- Still active: 6th Annual Report due May 1

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2009 NPDES Phase II General Permit

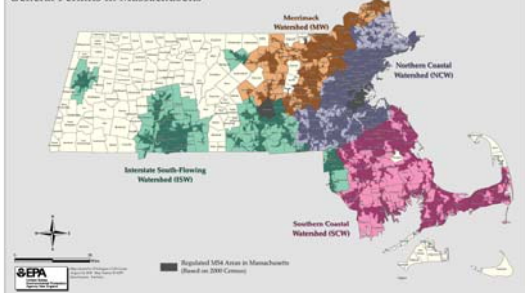
CURRENTLY PENDING

- Same 6 minimum measures
- More comprehensive
- Different reporting period (July 1-June 30)
- Enhanced focus on measurable goals

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4 Regional Permits

Regulated MS4 Areas and Applicable Watershed-Specific General Permits in Massachusetts



How do I know all this?

- Draft NH General Permit (Dec 2008)
- Discussions with EPA
- Information/updates released from EPA

Information in this presentation is based on best available information. However, the draft MA permit is not yet released.



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Timeline for Permit Issuance

- Drafts permits to be issued starting May 2009
- 30 day Public Comment period for each
- EPA will address responses
- EPA hopes to issue all 4 by end of 2009

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Timeline for Permit Coverage

- 90 days to submit NOI for coverage
- Receive authorization letter from EPA
- 120 days to submit Stormwater Management Plan (SWMP)
- Permit term – 5 years



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What's different about the new permit?

- Public Education and Outreach
- IDDE
- Construction Site Runoff Control
- New/Redevelopment Stormwater Management (LID/ Green Infrastructure)
- Good Housekeeping/Pollution Prevention
- Monitoring Requirements
- Detailed timelines and reporting requirements
- Special focus on TMDLs/ impaired waters

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Public Education and Outreach

- 4 specific target audiences: residents, commercial businesses, developers, industrial facilities
- 2 messages to each audience over 5 yrs
- List of topics to consider: lawn care, storage of materials, on-site infiltration, etc.
- Must evaluate effectiveness of the program (survey)



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Illicit Discharge Detection and Elimination

- By-law should already be in place
- Eliminate IDs within 30 days
- Map entire storm sewer system
- IDDE program to systematically investigate, map, remove and document illicit discharges
- Annual employee training



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Construction Site Runoff Control

- By-law already in place (?) (alteration \geq 1 acre)
- Permit provides a detailed list of requirements for review process, E&SC practices, site inspection and enforcement
- Revisit local by-law and regulations for consistency with permit



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New/Redevelopment Stormwater Management

- Focus on maintaining natural site hydrology (Low Impact Design)
- By-law should already be in place
- Assess local requirements for street and parking design, make changes to promote LID



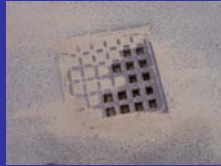
New/Redevelopment Stormwater Management

- Assess feasibility of allowing green infrastructure
- Perform retrofit assessment, implement improvements



Good Housekeeping/ Pollution Prevention

- O&M Programs for:
 - Parks and open space
 - Buildings and facilities
 - Vehicles and equipment
 - Roadway and storm systems
- SWPPPs for:
 - Maintenance garages
 - Public works facilities
 - Transfer stations
 - Other waste handling facilities
- Site Inspections



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Outfall Monitoring

- 1 wet and 1 dry sample event
- 25% of outfalls covered per year (yrs 2-5)
- Basic analytes, plus pollutant causing water quality impairment
- If pollutant causing impairment is detected, must eliminate it from discharge



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Reporting

- Detailed reporting requirements for each section of the permit
- Will require increased level of attention from the permittee throughout permit period

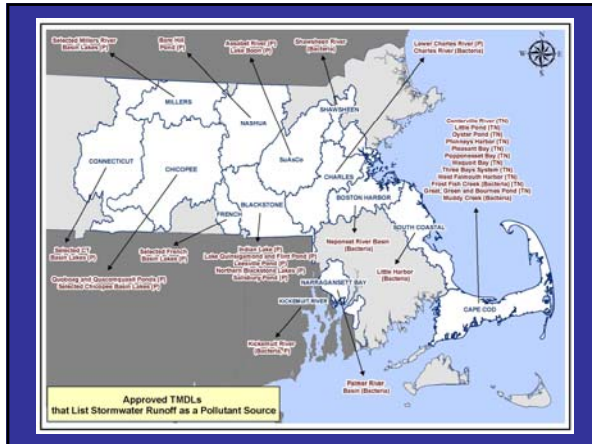


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TMDL Implementation

- Permit requirements enhanced in TMDL watersheds
- Must implement BMPs in accordance with TMDL document
- Map of impaired waters may be provided by EPA

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Who is going to pay for all this?

- Stormwater management is a service provided by the municipality
- Consider a stormwater fee or utility (dedicated enterprise account)
- Permit states: *“The permittee is encouraged to maintain an adequate funding source for the implementation of this program. Adequate funding means that a consistent source of revenue exists for the program.”*

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How to Fund Your Municipal Stormwater Program

Free Seminar

Thursday, April 30, 2009
9:00 am – 12:30 pm
Peabody Institute Library of Danvers
15 Sylvan Street
Danvers, MA

RSVPs are requested.
Call 978-741-7900 or email: info@salemsound.org

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Working Together to Save Money

- Public Outreach – leverage help from watershed orgs, local citizen groups stormwater committee; use existing public outreach materials; create regional materials
- Monitoring requirements – team with watershed orgs, stream teams, schools
- Staff trainings – consider regional training
- IDDE – the basic methodology is the same for everyone, work with other towns to draft it
- Network within town hall and with other towns

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Contact Info

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NPDES Stormwater Permit Program:
www.epa.gov/NE/npdes/stormwater/

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