APPENDIX G. CORRESPONDENCE WITH IDEM

IDEM/DPW NPDES Permit Renewal, Aug. 8, 2011
Purpose of the meeting was to discuss the proposed terms of the DPW redline mark-up submitted to IDEM in April 2009.

Discussion Items:

Reggie led with questions about the CEG (utility) transfer. She was uniformed that the MS4 (infrastructure) and all permit obligations stayed with DPW/City. Randy Braun confirmed that MS4 responsibilities were not transferring to CEG.

Reggie indicated that the Mapping effort that ends by requirement in 2016 seems long. We acknowledged the requirement and indicated we were on track to finish known MS4 mapping in that timeframe.

IDEM acknowledged the EPA issuance of the draft rule changes in September 2011 but noted that law suits are expected from many different sources. They indicated they felt it would take some time to implement volumetric control and effluent limits associated changes.

It was asked if they expect any such or related comments from USEPA to our proposed permit and they indicated no generally.

Reggie noted areas that seem to be of particular interest in the draft rule including considerations for retrofitting MS4, how to address school corps. and looking at combining MS4 phase 1 and Phase 2 type permits into a single permit. It was clear if this meant a general permit for all or an individual for all.

Randy Braun indicated that IDEM may look at our Construction Site controls program a little closer and discuss process more in the permit.

Reggie noted that the City’s Annual Report is “to big.” She would like to see a more condensed version. We indicated we were looking at the permit to report only what was mandatory. She noted to included measured results and were we are along the continuing program.
Randy noted that IDEM needed time yet to assemble comments for us and wanted to schedule a followup meeting. The meeting was tentatively scheduled for September 21st. At this time IDEM comments can be reviewed and discussed.

Randy noted that the City’s permit is on EPAs priority list to be issued (they want IDEM to get it done).

Action Items:
None at this time