



Illinois Environmental Protection Agency

Bureau of Water • 1021 N. Grand Avenue E. • P.O. Box 19276 • Springfield • Illinois • 62794-9276

Division of Water Pollution Control ANNUAL FACILITY INSPECTION REPORT

for NPDES Permit for Storm Water Discharges from Separate Storm Sewer Systems (MS4)

This fillable form may be completed online, a copy saved locally, printed and signed before it is submitted to the Compliance Assurance Section at the above address. Complete each section of this report.

Report Period: From March, 2016 _____ To March, 2017 _____

Permit No. ILR40 _____

MS4 OPERATOR INFORMATION: (As it appears on the current permit)

Name: Will County Mailing Address 1: 58 East Clinton Street
Mailing Address 2: Suite 100 County: Will
City: Joliet State: IL Zip: 60432 Telephone: 815-774-3362
Contact Person: Brian Radner Email Address: bradner@willcountylanduse.com
(Person responsible for Annual Report)

Name(s) of governmental entity(ies) in which MS4 is located: (As it appears on the current permit)

Will County

THE FOLLOWING ITEMS MUST BE ADDRESSED.

A. Changes to best management practices (check appropriate BMP change(s) and attach information regarding change(s) to BMP and measurable goals.)

- | | | | |
|--|--------------------------|---|--------------------------|
| 1. Public Education and Outreach | <input type="checkbox"/> | 4. Construction Site Runoff Control | <input type="checkbox"/> |
| 2. Public Participation/Involvement | <input type="checkbox"/> | 5. Post-Construction Runoff Control | <input type="checkbox"/> |
| 3. Illicit Discharge Detection & Elimination | <input type="checkbox"/> | 6. Pollution Prevention/Good Housekeeping | <input type="checkbox"/> |

B. Attach the status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, and your identified measurable goals for each of the minimum control measures.

C. Attach results of information collected and analyzed, including monitoring data, if any during the reporting period.

D. Attach a summary of the storm water activities you plan to undertake during the next reporting cycle (including an implementation schedule.)

E. Attach notice that you are relying on another government entity to satisfy some of your permit obligations (if applicable).

F. Attach a list of construction projects that your entity has paid for during the reporting period.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Brian Radner
Owner Signature:

Brian Radner, AICP
Printed Name:

5/26/2017
Date:

Director, WCLU Development Review
Title:

EMAIL COMPLETED FORM TO: epa.ms4annualinsp@illinois.gov

or Mail to: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
WATER POLLUTION CONTROL
COMPLIANCE ASSURANCE SECTION #19
1021 NORTH GRAND AVENUE EAST
POST OFFICE BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42) and may also prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

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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 11	Year 12	Year 13	Year 14	Year 15	
MS4					
A. Public Education and Outreach					
X	X	X	X	X	A.1 Distributed Paper Material
					A.2 Speaking Engagement
					A.3 Public Service Announcement
X	X	X	X	X	A.4 Community Event
X	X	X	X	X	A.5 Classroom Education Material
X	X	X	X	X	A.6 Other Public Education
B. Public Participation/Involvement					
					B.1 Public Panel
					B.2 Educational Volunteer
X	X	X	X	X	B.3 Stakeholder Meeting
X	X	X	X	X	B.4 Public Hearing
X	X	X	X	X	B.5 Volunteer Monitoring
					B.6 Program Coordination
X	X	X	X	X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination					
X	X	X	X	X	C.1 Storm Sewer Map Preparation
X	X	X	X	X	C.2 Regulatory Control Program
X	X	X	X	X	C.3 Detection/Elimination Prioritization Plan
X	X	X	X	X	C.4 Illicit Discharge Tracing Procedures
X	X	X	X	X	C.5 Illicit Source Removal Procedures
X	X	X	X	X	C.6 Program Evaluation and Assessment
					C.7 Visual Dry Weather Screening
					C.8 Pollutant Field Testing
					C.9 Public Notification
X	X	X	X	X	C.10 Other Illicit Discharge Controls

Year 11	Year 12	Year 13	Year 14	Year 15	
MS4					
D. Construction Site Runoff Control					
X	X	X	X	X	D.1 Regulatory Control Program
X	X	X	X	X	D.2 Erosion and Sediment Control BMPs
					D.3 Other Waste Control Program
X	X	X	X	X	D.4 Site Plan Review Procedures
X	X	X	X	X	D.5 Public Information Handling Procedures
X	X	X	X	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	X	X	X	X	E.2 Regulatory Control Program
					E.3 Long Term O&M Procedures
X	X	X	X	X	E.4 Pre-Const Review of BMP Designs
X	X	X	X	X	E.5 Site Inspections During Construction
X	X	X	X	X	E.6 Post-Construction Inspections
					E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping					
X	X	X	X	X	F.1 Employee Training Program
X	X	X	X	X	F.2 Inspection and Maintenance Program
X	X	X	X	X	F.3 Municipal Operations Storm Water Control
X	X	X	X	X	F.4 Municipal Operations Waste Disposal
X	X	X	X	X	F.5 Flood Management/Assess Guidelines
X	X	X	X	X	F.6 Other Municipal Operations Controls

Part B. Status of Compliance with Permit Conditions

(Provide the status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable [MEP], and your identified measurable goals for each of the minimum control measures.)

The status of BMPs and measurable goals performed in Year 14 are described below. A Stormwater Management Plan has been developed and posted on the County's web page in the NPDES section along with the NOI and Annual Reports.

1. Public Education and Outreach

Will County (County) committed to conduct Public Education and Outreach as part of program implementation. Public Education and Outreach includes 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 in stormwater runoff. The County committed to implementation of BMPs related to A.1, A.4, A.5 and A.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. A1 – Distributed Educational Material

Brief Description of BMP: The County makes a variety of stormwater quality or related materials available on the Will County Green website. This information includes recycling events, rain barrel information, Household Hazardous Waste events, and many other examples of educational materials. The WillCountyGreen.com website had an increase of more than 10,000 hits and reached 47,411 visitors in 2016. WillCountyGreen.com is a comprehensive environmental website with over 250 pages of information. It offers a database search filled with businesses, a newspaper article section and a calendar of upcoming events, along with a FAQ section that many people use to contact us. Due to these features, the website requires weekly updating.

The County also utilizes other electronic formats such as their E-Blast program to distribute stormwater quality or related information to residents and other interested parties. A newsletter is sent through Constant Contact to political leaders, citizens, teachers and to all employees throughout the County - this is estimated to reach over 3,000 people each month. It features a variety of brief articles, links to many of the Willcountygreen.com pages and invitations to follow us on Facebook, Twitter, YouTube. It occasionally highlights non-profits involved in storm water issues, such as the Conservation Foundation's "conserve-at-work and conserve-at-home programs.

BMP No. A4 – Community Event

Brief Description of BMP: The County annually hosts an informational booth at the County Fair to provide residents with the opportunity to obtain a variety of information including topics related to stormwater quality and similar issues. The County estimates that they distributed approximately 100 pamphlets at the County Fair Informational booth to residents interested in stormwater quality and related issues during Permit Year 14.

BMP No. A5 – Classroom Education Material

Brief Description of BMP: The County has an educational classroom program where County staff visits schools to provide education on a variety of topics including those relating to stormwater quality or related issues. During Permit Year 14 approximately 52 schools were visited reaching a student population of 6,032. In addition, presentations were also given to: 1 park district group, 1 library group, 1 scout group, 2

garden/summer clubs, and 1 Earth Day audience. A total of 275 children and adults were seen at these special meetings. Will County also distributed over 150 free oak trees to clean our air and waterways. We ask that the trees are planted to improve run-off, prevent erosion, and sequester carbon--as well as attract wildlife and improve property values in our county.

BMP No. A6 – Other Public Education

Brief Description of BMP: The County is actively involved in the use of social media as a means of distributing information and materials. The County operates a Facebook page as well as a Twitter account and uses both outlets to disseminate stormwater quality or related materials and/or information at least once a week.

The Facebook page is updated daily and it's followers increased over the permit year, going from 744 to 1,278. Many environmental messages are created for the site, including plenty on storm water, proper disposal of hazardous waste, cleaning with less harmful products, recycling and waste reduction.

The Twitter page is also updated daily, carrying the same messages (but without photos) as Facebook. An Instagram account was created near the end of the permit year.

The Lower Du Page River Watershed Coalition, in which Will County actively participates, has contracted with a Communications firm to produce a campaign tailored to each of the four seasons.

2. Public Participation/Involvement

The County committed to performing activities and services related to the Public Participation/Involvement minimum control measure under BMP numbers B.3, B.4, B.5, and B.7. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. B.3 – Stakeholder Meeting

Brief Description of BMP: The County has an active and progressive Stormwater Committee that is responsible for stormwater management and water quality activities. The Stormwater Committee publicly met bi-monthly providing the opportunity for interested individuals to learn, inquire or be involved in the County' stormwater management issues. The County continued to host and support the Stormwater Management Committee.

A Stormwater Management Plan has been developed and posted to the County's stormwater webpage in the NPDES section, along with the Notice of Intent (NOI) and Annual Facility Inspection Report (AFIR).

Environmental Justice Area (EJA) information from USEPA was reviewed. This information may be used to identify EJA's within the County or tailor public education and outreach materials.

BMP No. B.4 – Public Hearing

Brief Description of BMP: The County partners with the Will/South Cook Soil Water Conservation District to provide input and analysis for development sites throughout the County. Public Hearings are required as a part of the zoning process and occur at least 12 times per year. These hearings provide a dedicated opportunity for interested residents and individuals give input on stormwater management and related water quality issues. Public hearings were conducted at least monthly.

BMP No. B.5 – Volunteer Monitoring

Brief Description of BMP: The County participates in planning groups for specific watersheds within Will County. These groups meet to discuss issues affecting the watershed including preserving, protecting and restoring water quality and other issues relating to stormwater management. The County participates in the Hickory Creek Watershed Planning Group, the Lower DuPage River Watershed Coalition and the USGS managed Will County Rain Gage Network. Will County participated in the Hickory Creek Bio Blitz volunteer monitoring effort.

BMP No. B7 – Other Public Involvement

Brief Description of BMP: The County organizes specialized collection events that allow citizens to properly dispose of wastes that could potentially be dumped or otherwise disposed of illegally and end up in the storm sewer system. These events are held throughout the year and at various locations in the County to provide opportunities for as many residents as possible. During Permit Year 14, the County hosted 5 events and collected approximately 368,144 pounds of waste. Additionally, the County collected over 1,363.4 pounds of pharmaceutical/medical waste during the current permit year. The collection of these wastes prevented them from being dumped or otherwise introduced to the MS4 system.

3. Illicit Discharge Detection and Elimination

The County committed to perform some activities related to the Illicit Discharge Detection and Elimination minimum control under BMP numbers C.1, C.2, C.3, C.4, C.5, C.6 and C.10. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. C1 – Storm Sewer Map Preparation

Brief Description of BMP: The County has developed a comprehensive stormwater atlas showing the location of all County-owned outfalls and receiving streams in the County. The atlas is updated each year with new additions or system changes.

BMP No. C2 – Regulatory Control Program

Brief Description of BMP: The County has adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to detect, investigate and eliminate potential illicit discharges. The County will continue to review the Ordinances and update its program as necessary to effectively detect and eliminate illicit discharges in compliance with NPDES requirements. A review of the County's regulatory control program is currently underway. Updates and changes determined necessary through the review will be implemented.

BMP No. C3 – Detection/Elimination Prioritization Plan

Brief Description of BMP: The County has policies and procedures in place to detect and eliminate illicit discharges. Depending on the nature of the discharge, multiple departments and procedures may be involved. Enforcement procedures are utilized on an as-needed basis to obtain compliance. Additionally, the Will County Land Use Department Resource Recovery & Energy Division performed open dumping and burning related enforcement program and conducted a minimum of 185 inspections during the permit year. During this time frame 55 sites or cases with open dumping or burning were cleaned up and closed. A total 33,849 cubic yards of waste was removed from the sites or properties. All IDDE inspection and response activities are kept within the County's electronic filing system.

BMP No. C4 – Illicit Discharge Tracing Procedures

Brief Description of BMP: The County conducts the screening of outfalls on an annual basis or as funding allows to evaluate the potential for illicit discharges. The County employed established procedures to inspect storm sewer outfalls, identify potential problems and investigate potential illicit discharges during Year 14. 154 outfall inspections were performed, plus 4 at County facilities

BMP No. C5 – Illicit Source Removal Procedures

Brief Description of BMP: The County continued the existing program and review the procedures as needed to authorize the removal of illicit discharges from the storm sewer system. This program requires the disconnection of any illicit discharge source that can be identified through the tracing program. During Year 14, no removals were completed.

BMP No. C.6 – Program Evaluation and Assessment

Brief Description of BMP:

The County regularly assesses their NPDES program on an annual basis to determine the effectiveness of the BMPs selected to meet the specified goals for overall compliance. The goal of this program is to evaluate the appropriateness of the BMPs selected for the NPDES program in meeting the goals necessary to maintain compliance. The County continued the assessment during Year 14.

BMP No. C.10 - Other Illicit Discharge Controls

Brief Description of BMP:

The County performs regular monitoring activities of the receiving waters that receive discharges from MS4 outfalls. The goal of this program is to monitor the receiving waters for potential illicit discharges. The County continued to monitor the receiving waters upstream and downstream of the MS4 discharge points during Permit Year 14. No illicit discharges were observed.

4. Construction Site Runoff Control

The County committed to performing activities and services related to the Construction Site Runoff Control minimum control measure under BMP numbers D.1, D.2, D.4, D.5 and D.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. D1 – Regulatory Control Program

Brief Description of BMP: The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

BMP No. D2 – Erosion and Sediment Control BMPs

Brief Description of BMP: The County has procedures in place that require the review of Best Management Practices for proposed developments prior to construction. The intent of these procedures is to reduce or prevent the discharge of pollutants from construction sites through the use of effective BMPs. The County continued to review, inspect and enforce the ordinance regulations during Year 14 to prevent or reduce the discharge of sediment or other pollutants from construction sites.

BMP No. D4 – Site Plan Review Procedures

Brief Description of BMP: The County has procedures and policies in place that require the review of site plans for compliance with all applicable State and County Ordinances specifically as they relate to soil erosion and sediment control measures and other potential construction related pollutants. During Year 14, site plans were reviewed for stormwater BMP implementation and NPDES requirements.

BMP No. D5 – Public Information Handling Procedures

Brief Description of BMP: The County has procedures in place for receiving, logging and addressing reports from residents or other individual regarding the potential release of pollutants or sediment from construction sites. The County continued the program to receive, investigate and address publicly reported issues.

BMP No. D6 – Site Inspection/Enforcement Procedures

Brief Description of BMP: The County has procedures and policies in place for the inspection and enforcement of applicable ordinances for construction sites in the County. These procedures specifically apply to soil erosion and sediment control measures and other potential construction related pollutants. The County has a soil erosion and sediment control checklist that is employed during site inspections to verify compliance and consistency in the inspection process. Forms, checklists and other enforcement measures utilized by the County are available upon request. During permit Year 14, approximately 300 compliance inspections were performed and documented by the County. All inspection and response activities are kept within the County's electronic filing system.

5. Post-Construction Runoff Control

The County committed to performing activities and services related to the Post-Construction Site Runoff Control minimum control measure under BMP numbers E.2, E.4, E.5 and E.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. E2 – Regulatory Control Program

Brief Description of BMP: The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce post-construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate post-construction site runoff controls in compliance with NPDES requirements.

BMP No. E4 – Pre-Construction Review of BMP Designs

Brief Description of BMP: The County has procedures and policies in place that require the review of site plans for compliance with all applicable State and County Ordinances specifically as they relate to soil erosion and sediment control measures and other potential construction related pollutants. During Year 14, site plans were reviewed for stormwater BMP implementation and NPDES requirements.

BMP No. E.5, E.6 – Site Inspections During Construction, Post Construction Inspections

Brief Description of BMP: The County has site inspection procedures in place during and prior to releasing the site after construction to verify that proposed developments are in compliance with the County Ordinances and regulations related to site runoff controls and potential discharge of pollutants.

The County continued the site inspection and enforcement policies and procedures for all developments during and after construction and will update or modify as needed to maintain compliance with their NPDES permit conditions. During permit Year 14, approximately 300 compliance inspections were performed and documented by the County. All inspection and response activities are kept within the County's electronic filing system.

6. Pollution Prevention/Good Housekeeping

This minimum control measure involves the development and implementation of an operation, maintenance, and training program to reduce the discharge of stormwater pollutants from municipal operations. The County committed to perform activities for BMP numbers F.1, F.2, F.3, F.4, F.5 and F.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. F1 – Employee Training Program

Brief Description of BMP: The County conducts or attends annual stormwater pollution prevention training for employees including proper maintenance of municipal facilities and property, the inspection of stormwater management systems, and other areas that may impact stormwater runoff. Current program implementations staff includes four Certified Floodplain Managers and one Certified Stormwater Inspector.

The County continued employee training through the year. 9 employees filled 13 seats in five different classes off site. These classes included the consulting engineers MS4 Permit Compliance class, the Illinois Association of Flood Plain Managers conference, the IDOT Erosion and Sediment Control Workshop Fundamental Module, the IDOT Erosion and Sediment Control Workshop Construction Module, the ASFPM Finding a BFE, and the CMAP Pollutant Load & Reduction Modeling for Watershed Based Plans Workshop. The Consulting Engineer trained 13 employees in two classes on site. These two classes were General Construction Inspection Training and Outfall Inspection Training Procedures.

BMP No. F2 – Inspection and Maintenance Program

Brief Description of BMP: The County has an inspection and maintenance program that is designed to reduce pollutant runoff from municipal operations by maintaining properly functioning facilities. This maintenance program will be continued and evaluated on an annual basis to determine its effectiveness in reducing pollutant runoff.

Inspection and maintenance activities continued in Year 14. Approximately 42% of the total MS4 was inspected this year, prioritized within the urbanized area of the County. 4 inspections were conducted at 2 different County facilities.

BMP No. F3/F4 – Municipal Operations Stormwater Control, Municipal Operation Waste Disposal

Brief Description of BMP: The County currently has many operational policies designed to prevent storm water pollution associated with municipal operations. Road salt is stored on a paved surface and covered to protect it from precipitation. The County stores diesel fuel and gasoline for its vehicles in appropriate tanks with containment measures. Used vehicle oil is stored in a holding tank and periodically hauled away by a waste disposal service. Maintenance and washing of the County vehicles is performed in the County maintenance garage or similar facility. Wastes and recyclables are stored in designated containers and areas for proper disposal.

The County continued the current operations and waste control programs and procedures in Year 14.

BMP No. F5 – Flood Management/Assess Guidelines

Brief Description of BMP: The County and State have strict development regulations related to floodplain management and the evaluation of potential development in these areas. The County also has Certified Floodplain Managers on staff to assist with development issues and other floodplain management concerns. The County continued to enforce the requirements for potential development in special flood hazard areas.

Will County is participating in a DuPage River Feasibility Study which is ongoing. The study is being done by the USACE in partnership with Will and Du Page Counties.

BMP No. F6 – Other Municipal Operations Controls

Brief Description of BMP: The County regularly evaluates their policies and programs for effectiveness and compliance. Currently the program is evaluated and/or updated at least annually to maintain compliance with permit conditions. The County continued the current evaluation program.

Part C. Information and Data Collection Results

(Provide information and water quality sampling/monitoring data related to illicit discharge detection and elimination collected during the reporting period.)

As no illicit discharges were detected in Year 14, no IDDE information or data was collected during Year 14.

The County participates within local watershed groups that perform periodic water quality monitoring within the County's jurisdiction. This information is available for use in assessing the effectiveness of and implementing the MS4 program.

Part D. Summary of Year 15 Stormwater Activities

(Present a summary of the storm water activities you plan to undertake during the next reporting cycle, including an implementation schedule in the sections following the table.)

The table shown below summarizes the BMPs committed to for the next NPDES permitting cycle. Specific BMPs and measurable goals for future development activities are presented in the sections following the table.

Note: X indicates BMPs committed to for Year 15.

Year 15	
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
X	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
X	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
	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
	C.9 Public Notification
X	C.10 Other Illicit Discharge Controls

Year 15	
MS4	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
	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
	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
X	F.5 Flood Management/Assess Guidelines
X	F.6 Other Municipal Operations Controls

1. Public Education and Outreach

The County is committing to conduct Public Education and Outreach as part of its permit. Public Education and Outreach requires implementation of a program to distribute educational material to the community or conduct 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. The County commits to implementation of BMPs related to A.1, A.4, A.5 and A.6 as described below.

BMP No. A1 – Distributed Educational Materials

Brief Description of BMP: The County makes a variety of stormwater quality or related materials available on the Will County Green website. This information includes recycling events, rain barrel information, Household Hazardous Waste events, and many other examples of educational materials. The County also utilizes other electronic formats such as their E-Blast program to distribute stormwater quality or related information to residents and other interested parties.

Measurable Goal(s), including frequencies: The County will continue to provide the residents with stormwater articles or related materials on the County websites and update or add new material at least twice a year or as needed to maintain compliance with the permit conditions.

Milestones: Years 11-15: Continue to include stormwater information on County websites and update as new material and/or information becomes available. Include climate change information within the materials.

BMP No. A4 – Community Event

Brief Description of BMP: The County annually hosts an informational booth at the County Fair to provide residents with the opportunity to obtain a variety of information including topics related to stormwater quality and similar issues.

Measurable Goal(s), including frequencies: Annually distribute pamphlets at the County Fair Informational booth to residents interested in stormwater quality and related issues.

Milestones: Years 11-15: Distribute informational pamphlets annually at the County Fair and work to increase distribution.

BMP No. A5 – Classroom Education Material

Brief Description of BMP: The County has an educational classroom program where County staff visits schools to provide education on a variety of topics including those relating to stormwater quality or related issues. The County anticipates visiting approximately 50 schools during this permit year with a student population around 5,000.

Measurable Goal(s), including frequencies: Continue to visit local schools to present stormwater quality and similar issues with a target of once a month.

Milestones: Years 11-15: Continue to perform the classroom educational program and increase the number of schools as funding allows.

BMP No. A6 – Other Public Education

Brief Description of BMP: The County is actively involved in the use of social media as a means of distributing information and materials. The County operates a Facebook page as well as a Twitter Handle and uses both outlets to disseminate stormwater quality or related materials and/or information.

Measurable Goal(s), including frequencies: Continue to operate and maintain the social media sites as a means of disseminating educational materials.

Milestones: Years 11-15: Work to increase the number of active users on the social media sites.

2. Public Participation/Involvement

The County will perform activities and services related to the Public Participation/Involvement minimum control measure. BMPs will be implemented under BMP number B.3, B.4, B.5, and B.7 as described below.

BMP No. B.3 – Stakeholder Meeting

Brief Description of BMP: The County has an active and progressive Stormwater Committee that is responsible for a multitude of stormwater management and water quality activities. The Stormwater Committee publicly meets bi-monthly providing the opportunity for interested individuals to learn, inquire or be involved in the County's stormwater management issues.

Measurable Goal(s), including frequencies: The County will continue to host and support the Stormwater Management Committee.

Milestones: Years 11-15: The County will work to increase the attendance at the Stormwater Management Committee meetings and additional projects as funding allows. The County will complete its assessment of Environmental Justice Areas from an MS4 perspective.

BMP No. B.4 – Public Hearing

Brief Description of BMP: The County partners with the Will/South Cook Soil Water Conservation District to provide input and analysis for development sites throughout the County. Public Hearings are required as a part of the zoning process and occur at least 12 times per year.

Measurable Goal(s), including frequencies: Provide a dedicated opportunity for interested residents and individuals give input on stormwater management and related water quality issues.

Milestones: Years 11-15: The County will continue to partner with the Will/South Cook Soil and Water Conservation District and provide these public hearings targeting 12 times per year.

BMP No. B.5 – Volunteer Monitoring

Brief Description of BMP: The County participates in planning groups for specific watersheds within Will County. These groups meet to discuss issues affecting the watershed including preserving, protecting and restoring water quality and other issues relating to stormwater management.

Measurable Goal(s), including frequencies: Continue to provide the volunteer monitoring opportunities for protecting, preserving and restoring Will County watersheds.

Milestones: Years 11-15: The County will work to increase the participation in the planning groups each permit year.

BMP No. B.7 – Other Public Involvement

Brief Description of BMP: The County organizes specialized collection events that allow citizens to properly dispose of wastes that could potentially be dumped or otherwise disposed of illegally and end up in the municipal separate storm sewer system. These events are held throughout the year and at various locations in the County to provide opportunities for as many residents as possible.

Measurable Goal(s), including frequencies: Continue to organize, fund and provide the collection events to reduce or prevent the discharge of illicit material into the municipal separate storm sewer system.

Milestones: Years 11-15: The County will work to increase the number of participants/materials collected each year.

3. Illicit Discharge Detection and Elimination

The County commits to performing some activities related to the Illicit Discharge Detection and Elimination minimum control. BMPs will be implemented under BMP numbers C.1, C.2, C.3, C.4, C.5, C.6 and C.10 as described below.

BMP No. C1 – Storm Sewer Map Preparation

Brief Description of BMP: The County has developed a comprehensive stormwater atlas showing the location of all County-owned outfalls and receiving streams in the County.

Measurable Goal(s), including frequencies: The County will update the storm sewer atlas to reflect the latest development and any changes in the urbanized area based on the permit conditions.

Milestones: Years 11-15: Update the storm sewer atlas to reflect new development and permit modifications.

BMP No. C2 – Regulatory Control Program

Brief Description of BMP: The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to detect, investigate and eliminate potential illicit The County will continue to review the Ordinances and update its program as necessary to effectively detect and eliminate illicit discharges in compliance with NPDES requirements.

Measurable Goal(s), including frequencies: The County will continue to review the illicit discharge detection and elimination program and the associated Ordinances for compliance with NPDES requirements.

Milestones: Years 11-15: The County will review its program and associated Ordinances and revise as needed.

BMP No. C3 – Detection/Elimination Prioritization Program

Brief Description of BMP: The County has policies and procedures in place to detect and eliminate illicit discharges. Procedures may involve multiple departments and procedures such as tracing can be employed as necessary to identify and eliminate the discharge. Enforcement procedures are utilized on an as-needed basis to obtain compliance.

Measurable Goal(s), including frequencies: Inspect storm sewer outfalls, reported complaints and other issues to determine high priority sites or other potential issue and perform investigations as needed to locate and eliminate illicit discharges.

Milestones: Years 11-15: Continue inspections and enforce policies and procedures to identify, enforce and eliminate illicit discharge.

BMP No. C4 – Illicit Discharge Tracing Procedures

Brief Description of BMP: The County conducts the screening of outfalls on an annual basis or as funding allows to evaluate the potential for illicit discharges.

Measurable Goal(s), including frequencies: Employ established procedures to inspect storm sewer outfalls, identify potential problems and investigate potential illicit discharges.

Milestones: Years 11-15: Continue inspections to identify, trace and enforce illicit discharge regulations to eliminate potential pollution.

BMP No. C5 – Illicit Source Removal Procedures

Brief Description of BMP: The County will continue the existing program and review the procedures as needed to authorize the removal of illicit discharges from the storm sewer system.

Measurable Goal(s), including frequencies: Require disconnection of any illicit discharge source that can be identified through the tracing program.

Milestones: Years 11-15: Continue current program and review procedures as needed for updates to authorize the removal of illicit discharges.

BMP No. C.6 – Program Evaluation and Assessment

Brief Description of BMP:

The County regularly assesses their NPDES program on an annual basis to determine the effectiveness of the BMPs selected to meet the specified goals for overall compliance.

Measurable Goal(s), including frequencies:

The goal of this program is to evaluate the appropriateness of the BMPs selected for the NPDES program in meeting the goals necessary to maintain compliance.

Milestones: **Years 11-15:** The County will continue the yearly evaluation of its NPDES program and BMPs selected for effectiveness in meeting the specific measurable goals.

BMP No. C.10

Brief Description of BMP:

The County performs regular monitoring activities of the receiving waters that receive discharges from MS4 outfalls.

Measurable Goal(s), including frequencies:

The goal of this program is to monitor the receiving waters for potential illicit discharges from the MS4.

Milestones: **Years 11-15:** The County will continue to monitor the receiving waters upstream and downstream of the MS4 discharge points.

4. Construction Site Runoff Control

The County will perform activities and services related to the Construction Site Runoff Control minimum control measure. BMPs will be implemented under BMP numbers D.1, D.2, D.4, D.5, and D.6 as described below.

BMP No. D1 – Regulatory Control Program

Brief Description of BMP: The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

Measurable Goal(s), including frequencies: The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

Milestones: **Year 11-15:** The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

BMP No. D2 – Erosion and Sediment Control BMPs

Brief Description of BMP: The County has procedures in place that require the review of Best Management Practices for proposed developments prior to construction. The intent of these procedures is to reduce or prevent the discharge of pollutants from construction sites through the use of effective BMPs.

Measurable Goal(s), including frequencies: The County will continue to review, inspect and enforce the ordinance regulations to prevent or reduce the discharge of sediment or other pollutants from construction sites as it relates to BMP's.

Milestones: Year 11-15: The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

BMP No. D4 – Site Plan Review Procedures

Brief Description of BMP: The County has site plan review procedures in place to verify that proposed developments are in compliance with the County Ordinances and regulations related to construction site runoff controls and potential discharge of pollutants. The County has a soil erosion and sediment control checklist that is employed during reviews to verify compliance and consistency in the review process.

Measurable Goal(s), including frequencies: The County will continue the site plan review procedures for all developments and will update or modify as needed to maintain compliance with their NPDES permit conditions.

Milestones: Year 11-15: The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

BMP No. D5 – Public Information Handling Procedures

Brief Description of BMP: The County has procedures in place for receiving, logging and addressing reports from residents or other individual regarding the potential release of pollutants or sediment from construction sites.

Measurable Goal(s), including frequencies: The County will continue the program to receive, investigate and address publicly reported issues.

Milestones: Year 11-15: The County will continue the public reporting program to reduce or eliminate the potential for discharge of pollutants from construction site runoff related issues.

BMP No. D6 – Site Enforcement/Inspection Procedures

Brief Description of BMP: The County has site inspection and enforcement procedures in place to verify that proposed developments are in compliance with the County Ordinances and regulations related to construction site runoff controls and potential discharge of pollutants. The County has a soil erosion and sediment control checklist that is employed during site inspections to verify compliance and consistency in the inspection process.

Measurable Goal(s), including frequencies: The County will continue the site inspection and enforcement policies and procedures for all developments and will update or modify as needed to maintain compliance with their NPDES permit conditions.

Milestones: Year 11-15: The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

5. Post-Construction Runoff Control

The County will perform activities and services related to the Post-Construction Site Runoff Control minimum control measure. BMPs will be implemented under BMP numbers E.2, E.4, E.5 and E.6 as described below.

BMP No. E.2 – Regulatory Control Program

Brief Description of BMP: The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce post construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

Measurable Goal(s), including frequencies: The County will continue to review the Ordinances and update its program as necessary to effectively regulate post construction site runoff controls in compliance with NPDES requirements.

Milestones: Year 11-15: The County will continue to review the Ordinances and update its program as necessary to effectively regulate post construction site runoff controls in compliance with NPDES requirements.

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

Brief Description of BMP: The County has procedures in place that require the review of Best Management Practices for proposed developments prior to construction. The intent of these procedures is to reduce or prevent the discharge of pollutants from construction sites through the use of effective BMPs.

Measurable Goal(s), including frequencies: The County will continue to review, inspect and enforce the ordinance regulations to prevent or reduce the discharge of sediment or other pollutants from construction sites as it relates to BMP's.

Milestones: Year 11-15: The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

BMP No. E.5, E.6 – Site Inspections During Construction, Post Construction Inspections

Brief Description of BMP: The County has site inspection procedures in place during and prior to releasing the site after construction to verify that proposed developments are in compliance with the County Ordinances and regulations related to construction site runoff controls and potential discharge of pollutants. The County has a soil erosion and sediment control checklist that is employed during site inspections to verify compliance and consistency in the inspection process.

Measurable Goal(s), including frequencies: The County will continue the site inspection and enforcement policies and procedures for all developments during and after construction and will update or modify as needed to maintain compliance with their NPDES permit conditions.

Milestones: Year 11-15: The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

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. This program must include a training program for municipal employees. The County will perform BMPs under BMP numbers F.1, F.2, F.3, F.4, F.5 and F.6 as described below.

BMP No. F1 – Employee Training Program

Brief Description of BMP: The County regularly provides training to staff regarding a variety of topics aimed at reducing or preventing the discharge of contaminants from municipal operations. County staff currently includes four Certified Floodplain Managers and one Certified Stormwater Inspector. Both certifications require extensive training and continued educational credits to maintain certification.

Measurable Goal(s), including frequencies: Conduct annual employee training to educate staff on prevention and reduction of storm water pollution from municipal activities.

Milestones: Years 11-15: The County will continue to review and revise the existing employee training and educational programs as needed, and provide for annual staff training.

BMP No. F2 – Inspection and Maintenance Program

Brief Description of BMP: The County has an inspection and maintenance program that is designed to reduce pollutant runoff from municipal operations through proper maintenance and functionality. The County currently performs cleaning and routine maintenance as needed or based on reports of problem or concerns. This maintenance program will be continued and evaluated on an annual basis to determine its effectiveness in reducing pollutant runoff.

Measurable Goal(s), including frequencies: The County will continue the current program and continually review the inspection and maintenance program to determine effectiveness or update as needed based on the permit requirements.

Milestones: Years 11-15: The County will continue the current program and continually review the inspection and maintenance program to determine effectiveness.

BMP No. F3/F4 – Municipal Operations Stormwater Control, Municipal Operation Waste Disposal

Brief Description of BMP: The County currently has many operational policies designed to prevent storm water pollution associated with municipal operations. Road salt is stored on a paved surface and covered to protect it from precipitation. The County stores diesel fuel and gasoline for its vehicles in appropriate tanks with containment measures. Used vehicle oil is stored in a holding tank and periodically hauled away by a waste disposal service. Maintenance and washing of the County vehicles is performed in the County maintenance garage or similar facility. These programs will be evaluated on a regular basis to determine its effectiveness and modified as necessary to meet the requirements of the NPDES program.

Measurable Goal(s), including frequencies: The County will continue the current program and review these policies and revise as necessary to maintain compliance with the permit conditions.

Milestones: Years 11-15: The County will continue the programs in place and review and revise as necessary.

BMP No. F5 – Flood Management/Assess Guidelines

Brief Description of BMP: The County and State have strict development regulations related to floodplain management and the evaluation of potential development in these areas. The County also has Certified Floodplain Managers on staff to assist with development issues and other floodplain management concerns.

Measurable Goal(s), including frequencies: The County will continue to enforce the requirements for potential development in special flood hazard areas.

Milestones: Years 11-15: The County will continue to enforce the ordinances as needed for compliance with development in special flood hazard areas.

BMP No. F6 – Other Municipal Operations Controls

Brief Description of BMP: The County regularly evaluates their policies and programs for effectiveness and compliance. Currently the program is evaluated and/or updated at least annually or as needed to maintain compliance with permit conditions.

Measurable Goal(s), including frequencies: The County will continue the current evaluation program and review these policies and revise as necessary to maintain compliance with the permit conditions.

Milestones: Years 11-15: The County will continue the programs in place and review and revise as necessary.

