2020 MS4 Summit: Documentation!

Emily Jennings, PE
Survey Results
Survey Question 1

How does your City/Township conduct its annual MS4 meeting?

Responses (2):
• Board Meeting/Council Meeting
Survey Question 2

How does your City/Township notify the public regarding annual MS4 meetings?

Responses (2):
• Public Notice in Local Newspaper
Survey Question 3

Where are MS4 education materials that are specific to your City/Township available for the public?

Responses (2):
• Brochures at City/Town Hall and City/Town Website
• City/Town Website
Survey Question 4

Does your MS4 use shared materials or do you develop your own? Which of these do you use most often?

Responses (2):
• Shared materials most often
• Both – Use watershed organization materials about 70% of the time
Survey Question 5

If using shared resources, where are these materials available for the public?

Responses (1):
• Hand-outs from meetings, published content from newspapers or on websites
Survey Question 6

Who at your City/Township is responsible for MS4 permitting?

Responses (2):
- Clerk/Treasurer
- Engineering Department, Building Department, and Public Works Department
Survey Question 7

How would you describe your MS4 activities in context of non-MS4 City/Township workflow? Do these tasks balance and blend with each other, or is workflow difficult and sporadic? What would you like to change in this process?

Responses (2):

• Difficult and sporadic. More resources...

• Currently our sewer department inspects and maintains stormwater infrastructure when they have time. Additional stormwater funding and staff would help us to better meet our maintenance requirements. Inspection reporting and communication between departments could be improved.
Survey Question 8

What is one MS4 area that your City/Township has both: 1) Practical feasibility for improvements 2) Interest and understanding among staff?

Responses (1):

- Maintenance of existing structures
Survey Question 9

What is one MS4 area that your City/Township needs a better understanding of?

Responses (2):
• TMDL Requirements
• TMDL Requirements in the draft MS4 Permit
Survey +

• Public outreach is collaborative
• Public participation is fairly uniform
• Responsibility is wide-spread and this causes difficulties
• There is room for improvement
• Continued education and additional resources would be helpful
Responsibility is Wide-spread and this Causes Difficulties

- Written Procedures
- Documentation
- Focus on MCM 3 – 6
  - MCM 3: Illicit Discharge Detection and Elimination
  - MCM 4: Construction Site Stormwater Runoff Control
  - MCM 5: Post-Construction Stormwater Management
  - MCM 6: Pollution Prevention/Good Housekeeping For Municipal Operations
Permit Requirements
MCM 3 - Illicit Discharge Detection and Elimination (Draft Permit)

- Ordinance
- ERPs
- Mapping of MS4 (outfalls, BMPs) and Inventory of Priority Areas
- Training Program
- Regular and Priority Areas Inspections
- Spill Response Procedures
- Documentation
MCM 4 - Construction Site Stormwater Runoff Control (Draft Permit)

- Ordinance
- ERPs
- Mapping or Inventory of Active Construction Sites
- Site Plan Reviews
- Regular and Noncompliance Inspections
- Training
- Documentation
MCM 5 - Post-Construction Stormwater Management (Draft Permit)

- Ordinance
- ERPs
- Mapping or Inventory of BMPs not owned by MS4
- Site Plan Reviews
- Training
- Documentation
MCM 6 - Pollution Prevention/Good Housekeeping For Municipal Operations (Draft Permit)

- Mapping or Inventory of Facilities
- Structural and Non-Structural BMPs for Municipal Operations
- Pond Effectiveness Procedures
- Regular Inspections and Maintenance
- Training
- Documentation
Making It Happen
Understand Workflow

• Illicit Discharge Example, Item 18.11

• The permittee must implement written procedures for investigating, locating, and eliminating the source of illicit discharges. At a minimum, the written procedures must include:
  • a timeframe in which the permittee will investigate a reported illicit discharge;
  • use of visual inspections to detect and track the source of an illicit discharge;
  • tools available to the permittee to investigate and locate an illicit discharge (e.g., mobile cameras, collecting and analyzing water samples, smoke testing, dye testing, etc.);
  • name or position title of responsible person(s) for investigating, locating, and eliminating an illicit discharge.
Understand Workflow

MCM 3: BMP SUMMARY SHEET

Identification of Priority Areas
MS4 Permit Section III.D.3.f

BMP: Identification of Priority Areas
Responsible Person(s): Working Street Foreman

BMP Description: The City of Proctor identifies priority areas likely to have illicit discharges to reduce or eliminate the chance of illicit discharge within the City's MS4.

The City shall pay particularly close attention to these areas when detecting and eliminating illicit discharges and illicit connections through inspections and day to day operations within the City's MS4.

BMP Activity Log

<table>
<thead>
<tr>
<th>Priority Area</th>
<th>Land Use</th>
<th>Address</th>
<th>Past Discharge</th>
</tr>
</thead>
<tbody>
<tr>
<td>CN Railroad</td>
<td>Rail yard</td>
<td>2430 Railroad Avenue</td>
<td>Yes, No</td>
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<tr>
<td></td>
<td></td>
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<td>Yes, No</td>
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<td>Yes, No</td>
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</tbody>
</table>

Note:
Understand Workflow
## Working with Contractors

### >/>= 1 Acre
- State and Local Requirements
- Site Plan Reviews
- CSW Permittee must inspection once every 7 days and following rainfall event >>/>= 0.5 in as required by State permit
- MS4 Permittee must inspect at an appropriate frequency to determine compliance with ordinance or other regulatory mechanism
- Documentation

### < 1 Acre
- Local Requirements
- Site Plan Reviews
- Permittee must inspect based on local requirements
- MS4 Permittee must inspect at an appropriate frequency to determine compliance with ordinance or other regulatory mechanism
- Documentation
Working with Contractors

- Stormwater Pollution Prevention Plans (SWPPP)
- Templates developed for state requirements
- Example CSW Permit Item 9.17
  - Permittees must preserve a 50 foot natural buffer or, if a buffer is infeasible on the site, provide redundant (double) perimeter sediment controls when a surface water is located within 50 feet of the project's earth disturbances and stormwater flows to the surface water
- VLAWMO Buffer Rules

<table>
<thead>
<tr>
<th>Management Class</th>
<th>Base Buffer Width (ft)</th>
<th>Minimum Applied Buffer Width (ft)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manage 3: Storm Ponds</td>
<td>20</td>
<td>16</td>
</tr>
<tr>
<td>Manage 2</td>
<td>30</td>
<td>24</td>
</tr>
<tr>
<td>Manage 1</td>
<td>40</td>
<td>34</td>
</tr>
<tr>
<td>Preserve</td>
<td>75</td>
<td>67</td>
</tr>
</tbody>
</table>
• Paper Trails
• Point of Contact
• Early Collaboration
• Common Goal
## Checklist

- Draft Permit
- Site Plan Review

## Draft Permit

### 1.1 Project/Site Information

**Permit No:**

<table>
<thead>
<tr>
<th>Incorporated</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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<tbody>
<tr>
<td>I. Stormwater Pollution Control Plan Content</td>
<td></td>
<td></td>
<td></td>
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</table>

### 2.1 Stormwater Pollution Control Plan Content

<table>
<thead>
<tr>
<th>Content</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stormwater Pollution Control Plan incorporated</td>
<td></td>
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### 3.1 Construction Site Stormwater Control Plan

<table>
<thead>
<tr>
<th>Content</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Practices (BMP) to protect waters of the state...</td>
<td></td>
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### 4.1 Post-Construction Stormwater Management Requirements

<table>
<thead>
<tr>
<th>5.1 Special or Impaired Waters</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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</thead>
<tbody>
<tr>
<td>Does the project require post construction stormwater management?</td>
<td></td>
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</tbody>
</table>

### 5.2 Wetlands

<table>
<thead>
<tr>
<th>Content</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Redundant BMPs at a minimum for discharge to wetland areas.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**

- Include information on if a wetland delineation has been conducted.
- See comments above on receiving waters.
Have a Common Location

• Compliance Guide
• Electronic Folder
• Filing Cabinet
Putting the Pieces Together

- Annual Assessment (Self-Audit)
- Annual Report
- Annual Training
- Collaboration!
Questions?

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