

# General NPDES Permit for Discharge from Small Municipal Separate Storm Sewer Systems (MS4)

**ILR40**

**Focus on Minimum  
Control Measures**

# Background

- MS4 communities are determined by the results of the U.S. Census.
- Urbanized areas designated by the census must apply for a MS4 permit or waiver.
- MS4 permittees must develop a storm water management plan that includes 6 minimum control measures.

# 1. Public Education and Outreach

- Distribute educational materials.
- Provide outreach activities.
- Educate to eliminate contaminants from storm water.
  - Oils and Fuels
  - Soaps
  - Paint, solvents
  - Lawn Chemicals
  - De-icing materials

## 2. Public Involvement and Participation

- Provide at least one public meeting with a focus on MS4 program.
- Identify Environmental Justice Areas.
  - <https://www.epa.gov/ejscreen>

### 3. Illicit Discharge Detection & Elimination

- Illicit connections and discharges.
- Complete a storm sewer system map.
- Develop an ordinance or other regulatory mechanism.
- Enforcement mechanism.
- Detection and correction of non-storm water discharges.
- Inspection of outfalls during dry weather.

# 4. Construction Site Storm Water Runoff

- Ordinance or mechanism requiring:
  - Adequate erosion and sediment controls
  - Sanctions to ensure compliance
- Storm Water Pollution Prevention Plans (SWPPP).
- Non-Storm water discharge prevention.
- Receipt and consideration of public information.
- Site inspections.

# 5. Post Construction Storm Water Management

- Minimize volume, velocity and pollutant load.
- Adopt strategies incorporating:
  - Infiltration
  - Reuse
  - Evapotranspiration

# Post Construction Storm Water Management

- Combine structural and non-structural BMPs
  - Preserve
    - Natural storage and infiltration characteristics
    - Existing natural streams, channels, and drainage ways
    - Minimize creation of new impervious surfaces
    - Convey storm water to natural vegetated channels
  - Construct
    - Structures that provide quantity and quality control
    - Structures that provide quantity control
    - Serve multiple sites rather than single sites
- Development of long term operation and maintenance plan for BMPs



# Post Construction Storm Water Management

- Minimize the volume of storm water runoff and pollutants from public highways, streets, sidewalks.
  - Use of BMPs:
    - Reduce physical, chemical, or biological pollutant load.
    - Increase infiltration, evapotranspiration, and reuse.
    - Annual training for employees and contractors involved in green infrastructure maintenance, repair and replacement.

# Post Construction Storm Water Management

- Minimize the volume of storm water runoff and pollutants from privately owned developed property.
  - Identify
  - Implement BMPs
    - Encourage green infrastructure.
    - Evaluate flood control techniques.
      - feasibility of pollution control retrofits
      - Potential climate change impacts

# Post Construction Storm Water Management

- Implement additional controls where needed.
  - Special events such as fairs, parades, and performances.
- Implement appropriate maintenance programs.
  - Lawn care
  - Street cleaning

# Post Construction Storm Water Management

- Infiltration practices should be prohibited:
  - Vehicle fueling and maintenance sites
  - Shallow bedrock
  - Karst features
  - Contaminated soil areas
  - Delineated source water protection area
  - 400' of a community water supply well
  - 200' of a private water supply well

# Post Construction Storm Water Management

- Ordinance or regulatory mechanism which addresses post construction runoff.
- Require post construction management plans.
- Long term operation and maintenance of BMPs.
- Develop and implement a process to assess water quality impacts in the design of all new and existing flood management projects.
  - Include consideration of controls that can minimize impacts to site water quality and hydrology.

## 6. Pollution Prevention/Good Housekeeping

- Implement operation and maintenance program.
  - Annual training
- Design, install, and maintain pollution prevention measures to minimize pollutant discharge from municipal properties.

- This is a brief overview of one portion of the Illinois MS4 permit.
- Please contact me if you have further questions or concerns.

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# Questions

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