

Municipal MS4s

Complying with Current Permit Requirements
and Preparing for Permit Changes



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MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

● Agenda:

- Permit Schedule Update
- 2018 MS4 Tasks
 - MCMs/Typical Annual Tasks
 - Annual Report
 - Stormwater Ordinance Update
- PRP Implementation

● 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

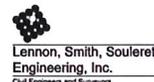


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MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

● Permit Schedule Update

- September 2017 - Renewal application (Notice of Intent) was submitted to PADEP.
- March 15, 2018 - Statewide General Permit took effect.
- August 7, 2018 - DEP authorized coverage for Sewickley Borough under the Statewide General Permit.
 - Current Permit issuance is intended to be indefinite. A new Notice of Intent will not be required in 2023 when the Statewide General Permit renews.
 - The Progress Report due September 30 of each year will serve as the annual renewal of permit coverage.



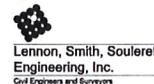
ANNUAL MS4 TASKS

● 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 (TraiSr) 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.



ANNUAL MS4 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 public meeting regarding MS4
 - Organize or support public pollution prevention events such as stream cleanups and recycling events



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ANNUAL MS4 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



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ANNUAL MS4 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



ANNUAL TASKS – PROGRESS REPORT

- **Annual MS4 Tasks**
 - Complete and submit your Annual/Progress Report. Reporting changes since the last permit cycle include:
 - Reporting is due every year. The previous permit required reporting every two years.
 - Reports are due September 30 of each year for all permittees.
 - A \$500 fee is due with each Report. No fee was previously collected.



2018 MS4 TASKS – STORMWATER MANAGEMENT ORDINANCE UPDATE

• Stormwater Management Ordinance Update

- DEP prepared a Model Stormwater Management Ordinance and Stormwater Management Ordinance Checklist to establish the minimum requirements for inclusion in each Permittee's Ordinance. The MS4 Permit requires adoption of a revised Ordinance by September 2022.
- Allegheny County has development an Act 167 Plan for implementation. Part of the Act 167 plan includes a Model Ordinance with minimum standard for compliance with the Act 167. All municipalities in Allegheny County must adopt an Act 167 Plan compliant Ordinance by December 1, 2018.
- Requirements of the DEP Model Ordinance and Act 167 Model Ordinance are similar. Adoption of a new Ordinance in 2018 will satisfy both requirements.



NEW PERMIT REQUIREMENTS – POLLUTANT REDUCTION PLAN

• Pollutant Reduction Plans (PRPs) were developed in 2017 and submitted to PADEP to meet the following requirements:

- 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

• Sewickley Borough Impaired Streams

- Hoey's Run – Sediment
- Davies Run – Sediment
- Ohio River – PCB, Pathogens (No PRP Required)



NPDES MS4 PERMIT – AUTHORIZATION TO DISCHARGE

II. POLLUTANT CONTROL MEASURES AND POLLUTANT REDUCTION PLANS

Permittees with coverage under this General Permit that discharge to impaired waters are required to implement Pollutant Control Measures (PCMs) and Pollutant Reduction Plans (PRPs), as applicable. Permittees are encouraged to consult DEP's MS4 Requirements Table, available at www.dep.pa.gov/MS4, to determine the applicability of PCMs under Appendices A, B, and C and PRPs under Appendices D and E of this General Permit.

- B. A PRP is a planning document prepared by the permittee which guides the selection and implementation of specific BMPs to reduce pollutant loading to surface waters. The objective of a PRP is to improve the condition of surface waters such that the waters eventually attain water quality standards and its designated and existing uses in accordance with 25 Pa. Code Chapter 93. A PRP shall be developed and submitted to DEP with the NOI if one or more of the following criteria are met:
1. At the time of the NOI submission, the permittee has at least one MS4 outfall that discharges to surface waters within the Chesapeake Bay watershed, or otherwise has at least one discharge to
 2. At the time of the NOI submission, the permittee has at least one stormwater outfall that discharges to waters impaired for nutrients (i.e., nitrogen and/or phosphorus) and/or sediment (i.e., siltation), and a TMDL has not been approved for such waters, or a TMDL has been approved but no wasteload allocation (WLA) has been assigned by the TMDL for the permittee's discharge(s). Upon DEP's written approval of General Permit coverage, permittees shall implement the PRP in accordance with Appendix E of this General Permit.

NPDES MS4 PERMIT – AUTHORIZATION TO DISCHARGE APPENDIX E

Minimum Reduction Requirement

The PRP is approved upon DEP's approval of coverage under this General Permit. The permittee shall implement its approved PRP and comply with the following:

- A. The permittee shall achieve the pollutant load reduction(s) (lbs/year) proposed in its PRP within 5 years following DEP's approval of coverage under the General Permit (identified on page 1). The minimum percent reduction for pollutant loadings of sediment and Total Phosphorus (TP) shall be 10% and 5%, respectively. If the surface water is impaired for both sediment and nutrients, both sediment (10%) and TP (5%) reductions must be achieved. If the surface water is impaired for sediment alone, a sediment (10%) reduction must be achieved. If the cause of impairment is nutrients, a TP (5%) reduction must be achieved. Pollutant reduction efficiencies for selected BMPs shall be in accordance with the BMP Effectiveness Values document published by DEP (3800-PM-BCW0100m) or Chesapeake Bay Program Office expert panel reports. The permittee shall submit a report demonstrating implementation of the PRP as an attachment to the first Annual MS4 Status Report that is due following completion of the 5th year of General Permit coverage.

NEW PERMIT REQUIREMENTS – POLLUTANT REDUCTION PLAN

- **Existing Pollutant Loading for runoff collected by the Borough MS4 was calculated using DEP methodology, based on drainage area and land cover.**
 - Total Existing Sediment Loading: 338,961 pounds per year
- **The required performance standard identified in the Permit is a minimum 10% reduction in annual pollutant (sediment) loading**
 - Minimum Required Reduction: 33,896 pounds per year
- **The PRP proposed a stream restoration project at War Memorial Park.**
 - A project length of 760 linear feet is proposed to achieve the minimum sediment reduction.



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NEW PERMIT REQUIREMENTS – POLLUTANT REDUCTION PLAN

- **BMPs identified in the PRP must be constructed and the required pollutant reduction achieved within 5 years of permit issuance (March 2023)**
- **Municipal budget for each year must include funds for:**
 - Final Design of BMPs – PRP provides 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



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NEW PERMIT REQUIREMENTS – POLLUTANT REDUCTION PLAN

- Each year's annual report will include documentation and supporting calculations for reductions achieved through implementation of the PRP.
- Permit includes following condition: "During the permit term, DEP will evaluate your progress in implementing the PRP(s). If progress is not satisfactory DEP may require you to obtain coverage under an individual permit."



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