



Regulatory Update

DRSCW Public Roads Deicing Workshop

September 26, 2013

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Regulatory Background

- ◆ **Federal Clean Water Act - USEPA**
 - ◆ Waters shall be “fishable” and “swimmable”
- ◆ **IEPA**
 - ◆ Administers programs and permits
 - ◆ Identifies impaired waters (303d list)
 - ◆ Develops TMDLs for impaired waters
- ◆ **Counties / Communities**
 - ◆ NPDES Phase II stormwater permit holders
 - ◆ Best Management Practices – BMPs

Regulatory Background

- ◆ Water quality standard for chloride – 500 mg/L
- ◆ DuPage River and Salt Creek do not currently meet standards
- ◆ IEPA TMDL recommended chloride load reductions
 - ◆ East Branch DuPage River - 33% reduction
 - ◆ West Branch DuPage River - 35% reduction
 - ◆ Salt Creek - 14% reduction

	Salt Creek	East Branch	West Branch	Total
TMDL Target, Tons of Cl/yr	13,300	5,200	13,700	32,200
TMDL Baseline, Tons of Cl/yr	15,500	7,800	21,100	44,400
DRSCW Baseline, Tons of Cl/yr	32,600	16,900	21,200	70,700

NPDES General Permit ILR40

- ◆ **General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)**
- ◆ **Permit goes by many names:**
 - ◆ **Municipal Stormwater Permit**
 - ◆ **General Stormwater Permit**
 - ◆ **MS4 Permit**
 - ◆ **NPDES Permit**
 - ◆ **Phase II Permit**

NPDES General Permit ILR40

- ◆ Issued Feb 20, 2009, effective April 1, 2009
- ◆ Within six minimum control measures required:
 - ◆ Pollution prevention for municipal operations
 - Prevent and reduce the discharge of pollutants to the maximum extent practicable
 - Training
 - **BMPs for deicing / snow removal**
 - ◆ Ensure the reduction of all pollutants of concern to the maximum extent practicable
- ◆ **Additional requirements for TMDL waters**
 - ◆ Program assessment - check for waste load allocation
 - ◆ Monitoring requirement - annual

General NPDES Permit No. ILR40

Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North Grand East
P.O. Box 19276
Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

General NPDES Permit For Discharges from Small Municipal Separate Storm Sewer Systems

Expiration Date: March 31, 2014

Issue Date: February 20, 2009

Effective Date: April 1, 2009

In compliance with the provisions of the Illinois Environmental Protection Act, the Illinois Pollution Control Board Rules and Regulations (35 Ill. Adm. Code, Subtitle C, Chapter 1) and the Clean Water Act, the following discharges may be authorized by this permit in accordance with the conditions herein:

Discharges of only storm water from small municipal separate storm sewer systems, as defined and limited herein. Storm water means storm water runoff, snow melt runoff, and surface runoff and drainage.

Receiving waters: Discharges may be authorized to any surface water of the State.

To receive authorization to discharge under this general permit, a facility operator must submit an application as described in the permit conditions to the Illinois Environmental Protection Agency. Authorization, if granted, will be by letter and include a copy of this permit.

DuPage County Technical Guidance - Water Quality Best Management Practices

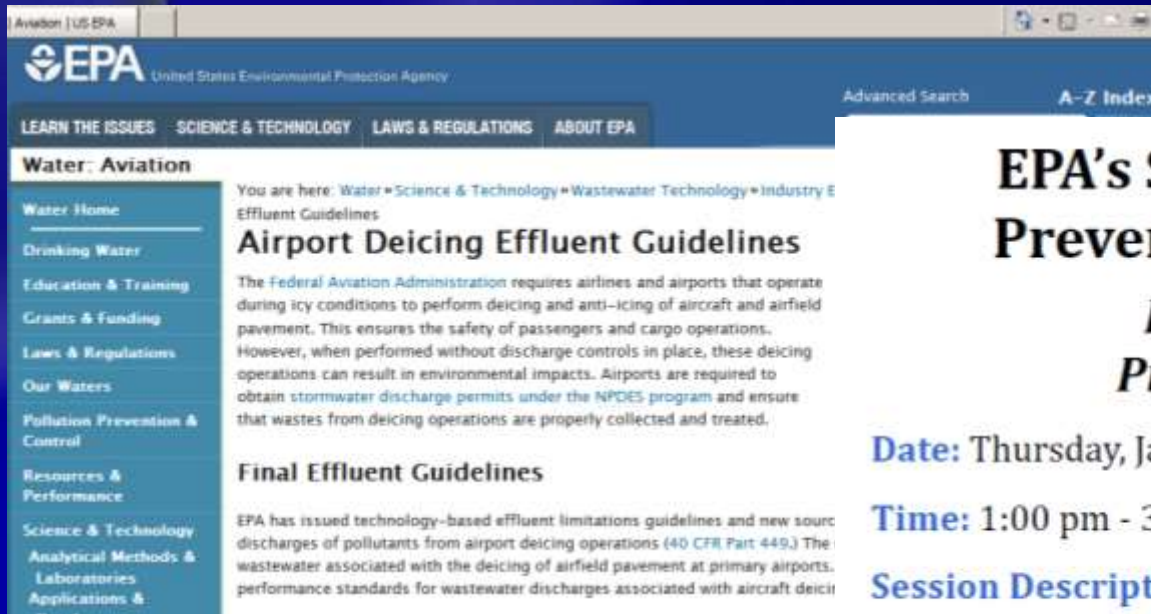
- ◆ ***Section 2: GENERAL OVERVIEW OF BEST MANAGEMENT PRACTICES (BMPs)***
 - ◆ Includes “pollution prevention BMPs – often termed *good housekeeping activities*.”
 - ◆ “municipal street sweeping, commercial grease traps, roadway salt alternatives and spill prevention plans and/or structures.”

Training Requirements

- ◆ Attendance at this workshop helps to meet NPDES permit training requirement
 - ◆ Receiving information on best management practices for reducing pollutant loads from deicing operations
- ◆ Mention this training workshop in NPDES annual reporting

Increased Focus on Deicing Programs

- ◆ IEPA - MS4 Permit audits
- ◆ USEPA
 - ◆ Effluent limits for airport deicing
 - ◆ Workshops on roadway deicing improvements



The screenshot shows the EPA website interface. At the top, there is a navigation bar with the EPA logo and the text 'United States Environmental Protection Agency'. Below this, there are links for 'Advanced Search' and 'A-Z Index'. The main navigation menu includes 'LEARN THE ISSUES', 'SCIENCE & TECHNOLOGY', 'LAWS & REGULATIONS', and 'ABOUT EPA'. The 'Water: Aviation' section is highlighted, and the 'Water Home' link is selected. The page content includes a breadcrumb trail: 'You are here: Water » Science & Technology » Wastewater Technology » Industry Effluent Guidelines'. The main heading is 'Airport Deicing Effluent Guidelines'. The text below explains that the Federal Aviation Administration requires airlines and airports to perform deicing and anti-icing of aircraft and airfield pavement during icy conditions. It notes that these operations can result in environmental impacts and that airports are required to obtain stormwater discharge permits under the NPDES program. The section is titled 'Final Effluent Guidelines' and mentions that EPA has issued technology-based effluent limitations guidelines and new source discharges of pollutants from airport deicing operations (40 CFR Part 449).

EPA's Stormwater Pollution Prevention Webinar Series:

Road Salt Pollution Prevention Strategies

Date: Thursday, January 31, 2013

Time: 1:00 pm - 3:00 pm Eastern Daylight Time

Session Description:

EPA's Stormwater Pollution Prevention Webinar Series will highlight efforts to reduce pollutants in stormwater through controlling pollutants at their sources.

Permit Notice of Intent (NOI)

- ◆ **Communities submit a NOI form for coverage under the general stormwater permit**
- ◆ **Contains commitments for implementing best municipal practices for water quality protection**
- ◆ **NOI forms are due very soon**
- ◆ **NOI discussion immediately after the workshop**
 - ◆ **Discuss NOI submittal**
 - ◆ **Example language**

Questions?