

2025 IWEA MS4 Workshop Summary

IWEA's Watershed Management Committee held two workshops to discuss the requirements of the new Illinois Municipal Separate Storm Sewer System (MS4) Permit, issued by Illinois EPA effective August 1, 2025. The workshops were held on October 10, 2025 at the Lake County Central Permit Facility in Libertyville, and on October 17, 2025 at the Village of New Lenox Public Works facility. Discussion focused on interpretation and understanding of the new permit requirements. Staff from Illinois EPA, county stormwater agencies, local watershed groups, local municipalities and their consultants were in attendance to discuss the new requirements and offer input for implementation. This summary provides areas of general consensus on new permit requirements from the workshops, as well as areas where workshop attendees felt additional information or clarification would be helpful.

There was general consensus on the following MS4 permit items:

- A Notice of Intent (NOI) for the new permit is not required to be submitted to Illinois EPA if one was submitted circa 2021 as the previous MS4 permit was expiring. Permittee's stormwater management program plans must be updated with the new permit requirements by Aug 1, 2026. Permittees may develop and submit an updated NOI to be consistent with the new permit requirements and updated stormwater management plans, only if desired.
- The next MS4 annual report is due June 1, 2026. The information submitted in that report may largely be information based on the previous MS4 permit requirements, as Permittees will still be working on the modifications to their programs for the new permit requirements. The report may include information based on the new permit requirements if implemented by the end of the reporting year (March 31, 2026).
- In the Public Involvement requirements of the new MS4 permit, Permittees are required to identify watershed workgroups within their jurisdiction and participate with other stakeholders. If winter deicing activities are performed, Permittees are also required, where feasible, to participate in a watershed workgroup to reduce chloride concentrations in receiving streams. Workshop attendees generally agreed that "participation" included either being an official member of those workgroups, contributing financially or with in-kind services, or just attending and taking part in watershed workgroup meetings and functions.
- In the Illicit Discharge Detection and Elimination requirements of the new MS4 permit, Permittees are required to submit storm sewer mapping in the MS4 annual report. Some workshop attendees expressed concern with submitting the mapping for infrastructure security reasons. There was consensus that, as stated in the MS4 Permit, mapping was not required to be submitted if there were security concerns with submitting the information.

- In the Construction Site Stormwater Runoff Control requirements of the MS4 permit, site inspections are required at least once prior to land disturbance and once during construction. Workshop attendees generally agreed that the person performing the inspections could be anyone knowledgeable & trained to perform the inspections, a professional certification is not required, and that the inspection prior to land disturbance would also count as a pre-construction meeting for annual reporting.
- Workshop attendees generally agreed that only construction site issues resulting in local enforcement action would be considered violations for reporting in the MS4 annual report, therefore the number of violations and enforcement actions reported would be substantially the same.
- In the Pollution Prevention/Good Housekeeping for Municipal Operations requirements of the new MS4 permit, there is a requirement for developing an inventory of municipal facilities for quarterly inspection and observation of stormwater discharges. Workshop attendees agreed that only facilities owned or operated by the permittee should be included in the inventory.
- There are several new annual reporting requirements in the new MS4 permit. Workshop attendees discussed how different agency departments may be responsible for tracking and reporting permit-required information going forward, and how the lead department or person responsible for the MS4 annual report must make sure other departments are keeping up with the required documentation.

Based on workshop discussion, additional guidance would be helpful on the following MS4 permit requirements:

- The format and information that will be required for MS4 annual reporting in the Central Data Exchange (CDX)
- How storm sewer system mapping information, typically a GIS, will be submitted with annual reports via the CDX system
- In Part II. NOI Requirements, the permit states that permittees shall comply with any new provisions 12 months from the coverage letter. Will permittees be receiving a coverage letter?
- In the Post-Construction Storm Water Management in New Development and Redevelopment section, guidance on how to implement the evaluation of the total number of BMPs implemented and the estimated percent reduction in storm water runoff and pollutants
- Also in that section, under 5.d.i, contractor training that was required by the previous permit (5 d ii) has been removed. Please provide confirmation that the training is no longer required, or if it was inadvertently deleted from the new permit

- In the Pollution Prevention/Good Housekeeping for Municipal Operations section, guidance on evaluating landscape material reduction activities and material disposed of, and what to include in the annual report
- Also in that section, within the Municipal Facility and Storm Water Control Inventory requirements, can the quarterly facility inspections be performed simultaneously with quarterly observations of stormwater discharges?
- Also in that section, within the Municipal Facility Inventory requirement, municipally owned and/or maintained structural storm water controls are to be included within the inventory. The IEPA Response to Comments document provides some clarification as to what controls to include, and states that catch basins are to be included. Given that most communities have hundreds of catch basins in their storm drain system, confirm that catch basins are to be included or not included for quarterly facility inspections and quarterly observations of stormwater discharge

This summary was developed from IWEA MS4 Workshop attendee discussion and is provided for information purposes only. It should not be considered official direction for MS4 permit implementation or compliance.