

City of Highland Park Annual Facility Inspection Report

**Illinois Environmental Protection Agency
National Pollutant Discharge Elimination System Phase II**

Permit Year 6: March 2008 to March 2009

City of Highland Park

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Part A. Changes to Best Management Practices

Note: X indicates BMPs performed that were proposed in your NPDES permit
 ✓ indicates changes to BMPs proposed in your NPDES permit

Year 6	
MS4	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
	A.3 Public Service Announcement
X	A.4 Community Event
	A.5 Classroom Education Material
X	A.6 Other Public Education
B. Public Participation/Involvement	
	B.1 Public Panel
	B.2 Educational Volunteer
X	B.3 Stakeholder Meeting
X	B.4 Public Hearing
	B.5 Volunteer Monitoring
	B.6 Program Coordination
X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination	
X	C.1 Storm Sewer Map Preparation
X	C.2 Regulatory Control Program
X	C.3 Detection/Elimination Prioritization Plan
X	C.4 Illicit Discharge Tracing Procedures
X	C.5 Illicit Source Removal Procedures
X	C.6 Program Evaluation and Assessment
X	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
X	C.9 Public Notification
	C.10 Other Illicit Discharge Controls

Year 6	
MS4	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
X	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
X	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
X	F.2 Inspection and Maintenance Program
X	F.3 Municipal Operations Storm Water Control
X	F.4 Municipal Operations Waste Disposal
	F.5 Flood Management/Assess Guidelines
X	F.6 Other Municipal Operations Controls

All Sections

Measurable Goals: Participate in the SMC and APWA-sponsored illicit discharge detection and elimination workshop.

The Lake County SMC prepared an IDDE Guidance Manual for Lake County. Training on this manual and the Watershed Development Ordinance were deferred as these countywide documents were prepared and distributed.

Part B. Status of Compliance with Permit Conditions

The status of BMPs and measurable goals performed in Year 6 is described below.

1. Public Education and Outreach

The City of Highland Park is committing to implementing the Public Education and Outreach component of its Stormwater Management Program. The Public Education and Outreach program includes the distribution of educational material to the community or conducting equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants to storm water runoff. The City of Highland Park commits to implementation of BMPs as described below.

BMP No. A.1: Distributed Paper Material

The SMC develops and distributes a variety of materials related to storm water management in Lake County. A number of pamphlets and brochures related to BMPs and storm water management have been produced. The City of Highland Park makes these publications, at a minimum, available.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review and revise enhanced SMPP template, provided by QLP,
language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. Documents are available at the City of Highland Park Public Works facility for all interested parties. Lake County SMC also sponsors an annual workshop for homeowners associations who are responsible for maintaining detention ponds, swales, wetlands or other natural areas.

BMP No. A.4: Community Event

The City of Highland Park provides a convenient location where the general public can dispose of common household pollutants. Solid Waste Agency of Lake County (SWALCO) holds household waste collection events in various communities throughout Lake County, which assist in collecting waste before it enters the storm sewer system. The City of Highland Park publicizes these SWALCO events.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review and revise enhanced SMPP template, provided by QLP,
language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. There is a SWALCO sponsored electronics-recycling event every Tuesday and Thursday. Residents can dispose of old electronics at the Public Services Campus.

BMP No. A.6: Other Public Education

The City of Highland Park provides additional educational materials to the general public. This is accomplished by periodically including a water quality/storm water section in local newsletter and maintaining links to NPDES II and BMP resources.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review and revise enhanced SMPP template, provided by QLP,
language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template.

2. Public Participation/Involvement

The City of Highland Park is committing to implementing the Public Participation/Involvement component of its Stormwater Management Program. The Public Participation/Involvement program includes attending and publicizing watershed stakeholder meetings, presenting program information at a public meeting at least annually and publicizing IDDE reporting contact numbers. The City of Highland Park commits to implementation of BMPs as described below.

BMP No. B.3: Stakeholder Meeting

Stakeholder meetings are conducted throughout the county for ongoing planning and project implementation efforts. When stakeholder groups (such as watershed planning committees) include the jurisdictional area of the City of Highland Park, the City of Highland Park will publicize stakeholder meetings locally and participate by being represented at the stakeholder meetings.

Measurable Goal(s): Implement current City of Highland Park SMPP.

The City of Highland Park is in the process of revising the SMPP template. Engineering staff has attended meetings of the Municipal Advisory Committee of the Lake County Stormwater Management Commission.

BMP No. B.4: Public Hearing

The City of Highland Park will conduct a public meeting to present each annual report and on its proposed SMPP.

*Measurable Goal(s): Present summary of ongoing program implementation (annual report) at public meeting.
Present enhanced SMPP at end of Year 6 for board review and approval/acceptance.*

BMP No. B.7: Other Public Involvement

The City of Highland Park will maintain and publicize illicit discharge/illegal dumping contact numbers for citizens to report illegal dumping and suspicious discharges.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review and revise enhanced SMPP template, provided by QLP,
language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. Citizens can report illegal dumping or discharges to the Public Works Department.

3. Illicit Discharge Detection and Elimination

The City of Highland Park will implement program activities related to the Illicit Discharge Detection and Elimination (IDDE) minimum control. The requirements of an IDDE program include the following:

- Develop a storm sewer system map that shows the locations of all outfalls and the names and locations of all water of the US that receive discharges from those outfalls.
- Prohibit non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions.
- Develop and implement a plan to detect and address illicit discharges into the storm sewer system.
- Educate public employees, businesses and general public of hazards associated with illegal discharges and improper disposal of waste.
- Identify the appropriate best management practices and measurable goals.

BMP No. C.1: Storm Sewer Map Preparation

The City prepared an outfall map, under the original NOI, to allow for tracking of dry weather flow inspections and outfall maintenance.

*Measurable Goal(s): Maintain and update outfall map.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. The City's GIS maps are continually updated by Public Works field crews and by providing as-builts of capital improvement projects to reflect the current state of the storm sewer system.

BMP No. C.2: Regulatory Control Program

The City of Highland Park adopted ordinance language to prohibit non-storm water discharges to the storm sewer or drainage system, under the original NOI. Additionally, the WDO includes provisions, which prohibit illegal dumping to the storm sewer or drainage system.

Measurable Goal(s): Continue to enforce the ordinances.

The City of Highland Park has adopted an IDDE ordinance in the City Code and continues to enforce it.

BMP No. C.3: Detection/Elimination Prioritization Plan

Implement plan established during original NOI to detect and address illicit discharges. Detection methods include dry-weather screening, regular storm sewer maintenance, and public reporting. Plan will be implemented in accordance with performance milestones established in current SMPP. All outfalls observed to have dry weather flow during pre-screening (pre-screening activities completed during original NOI), to be investigated by the end of Year 8. Complete dry weather screening of all outfalls on a rotating basis with each

outfall being inspected at least once every 5-years. Enhance current plan based on SMPP template and implement plan enhancements.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park has implemented a program to repair or replace leaking sewers and sewer laterals. This program is designed to reduce storm water inflow and infiltration into the City's sanitary sewer system.

BMP No. C.4: Illicit Discharge Tracing Procedures

Implement procedures established during original NOI to trace found/observed illicit discharges to their origin. Efforts to locate illicit discharges will be documented. Enhance current plan based on SMPP template and implement plan enhancements.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template.

BMP No. C.5: Illicit Source Removal Procedures

Implement procedures established during original NOI to remove directly connected illicit discharges (to the extent practicable), identified through the tracing program. Continue to advertise illicit discharge/illegal dumping hotline in local newsletter and track hotline calls. Enhance current plan based on SMPP template and implement plan enhancements.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template.

BMP No. C.6: Program Evaluation and Assessment

Periodically evaluate and assess the IDDE portion of the SMPP. Collaborate and share information about IDDE program and results through MAC.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template.

BMP No. C.7: Visual Dry Weather Screening

Implement dry weather screening program, established during original NOI. Continue screening storm sewer structures as part of regular cleaning and maintenance. Continue to investigate citizen illicit discharge/illegal dumping hotline reports in the field (“reactive investigation”).

Measurable Goal(s): *Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template.

BMP No. C.9: Public Notification

It is anticipated that the enhanced SMPP template may include measures beyond the current program scope.

Measurable Goal(s): *Consider additional language in SMPP template language, and incorporate into program by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template.

4. Construction Site Runoff Control

Lake County has adopted a Watershed Development Ordinance (WDO) that establishes the minimum storm water management requirements for development in Lake County. The WDO, which is enforced by SMC as well as by certified communities in the county, establishes standards for construction site runoff control. The enforcement of the WDO implements BMPs as described below.

BMP No. D.1: Regulatory Control Program

See QLP description (in section E.4 of this document)

Measurable Goal(s): *Enforce WDO.
Administer the Designated Erosion Control Inspector Program as outlined by the WDO.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park adopted the WDO amendments and continues to enforce the WDO, as codified in Article XVIII of the Zoning Code.

BMP No. D.2: Erosion and Sediment Control BMPs

See QLP description (in section E.4 of this document).

Measurable Goal(s): *Enforce WDO.
Implement current City of Highland Park SMPP.*

Review, revise and accept SMPP template language related to this provision by end of Year 6.

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park adopted the WDO amendments and continues to enforce the WDO, as codified in Article XVIII of the Zoning Code.

BMP No. D.3: Other Waste Control Program

See QLP description (in section E.4 of this document).

Measurable Goal(s): Enforce WDO.

Implement current City of Highland Park SMPP.

Review, revise and accept SMPP template language related to this provision by end of Year 6.

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park adopted the WDO amendments and continues to enforce the WDO, as codified in Article XVIII of the Zoning Code.

BMP No. D.4: Site Plan Review Procedures

See QLP description (in section E.4 of this document). Continue to stay in good standing with SMC. Continue to review TAC meeting minutes and provide input as applicable.

Measurable Goal(s): Implement current City of Highland Park SMPP.

Review, revise and accept SMPP template language related to this provision by end of Year 6.

The City of Highland Park is in the process of revising the SMPP template. Members of the Engineering Division review plans for drainage and grading.

BMP No. D.5: Public Information Handling Procedures

See QLP description (in section E.4 of this document). Continue tracking number of complaints received and processed related to soil erosion and sediment control.

Measurable Goal(s): Implement current City of Highland Park SMPP.

Review, revise and accept SMPP template language related to this provision by end of Year 6.

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park continues to maintain a database of complaints received by concerned residents. City staff keeps this database updated with any changes to the status of the complaints.

BMP No. D.6: Site Inspection/Enforcement Procedures

See QLP description (in section E.4 of this document). Continue current inspection and enforcement efforts.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park conducts regular jobsite inspections of both private and City funded jobs.

5. Post-Construction Runoff Control

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum storm water management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or redevelopment resulting in over 0.5 acres of new impervious area. The enforcement of the WDO implements BMPs as described below.

BMP No. E.2: Regulatory Control Program

See QLP description (in section E.4 of this document).

*Measurable Goal(s): Enforce WDO.
Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park adopted the WDO amendments and continues to enforce the WDO, as codified in Article XVIII of the Zoning Code.

BMP No. E.3: Long Term O&M Procedures

See QLP description (in section E.4 of this document). Continue existing village inspection program of detention facilities.

*Measurable Goal(s): Enforce WDO.
Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park adopted the WDO amendments and continues to enforce the WDO, as codified in Article XVIII of the Zoning Code.

BMP No. E.4: Pre-Construction Review of BMP Designs

See QLP description (in section E.4 of this document).

*Measurable Goal(s): Enforce WDO.
Implement current City of Highland Park SMPP.*

Review, revise and accept SMPP template language related to this provision by end of Year 6.

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park adopted the WDO amendments and continues to enforce the WDO, as codified in Article XVIII of the Zoning Code.

BMP No. E.5: Site Inspections during Construction

See QLP description (in section E.4 of this document).

Measurable Goal(s): Enforce WDO.

Implement current City of Highland Park SMPP.

Review, revise and accept SMPP template language related to this provision by end of Year 6.

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park adopted the WDO amendments and continues to enforce the WDO, as codified in Article XVIII of the Zoning Code.

BMP No. E.6: Post-Construction Inspections

See QLP description (in section E.4 of this document).

Measurable Goal(s): Enforce WDO.

Implement current City of Highland Park SMPP.

Review, revise and accept SMPP template language related to this provision by end of Year 6.

The City of Highland Park is in the process of revising the SMPP template. The City of Highland Park adopted the WDO amendments and continues to enforce the WDO, as codified in Article XVIII of the Zoning Code.

6. Pollution Prevention/Good Housekeeping

This portion of the program involves the implementation of the operation and maintenance program to reduce the discharge of pollutants from municipal operations and a training program for municipal employees. The City of Highland Park commits to implementation of BMPs as described below.

BMP No. F.1: Employee Training Program

Implement training program for municipal employees. SMC, the Qualifying Local Program, will serve as a clearinghouse of these materials.

Measurable Goal(s): Implement current City of Highland Park SMPP.

Review, revise and accept SMPP template language related to this provision by end of Year 6.

BMP No. F.2: Inspection and Maintenance Program

The Pollution Prevention/Good Housekeeping program includes measures to reduce the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems. Clean, correct, or otherwise address identified storm and sanitary sewer trouble areas.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

BMP No. F.3: Municipal Operations Storm Water Control

The program identifies where maintenance and washing of the City of Highland Park fleet is done, how lubricant and oil spills are handled, how/where road salt and chemicals are stored, etc.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

The City of Highland Park is in the process of revising the SMPP template. All municipal operations are regularly inspected for compliance with Article XVIII of the Zoning Code and the IDDE ordinance.

BMP No. F.4: Municipal Operations Waste Disposal

The program helps ensure a reduction in the amount and type of pollution that results from waste disposal operations, such as separate storm sewer systems, roads and parking lots, maintenance and storage yards (including salt/sand storage and snow disposal areas), and waste transfer stations.

*Measurable Goal(s): Implement current City of Highland Park SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

BMP No F.6: Other Municipal Operations Control

It is anticipated that the enhanced SMPP template may include measures beyond the current program scope.

Measurable Goal(s): Consider additional language in SMPP template language, and incorporate into program by end of Year 6.

Part C. Information and Data Collection Results

Year 6 activities related to illicit discharge detection and elimination consisted primarily of program planning efforts. Therefore, no information or data was collected during this period.

Part D. Summary of Year 7 Stormwater Activities

The following table summarizes the BMPs committed to for Year 7. Specific BMPs and measurable goals for Year 7 Stormwater Management Program development activities are presented in the sections following the table.

Note: X indicates BMPs committed to for Year 7.

Year 7	
MS4	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
	A.3 Public Service Announcement
X	A.4 Community Event
	A.5 Classroom Education Material
X	A.6 Other Public Education
B. Public Participation/Involvement	
	B.1 Public Panel
	B.2 Educational Volunteer
X	B.3 Stakeholder Meeting
X	B.4 Public Hearing
	B.5 Volunteer Monitoring
	B.6 Program Coordination
X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination	
X	C.1 Storm Sewer Map Preparation
X	C.2 Regulatory Control Program
X	C.3 Detection/Elimination Prioritization Plan
X	C.4 Illicit Discharge Tracing Procedures
X	C.5 Illicit Source Removal Procedures
X	C.6 Program Evaluation and Assessment
X	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
X	C.9 Public Notification
	C.10 Other Illicit Discharge Controls

Year 7	
MS4	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
X	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
X	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
X	F.2 Inspection and Maintenance Program
X	F.3 Municipal Operations Storm Water Control
X	F.4 Municipal Operations Waste Disposal
	F.5 Flood Management/Assess Guidelines
X	F.6 Other Municipal Operations Controls

The QLP provided a Stormwater Management Program Plan (SMPP) template in December 2008. The QLP is in the process of enhancing this SMPP template to improve compliance with the new ILR40 permit requirements. The revised SMPP template is anticipated to be available in August 2009. The QLP is also in the process of creating three tracking forms describing the commitments in the revised SMPP template (annual, as needed, and on going). Use of the tracking forms should demonstrate that the measurable goals in the SMPP are implemented. The City of Highland Park will review and revise an enhanced SMPP and implement related tracking forms in Year 7.

1. Public Education and Outreach

The MS4 is committing to implementing the Public Education and Outreach component of its Stormwater Management Program Plan. The Public Education and Outreach program includes the distribution of educational material to the community or conducting equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants to stormwater runoff, supporting classroom education, supporting storm drain stenciling efforts and, supporting SWALCO events.

Measurable Goal(s): Implement, and track progress, of BMPs as described in the SMPP. Enhance SMPP, based on recommendations from the QLP if any, for compliance with the 2009 ILR40 permit conditions.

2. Public Participation/Involvement

The MS4 is committing to implementing the Public Participation/Involvement component of its Stormwater Management Program Plan. The Public Participation/Involvement program includes the process for receiving citizen input, attending and publicizing stakeholder meetings, presenting program information at a public meeting at least annually and publicizing IDDE reporting contact numbers.

Measurable Goal(s): Implement, and track progress, of BMPs as described in the SMPP. Enhance SMPP, based on recommendations from the QLP if any, for compliance with the 2009 ILR40 permit conditions.

3. Illicit Discharge Detection and Elimination

The MS4 will implement program activities related to the Illicit Discharge Detection and Elimination (IDDE) minimum control. The requirements of an IDDE program include the following:

- Maintain a storm sewer system map that shows the locations of all outfalls and the names and locations of all water of the US that receive discharges from those outfalls.
- Prohibit non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions.
- Implement the illicit discharge detection and elimination portions of the SMPP.
- Educate public employees, businesses and general public of hazards associated with illegal discharges and improper disposal of waste.

Measurable Goal(s): Implement, and track progress, of BMPs as described in the SMPP. Enhance SMPP, based on recommendations from the QLP if any, for compliance with the 2009 ILR40 permit conditions.

4. Construction Site Runoff Control

Lake County has adopted a Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County. The WDO, which is enforced by the MS4, establishes standards for construction site runoff control.

*Measurable Goal(s): Implement, and track progress, of BMPs as described in the SMPP.
Enforce WDO.
Enhance SMPP, based on recommendations from the QLP if any, for compliance with the 2009 ILR40 permit conditions.*

5. Post-Construction Runoff Control

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum stormwater management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or redevelopment resulting in over 0.5 acres of new impervious area. The Stormwater Management Program Plan also includes inspection procedures for pre-WDO developments, stream banks/shorelines, streambeds, and detention/retention ponds.

*Measurable Goal(s): Implement, and track progress, of BMPs as described in the SMPP.
Enforce WDO.
Enhance SMPP, based on recommendations from the QLP if any, for compliance with the 2009 ILR40 permit conditions.*

6. Pollution Prevention/Good Housekeeping

This portion of the program involves the implementation of the operation and maintenance program to reduce the discharge of pollutants from municipal operations and a training program for municipal employees.

*Measurable Goal(s): Implement, and track progress, of BMPs as described in the SMPP.
Enhance SMPP, based on recommendations from the QLP if any, for compliance with the 2009 ILR40 permit conditions.*

Part E. Notice of Qualifying Local Program

The Lake County Stormwater Management Commission (SMC) will serve as a Qualifying Local Program (QLP) for MS4s in Lake County. As outlined in the General Permit, SMC will perform functions related to each of the six minimum control measures. **As part of the second NOI, SMC created a SMPP template that can be reviewed and revised by each MS4, to enhance their existing program.** Part E of the Annual Report, which outlines the activities performed by SMC as the Qualifying Local Program, consists of the following five subparts:

- **Part E1** summarizes and describes any changes to Best Management Practices (BMPs) originally outlined for Year 5 in the General Permit.
- **Part E2** describes the status of BMPs and measurable goals performed in Year 5.
- **Part E3** provides the results of information or data collected during Year 5.
- **Part E4** describes BMPs and measurable goals for the program for Year 6.
- **Part E5** lists the construction projects funded by the QLP during Year 5 of the permit.

Part E1. Changes to Best Management Practices

Note: X indicates BMPs performed that were proposed in your NPDES permit
 ✓ indicates changes to BMPs proposed in your NPDES permit

Year 6	
QLP	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
X	A.3 Public Service Announcement
X	A.4 Community Event
X	A.5 Classroom Education Material
X	A.6 Other Public Education
B. Public Participation/Involvement	
X	B.1 Public Panel
	B.2 Educational Volunteer
X	B.3 Stakeholder Meeting
	B.4 Public Hearing
	B.5 Volunteer Monitoring
X	B.6 Program Coordination
X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination	
X	C.1 Storm Sewer Map Preparation
X	C.2 Regulatory Control Program
X	C.3 Detection/Elimination Prioritization Plan
X	C.4 Illicit Discharge Tracing Procedures
X	C.5 Illicit Source Removal Procedures
X	C.6 Program Evaluation and Assessment
X	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
X	C.9 Public Notification
X	C.10 Other Illicit Discharge Controls

Year 6	
QLP	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
X	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
X	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
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X	F.2 Inspection and Maintenance Program
X	F.3 Municipal Operations Storm Water Control
X	F.4 Municipal Operations Waste Disposal
X	F.5 Flood Management/Assess Guidelines
X	F.6 Other Municipal Operations Controls

Part E2. Status of Compliance with Permit Conditions

The Lake County Stormwater Management Commission (SMC) will serve as a Qualifying Local Program for MS4s in Lake County. As part of ongoing services, SMC will perform functions related to each of the six minimum control measures. The status of BMPs and measurable goals performed in Year 5 are described below.

1. Public Education and Outreach

A.1 Distributed Paper Material

Measurable Goals: Distribute informational materials from “take away” rack at SMC. Upon request, distribute materials directly to municipalities for local distribution. Recommend measures to address this BMP in SMPP template.

Various NPDES II related information is available on SMC’s “take away” rack and on its website. This information is distributed to MS4s through mail-outs and in PDF format for use on MS4 websites. SMPP template completed and distributed in December 2008.

A.3 Public Service Announcement

Measurable Goals: Include public service announcement highlighting community accomplishments related to the NPDES Phase II process in “Mainstream” once annually. Post watershed identification signage with LCDOT.

One article was featured in “Mainstream” on local MS4 activities. Watershed planning signs are located throughout the county.

A.4 Community Event

Measurable Goals: Conduct or Co-sponsor workshop on NPDES related topic. Recommend measures to address this BMP in SMPP template

A Workshop for Homeowners Associations on Maintenance Techniques or Practices for Subdivision Drainage Systems was held on July 14, 2008. SMPP template completed and distributed in December 2008.

BMP No. A.5: Classroom Education

Measurable Goals: Develop and compile information for stormwater educational kit for distribution upon request. Provide materials and training on storm sewer inlet stenciling kits to teachers upon request.

No educational materials were requested.

A.6 Other Public Education

Measurable Goals: Maintain and update the NPDES Phase II portion SMC website with resource materials such as model ordinances, case studies and brochures and web links

Recommend measures to address this BMP in SMPP template.

As information becomes available, it is posted and/or distributed to MS4s. SMPP template completed and distributed in December 2008.

2. Public Participation/Involvement

B.1 Public Panel

*Measurable Goals: -Provide notice of public meetings on SMC website.
-Track number of meetings conducted.*

Notice of all public meetings was provided by SMC on their website's calendar of events. SMC tracked the number of Stormwater Management Committee Board meetings, Technical Advisory Committee (TAC) meetings, and Watershed Management Board (WMB) meetings held during the 2008 fiscal year. According to records, there were 10 SMC meetings, 11 TAC meetings, and one WMB meeting conducted during this period.

B.3 Stakeholder Meeting

*Measurable Goals: Provide notice of stakeholder meetings on SMC website.
Track number of watershed planning committee meetings conducted.
Establish watershed planning committees for each new watershed planning effort.
Recommend measures to address this BMP in SMPP template*

Notice of all stakeholder meetings was provided by SMC on their website's calendar of events. SMC tracked the number of stakeholder meetings for the various committees held during the 2008 fiscal year. The list below provides the stakeholder meeting and number of occurrences during the 2008 fiscal year:

North Branch Ecosystem Partnership BMP Selection Committee –0

North Branch Planning Committee – 4

Indian Creek –1

Bull's Brook/Bull Creek – 2

Dead River/Kellogg Creek- 2

SMPP template completed and distributed in December 2008.

B.6 Program Coordination

*Measurable Goals: Track number of MAC meetings conducted during Year 6.
Prepare draft report on Qualifying Local Program activities at end of Year 6.*

Five Municipal Advisory Committee (MAC) meetings were held during Year 6 of the permit. The status of QLP activities at the end of Year 6 is provided in Part E2 of the Annual Facility Inspection Report (Annual Report) for each BMP which SMC committed to in the General Permit. The QLP measurable goals for Year 7 are in Part E4 of the Annual Report.

BMP No. B.7: Other Public Involvement

Measurable Goals: Recommend measures to address this BMP in SMPP template, if appropriate.

SMPP template completed and distributed in December 2008.

3. Illicit Discharge Detection and Elimination

BMP No. C.1: Storm Sewer Map Preparation

Measurable Goals: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

BMP No. C.2: Regulatory Control Program

Measurable Goal: Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

BMP No. C.3: Detection/Elimination Prioritization Plan

Measurable Goals: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

BMP No. C.4: Illicit Discharge Tracing Procedures

Measurable Goals: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

BMP No. C.5: Illicit Source Removal Procedures

Measurable Goals: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

BMP No. C.6: Program Evaluation and Assessment

Measurable Goals: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

BMP No. C.7: Visual Dry Weather Screening

Measurable Goals: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

BMP No. C.9: Public Notification

Measurable Goals: Recommended measures to address this BMP may be included in the SMPP template.

SMPP template completed and distributed in December 2008.

4. Construction Site Runoff Control

D.1 Regulatory Control Program

*Measurable Goals: Continue to enforce the countywide WDO.
Initiate and administer the Designated Inspector Program as outlined by the WDO.
Recommend measures to address this BMP in SMPP template.*

SMC continues to enforce the countywide WDO. DECI program implemented and administered. SMPP template completed and distributed in December 2008.

D.2 Erosion and Sediment Control BMPs

*Measurable Goal: Continue to enforce the countywide WDO.
Complete TRM updates, approve and publicize final TRM.
Recommend measures to address this BMP in SMPP template.*

SMC continues to enforce the countywide WDO. TRM update process is still ongoing. Sections 1, 2, 5 and 7 have been approved and are available for download off the SMC website. SMPP template completed and distributed in December 2008.

D.3 Other Waste Control Program

*Measurable Goal: Enforce WDO provisions regarding the control of waste and debris at construction sites.
Recommend measures to address this BMP in SMPP template.*

SMC continues to enforce the countywide WDO. SMPP template completed and distributed in December 2008.

BMP No. D.4: Site Plan Review Procedures

*Measurable Goals: Track number of enforcement officers who have passed the exam.
Track number of communities that undergo a performance review.
Complete Ordinance Administration Chapter of TRM.
Recommend measures to address this BMP in SMPP template.*

There are currently 60 EOs who have passed the EO exam. No communities underwent a performance review during the 2008 fiscal year. Chapter 7 of the TRM, Ordinance Administration, was completed and approved.

SMPP template completed and distributed in December 2008.

BMP No. D.5: Public Information Handling Procedures

Measurable Goal: Track number of complaints received and processed related to soil erosion and sediment control.

Recommend measures to address this BMP in SMPP template.

Five SE/SC complaints were received and processed. SMPP template completed and distributed in December 2008.

BMP No. D.6: Site Inspection/Enforcement Procedures

Measurable Goals: Track number of site inspections conducted by SMC.

Recommend measures to address this BMP in SMPP template.

Between March 2008 and March 2009, approximately 729 site inspections were conducted. SMPP template completed and distributed in December 2008.

5. Post-Construction Runoff Control

BMP No. E.2: Regulatory Control Program

Measurable Goal: Continue to enforce the countywide WDO.

Recommend measures to address this BMP in SMPP template.

SMC continues to enforce the countywide WDO. Approximately 27 violation notifications were resolved successfully between March 2008 and March 2009. SMPP template completed and distributed in December 2008.

BMP No. E.3: Long Term O&M Procedures

Measurable Goal: Continue to enforce the countywide WDO.

Recommend measures to address this BMP in SMPP template.

SMC continues to enforce the countywide WDO. SMPP template completed and distributed in December 2008.

BMP No. E.4: Pre-Construction Review of BMP Designs

Measurable Goal: Continue to enforce the countywide WDO.

Recommend measures to address this BMP in SMPP template.

SMC continues to enforce the countywide WDO. SMPP template completed and distributed in December 2008.

BMP No. E.5: Site Inspections during Construction

Measurable Goal: Continue to enforce the countywide WDO.

Recommend measures to address this BMP in SMPP template.

SMC continues to enforce the countywide WDO. SMPP template completed and distributed in December 2008.

BMP No. E.6: Post-Construction Inspections

*Measurable Goal: Continue to enforce the countywide WDO.
Recommend measures to address this BMP in SMPP template.*

**SMC continues to enforce the countywide WDO.
SMPP template completed and distributed in December 2008.**

BMP No. E.7: Other Post-Construction Runoff Controls

*Measurable Goals: Conduct annual WMB meeting.
Contribute funding to flood reduction and water quality improvement projects, including BMP retrofits, through the WMB.*

The annual WMB meeting was held on December 11, 2008. There were 13 BMP construction projects approved for WMB funding. Part E5 contains a list of ongoing construction projects through the WMB program.

6. Pollution Prevention/Good Housekeeping

BMP No. F.1: Employee Training Program

*Measurable Goal: Provide list of available resources to MS4s.
Provide employee training workshops.
Include training recommendations in SMPP template.*

SMC continually passes along information on training opportunities and resources to MS4's. Two training workshops are scheduled for Year 7. SMPP template completed and distributed in December 2008.

BMP No. F.2: Inspection and Maintenance Program

Measurable Goal: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

BMP No. F.3: Municipal Operations Storm Water Control

Measurable Goal: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

BMP No. F.4: Municipal Operations Waste Disposal

Measurable Goal: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

BMP No. F.5: Flood Management/Assess Guidelines

Measurable Goal: Track number of projects that are reviewed for multi-objective opportunities.

There were 24 SMC sponsored multi-objective projects reviewed.

BMP No. F.6: Other Municipal Operations Control

Measurable Goal: Recommend measures to address this BMP in SMPP template.

SMPP template completed and distributed in December 2008.

Part E3. Information and Data Collection Results

Year 6 activities consisted primarily of permit program planning efforts. Therefore, no information or monitoring data was collected during this period.

Part E4. Summary of Year 6 Stormwater Activities

The table shown below summarizes the BMPs committed to for Year 7. Specific BMPs and measurable goals for Year 7 program development activities are presented in the sections following the table.

Note: X indicates BMPs committed to for Year 7.

Year 7	
QLP	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
X	A.3 Public Service Announcement
X	A.4 Community Event
X	A.5 Classroom Education Material
X	A.6 Other Public Education
B. Public Participation/Involvement	
X	B.1 Public Panel
	B.2 Educational Volunteer
X	B.3 Stakeholder Meeting
	B.4 Public Hearing
	B.5 Volunteer Monitoring
X	B.6 Program Coordination
	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination	
	C.1 Storm Sewer Map Preparation
X	C.2 Regulatory Control Program
	C.3 Detection/Elimination Prioritization Plan
	C.4 Illicit Discharge Tracing Procedures
	C.5 Illicit Source Removal Procedures
	C.6 Program Evaluation and Assessment
	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
	C.9 Public Notification
X	C.10 Other Illicit Discharge Controls

Year 7	
QLP	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
X	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
X	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
X	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
X	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
	F.2 Inspection and Maintenance Program
	F.3 Municipal Operations Storm Water Control
	F.4 Municipal Operations Waste Disposal
X	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls

SMC has committed to revising the Stormwater Management Program Plan (SMPP) template completed in Year 6 to address new requirements in the ILR40 General Permit effective April 1, 2009. The SMPP describes QLP commitments related to the program. SMC will create three tracking forms describing the commitments in the SMPP (annual, as needed, and on going) for the use of the MS4s. It is anticipated that the tracking forms will be used during Year 7 by the MS4 to demonstrate that their measurable goals are implemented.

1. Public Education and Outreach

A.1 Distributed Paper Material

The SMC develops and distributes a variety of materials related to stormwater management in Lake County. A number of pamphlets and brochures related to BMPs and stormwater management have been produced. SMC prepares a quarterly newsletter, "Mainstream" as well as an Annual Report that highlights the stormwater management activities in Lake County. SMC also prepares Project Fact Sheets that provide information on ongoing and recently completed stormwater management projects. SMC will develop or collaborate on manuals or manual updates related to stormwater management.

Measurable Goals: Distribute informational materials from "take away" rack at SMC. Upon request, distribute materials directly to municipalities for local distribution.

A.3 Public Service Announcement

A public service announcement related to the NPDES Phase II program will be written and included in the Quarterly Newsletter, "Mainstream." SMC will coordinate with Lake County Department of Transportation (LCDOT) to post watershed identification signage in watersheds where watershed planning activities occur.

Measurable Goals: Include public service announcement highlighting community accomplishments related to the NPDES Phase II process in "Mainstream" once annually. Post watershed identification signage with LCDOT.

A.4 Community Event

The SMC sponsors technical training and public awareness workshops. SMC and the local APWA chapter will co-sponsor a workshop on management practices to protect water quality.

Measurable Goals: Conduct or Co-sponsor workshop on NPDES related topic.

BMP No. A.5: Classroom Education

The SMC will contribute to the development and compilation of a stormwater educational material kit for local teachers.

*Measurable Goals: Develop and compile information for stormwater educational kit for distribution upon request.
Provide materials and training on storm sewer inlet stenciling kits to teachers upon request.*

A.6 Other Public Education

The SMC operates a website that provides many resources for citizens, developers, engineers, and municipalities. The website includes pages such as “Citizens Assistance”, “Watershed Planning”, “Projects”, “Best Management Practices”, “Publications”, “Press Releases” and “Links.” These pages provide notices of upcoming meetings and ongoing projects, allow for download of many SMC documents, and provide links to other NPDES II and BMP resources.

Measurable Goals: Maintain and update the NPDES Phase II portion SMC website with resource materials such as model ordinances, case studies and brochures.

2. Public Participation/Involvement

The SMC will support Lake County MS4s by performing activities and services related to the Public Participation/Involvement minimum control measure.

B.1 Public Panel

The SMC coordinates and conducts public meetings and committee meetings that include public representation. A monthly Stormwater Management Commission meeting is open to the public and includes the SMC Board of Commissioners, which includes six municipal representatives and six county board members.

The Technical Advisory Committee (TAC) was started in 1992 to assist in the development, revision and review of the Watershed Development Ordinance (WDO) standards and administrative procedures. TAC is made up of representatives from the development, environmental, municipal and consultant engineering fields. TAC meetings are held monthly or on an as-needed basis.

The Municipal Advisory Committee (MAC) is made up of municipal, township, drainage district, consulting and county representatives. The MAC will continue to meet as needed during the implementation of the NPDES Phase II stormwater management program.

The Watershed Management Boards (WMBs) meet yearly to make recommendations on BMP project funding. Members include chief municipal elected officials, township supervisors, drainage district chairs, and county board members from each district within the boundaries of the watersheds.

*Measurable Goals: Provide notice of public meetings on SMC website.
Track number of meetings conducted.*

B.3 Stakeholder Meeting

The SMC is actively involved in watershed planning throughout Lake County. SMC believes that the watershed planning process cannot happen and will not be successful without the input, interest and commitment of stakeholders. Stakeholders may include municipalities, townships, drainage districts, homeowner associations, developers, county agencies, lakes management groups, landowners and local, state and federal agencies.

*Measurable Goals: Provide notice of stakeholder meetings on SMC website.
Track number of watershed planning committee meetings conducted.
Establish watershed planning committees for each new watershed planning effort.*

B.6 Program Coordination

The Countywide Approach to NPDES Phase II Permitting Summary identifies the role of SMC as a Qualifying Local Program. The SMC proactively formed the Municipal Advisory Committee (MAC) to facilitate coordination of the NPDES Phase II stormwater program in Lake County. SMC also prepared a presentation that can be used by municipal representatives to inform their board members about the NPDES II program and how it will be implemented in Lake County through existing local resources and programs. SMC will continue to coordinate the program and provide guidance for the regulated MS4s by continuing to facilitate MAC meetings through the program implementation phase. SMC will prepare a draft report on the Qualifying Local Program activities and provide guidance to MS4s in preparing their annual reports.

*Measurable Goals: Track number of MAC meetings conducted during Year 7.
Prepare draft report on Qualifying Local Program activities at end of Year 7.*

3. Illicit Discharge Detection and Elimination

MS4s are required to perform activities related to the Illicit Discharge Detection and Elimination (IDDE) minimum control.

BMP No. C.2: Regulatory Control Program

The SMC provided model ordinance examples for MS4s to consider at the local level. The model ordinance language will prohibit non-storm water discharges to the storm sewer or drainage system. Additionally, the WDO includes provisions, which prohibit illegal dumping to the storm sewer or drainage system.

Measurable Goal: Continue to enforce the countywide WDO.

BMP No. C.10: Other Illicit Discharge Controls

Measurable Goal: Host and track number of attendees at the Illicit Discharge Detection and Elimination Training Workshop

4. Construction Site Runoff Control

Lake County has adopted a Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County. The WDO, which is enforced by SMC as well as by certified communities in the county, establishes standards for construction site runoff control. The enforcement of the WDO, in conjunction with other SMC activities and functions implements BMPs, as described below.

D.1 Regulatory Control Program

The WDO has been adopted as the regulatory mechanism to require erosion and sediment controls for construction activities in Lake County. The soil erosion and sedimentation control performance standards are included in Article IV, Section B.1.j. of the WDO. At a minimum, these standards apply to any development that hydrologically disturbs 5,000 square feet or more.

SMC initiated a Designated Erosion Control Inspector (DECI) Program, which originated out of an assessment of WDO implementation during the original NOI period. The purpose of the DECI program is to facilitate positive communication between the permit issuing agency or community and the permit holder by creating a single point of contact for soil erosion/sediment control issues with the idea that it is easier to prevent soil erosion and sediment control problems than it is to correct them after they have occurred. Further, the program is intended to improve site conditions, minimize environmental impacts, and educate contractors/developers/inspectors about proper soil erosion/sediment control Best Management Practices. The DECI program was designed to mirror the inspection requirements of the IEPA NPDES Phase II permit (for individual construction sites).

*Measurable Goals: Continue to enforce the countywide WDO.
Administer the Designated Inspector Program as outlined by the WDO.
Revise WDO to be consistent with new ILR10 permit conditions.*

D.2 Erosion and Sediment Control BMPs

Article IV, Section B.1.j of the WDO specifies the required soil erosion and sediment control measures for any land disturbance activity. This section of the WDO includes 15 requirements for soil erosion and sediment control measures including: minimize soil disturbance; protect adjoining properties from erosion and sedimentation; complete installation of soil erosion and sediment control features prior to commencement of hydrologic disturbance; stabilize disturbed areas within 14 days of active disturbance; avoid disturbance of streams and when possible, size measures appropriate to the amount of tributary drainage area; protect functioning storm sewers from sediment; prevent sediment from being tracked onto adjoining streets; limit earthen embankments to slopes of 3H:1V; identify soil stockpile areas; and utilize statewide standards and specifications as guidance for soil erosion and sediment control.

The SMC has also prepared the Technical Reference Manual (TRM) for the WDO. The TRM is used to guide compliance with the WDO and provides detailed information on soil erosion and sedimentation control BMPs. The TRM is currently being updated and expanded to include BMP guidance chapters on Wetland Areas, Public Roadways, and Ordinance Administration and Enforcement.

*Measurable Goal: Continue to enforce the countywide WDO.
Complete TRM updates, approve and publicize final TRM.
Revise WDO to be consistent with new ILR10 permit conditions.*

D.3 Other Waste Control Program

The WDO includes provisions regarding the control of waste and debris at construction sites.

Measurable Goal: Enforce WDO provisions regarding the control of waste and debris at construction sites.

BMP No. D.4: Site Plan Review Procedures

Within each jurisdiction, one of the primary duties of the enforcement officer is to review all Watershed Development Applications and issue permits for those projects that comply with the provisions of the WDO. SMC provides training for all new enforcement officers and enforcement officers must pass an exam in order to be certified. SMC periodically reviews all certified communities' Ordinance enforcement records and performance. Ongoing updates to the TRM include the addition of sections that discuss Ordinance Administration and Enforcement.

*Measurable Goals: Track number of enforcement officers who have passed the exam.
Track number of communities that undergo a performance review.
Complete Ordinance Administration Chapter of TRM.*

BMP No. D.5: Public Information Handling Procedures

The SMC provides a number of opportunities for receipt and consideration of information submitted by the public. The Citizen Inquiry Response System (CIRS) documents and tracks the resolution of reported problems and citizen complaints. SMC's website provides information on "Who to call" for various problems or concerns. An Interagency Coordination Agreement between SMC and the U.S. Army Corps of Engineers, the Lake County Soil and Water Conservation District and the National Resources Conservation Service specifies that if any of these agencies receive a report of a soil erosion and sediment control issue, they will contact SMC. SMC will then investigate the report and prescribe corrective action to the property owner or coordinate with the certified community to find a solution.

Measurable Goal: Track number of complaints received and processed related to soil erosion and sediment control.

BMP No. D.6: Site Inspection/Enforcement Procedures

Article VI of the WDO provides both the recommended and the minimum requirements for site inspection. The enforcement officers within each certified community must conduct site

inspections. SMC has direct responsibility for non-certified communities, LCDOT, and the Lake County Forest Preserve. Article VII of the WDO specifies the penalties and legal action that may be imposed if the WDO is violated. If a construction site does not comply with the requirements of the WDO, the jurisdictional enforcement officer may issue a stop work order on all development activity on the subject property or on the portion of the activity in direct violation of the WDO. In addition, failure to comply with any of the requirements of the WDO constitutes a violation, and any person convicted thereof may be fined.

Measurable Goals: Track number of site inspections conducted by SMC.

5. Post-Construction Runoff Control

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum stormwater management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or redevelopment that results in over 0.5 acres of new impervious area. The enforcement of the WDO, in conjunction with other SMC activities and functions, implements the BMPs, as described below.

BMP No. E.2: Regulatory Control Program

The WDO requires that all applicants adopt a stormwater management strategy for controlling post-construction runoff. The applicant must develop a stormwater management strategy that minimizes the increase in runoff volumes and rates and addresses the water quality treatment requirements of the WDO. The proposed drainage plan must use the runoff reduction hierarchy in the WDO and implement BMPs as presented in the TRM. The WDO also requires the use of buffers when adjacent to existing water bodies.

Measurable Goal: Continue to enforce the countywide WDO.

BMP No. E.3: Long Term O&M Procedures

The WDO requires that a maintenance plan be prepared for all stormwater management system components for Major developments (as defined by the WDO). Enforcement officers may require maintenance plans to be prepared for all development sites that require a NPDES permit. The maintenance plan must include: maintenance tasks; the party responsible for performing the maintenance tasks; a description of all permanent public or private access maintenance easements and overland flow paths, and compensatory storage areas; and a description of dedicated sources of funding for the required maintenance. The TRM includes a sample maintenance plan. The Ordinance also requires that all stormwater management systems be located and described within a deed or plat restriction to ensure perpetuity and access for maintenance.

Measurable Goal: Continue to enforce the countywide WDO.

BMP No. E.4: Pre-Construction Review of BMP Designs

Within each jurisdiction, one of the primary duties of the enforcement officer is to review all Watershed Development Applications and issue permits for those projects that comply with

the provisions of the WDO. This includes a review of the proposed BMPs for post-construction runoff control.

Measurable Goal: Continue to enforce the countywide WDO.

BMP No. E.5: Site Inspections during Construction

Article VI of the WDO provides both the recommended and the minimum requirements for site inspection. The enforcement officers for each certified community must conduct these inspections. Enforcement officers may inspect site development at any stage in the construction process. For major developments, the enforcement officer shall conduct site inspections, at a minimum, upon completion of installation of sediment and runoff control measures and after final stabilization and landscaping, prior to removal of sediment controls.

Measurable Goal: Continue to enforce the countywide WDO.

BMP No. E.6: Post-Construction Inspections

(See description of the inspection program provided under E.5)

Measurable Goal: Continue to enforce the countywide WDO.

BMP No. E.7: Other Post-Construction Runoff Controls

Through the Watershed Management Board (WMB), SMC reviews and partially funds projects related to drainage and water quality improvements. The WMB representing the Lake Michigan, North Branch of the Chicago River, Fox and Des Plaines watersheds – meets yearly to make recommendations on project funding. Members include chief municipal elected officials, township supervisors, drainage district chairs, and county board members from each district within the boundaries of the watershed. The goal of the WMB is to maximize opportunities for local units of government and other groups to have input and influence in local stormwater management problem solving. Projects have improved quality of water in streams and swales, and have enhanced stormwater facilities.

*Measurable Goals: Conduct annual WMB meeting.
Contribute funding to water quality improvement projects, including BMP retrofits, through the WMB.*

6. Pollution Prevention/Good Housekeeping

This minimum control measure involves the development and implementation of an operation and maintenance program to reduce the discharge of pollutants from municipal operations and an associated training program.

BMP No. F.1: Employee Training Program

The SMC will assist MS4s in developing programs for F.1 by incorporating recommended actions into the SMPP template. Additionally, SMC will serve as technical advisors, as a clearinghouse of information related to employee training BMPs, and periodically offer training programs.

*Measurable Goal: Provide list of available resources to MS4s.
Provide ILR-10 and ILR-40 Training Workshop.
Purchase and make available the Excal Visual Municipal Storm Water
Pollution Prevention Storm Watch Everyday Best Management Practices
Software.*

BMP No. F.5: Flood Management/Assess Guidelines

By adopted policy in the Lake County Stormwater Management Plan, SMC's standard operating procedure is to assess the feasibility of implementing water quality functions in all flood control designs. SMC will evaluate all SMC-sponsored projects for multi-objective opportunities.

Measurable Goal: Track number of projects that are reviewed for multi-objective opportunities.

