



Public Works Department

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DATE: 2/24/2025
SUBJECT: 2025 MS4 Permit Annual Report

Adams County holds a Phase II Municipal Separate Storm Sewer System (MS4) Permit No. COR: 090041 issued by the Colorado Department of Public Health and Environment (CDPHE) Water Quality Control Division. This is a statewide general permit for jurisdictions with population between 10,000 to 100,000 that grants permission to discharge untreated stormwater flows into waters of the United States. This permitting mechanism is designed to prevent stormwater runoff from washing harmful pollutants into local surface waters.

Under MS4 Permit regulations, Adams County has been mandated since 2003 to develop, implement and enforce the following six (6) Minimum Control Measures within unincorporated Adams County MS4 Permitted area:

1. Public Education and Outreach on Stormwater Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-Construction Runoff Control
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The MS4 Permit is not a technology-based permit, there is no specific numeric effluent limitation like Wastewater Treatment Plant discharges. Instead, the MS4 permit is regulated under a practice-based framework. This means that adequate best management practices are required to be implemented to the maximum extent practicable to minimize stormwater pollution.

The County is currently under the fourth renewal of the CDPS General Permit. The permit will be renewed again on 7/1/2026. No additional permit requirements are anticipated in the upcoming 5-year permit cycle. The 2020 Census data became available in January 2023, and it appears that there is no impact to the current MS4 permitted area (based on 2010 census data).

The County is required to submit an annual MS4 Permit Report that identifies the accomplishments in accordance with the goals set forth under the 6 minimum control measure. The annual report is delivered on a standard State-issued form and it must be submitted to CDPHE by **March 10, 2025** by the Stormwater Administrator.

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Unincorporated Adams County owns and operates the public storm sewer system. To be able to discharge stormwater flows into the river, the County is required to comply with the terms and conditions of the MS4 permit (Municipal Separate Storm Sewer System) issued by CDPHE and required by the Clean Water Act. The specific permit requirements aim to reduce degradation of water quality and are applicable within the County's MS4 permitted area. This area is an urbanized area determined by the **2010** census data. As opposed to Wastewater Treatment Plants, which discharge sanitary sewer based on "numeric" effluent permit limitations, the MS4 permit is "practice" based and requires implementation of a series of administrative and structural best management practices to be able to operate and discharge from the system.

2024 Highlights:

- **CDPHE Stormwater inspection:** Adams County Public Works 62nd Ave CIP was inspected by CDPHE for stormwater compliance. This is the **first** construction stormwater inspection on a Public Works county-owned project. Corrective actions did not trigger enforcement.
- **Innovation:** The first "Site-saver" and "Gutter-bin" systems that provide pre-treatment of stormwater flows were installed on an Adams County project, at 62nd Ave CIP. In addition, the first cartridge filter system was installed at the 73rd Ave Warehouse (private).
- **Colorado LTAP Trailblazer Winner!** for the Washington Pond Trash Baskets. Stormwater Division staff flew to the Local Road Conference in Sioux Falls, South Dakota to receive the award in October 2024.
- **Stormwater Utility:** Optional paperless billing program launched in 2024 in alignment with the Sustainability Plan goals. Only 700 subscribers out of a total of 27,000 customers. In addition, Finance also secured a company to process checks more efficiently (qty=12,000) in 2025.
- **Pond Inspections:** The annual pond inspection program continued in 2024. All existing private and public ponds in unincorporated Adams County (500) were inspected by our consultant in alignment with Sustainability Plan goals to meet FEMA's Community Rating System requirements.
- **MS4 Non-Compliance Letter** sent to CDPHE due to a site that bypassed the SWQ permit process. Process improvements were implemented in Accela to create a filter that notifies the stormwater team. This filter narrows the unnecessary reviews and focuses on applicable sites that meet certain conditions. Those cases are now added to the Building Permit card for certificate of occupancy sign-off requirements.



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MEMORANDUM

Educational Program

The Educational Program consists of brochures distribution, signs along streams, “Dump no Waste” markers for storm inlets, “Dump No Waste” storm manhole covers, contracted classes provided to schools by Denver Zoo, booths at public events, website updates, watershed associations memberships, research partnerships, etc. The program has consistently been supporting the following events:

- 1) Adams County Fair Kid’s day
- 2) Annual Barr Lake Clean-up
- 3) Westminster/Thornton/Northglenn Water Festival
- 4) Adams County - Bring your Kid to Work
- 5) Denver Zoo’s water quality classes to 5th graders.

In addition, Adams County is proud to have been participating in the annual Colorado Stormwater Council (CSC) state-wide educational campaign (from Pueblo to Ft Collins). This team effort allowed 80+ jurisdictions to send a unified message, increase length of campaign and platforms, as well as share resources. Adams County led the Spanish radio campaign since 2022 on behalf of CSC.

The County is required to provide educational information about stormwater pollution prevention practices for food related businesses since 2018. In 2024, **208** restaurants, school kitchens and supermarkets in the MS4 area were targeted. This industry has been identified as one business with the highest stormwater pollutant potential. Information has been provided in English and Spanish.



Senior day at the Fair



Water Festival



MineCraft Video created by Youth Prog,

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DISTRICT 1

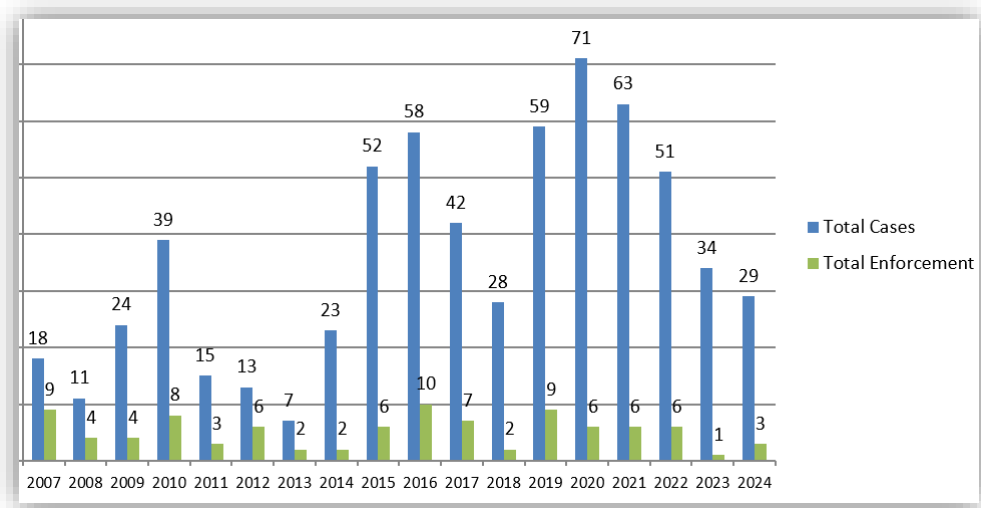
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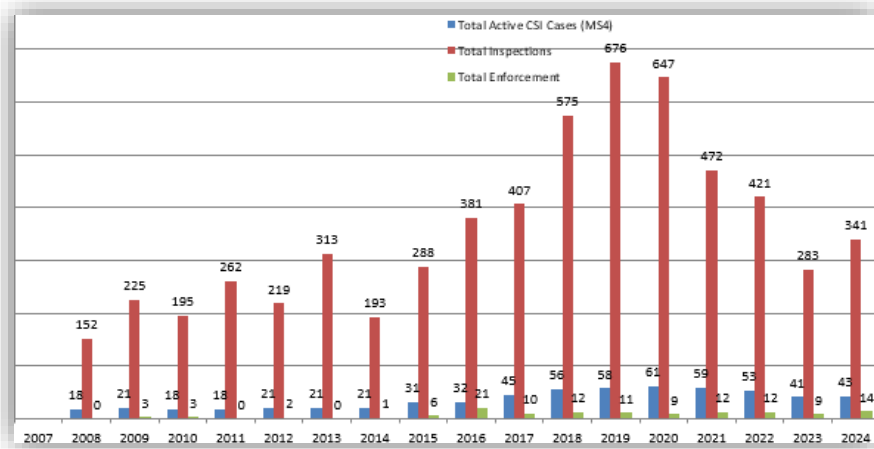
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Illicit Discharge Program



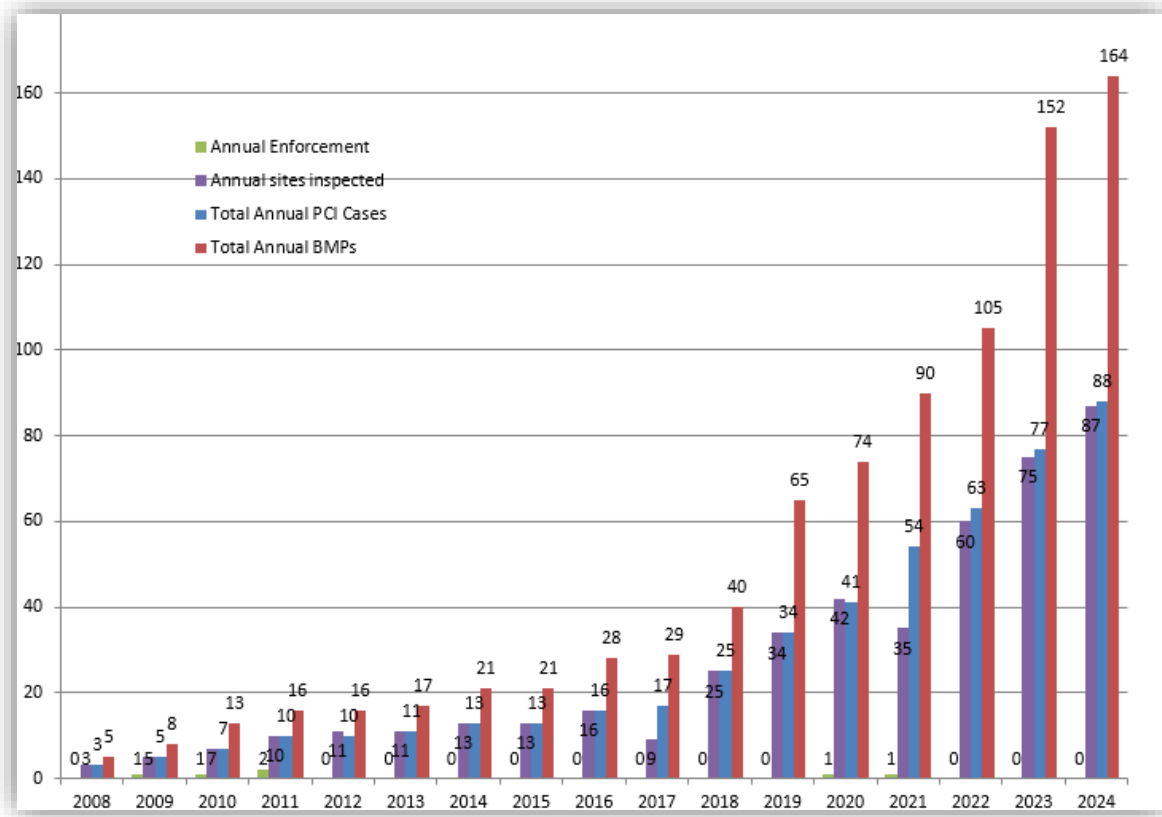
The Stormwater Division responds to illicit discharge complaints trying to find the right balance between education and enforcement actions to comply with Ordinance 11 and Adams County Development Standards and Regulations Chapter 9-05. The Illicit Discharge program is required in the MS4 permitted area, but the County is also implementing this program outside the MS4 area to protect water quality (and the environment) throughout all unincorporated Adams County boundaries.

Construction Program



Sediment is the #1 pollutant of our streams and lakes according to EPA. Erosion from construction sites impacts 8 times more than agricultural practices. Erosion releases sediments which easily bond and act as a carrier of other toxic pollutants during rain events. EPA/CDPHE established stringent requirements for construction sites disturbing 1+ acres. The County's role is to oversee sites in the MS4 area on a regular monthly basis to assist contractors and prevent compliance issues, as opposed to EPA/CDPHE role, which typically end up in major and costly enforcement cases.

Post-Construction Drainage Inspection Program



Since 2008, development projects in the MS4 area which disturbed 1 or more acres have been required to provide water quality treatment. As of 2024, 164 water quality drainage structures have been installed in private/public areas as part of this program. The structures are within 88 development sites in the MS4 area. The County is required to inspect each drainage structure (pond, vault, bioretention, hydrodynamic separator, etc) once every 5 years to ensure property owners (private and public) perform long-term maintenance of these structures. The County strives to inspect all applicable water quality drainage facilities annually, but in 2024 just 87 sites were inspected by the county.

Water quality is typically achieved by the installation of ponds, but the industry is moving towards **Green Infrastructure (GI)**. Rain gardens, sand filters, green roofs, pervious pavers, etc. are new environmentally friendly GI which promotes groundwater infiltration and reduces run-off volume mimicking nature.

House-Keeping Program

Annual stormwater pollution prevention training was provided for county employees that work in the field. In person training was provided in-house. A total of 131 employees attended the training.

