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Stormwater Pollution Prevention Plans/NPDES Permits: Illinois House Bill 4418 Requires Application to Plastic Pellets or Other Preproduction Plastic Materials Manufacturing Facilities

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The Illinois Governor signed on August 7th House Bill 4418 ("HB4418") which amends the Illinois Environmental Protection Act in regard to Clean Water Act National Pollutant Discharge Elimination System ("NPDES") permit requirements addressing stormwater.

The Bill requires that the Illinois Environmental Protection Agency ("IEPA") develop and begin implementation of requirements for a Stormwater Pollution Prevention Plan or other similar best management practice requirements to be included in NPDES permits issued to facilities regulated under certain federal regulations.

The above-referenced program is required to address the control of plastic pellets or other preproduction plastic materials in stormwater runoff from facilities manufacturing these materials.

HB4418 defines preproduction plastic pellets as a pollutant and directs the IEPA to develop and implement stormwater pollution controls that specifically target these materials. Such preproduction plastic pellets are sometimes referred to as "nurdles" and are components of plastics manufacturing.

Proponents of the legislation have argued that nurdles can spill from manufacturing facilities during storage, movement, or plant operations. They express concern that if so, they can enter rivers, lakes, and streams and pose risks to wildlife.

A copy of HB4418 can be found [here](#).