

# Municipal Separate Storm Sewer System (MS4)

## General Permit Renewal (OHQ0000004)

**Anthony Robinson**  
**Ohio EPA**  
**Division of Surface Water**

# Ohio EPA Storm Water Program Areas

## Construction Activities



## Municipal Separate Storm Sewer Systems (MS4)



## Industrial Activities



# MS4 Program

- Municipal Separate Storm Sewer System (MS4)
- Refers to a system of conveyances-drainage systems, swales, ditches, gutters and storm sewers



# MS4 Program

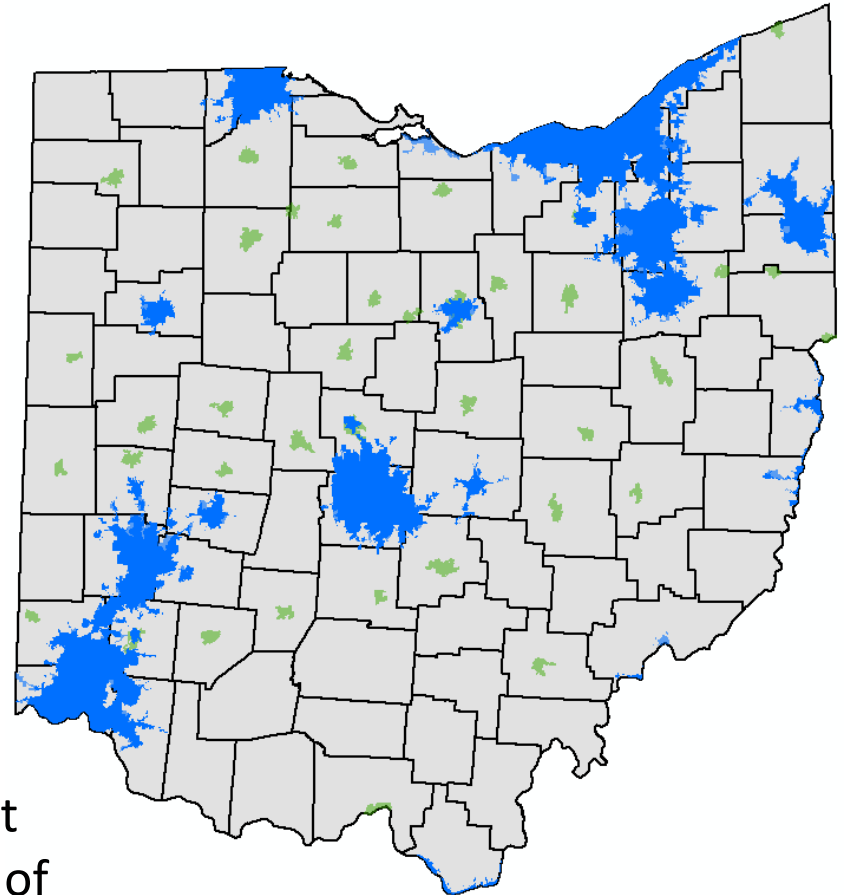
## Phase I MS4s

- >100,000 ppl, not combined sewers
- Individual permits
- Akron, Columbus, Dayton & Toledo

## Phase II MS4s

Within an urbanized area (defined by last census) or designated by population, population density and other factors

- **619** Small MS4s covered under **296** general permits
- Typically cities, counties, townships, but may include park districts, department of transportation, universities etc.





# MS4 Program

## Phase I MS4s

Columbus - Working to renew

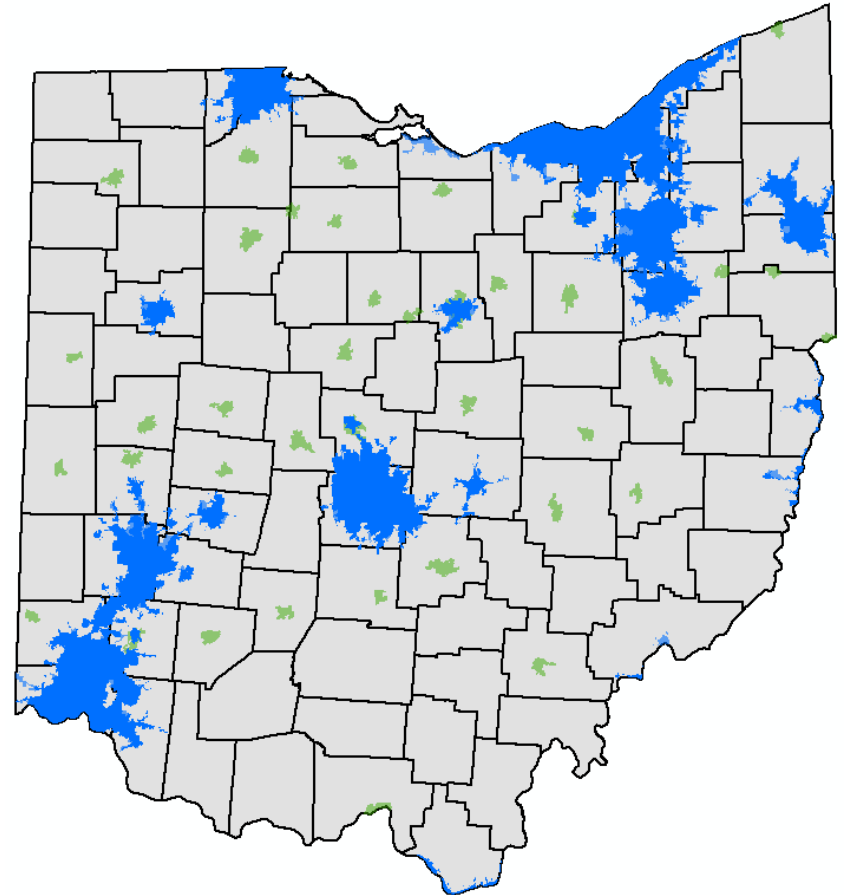
Dayton - Expires 10-2022

Akron - Working to renew

Toledo - Working to renew

## Phase II MS4s

Permit expires September 10, 2019



Permits are renewed every 5 years.

# MS4 Program: What's Required?

- Submittal
  - Notice of Intent (NOI)
  - Storm Water Management Program (SWMP)
  - Alone or Co-Permittee
- Develop and Implement SWMP
  - In each MCM
- Recordkeeping/Reporting
  - Submit reports to Ohio EPA
  - Maintain other records/documentation

# Storm Water Management Program (SWMP)

- Best Management Practices (BMPs) that address the 6 Minimum Control Measures
- Legal authority
- Performance standards
- Timeframes for BMP implementation
- Point of contact/responsible parties
- How success of minimum control measures and BMPs will be evaluated

# Six Minimum Control Measures



Public Education & Outreach



Public Involvement & Participation



Illicit Discharge Detection & Elimination



Construction Site Runoff Control



Post-Construction Storm Water Management



Pollution Prevention / Good Housekeeping



# Public Education & Outreach / Public Involvement/Participation

## Public Education Performance Standard:

- Storm Water Public education and outreach program shall include **more than one mechanism and target at least five different storm water themes** over the permit term. At a minimum, **one theme shall target the development community**. Program must reach 50 percent of your population over the permit term.

## Public Involvement/participation Performance Standard:

- Public involvement / participation program shall include, at a minimum, **five public involvement activities over the permit term**.

# Illicit Discharge Detection & Elimination

“...any discharge to an MS4 that is not composed entirely of storm water, except for fire-fighting activities and NPDES permitted discharges.”



## Model Illicit Discharge and Connection Stormwater Ordinance

ORDINANCE NO. \_\_\_\_\_

This document is downloadable in WordPerfect format.

### SECTION 1. PURPOSE/INTENT.

The purpose of this ordinance is to provide for the health, safety, and general welfare of the citizens of ( ) through the regulation of non-storm water discharges to the storm drainage system to the maximum extent practicable as required by federal and state law. This ordinance establishes methods for controlling the introduction of pollutants into the municipal separate storm sewer system (MS4) in order to comply with requirements of the National Pollutant Discharge Elimination System (NPDES) permit process. The objectives of this ordinance are:

- (1) To regulate the contribution of pollutants to the municipal separate storm sewer system (MS4) by stormwater discharges by any user
- (2) To prohibit Illicit Connections and Discharges to the municipal separate storm sewer system
- (3) To establish legal authority to carry out all inspection, surveillance and monitoring



# Illicit Discharge Detection & Elimination

## Performance Standards:

- Shall include an **initial dry-weather screening** of all your storm water outfalls over the permit term.
- Your program shall establish **priorities and specific goals for long-term system-wide surveillance of your MS4**, as well as for specific investigations of outfalls and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges.
- Data collected each year shall be evaluated and **priorities and goals shall be revised annually** based on this evaluation.
- **Comprehensive storm sewer system map** (updated annually).

# Construction Site Runoff Control



# Post-Construction Runoff Control



# Construction Site & Post-Construction Runoff Control

## Performance Standards:

- **Storm Water Pollution Prevention Plan (SWP3)** review of all applicable projects
- **Inspect applicable sites initially then on at least a monthly basis**
- Ensure that **controls** are installed per requirements
- Ensure that long-term **Operation & Maintenance Plans** are developed and **agreements** in place
- **Common issues**
  - Inconsistent ordinances, resolutions, regulations
  - Lack of formal plan review and inspection process
  - Lack of Enforcement Protocol



# Pollution Prevention/Good Housekeeping for Municipal Operations

## Operation and Maintenance Program

- Maintenance activities, schedules and long-term inspection procedures
- BMPs for streets, parking, maintenance areas, transfer stations, salt/sand storage locations and snow disposal areas
- Procedures for proper disposal of waste

**Conduct employee training once per year (min)**



# MS4 Permit Renewal Timeline

Month	Action Item
Jan/Feb 2019	Early Stakeholder Outreach meetings to promote interested party input for GP renewal
March 2019	Review input and develop a draft GP with proposed changes
April 2019	Public Notice Draft GP for public comment
	Comment Period ends 52 days after Public Notice
June/July 2019	Review/evaluate comments received and develop final GP

# Potential Updates

- Require update of ordinances and regulations within *X* months of renewal of MS4 General Permit (*reduce from 24 months*)
- Adjust language regarding plan review and inspection to ensure thorough process and documentation
- Require enforcement protocol (e.g. notices of violation in an enforcement escalation plan)

# Potential Updates

Address how MS4s show in their Storm Water Management Program that they are responding to their watershed's TMDL (Total Maximum Daily Loads)

- Perhaps standard BMPs that communities can select from (fitting particular TMDL issues)



	NUTRIENT			HABITAT	BACTERIA	TSS	DO/OE	Flow
	Phosphorus TMDL	Nitrogen TMDL	Ammonia TMDL	Habitat TMDL	Bacteria TMDL	Sediment /Total /suspend	Dissolved Oxygen /DO/Org	Flow
Community								
Twinsburg Township	X	X		X	X		X	
Twinsburg Township	X	X		X	X		X	
Twinsburg Township	X	X		X	X		X	
Valley View Village	X	X		X	X		X	
Valley View Village	X	X		X	X		X	
Valley View Village	X	X		X	X		X	
Valley View Village	X	X		X	X		X	

The Northeast Ohio Stormwater Training Council has developed papers on TMDLs and potential practices that may provoke ideas for input.

<http://neohiostormwater.com/index.html>

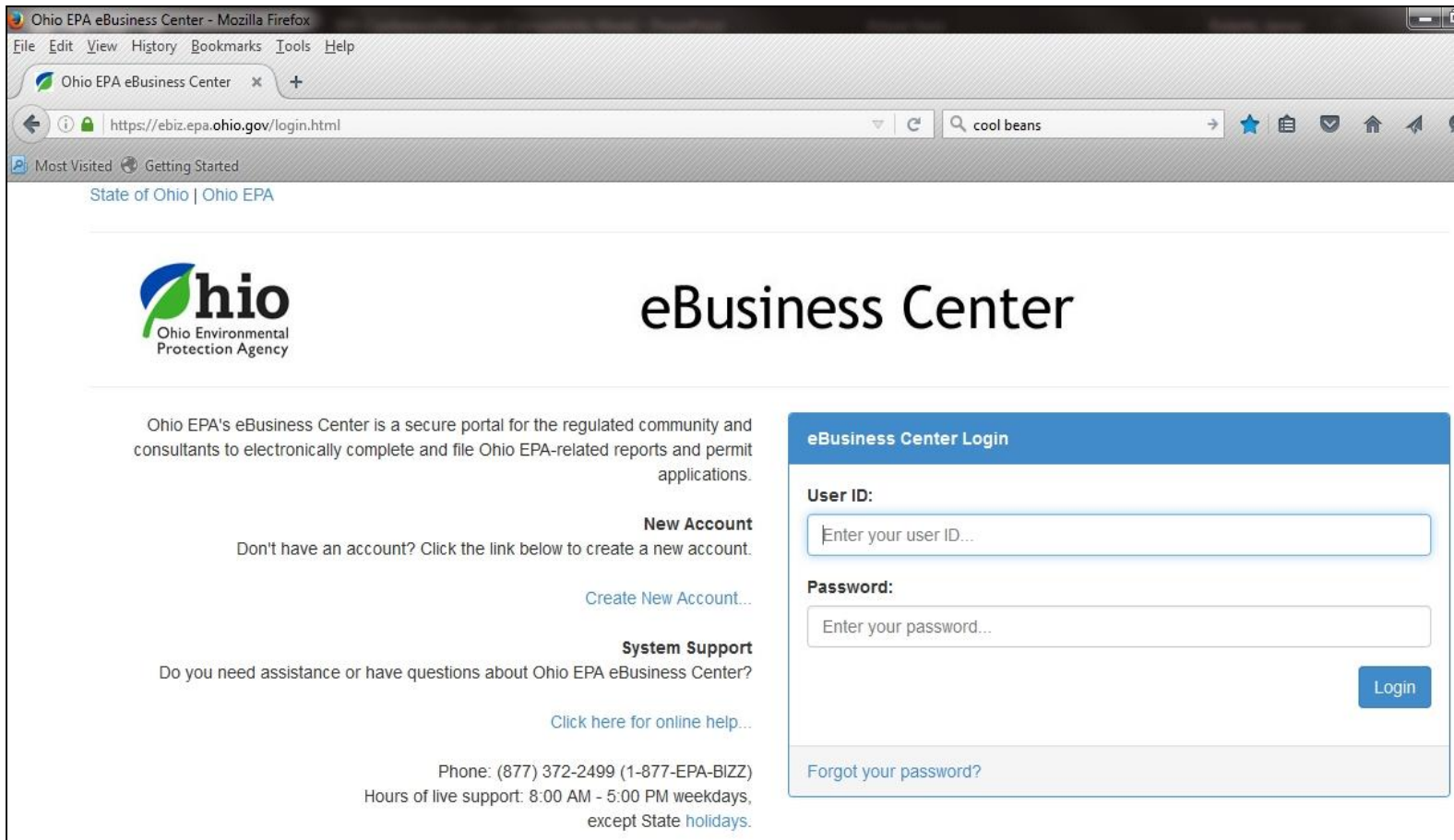


# Potential Updates

Review permit language and performance measures to ensure permit requirements are clear and specific, meets federal requirements and avoids any public notice of each MS4 NOI application.

# Potential Updates or Changes

## Require electronic submittal of notice of intent



The screenshot shows a web browser window titled "Ohio EPA eBusiness Center - Mozilla Firefox". The address bar displays "https://ebiz.epa.ohio.gov/login.html". The page features the Ohio EPA logo and the text "eBusiness Center". A description states: "Ohio EPA's eBusiness Center is a secure portal for the regulated community and consultants to electronically complete and file Ohio EPA-related reports and permit applications." There are links for "New Account" (with subtext "Don't have an account? Click the link below to create a new account.") and "System Support" (with subtext "Do you need assistance or have questions about Ohio EPA eBusiness Center?"). A "Login" form is on the right with fields for "User ID" and "Password", a "Login" button, and a "Forgot your password?" link. Contact information at the bottom includes the phone number (877) 372-2499 and live support hours (8:00 AM - 5:00 PM weekdays, except State holidays).

Ohio EPA eBusiness Center - Mozilla Firefox

File Edit View History Bookmarks Tools Help

Ohio EPA eBusiness Center

https://ebiz.epa.ohio.gov/login.html

cool beans

Most Visited Getting Started

State of Ohio | Ohio EPA

**hio**  
Ohio Environmental  
Protection Agency

**eBusiness Center**

Ohio EPA's eBusiness Center is a secure portal for the regulated community and consultants to electronically complete and file Ohio EPA-related reports and permit applications.

**New Account**  
Don't have an account? Click the link below to create a new account.  
[Create New Account...](#)

**System Support**  
Do you need assistance or have questions about Ohio EPA eBusiness Center?  
[Click here for online help...](#)

Phone: (877) 372-2499 (1-877-EPA-BIZZ)  
Hours of live support: 8:00 AM - 5:00 PM weekdays,  
except State holidays.

**eBusiness Center Login**

**User ID:**

**Password:**

[Forgot your password?](#)

Login

<https://ebiz.epa.ohio.gov>

# Potential Updates

- Require most current Storm Water Management Program document (SWMP) to be uploaded with NOI submittal

## Attachment Uploads

NO ATTACHMENT REQUIRED  
- for internal use only -

### Attachment

[Browse...](#) You may add another attachment

Athens-Ohio Univ Stormwater Management Program 6-15-2017.pdf

[Remove Attachment](#)

Many have not been submitted since the first MS4 Permit (2003).

# Potential Updates

Submit annual reports electronically

NPDES Small MS4 General Permit Annual Reporting Form [Form Instructions](#)

**General Information**

<b>Name of MS4</b> 30-character limit	<b>Report for Year</b>
<b>Ohio NPDES Permit Number</b> 3GR01803*AG	<b>County</b> Cuyahoga

**Contact Information**

<b>First Name</b> Jay	<b>Last Name</b> Finegan
<b>Title</b> Title	
<b>Email</b>	<b>Phone</b>

# Potential Updates

## Include a Storm Water Utilities survey in annual report requirements

1. Do you have a storm water utility in your community that accesses fees? Yes\_\_\_ No\_\_\_  
If Yes, complete questions 2 – 10.
2. What year was your storm water utility established? \_\_\_\_\_
3. What collection mechanism (i.e., utility bill, assessment, etc.) is used? \_\_\_\_\_
4. What is your billing period (monthly, quarterly, etc.)? \_\_\_\_\_
5. What is your Equivalent Residential Unit (ERU) for impervious surface? \_\_\_\_\_ sq. ft.
6. What is your Residential parcel rate? \$ \_\_\_\_\_
7. What is your Commercial parcel rate? \$ \_\_\_\_\_
8. What is your Industrial parcel rate? \$ \_\_\_\_\_
9. List any parcels exempt from service fee: \_\_\_\_\_
10. Does your storm water utility have a credit program to reduce service fees? Yes\_\_\_ No\_\_\_



# Potential Updates

Identify priority illicit discharges that require immediate notification to Ohio EPA

E.g. Cross-connections, sewage releases...



# Contact Information:

Anthony Robinson  
Ohio EPA, Division of Surface Water  
[Anthony.Robinson@epa.ohio.gov](mailto:Anthony.Robinson@epa.ohio.gov)