



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, 2013 _____ To March, 2014 _____

Permit No. ILR40 0272

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

Name: Will County Department of Highways Mailing Address 1: 16841 W. Laraway Road
Mailing Address 2: _____ County: Will
City: Joliet State: IL Zip: 60433 Telephone: 815-727-8476
Contact Person: Bruce D. Gould, P.E. Email Address: bgould@willcountyillinois.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.

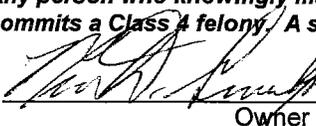
C. Attach results of information collected and analyzed, including monitoring data, if any during the reporting period.

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))



Owner Signature:

Bruce D. Gould, P.E.

Printed Name:

5/28/14

Date:

Dir. of Transportation/County Engineer

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

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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					A.1 Distributed Paper Material
					A.2 Speaking Engagement
X					A.3 Public Service Announcement
					A.4 Community Event
					A.5 Classroom Education Material
					A.6 Other Public Education
B. Public Participation/Involvement					
					B.1 Public Panel
X					B.2 Educational Volunteer
					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
					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
					C.10 Other Illicit Discharge Controls

Year 11	Year 12	Year 13	Year 14	Year 15	
MS4					
D. Construction Site Runoff Control					
X					D.1 Regulatory Control Program
					D.2 Erosion and Sediment Control BMPs
					D.3 Other Waste Control Program
X					D.4 Site Plan Review Procedures
					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
					E.5 Site Inspections During Construction
					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
					F.3 Municipal Operations Storm Water Control
					F.4 Municipal Operations Waste Disposal
					F.5 Flood Management/Assess Guidelines
					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 11 are described below.

1. Public Education and Outreach

Will County (County) committed to conduct Public Education and Outreach as part of program implementation. Public Education and Outreach included 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 implement BMPs A.1 and A.3. The status or progress for each of the measurable goals related to these BMPs is presented below:

BMP No. A.1 – Distributed Educational Material

Brief Description of BMP: The County made a variety of stormwater quality or related materials available on the Will County Green website. This information included recycling events, rain barrel information, Household Hazardous Waste events, and many other examples of educational materials. WillCountyGreen.com is a comprehensive environmental website with over 200 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. The website requires weekly updating.

BMP No. A.3 – Public Service Announcement

Brief Description of BMP: County staff held informational sessions to help guide the Townships in the development of their NOI submittals for the NPDES Phase II permits. Meetings were scheduled with the townships an effort was made to inform them what steps must be taken in order to be in compliance with the permit.

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.2, B.6 and B.7. The status or progress for each of the measurable goals related to these BMPs is presented below:

BMP No. B.2 – Educational Volunteer

Brief Description of BMP: The County had 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.

BMP No. B.6 – Program Coordination

Brief Description of BMP: Through the Adopt-A-Highway program, the Will County Department of Highways assigned a section of roadway to each volunteer group. The group signs a two-year contract to clean up litter in the right-of-way four times each year. County staff coordinated this program.

BMP No. B.7 – Other Public Involvement

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

The County organized 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 were held throughout the year and at various locations in the County to provide opportunities for as many residents as possible. During Permit Year 11, the County partnered with IEPA to host a tire collection event in Park Forest and collected approximately 6,000 tires. The collection of these tires prevented them from being dumped or otherwise introduced to the MS4 system.

3. Illicit Discharge Detection and Elimination

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

BMP No. C.1 – Storm Sewer Map Preparation

Brief Description of BMP: The County continued to use updated technology including GIS mapping. The County has developed a comprehensive stormwater atlas showing the location of all County-owned outfalls and receiving streams in the County. The atlas was up dated with new additions or system changes.

BMP No. C.2 – Regulatory Control Program

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

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

Brief Description of BMP: The County had 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 were utilized on an as-needed basis to obtain compliance. Additionally, the Will County Land Use Department Resource Recovery & Energy Division performs an open dumping and burning related enforcement program.

4. Construction Site Runoff Control

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

BMP No. D.1 – Regulatory Control Program

Brief Description of BMP: The County 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 reviewed the Ordinances and updated its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

BMP No. D.4 – Site Plan Review Procedures

Brief Description of BMP: The County had 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 11, site plans were reviewed for stormwater BMP implementation and NPDES requirements.

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

Brief Description of BMP: The County had procedures and policies in place for the inspection and enforcement of applicable ordinances for construction sites in the County. These procedures specifically applied to soil erosion and sediment control measures and other potential construction related pollutants. The County had a soil erosion and sediment control checklist that is employed during site inspections to verify compliance and consistency in the inspection process. During permit Year 11, compliance inspections were performed and documented by the County.

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 and E.4. The status or progress for each of the measurable goals related to these BMPs is presented below:

BMP No. E.2 – Regulatory Control Program

Brief Description of BMP: The County prepared, adopted and enforced the Will County Stormwater Management and Water Resources Ordinances. These ordinances provided the regulatory authority for the County to inspect, evaluate and enforce post-construction site runoff control measures. The County continued to review the Ordinances and updated 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 had 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 11, site plans were reviewed for stormwater BMP implementation and NPDES requirements.

The County had site inspection procedures in place during and prior to releasing the site after construction to verify that proposed developments were 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. During permit Year 11, compliance inspections were performed and documented by the County.

6. Pollution Prevention/Good Housekeeping

This minimum control measure involved 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 and F.2. The status or progress for each of the measurable goals related to these BMPs is presented below:

BMP No. F.1 – Employee Training Program

Brief Description of BMP: The County conducted or attended 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. In Year 11, the program implementation staff included four Certified Floodplain Managers and one Certified Stormwater Inspector. The County continued employee training.

BMP No. F.2 – Inspection and Maintenance Program

Brief Description of BMP: The County had an inspection and maintenance program that is designed to reduce pollutant runoff from municipal operations by maintaining properly functioning facilities. This maintenance program was continued in Year 10 to reduce pollutant runoff.

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 11, no IDDE information or data was collected during Year 11.

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 12 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 12.

Year 12	
MS4	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
X	A.3 Public Service Announcement
	A.4 Community Event
	A.5 Classroom Education Material
	A.6 Other Public Education
B. Public Participation/Involvement	
	B.1 Public Panel
X	B.2 Educational Volunteer
	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
	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
	C.10 Other Illicit Discharge Controls

Year 12	
MS4	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
	D.2 Erosion and Sediment Control BMPs
	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
	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
	E.5 Site Inspections During Construction
	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
	F.3 Municipal Operations Storm Water Control
	F.4 Municipal Operations Waste Disposal
	F.5 Flood Management/Assess Guidelines
	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 and A.3 as described below.

BMP No. A.1 – 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. WillCountyGreen.com is a comprehensive environmental website with over 200 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.

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: Year 12: 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. A.3 – Public Service Announcement

Brief Description of BMP: County staff will hold informational sessions to help guide the Townships in the development of their NOI submittals for the NPDES Phase II permits. Meetings will be scheduled with the townships and efforts made to inform them what steps are necessary to be taken in order to be in compliance with the permit.

Measurable Goal(s), including frequencies: Meet with the Townships to ensure they are in compliance with the NPDES Phase II permit.

Milestones: Years 12: Continue to meet with the Townships to ensure they are in compliance with the NPDES Phase II permit.

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.2, B.6 and B.7 as described below.

BMP No. B.2 – Educational Volunteer

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.

Measurable Goal(s), including frequencies: The County staff will gather educational materials and contact other water quality educators such as the Forest Preserve District and the Will South Cook Soils and Water Conservation District.

Milestones: Year 12: The County will continue to educate with various training sessions throughout the year.

BMP No. B.6 – Program Coordination

Brief Description of BMP: Through the Adopt-A-Highway program, the Will County Department of Highways assigns a section of roadway to each volunteer group. The group signs a two-year contract to clean up litter in the right-of-way four times each year. County staff coordinates this program and will continue to encourage increased participation.

Measurable Goal(s), including frequencies: The County will continue to advertise the program and meet with interested groups.

Milestones: Years 12: Total shall exceed total from previous years. If total does not exceed the total from previous year, then re-evaluate the target audience and advertising to encourage additional participation.

BMP No. B.7 – Other Public Involvement

Brief Description of BMP: The County participates in planning groups for specific watersheds within Will County when they are active. 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 currently participates in the Hickory Creek Watershed Planning Group, the Lower DuPage River Watershed Coalition and the USGS managed Will County Rain Gage Network.

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 11, the County partnered with IEPA to host a tire collection event in Park Forest and collected approximately 6,000 tires. The collection of these tires prevented them from being dumped or otherwise introduced to the MS4 system.

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. The County will continue to participate in active water shed groups.

Milestones: Year 12: The County will work to increase the number of participants/materials collected each year. The County will continue to participate in active water shed groups.

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, and C.3.

BMP No. C.1 – 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: Year 12: Update the storm sewer atlas to reflect new development and permit modifications.

BMP No. C.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 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.

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: Year 12: The County will review its program and associated Ordinances and revise as needed.

BMP No. C.3 – 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: Year 12: Continue inspections and enforce policies and procedures to identify, enforce and eliminate illicit discharges.

4. Construction Site Runoff Control

BMP No. D.1 – 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 12: 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. D.4 – 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 12: 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. D.6 – 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 12: 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 and E.4 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 12: 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.

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 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 12: 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 and F.2 as described below.

BMP No. F.1 – 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 12: 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. F.2 – 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 12: The County will continue the current program and continually review the inspection and maintenance program to determine effectiveness.

Part E. Notice of Reliance on another Government Entity

Will County is not relying on any other government entity to implement the program. The County participates in local watershed groups to perform water quality monitoring.

