

# Non-Standard MS4 Permit Renewal Highlights for School Districts



January 8, 2020



# Second Draft

- Issuing a second draft for public notice
- Considering changes to:
  - Applicability of MS4 locations.
  - Facilitate working with standard MS4s.
  - Simplify inspection and maintenance of post construction control measures.
  - Simplify reporting for TMDL and impaired water requirements.



# Applicability of MS4 Locations

- Renewal permit will tentatively address all of a district's MS4s within the urbanized area when the combined maximum daily user population is 1,000 or greater.



# MS4 Locations Addressed in Permit changes considered

- Non standard may exclude individual MS4 locations that serve a maximum daily user population of less than 1,000 if they provide assurance they participate in city/county program.



# Facilitate Working With Standard MS4s



## Existing Permit

- Option 1: Follow the surrounding city or county program requirements.
- Option 2: Develop your own program.
- Construction and post construction programs only.

# Option 1/Option 2 considered changes

- Dropped Options in June 2019 draft
- Future draft-keep Option 1 in permit with conditions:
  - Must provide division assurance they would abide by local program requirements.
  - Full participation: not just “follow” program.



# POTENTIAL STRATEGIES FOR SCHOOLS



# I. All MS4s

- Include all existing and new MS4 locations in your program.



## II. All MS4s-Supported

- Include all existing and new MS4 locations in your program.
- Have another entity (e.g., city/county or contractor) implement parts of program or implement program at some MS4 locations.



# III. Partial Program Deferral

For all existing and new MS4 locations:

You Implement	City and county implements through local program
public participation	construction sites
public information and outreach	post construction stormwater management in new development and re-development.
illicit discharge detection and elimination	
pollution prevention/good housekeeping	
TMDL requirements	



# IV. MS4 location deferral

- New MS4 locations(only) regulated under city/county local program
- Requires written agreement



# Simplify Inspection and Maintenance of Post Construction Control Measures

- June 2019 Draft
  - Operation and maintenance inspections
  - Oversight inspections



# Long-Term Operation and Maintenance and Post Acceptance Oversight-**considered changes**

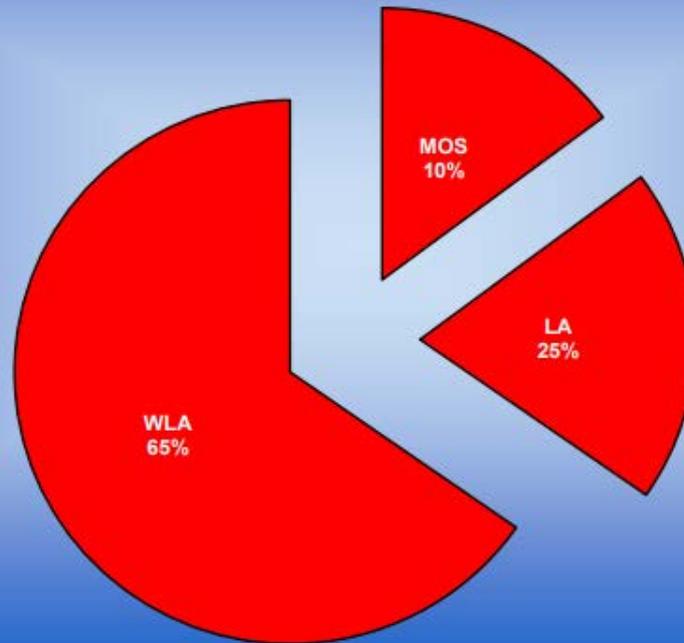
If you implement your own post-construction program and own a control measure associated with new development/redevelopment, then...

- Oversight might be reduced and/or rolled into the pollution prevention/good housekeeping program.



# Simplify Reporting TMDLs/Impaired Waters

WLA + LA + MOS = TMDL



# TMDL WLA met by:

- Implementing targeted control measures.
- Monitoring of dry weather discharges.



# Dry-weather Discharges to Impaired Waters

- Must provide information on outfalls (i.e., direct discharges) that discharge to impaired waters.
- Monitor for the pollutants causing impairments.



# Off-Ramps

- Dry weather discharge ceases.
- Monitoring results are below a threshold (reduced frequency).

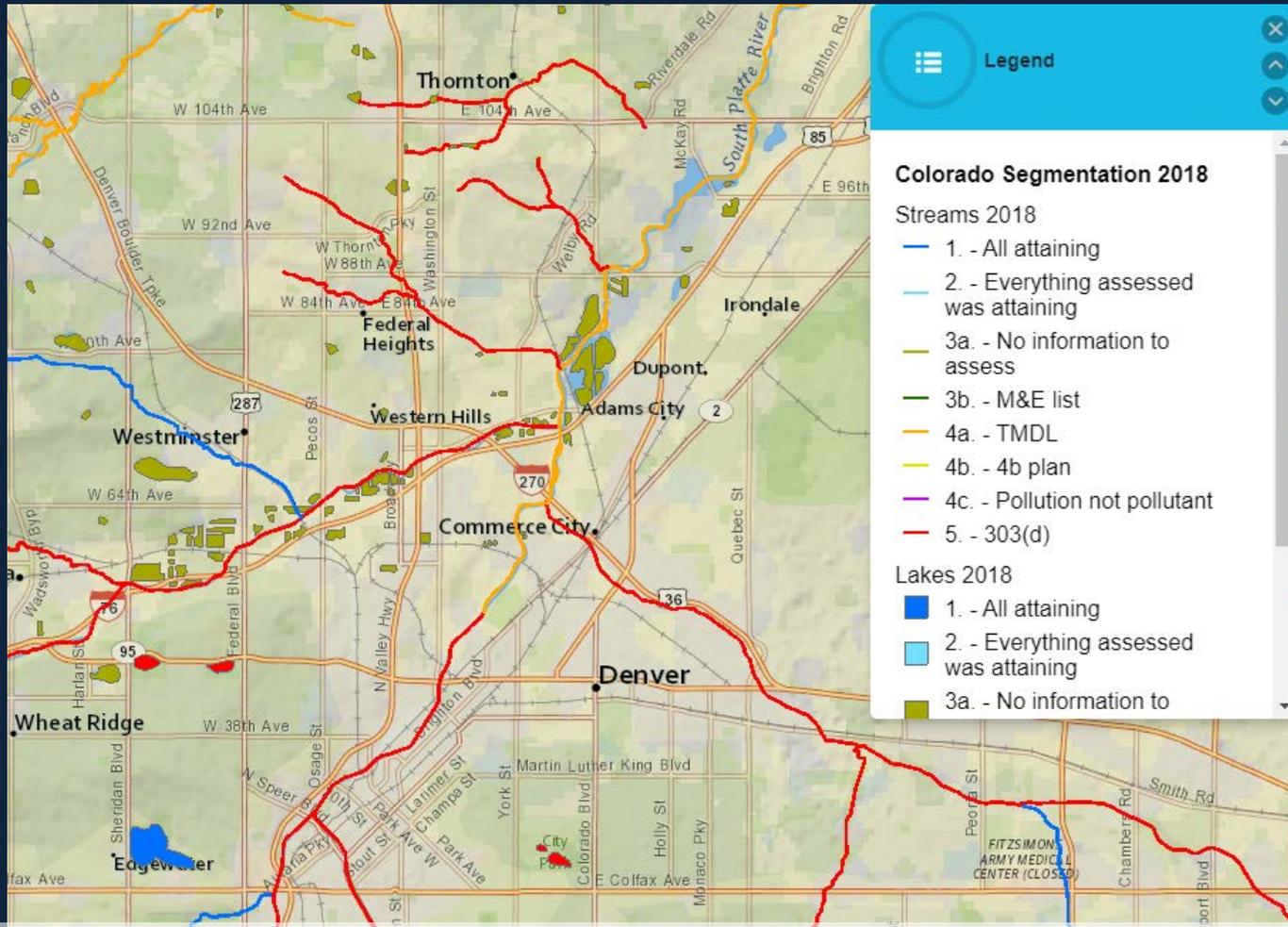


# Reporting Results-E. coli considered changes

- Report individual results and seasonal geometric mean.
- Concentrations, not loadings
- Less calculations.



# Impairments



■ <https://www.colorado.gov/pacific/cdphe/clean-water-gis-maps>



# Contact information

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<https://www.colorado.gov/pacific/cdphe/non-standard-ms4-general-permitrenewal>

