



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, 2015 _____ To March, 2016 _____

Permit No. ILR40 0482

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

Name: City of Zion _____ Mailing Address 1: 2828 Sheridan Road _____

Mailing Address 2: _____ County: Lake _____

City: Zion _____ State: IL _____ Zip: 60099 _____ Telephone: 847-746-4057 _____

Contact Person: Ron Colangelo _____ Email Address: ronc@zion.il.us _____
(Person responsible for Annual Report)

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

City of Zion _____

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

Ron Colangelo

Printed Name:

4-22-15

Date:

Director Public Works & Engineering

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.

**Illinois Environmental Protection Agency
Annual Facility Inspection Report
for General Permit for Discharges from Small MS4s**

**City Zion
Permit Year 12: March 2014 to February 2015**

Contents

Part A. Changes to Best Management Practices A-1

Part B. Status of Compliance with Permit ConditionsB-1

Part C. Information and Data Collection Results C-1

Part D. Summary of Year 13 Stormwater ActivitiesD-1

Part E. Notice of Qualifying Local ProgramE-1

 Part E1. Changes to Best Management Practices..... E-2

 Part E2. Status of Compliance with Permit Conditions E-3

 Part E3. Information and Data Collection Results E-11

 Part E4. Summary of Year 13 Stormwater Activities E-14

 Part E5. Construction Projects Conducted During Year 12 E-26

Part F. Construction Projects Conducted During Year 12 F-1

Part A. MS4 Changes to Best Management Practices, Year 12

Information regarding the status of all of the BMPs and measurable goals described in the City of Zion's NOI is provided in the following table.

Note: X indicates BMPs that were implemented in accordance with the City of Zion's NOI
✓ indicates BMPs that were changed during Year 12

Year 12	
MS4	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
	A.3 Public Service Announcement
	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
	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
	C.3 Detection/Elimination Prioritization Plan
	C.4 Illicit Discharge Tracing Procedures
	C.5 Illicit Source Removal Procedures
	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 12	
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
	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
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
	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls

Additional information about the changes that were made to the BMPs described in the City of Zion's NOI during Year 12 is provided below.

B. Public Participation/Involvement

B.6 Program Coordination

Measurable Goal(s): Continue to attend and participate in MAC meetings.

Due to scheduling conflicts, the City of Zion was unable to attend and participate in the several of the MAC meetings facilitated by SMC during Year 12. Meeting materials were obtained and reviewed for all missed MAC meetings. During Year 13, the MS4 anticipates that it will be able to resume its participation in MAC meetings.

Part B. MS4 Status of Compliance with Permit Conditions, Year 12

Stormwater Management Activities, Year 12

As part of its stormwater management program, the City of Zion conducts a number of activities related to each of the six minimum control measures (MCMs) described in IEPA's General NPDES Permit No. ILR40. Please note that the current version of IEPA's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that IEPA will make to the new version of the Permit, the City of Zion remains committed to performing activities related to each of the six MCMs described in the current version of the Permit. Following the expiration of the current version of the Permit on March 31, 2014, the City of Zion plans to continue to perform a variety of stormwater management activities, as described in more detail below.

A. Public Education and Outreach

As part of its stormwater management program, the City of Zion conducts a number of Public Education and Outreach activities that educate and inform the public about the impacts of stormwater runoff on receiving water bodies and the steps that the public can take to reduce those impacts. In coordination and collaboration with the QLP, the City of Zion will continue to perform activities related to the Public Education and Outreach MCM, as described below.

A.1 Distributed Paper Material

In addition to the QLP's efforts to distribute informational materials throughout Lake County, which are described in more detail in Attachment A, the City of Zion works to compile and distribute within the City of Zion a variety of materials related to stormwater management from a variety of sources, including the Lake County Stormwater Management Commission (i.e., QLP), IEPA, US EPA, the Center for Watershed Protection, and other agencies and organizations. The City of Zion maintains a list of the types of materials it has made available to the public and the methods through which such materials have been distributed.

Measurable Goal(s): Distribute informational materials from "take away" rack at 2828 Sheridan Road (e.g., City Hall).

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.5 Classroom Education Material

In addition to the QLP's efforts to educate local students, teachers, and other local stakeholders, which are described in more detail in Attachment A, upon request, the City of Zion will provide educational presentations on stormwater management-related topics to local students and teachers and/or other local stakeholders. The City of Zion maintains a list of the stormwater management-related educational presentations that it has provided at local schools. Additionally, upon request, the City of Zion will provide information and training to

local students and teachers and/or other local stakeholders interested in conducting storm drain stenciling.

Measurable Goal(s): Upon request, provide stormwater management-related educational presentation to local students and teachers and/or other local stakeholders.

Upon request, provide information and training to local students and teachers and/or other local stakeholders interested in conducting storm drain stenciling.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.6 Other Public Education

In addition to the QLP's efforts to distribute information via its website, which are described in more detail in Attachment A, the City of Zion maintains a website that contains materials and resources related to stormwater management. The website includes a webpage that provides information about IEPA's NPDES Stormwater Program, information about the City of Zion's stormwater management program, including its NOI, Permit, and Annual Reports, and links to a number of other stormwater management-related resources, including the Lake County Stormwater Management Commission's (i.e., QLP's) website.

Measurable Goal(s): Maintain and update the portion of the City of Zion website dedicated to its stormwater management program.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B. Public Education and Outreach

As part of its stormwater management program, the City of Zion conducts a number of Public Participation/Involvement activities that involve and engage the public in the implementation of its stormwater management program. In coordination and collaboration with the QLP, the City of Zion will continue to perform activities related to the Public Education and Outreach MCM, as described below.

B.6 Program Involvement

SMC serves as a Qualifying Local Program (QLP) for all Lake County MS4s. In this role, in 2002, SMC proactively formed the Municipal Advisory Committee (MAC) to provide a forum for representatives of local MS4s to discuss, among other topics, the implementation of IEPA's NPDES Stormwater Program. SMC plans to continue to facilitate quarterly MAC meetings to bring Lake County MS4s together to discuss the implementation of IEPA's NPDES Stormwater Program. The City of Zion will continue to attend and participate in the quarterly MAC meetings.

Measurable Goal(s): Continue to attend and participate in MAC meetings.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B.7 Other Public Involvement

The City of Zion provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The City of Zion documents and tracks the resolutions of problems and complaints reported by the public, including reports of illicit discharges and illegal dumping.

*Measurable Goal(s): Provide phone number that the public can use to submit information about stormwater-related problems and concerns.
As needed, follow up on reports of stormwater-related problems and concerns received from the public.*

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C. Illicit Discharge Detection and Elimination

As part of its stormwater management program, the City of Zion conducts a number of activities related to Illicit Discharge Detection and Elimination. In accordance with the current version of the Permit, the City of Zion's Illicit Discharge Detection and Elimination program includes:

- A storm sewer system map showing the locations of all outfalls and the names and locations of all waters that receive discharges from those outfalls;
- An ordinance or other regulatory mechanism that prohibits all non-stormwater discharges into the storm sewer system and provides the authority for appropriate enforcement procedures and actions;
- A plan to detect and address all non-stormwater discharges, including illegal dumping, into the storm sewer system;
- A program to educate public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste; and,
- Annual inspection of storm sewer outfalls for detection of non-stormwater discharges and illegal dumping.

In coordination and collaboration with the QLP, the City of Zion will continue to perform activities related to the Illicit Discharge Detection and Elimination MCM, as described below. Note that although the City of Zion intends to share responsibility for the implementation of the Illicit Discharge Detection and Elimination MCM with the QLP, as outlined in this NOI, the primary responsibility for the implementation of the Illicit Discharge Detection and Elimination MCM lies with the SMC.

C.1 Sewer Map Preparation

The City of Zion has prepared a storm sewer system map showing the locations of all outfalls and the names and locations of all waters that receive discharges from those outfalls. The

storm sewer system map is periodically maintained and updated to include outfalls associated with development projects and any previously unidentified outfalls.

Measurable Goal(s): Maintain and update storm sewer system map.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.2 Regulatory Control Program

The City of Zion has adopted an illicit discharge ordinance that prohibits all non-stormwater discharges into the storm sewer system and provides the authority for appropriate enforcement procedures and actions. In addition, the Watershed Development Ordinance (WDO) includes provisions that prohibit illicit discharges to the storm sewer system during construction (i.e., prior to final site stabilization) on development sites.

Measurable Goal(s): Continue Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.7 Visual Dry Weather Screening

In accordance with the current version of the Permit, the City of Zion conducts annual inspections of storm sewer outfalls for detection of non-stormwater discharges and illegal dumping. During such inspections, outfalls are assessed to determine whether or not flow is observed and whether or not any indicators of an illicit discharge are present. The results of each inspection are recorded on a form, and based on such results, appropriate follow-up actions are prescribed. Such follow-up actions may include additional inspections, additional water quality sampling and analysis, source tracking, and source removal. Follow-up activities are generally prioritized based on the scope and magnitude of the associated illicit discharge.

Measurable Goal(s): Conduct annual inspections of storm sewer outfalls for detection of illicit discharges.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.9 Public Notification

The City of Zion provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns.

*Measurable Goal(s): Provide phone number that the public can use to submit information about stormwater-related problems and concerns, including illicit discharges.
As needed, follow up on reports of illicit discharges and illegal dumping received from the public.*

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.10 Other Illicit Discharge Controls

As part of its Public Education and Outreach program, the City of Zion distributes informational materials to businesses and the general public about the hazards associated with illegal discharges and the improper disposal of waste.

Measurable Goal(s): Distribute informational materials about the hazards of illicit discharges and illegal dumping from "take away" rack at 2828 Sheridan road (Village Hall) and through the City of Zion website.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D. Construction Site Runoff Control

Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County. The WDO, which is administered and enforced within the City of Zion by SMC, establishes standards for Construction Site Runoff Control. Although the City of Zion intends to share responsibility for the implementation of the Construction Site Runoff Control MCM with the QLP, as outlined in this NOI, the primary responsibility for the implementation of the Construction Site Runoff Control MCM lies with SMC, as the City of Zion is currently a Non-Certified Community, as defined by the WDO.

D.1 Regulatory Control Program

The WDO is the regulatory mechanism that requires the use of soil erosion and sediment controls on development sites throughout Lake County. The soil erosion and sediment control provisions of the WDO are included in Article IV, Section B.1.j. of the ordinance. At a minimum, these standards apply to any development project that hydrologically disturbs 5,000 square feet of land or more.

As a Non-Certified Community, SMC is responsible for the administration and enforcement of the WDO within the City of Zion.

Measurable Goal(s): Continue Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.2 Erosion and Sediment Control BMPs

Article IV, Section B.1.j of the WDO specifies the soil erosion and sediment control measures that must be used in conjunction with any land disturbing activities conducted on a development site. It specifies the use of a variety of soil erosion and sediment control BMPs 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 7 days of active disturbance; avoid disturbance of streams whenever possible; use controls that are appropriate for the size of the 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. As Non-Certified Community, SMC is responsible for the administration and enforcement of the WDO within the City of Zion.

Measurable Goal(s): Continue to Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.3 Other Waste Control Program

Article IV, Section B.1.j of the WDO includes provisions related to the control of waste and debris during construction on development sites. As a Non-Certified Community, SMC is responsible for the administration and enforcement of the WDO within the City of Zion.

Measurable Goal(s): Continue to Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.4 Site Plan Review Procedures

A community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO. Within certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO), responsibility for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO lies with the MS4; within non-certified communities, the designated enforcement officer is SMC's chief engineer. Since the City of Zion is a Non-Certified Community, SMC's Chief Engineer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within the City of Zion.

Measurable Goal(s): Continue to Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.6 Site Inspection/Enforcement Procedures

Article VI of the WDO contains both recommended and minimum requirements for the inspection of development sites. Within certified communities, the community's designated enforcement officer is responsible for conducting these inspections; within non-certified communities, SMC's chief engineer is responsible for conducting these inspections. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls. Since the City of Zion is a Non-Certified Community, SMC's Chief Engineer is responsible for conducting site inspections within the City of Zion.

Article VII of the WDO specifies the legal actions that may be taken and the penalties that may be imposed if the provisions of the WDO are violated. If development activities on a development site are not in compliance with the requirements of the WDO, the enforcement officer may issue a stop work order on all development activity on the development site or on the development activities that are in direct violation of the WDO. In addition, failure to comply with any of the requirements of the WDO constitutes a violation of the WDO, and any person convicted of violating the WDO may be fined.

Measurable Goal(s): Continue to Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E. Post-Construction Runoff Control

As described above, Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County. The WDO, which is administered and enforced within the City of Zion by SMC, establishes standards for Post-Construction Runoff Control. Although the City of Zion intends to share responsibility for the implementation of the Post-Construction Runoff Control MCM with the QLP, as outlined in this NOI, the primary responsibility for the implementation of the Post-Construction Runoff Control MCM lies with SMC, as the City of Zion is currently a Non-Certified Community, as defined by the WDO.

E.2 Regulatory Control Program

The WDO requires all applicants to adopt stormwater management strategies for controlling post-construction stormwater runoff on development sites. As outlined in Article IV, Section B.1 of the WDO, all applicants must adopt stormwater management strategies that minimize increases in stormwater runoff rates, volumes, and pollutant loads from development sites. Proposed stormwater management strategies must address the runoff volume reduction requirements described in Article IV, Section B.1.d of the WDO and must include appropriate stormwater BMPs to address the other applicable post-construction runoff control

requirements of the WDO. As a Non-Certified Community, SMC's Chief Engineer is responsible for the administration and enforcement of the WDO within the City of Zion.

Measurable Goal(s): Continue to Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.3 Long Term O&M Procedures

The City of Zion has developed long-term operation and maintenance procedures to help reduce the amount of pollution contained in post-construction stormwater runoff that enters the City of Zion's storm sewer system. The procedures address both new and existing development.

The City of Zion's long-term operation and maintenance procedures address new development via the WDO. The WDO requires that maintenance plans be developed for all stormwater management systems designed to serve major developments, as defined by the WDO. Such maintenance plans must include: a description of all maintenance tasks; an identification of the party or parties responsible for performing such maintenance tasks; a description of all permanent maintenance easements or access agreements, overland flow paths, and compensatory storage areas; and a description of dedicated sources of funding for the required maintenance. The WDO also requires that all stormwater management systems be located within a deed or plat restriction (e.g., easement) to ensure that the system remains in place in perpetuity and that access to the system is maintained in perpetuity for inspection and maintenance purposes. As a Non-Certified Community, SMC is responsible for the administration and enforcement of the WDO within the City of Zion.

The City of Zion's long-term operation and maintenance procedures address existing development via an inspection and maintenance program. The City of Zion periodically inspects all existing post-construction stormwater management facilities (e.g., detention facilities), including those that have a maintenance plan (i.e., facilities located within developments regulated by the WDO) as well as those that do not (i.e., facilities located within developments pre-dating, and therefore not regulated by, the WDO), to identify any maintenance tasks and/or any repairs that need to be completed. Responsible parties are notified of the inspection results and of the need to complete any maintenance tasks or repairs.

Measurable Goal(s): Continue to Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.4 Pre-Construction Review of BMP Designs

As described above, a community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the

provisions of the WDO. This includes a review of the stormwater BMPs that will be used to meet the post-construction runoff control requirements of the WDO. Since the City of Zion is a Non-Certified Community, SMC's Chief Engineer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within the City of Zion.

Measurable Goal(s): Continue to Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.5 Site Inspections During Construction

As described above, Article VI of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls. Since the City of Zion is a Non-Certified Community, SMC's Chief Engineer is responsible for conducting site inspections within the City of Zion.

Measurable Goal(s): Continue to Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.6 Post-Construction Inspections

As described above, Article VI of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process, including after final stabilization and landscaping, after the removal of soil erosion and sediment controls. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls. Since the City of Zion is a Non-Certified Community, SMC's Chief Engineer is responsible for conducting site inspections within the City of Zion.

Measurable Goal(s): Continue to Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

F. Pollution Prevention/Good Housekeeping

In accordance with the current version of the Permit, the City of Zion has developed and implemented a Pollution Prevention/Good Housekeeping program to reduce the amount of pollution generated by municipal activities and operations. The program includes: an operation and maintenance program that incorporates pollution prevention and good housekeeping into day-to-day activities and operations; spill prevention and response procedures; and, an employee training program.

In coordination and collaboration with the QLP, the City of Zion will continue to perform activities related to the Pollution Prevention/Good Housekeeping minimum control measure, as described below. Note that although the City of Zion intends to share responsibility for the implementation of the Pollution Prevention/Good Housekeeping MCM with the QLP, as outlined in this NOI, the primary responsibility for the implementation of the Pollution Prevention/Good Housekeeping MCM lies with the SMC.

F.1 Employee Training Program

The City of Zion has developed and implemented an employee training program to help educate employees about the impacts of the pollution generated by municipal activities and operations and the steps that they can take to reduce those impacts. The employee training program teaches employees about the following: the impacts of stormwater runoff on receiving water bodies; the activities and operations that may be sources of stormwater pollution and/or non-stormwater discharges; the roles and responsibilities of each department and each individual employee in reducing the amount of pollution generated by municipal activities and operations; selecting and implementing stormwater best management practices; and, managing and maintaining green infrastructure practices.

Employees are subjected to a software-based employee training program, which provides baseline training on municipal pollution prevention/good housekeeping and are encouraged to attend relevant training opportunities that appear on the list of known employee training resources and opportunities provided by the QLP. Additionally, the City of Zion works to identify and develop employee training resources and opportunities that contain educational materials tailored to those activities and operations conducted by specific departments and employees.

Measurable Goal(s): Continue to develop and implement employee training program.

Milestone(s): The City of Zion began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

Stormwater Management Program Assessment, Year 12

An overall assessment of the MS4's stormwater management program and the appropriateness of its BMPs is provided below.

B. Public Participation/Involvement

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.

The City of Zion continues to implement the BMPs described in its NOI and to track progress in implementing its stormwater management program.

C. Illicit Discharge Detection and Elimination

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the SMPP.

The City of Zion continues to implement the BMPs described in its NOI and to track progress in implementing its stormwater management program.

D. Construction Site Runoff Control

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI. Assist SMC in ensuring that all applicable developments are in compliance with the WDO.

The City of Zion continues to implement the BMPs described in its NOI and to track progress in implementing its stormwater management program.
The City of Zion continues to assist SMC in ensuring that all applicable developments are in compliance with the WDO.

E. Post-Construction Runoff Control

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI. Assist SMC in ensuring that all applicable developments are in compliance with the WDO.

The City of Zion continues to implement the BMPs described in its NOI and to track progress in implementing its stormwater management program.
The City of Zion continues to assist SMC in ensuring that all applicable developments are in compliance with the WDO.

F. Pollution Prevention/Good Housekeeping

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.

The City of Zion continues to implement the BMPs described in its NOI and to track progress in implementing its stormwater management program.

Part C. MS4 Information and Data Collection Results, Year 12

Annual Monitoring and Data Collection, Year 12

Information and data that the MS4 collected to meet the annual monitoring requirement of IEPA's General NPDES Permit No. ILR40 are summarized below.

Water quality sampling was conducted within the receiving waters, both upstream and downstream of the MS4's stormwater discharges. A total of [number of sampling locations] sampling points are included in the MS4's annual monitoring program. At these locations, the physical characteristics of the sampling point were observed and water quality samples (i.e., grab samples) were collected. Collected water quality samples were tested for: [list of monitoring parameters (e.g., copper, phosphorus, chlorine, ammonia, alkalinity, and pH)]. There were no noticeable increases in these water quality parameters between the upstream and downstream sampling points.

IDDE Monitoring and Data Collection, Year 12

Information and data that the MS4 collected as part of its illicit discharge detection and elimination program are summarized below.

A total of 4 dry weather flows were investigated at stormwater outfalls. No potential illicit discharges were identified at any of these locations.

Part D. MS4 Summary of Year 13 Stormwater Activities

The table below indicates the stormwater management activities that the MS4 plans to undertake during Year 13. Additional information about the stormwater management activities that the MS4 will perform during Year 13 is provided in the section following the table.

Note: X indicates BMPs that will be implemented during Year 13

Year 13	
MS4	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
	A.3 Public Service Announcement
	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
	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
	C.3 Detection/Elimination Prioritization Plan
	C.4 Illicit Discharge Tracing Procedures
	C.5 Illicit Source Removal Procedures
	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 13	
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
	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
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
	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls

Please note that the most recent version of IEPA's General NPDES Permit No. ILR40 (Permit) expired on March 31, 2014, but has been administratively continued by IEPA. Since the new version of the Permit has not yet been released to the public, and there is not yet a timeline for its release, the MS4 assumes that the most recent version of the Permit will continue to apply through the at least the end of Year 13. The MS4 remains committed to performing activities related to the six MCMs described in the most recent version of the Permit.

Stormwater Management Activities, Year 13

During Year 13, the City of Zion plans to continue to perform a variety of stormwater management activities. The City plans to develop and implement a SMPP. The completed SMPP will be viewed at cityofzion.com.

A. Public Education and Outreach

The City of Zion is committed to implementing the Public Education and Outreach component of its SMPP. The Cities Public Education and Outreach program includes: the distribution of educational material to the community or conducting equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce those impacts; supporting classroom education; supporting storm drain stenciling efforts; and, supporting SWALCO events.

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the SMPP.

B. Public Participation/Involvement

The City of Zion is committed to implementing the Public Participation/Involvement component of its SMPP. The Cities Public Participation/Involvement program includes: maintaining a process for receiving and processing citizen input; attending and publicizing stakeholder meetings; presenting program information at a public meeting at least once annually; and, publicizing IDDE reporting contact numbers.

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the SMPP.

C. Illicit Discharge Detection and Elimination

The City of Zion will conduct activities related to the Illicit Discharge Detection and Elimination (IDDE) minimum control measure. According to IEPA's General NPDES Permit No. ILR40, the MS4's IDDE program must include:

- A storm sewer system map showing the locations of all outfalls and the names and locations of all waters that receive discharges from those outfalls;
- An ordinance or other regulatory mechanism that prohibits all non-storm water discharges into the storm sewer system and provides the authority for appropriate enforcement procedures and actions;
- A plan to detect and address all non-stormwater discharges, including illegal dumping, into the storm sewer system;
- A program to educate public employees, businesses, and the general public about the

- hazards associated with illegal discharges and improper disposal of waste; and,
- Periodic inspection of storm sewer outfalls for detection of non-stormwater discharges and illegal dumping.

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the SMPP.

D. Construction Site Runoff Control

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

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the SMPP. Assist SMC in ensuring that all applicable developments are in compliance with the WDO.

E. Post-Construction Runoff Control

As described above, the countywide 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 City of Zion's SMPP will also include inspection procedures for pre-WDO developments, streambanks and shorelines, streambeds, and detention/retention ponds.

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the SMPP. Assist SMC in ensuring that all applicable developments are in compliance with the WDO.

F. Pollution Prevention/Good Housekeeping

The City of Zion is committed to implementing the Pollution Prevention/Good Housekeeping component of its SMPP. The MS4's Pollution Prevention/Good Housekeeping program includes: the evaluation and improvement of municipal policies and procedures to reduce the discharge of pollutants from municipal activities and operations; and, a training program for municipal employees.

Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the SMPP.

Part E. Notice of Qualifying Local Program

The Lake County Stormwater Management Commission (SMC) serves as a Qualifying Local Program (QLP) for MS4s in Lake County. In accordance with IEPA's General NPDES Permit No. ILR40, as a QLP, SMC performs activities related to each of the six minimum control measures. This part of the Annual Report, which summarizes the stormwater management activities performed by SMC as a QLP, consists of the following five sections:

- **Part E1** identifies changes to Best Management Practices (BMPs) that occurred during Year 12 and includes information about how these changes affected the QLP's stormwater management program.
- **Part E2** describes the stormwater management activities that the QLP performed during Year 12.
- **Part E3** summarizes the information and data collected by the QLP during Year 12.
- **Part E4** describes the stormwater management activities that the QLP plans to undertake during Year 13.
- **Part E5** lists the construction projects conducted by the QLP during Year 12.

Part E1. QLP Changes to Best Management Practices, Year 12

Note: X indicates BMPs that were implemented as planned
✓ indicates BMPs that were changed during Year 12

Year 12	
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 12	
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
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

Part E2. QLP Status of Compliance with Permit Conditions, Year 12

The Lake County Stormwater Management Commission (SMC) serves as a Qualifying Local Program (QLP) for MS4s in Lake County. In accordance with IEPA's NPDES General Permit No. ILR40, as a QLP, SMC performs activities related to each of the six minimum control measures. The stormwater management activities that the QLP performed during Year 12 are described below.

A. Public Education and Outreach

A.1 Distributed Paper Material

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

SMC distributes a variety of informational materials related to stormwater management through its "take away" rack and website. Upon request, informational materials are distributed directly to Lake County MS4s in .PDF format for use on community websites, in community newsletters, and in community "take away" racks.

A.3 Public Service Announcement

Measurable Goal(s): Include public service announcement highlighting community accomplishments related to IEPA's NPDES Stormwater Program in "Mainstream" once annually. Post watershed identification signage with LCDOT. Upon request, present "The Big Picture: Water Quality, Regulations & NPDES" to Lake County MS4s.

SMC includes announcements highlighting community accomplishments related to IEPA's NPDES Stormwater Program on its website, in its newsletter, and through other media outlets.

Watershed identification signage is located throughout the county.

SMC continues to make available "The Big Picture: Water Quality, Regulations & NPDES" presentation to Lake County MS4s.

A.4 Community Event

Measurable Goal(s): Sponsor or co-sponsor workshop on a topic related to IEPA's NPDES Stormwater Program.

SMC sponsored or co-sponsored a number of workshops and events on stormwater-related topics between March 1, 2014 and February 28, 2015, including:

- **Webcast on The Life of a Stormwater Practice: The Role of Local Codes on Mar. 12, 2014**
- **Presentation from IEPA on IEPA's Proposed New General NPDES Permit No. ILR40 at Mar. 19, 2014 MAC meeting**
- **Presentation on Des Plaines River Watershed Workgroup at Mar. 19, 2014 MAC meeting**
- **Designated Erosion Control Inspector (DECI) Workshop held on Mar. 28, 2014**
- **Webcast on The Life of a Stormwater Practice: Design and Construction of BMPs on Apr. 9, 2014**
- **Homeowners Association (HOA) Stormwater Maintenance Workshop held on Apr. 16, 2014**
- **Fox River/Chain O'Lakes river clean-up in Fox Lake, Port Barrington & Antioch, IL May 3, 2014**
- **Chicago River Day clean-up in Highland Park, Lake Forest & Deerfield, IL on May 9, 2014**
- **Rain Barrel, Compost Bin, and Native Plant Sale held on May 9, 2014**
- **Webcast on The Life of a Stormwater Practice: BMP Maintenance on May 21, 2014**
- **Presentation on Fox River Study Group's Fox River Implementation Plan at Jun. 11, 2014 MAC meeting**
- **Presentation on ASCE's Envision's Rating System at Jun. 11, 2014 MAC meeting**
- **Webcast on How to Pick the Right Vegetation for Bioretention and Its Cousins on Jun. 11, 2014**
- **Workshop on Watershed-Based Planning at Beyond the Basics 2014: Making Green Stormwater Practices Pay Off for Your Community Conference on Sep. 9, 2014**
- **Webcast on Stream Restoration as a Pollutant Reduction Strategy on Sep. 10, 2014**
- **Presentation on Municipal Spill Response Programs at Sep. 10, 2014 MAC meeting**
- **Des Plaines River clean-up in Riverwoods, IL on Sep. 13, 2014**
- **Presentation on the Illinois Urban Manual at Sep. 10, 2014 MAC meeting**
- **Roadway De-Icing Workshop held on Oct. 7 & 8, 2014**
- **Webcast on Implementing TMDLs: Local TMDLs and Regional/River Basin TMDLs: A Happy Engagement or a Shotgun Wedding on Oct. 8, 2014**
- **Webcast on Implementing TMDLs: Retrofitting Existing Stormwater Ponds & Basins on Nov. 12, 2014**
- **Presentation from IEPA on the Requirements of and Expectations Associated with IEPA's General NPDES Permit No. ILR40 at Dec. 10, 2014 MAC meeting**

- **Webcast on Using Illicit Discharge Programs to Monitor Bacteria on Feb. 18, 2015**

A.5 Classroom Education

Measurable Goal(s): 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.

Stormwater educational materials were compiled for use at several public education events that were held between March 1, 2014 and February 28, 2015, including:

- **Lake County Green Living Fair held in Libertyville, IL on Mar. 15, 2014**
- **Homeowners Association (HOA) Stormwater Maintenance Workshop held on Apr. 16, 2014**
- **Rain Barrel, Compost Bin, and Native Plant Sale held on May 9, 2014**
- **Village of Round Lake Public Works Week Celebration held in Round Lake, IL on May 21, 2014**
- **League of Women Voters Presentations on Lake Michigan: Stormwater From the Ground Up held in various locations on Jul. 9, Jul. 31, and Sep. 14, 2014**

A.6 Other Public Education

Measurable Goal(s): Maintain and update the portion of the SMC website dedicated to IEPA's NPDES Stormwater Program with resource materials such as model ordinances, case studies, brochures and web links.

Make "The Big Picture: Water Quality, Regulations & NPDES" presentation available to Lake County MS4s.

As new information and resource materials become available, they are posted to the SMC website and/or distributed directly to Lake County MS4s.

SMC continues to make available "The Big Picture: Water Quality, Regulations & NPDES" presentation to Lake County MS4s.

B. Public Participation/Involvement

B.1 Public Panel

Measurable Goal(s): Provide notice of public meetings on SMC website.

Track number of meetings conducted.

Notice of all public meetings continues to be provided on the SMC website and through direct mailings and e-mailings to distribution lists.

SMC tracked the number of Stormwater Management Committee Board (SMC) meetings, Technical Advisory Committee (TAC) meetings, Municipal Advisory Committee (MAC), and Watershed Management Board (WMB) meetings conducted during Year 12. According to records, there were 9 SMC meetings, 2

TAC meetings, 4 MAC meetings, and 1 WMB meeting conducted during this reporting period.

B.3 Stakeholder Meeting

*Measurable Goal(s): 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.*

Notice of all stakeholder meetings continues to be provided on the SMC website and through direct mailings and e-mailings to stakeholder lists.

SMC tracked the number of stakeholder meetings conducted for the various watershed planning committees during the reporting period. The list below summarizes the watershed planning committee meetings that were conducted during Year 12:

- **North Branch Chicago River Planning Committee – 4**
- **North Branch Watershed Consortium – 1**
- **Mill Creek Watershed Planning Committee – 1**
- **Bull Creek/Bull's Brook Watershed Council – 4**
- **Buffalo Creek Clean Water Partnership – 5**
- **Flint Creek Watershed Partnership – 2**
- **Tower Lake Drain Watershed Partnership – 4**
- **9 Lakes Watershed Planning Committee – 2**

SMC continues to establish and/or assist watershed planning committees for each new watershed planning effort.

B.6 Program Coordination

*Measurable Goal(s): Track number of MAC meetings conducted during Year 12.
Prepare annual report on Qualifying Local Program activities at end of Year 12.*

SMC tracked the number of Municipal Advisory Committee (MAC) meetings conducted during Year 12. According to records, there were 4 MAC meetings conducted during this reporting period.

The stormwater management activities that SMC performed as a QLP during Year 12 are described in the Annual Facility Inspection Report (i.e., Annual Report) template provided to Lake County MS4s. The stormwater management activities that SMC plans to perform as a QLP during Year 13 are described in Part E4 of the Annual Report template.

C. Illicit Discharge Detection and Elimination

C.2 Regulatory Control Program

Measurable Goal(s): Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

C.10 Other Illicit Discharge Controls

Measurable Goal(s): Sponsor or co-sponsor and track the number of attendees at an Illicit Discharge Detection and Elimination workshop or other training workshop related to IEPA's NPDES Stormwater Program.

SMC sponsored or co-sponsored a number of workshops and events on stormwater-related topics between March 1, 2014 and February 28, 2015. Such workshops and events are described above.

D. Construction Site Runoff Control

D.1 Regulatory Control Program

*Measurable Goal(s): Continue to enforce the countywide WDO.
Administer the Designated Erosion Control Inspector (DECI) program outlined by the WDO.*

SMC continues to enforce the countywide WDO.

SMC continues to administer the Designated Erosion Control Inspector (DECI) program as outlined by the WDO.

D.2 Erosion and Sediment Control BMPs

*Measurable Goal(s): Continue to enforce the countywide WDO.
Complete TRM update and work toward final approval and publication of the document.*

SMC continues to enforce the countywide WDO.

The TRM is currently being updated to include guidance on the WDO amendments as well as ordinance administration and enforcement.

D.3 Other Waste Control Program

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

SMC continues to enforce the countywide WDO.

D.4 Site Plan Review Procedures

*Measurable Goal(s): Track number of enforcement officers who have passed the exam.
Track number of communities that undergo a performance review.
Complete ordinance administration and enforcement chapter of TRM.*

SMC continues to track the number of enforcement officers (EOs) who have passed the EO exam and have become EOs. According to records, as of the end of Year 12, there were 67 EOs in Lake County.

SMC last completed a cycle of the community re-certification process, which included a performance review of all 53 certified and non-certified communities, during a previous reporting period (i.e., Year 9). In accordance with the amended countywide WDO, the next cycle of the community re-certification process is scheduled to be completed in 2017.

The TRM is currently being updated to include guidance on the WDO amendments as well as ordinance administration and enforcement.

D.5 Public Information Handling Procedures

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

SMC continues to track the number of complaints received and processed related to soil erosion and sediment control. According to records, between March 1, 2014 and February 28, 2015, 4 SE/SC complaints were received and processed by SMC staff.

D.6 Site Inspection/Enforcement Procedures

Measurable Goal(s): Track number of site inspections conducted by SMC.

SMC continues to track the number of site inspections conducted by SMC staff. According to records, between March 1, 2014 and February 28, 2015, 655 site inspections were conducted by SMC staff.

E. Post-Construction Runoff Control

E.2 Regulatory Control Program

Measurable Goal(s): Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

E.3 Long Term O&M Procedures

Measurable Goal(s): Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

E.4 Pre-Construction Review of BMP Designs

Measurable Goal(s): Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

E.5 Site Inspections During Construction

Measurable Goal(s): Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

E.6 Post-Construction Inspections

Measurable Goal(s): Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

E.7 Other Post-Construction Runoff Controls

*Measurable Goal(s): Conduct annual WMB meeting.
Contribute funding to flood reduction and water quality improvement projects, including stormwater retrofits, through the WMB.*

The annual WMB meeting was held on Dec. 11, 2014.

At the annual WMB meeting, 16 flood reduction and water quality improvement projects, including stormwater retrofit projects, were selected to receive \$152,000 of funding through the WMB.

F. Pollution Prevention/Good Housekeeping

F.1 Employee Training Program

*Measurable Goal(s): Provide list of available resources to MS4s.
Sponsor or co-sponsor employee training workshops or events.
Make available the Excal Visual Municipal Storm Water Pollution Prevention Storm Watch Everyday Best Management Practices software.*

SMC continues to provide information on training opportunities and training resources to Lake County MS4s.

SMC sponsored or co-sponsored a number of workshops and events on stormwater-related topics between March 1, 2014 and February 28, 2015. Such workshops and events are described above.

SMC continues to make available the Excal Visual Storm Watch Municipal Stormwater Pollution Prevention software to Lake County MS4s. According to records, between March 1, 2014 and February 28, 2015, 1 MS4 borrowed the Excal Visual software.

F.5 Flood Management/Assess Guidelines

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

SMC continues evaluate all SMC-sponsored projects for multi-objective opportunities, such as flood control and water quality.

Part E3. QLP Information and Data Collection Results, Year 12

The QLP did not collect any monitoring data on behalf of Lake County's MS4s during Year 12. However, SMC has reviewed information presented by the Illinois EPA in the 2014 Illinois Integrated Water Quality Report and 303(d) List and has developed the brief "State of Lake County's Waters" report provided below.

State of Lake County's Waters April 2015

This brief report is based on information contained in the Illinois EPA's 2014 Illinois Integrated Water Quality Report and Section 303(d) List, dated March 24, 2014. Its purpose is to provide basic information to Lake County's MS4 on the condition of surface waters within Lake County. More detailed information about the condition of surface waters in Lake County can be found in the Illinois EPA's 2014 Illinois Integrated Water Quality Report and Section 303(d) List.

Streams

An analysis of data accompanying the Illinois EPA's 2014 Illinois Integrated Water Quality Report and Section 303(d) List shows that 183 stream miles in Lake County have been assessed by the Illinois EPA for attainment of at least one designated use. The degree of support (attainment) of a designated use in a particular stream segment is determined by the Illinois EPA through an analysis of various types of information, including biological, physicochemical, physical habitat, and toxicity data. When sufficient data are available, the Illinois EPA assesses each applicable designated use in a particular stream segment as Fully Supporting (good), Not Supporting (fair), or Not Supporting (poor). Waters in which at least one applicable use is not fully supported are called "impaired."

An analysis of data accompanying the Illinois EPA's 2014 Illinois Integrated Water Quality Report and Section 303(d) List shows that 139 stream miles (of the 183 stream miles that have been assessed) in Lake County are considered impaired by the Illinois EPA. These stream segments have been mapped and are shown in Figure E3.1.

Lakes

An analysis of data accompanying the Illinois EPA's 2014 Illinois Integrated Water Quality Report and Section 303(d) List shows that 170 inland lakes in Lake County have been assessed by the Illinois EPA for attainment of at least one designated use. As with streams, the degree of support (attainment) of a designated use in a particular lake is determined by the Illinois EPA through an analysis of various types of information, including biological, physicochemical, physical habitat, and toxicity data. When sufficient data are available, the Illinois EPA assesses each applicable designated use in a particular lake as Fully Supporting (good), Not Supporting (fair), or Not Supporting (poor). Waters in which at least one applicable use is not fully supported are called "impaired."

An analysis of data accompanying the Illinois EPA's 2014 Illinois Integrated Water Quality Report and Section 303(d) List shows that 135 inland lakes in Lake County are considered impaired by the Illinois EPA. These lakes have been mapped and are shown in Figure E3.1.

Lake Michigan

Lake Michigan is monitored by the Illinois EPA through the Lake Michigan Monitoring Program. Bordering Cook and Lake Counties, the State of Illinois has jurisdiction over approximately 1,526 square miles of open water, 2.62 square miles of harbors, and 64 shoreline miles of Lake Michigan.

196 square miles of open water of Lake Michigan, or about thirteen percent of the total open water located within Illinois, were assessed for the Illinois EPA's 2014 Illinois Integrated Water Quality Report and Section 303(d) List, and all 196 assessed square miles were rated as Fully Supporting for the following uses: aquatic life use, primary contact use, secondary contact use, and public and food processing water supply use. However, fish consumption use in all 196 assessed square miles of open water was rated as Not Supporting due to contamination from polychlorinated biphenyls (PCBs) and mercury. Additionally, aesthetic quality use in all 196 assessed square miles of open water was rated as Not Supporting due to exceedances of the Lake Michigan open water standard for total phosphorus. It should be noted that such exceedances do not necessarily indicate that there are offensive conditions in Lake Michigan due to excessive algal or aquatic plant growth.

A portion of all 2.62 square miles of harbors of Lake Michigan located in Illinois were assessed for the Illinois EPA's 2014 Illinois Integrated Water Quality Report and Section 303(d) List for several different designated uses. 66.7 percent of the square miles of harbors assessed for aesthetic quality (i.e., 0.12 of 0.18 sq. mi.) were rated as Fully Supporting, while the remaining 33.3 percent (i.e., 0.06 of 0.18 sq. mi.) were rated as Not Supporting. 97.6 percent of the square miles of harbors assessed for aquatic life use (i.e., 2.52 of 2.58 sq. mi.) were rated as Fully Supporting, while the remaining 2.4 percent (i.e., 0.06 of 2.58 sq. mi.) were rated as Not Supporting. 100 percent of the square miles of bays and harbors assessed for fish consumption (i.e., 2.62 of 2.62 sq. mi.), were rated as Not Supporting. Potential causes of impairment in the harbors of Lake Michigan located in Illinois include contamination from polychlorinated biphenyls (PCBs), mercury, bottom deposits, lead, zinc, cadmium, arsenic, phosphorus, copper, and chromium.

A portion of all 64 shoreline miles of Lake Michigan located in Illinois were assessed for the Illinois EPA's 2014 Illinois Integrated Water Quality Report and Section 303(d) List for several different designated uses. All 64 of the shoreline miles assessed for fish consumption and primary contact use were rated as Not Supporting due to bacterial contamination from *Escherichia coli* (*E. coli*) bacteria and contamination from polychlorinated biphenyls (PCBs) and mercury.

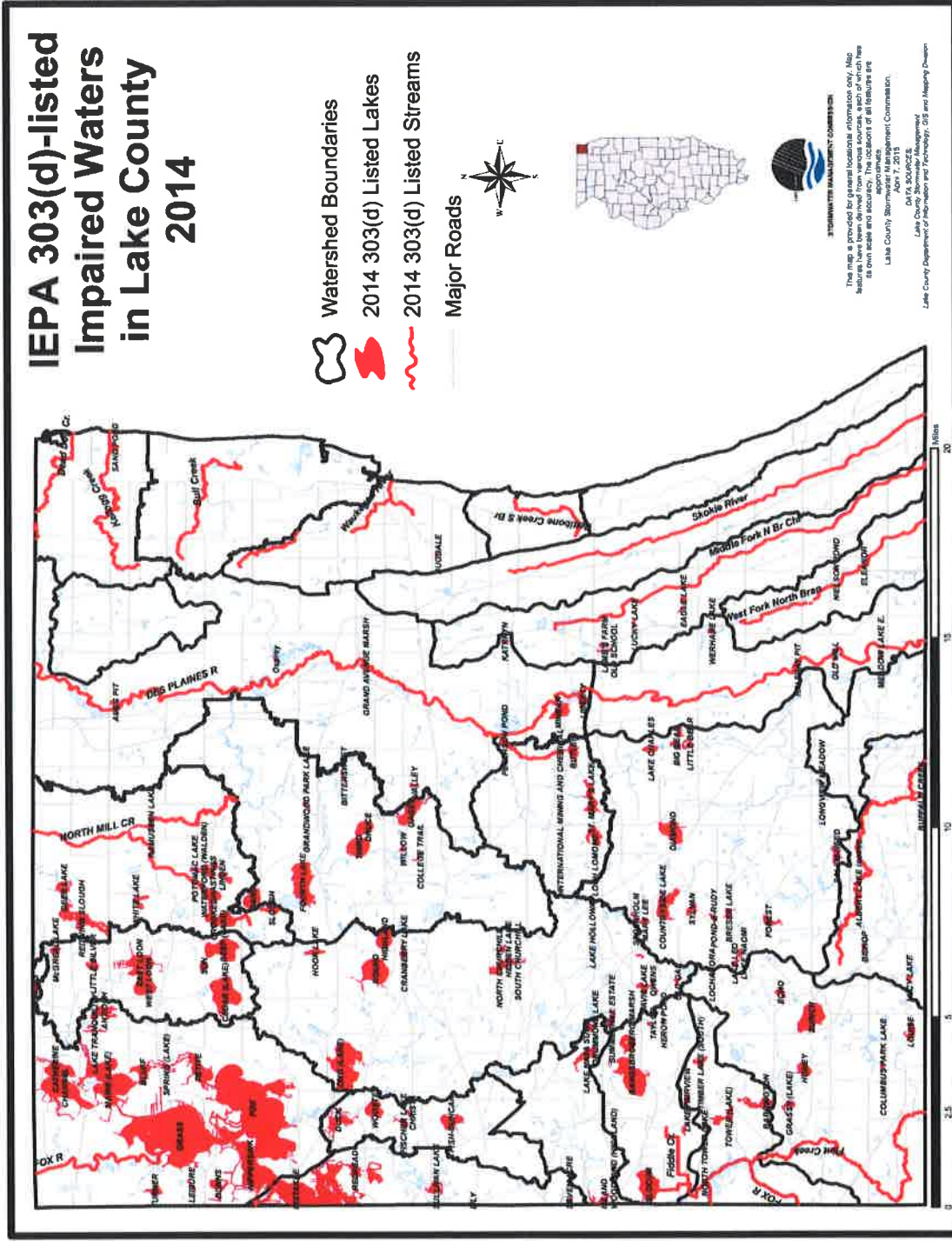


Figure E3.1

Part E4. QLP Summary of Year 13 Stormwater Activities

The table below indicates the stormwater management activities that the QLP plans to undertake during Year 13. Additional information about the BMPs and measurable goals that the QLP will implement during Year 13 is provided in the section following the table.

Note: X indicates BMPs that will be implemented during Year 13

Year 13	
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 13	
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
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

Please note that the most recent version of IEPA's General NPDES Permit No. ILR40 (Permit) expired on March 31, 2014, and that the new version of the Permit has not yet been released to the public. Although it is difficult to accurately predict the changes that IEPA will make to the new version of the Permit, SMC remains committed to performing activities related to the six MCMs described in the most recent version of the Permit.

During Year 13, SMC plans to continue to perform a variety of stormwater management activities, as described in more detail below. In addition to the stormwater management activities described below, SMC will continue to provide general support to Lake County MS4s as they continue to implement their stormwater management programs.

A. Public Education and Outreach

SMC will continue to support Lake County MS4s in the development and implementation of their stormwater management programs by performing activities related to the Public Education and Outreach minimum control measure, as described below.

A.1 Distributed Paper Material

SMC compiles, develops, and distributes throughout Lake County a variety of materials related to stormwater management. SMC has produced a number of pamphlets and brochures related to stormwater management and prepares a quarterly newsletter, "Mainstream," as well as an Annual Report, which highlight successful stormwater management activities conducted throughout Lake County. SMC also prepares project fact sheets that provide information about ongoing and recently completed stormwater management projects. In addition, SMC has developed or collaborated on a number of manuals related to stormwater management, such as "Riparian Areas Management: A Citizen's Guide," "A Citizen's Guide to Maintaining Stormwater Best Management Practices," and the "Streambank Stabilization Manual," and will continue to develop or collaborate on such manuals or manual updates on an as-needed basis.

Measurable Goal(s): Distribute informational materials from "take away" rack at SMC. Upon request, distribute informational materials directly to Lake County MS4s for local distribution.

A.2 Speaking Engagement

SMC provides educational presentations related to IEPA's NPDES Stormwater Program on a regular basis at Municipal Advisory Committee (MAC) meetings. Upon request, SMC will provide educational presentations related to IEPA's NPDES Stormwater Program to Lake County MS4s.

Measurable Goal(s): Provide educational presentations related to IEPA's NPDES Stormwater Program at MAC meetings. Upon request, provide educational presentations related to IEPA's NPDES Stormwater Program (e.g., "The Big Picture: Water Quality, Regulations & NPDES") to Lake County MS4s.

A.3 Public Service Announcement

A public service announcement related to IEPA's NPDES Stormwater Program will be included in SMC's Quarterly Newsletter, "Mainstream," at least once each year. SMC will coordinate with the Lake County Department of Transportation (LCDOT) to post watershed identification signage in watersheds where watershed planning activities have occurred or are occurring.

*Measurable Goal(s): Include public service announcement related to IEPA's NPDES Stormwater Program in its quarterly newsletter, "Mainstream," at least once each year.
Post watershed identification signage in cooperation and collaboration with LCDOT.*

A.4 Community Event

SMC sponsors and co-sponsors educational and technical training workshops on a variety of stormwater management-related topics. Each year, SMC will sponsor or co-sponsor at least one workshop on a topic related to IEPA's NPDES Stormwater Program, such as soil erosion and sediment control, illicit discharge detection and elimination, or stormwater best management practices (BMPs) that can be used to protect and improve water quality.

Measurable Goal(s): Sponsor or co-sponsor workshop on a topic related to IEPA's NPDES Stormwater Program.

A.5 Classroom Education Material

Upon request, SMC will contribute to the development and compilation of material for inclusion in a stormwater education kit that can be distributed to local students and teachers and/or other local stakeholders. Additionally, upon request, SMC will provide information, materials, and training to local students and teachers and/or other local stakeholders interested in conducting storm drain stenciling.

*Measurable Goal(s): Upon request, develop and compile materials for inclusion in a stormwater education kit.
Upon request, provide information, materials, and training to local students and teachers and/or stakeholders interested in conducting storm drain stenciling.*

A.6 Other Public Education

SMC maintains a website that contains a variety of materials and resources related to stormwater management. The website includes webpages such as "National Pollutant Discharge Elimination System Stormwater Program," "Best Management Practices," "Projects," "Publications," "Watershed Management Plans," "Partnerships," and "Advisory Committees." These webpages provide information about IEPA's NPDES Stormwater Program, provide information about stormwater best management practices (BMPs), allow for download of stormwater management-related publications and documents, provide notices of upcoming meetings and ongoing projects, and provide links to a number of other stormwater management-related resources.

Measurable Goal(s): Maintain and update the portion of the SMC website dedicated to IEPA's NPDES Stormwater Program with resources such as model ordinances, case studies, brochures, and links.

B. Public Participation/Involvement

SMC will continue to support Lake County MS4s in the development and implementation of their stormwater management programs by performing activities related to the Public Participation/Involvement minimum control measure, as described below.

B.3 Stakeholder Meeting

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 the watershed stakeholders. Watershed stakeholders may include municipalities, townships, drainage districts, homeowner associations, lakes management associations, developers, landowners, and local, county, state, and federal agencies.

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

B.4 Public Hearing

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

The Technical Advisory Committee (TAC) was created in 1992 to assist in the development, review, and revision of the Watershed Development Ordinance (WDO) and the associated administrative policies and procedures. TAC is made up of representatives from the development, environmental, municipal, and consulting 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 firm, and county representatives. MAC has worked to discuss, coordinate, and collaborate on the implementation of IEPA's NPDES Stormwater Program. MAC will continue to meet quarterly or as needed to assist Lake County MS4s with the implementation of IEPA's Stormwater Program.

The Watershed Management Board (WMB) meets annually to make recommendations on stormwater BMP project funding. WMB members include chief municipal elected officials, township supervisors, drainage district chairs, and county board members from each district within each of Lake County's four major watersheds.

*Measurable Goal(s): Provide notice of public meetings on SMC website.
Track number of meetings conducted.*

B.6 Program Coordination

Consistent with Lake County's comprehensive, countywide approach to stormwater management, SMC serves as a Qualifying Local Program (QLP) for all Lake County MS4s. In this role, in 2002, SMC proactively formed the Municipal Advisory Committee (MAC) to provide a forum for representatives of local MS4s, which include municipalities, townships, and drainage districts, to discuss, among other topics, the implementation of IEPA's NPDES Stormwater Program. SMC will continue to facilitate quarterly MAC meetings and will continue to provide general support to Lake County MS4s as they continue to develop and implement their stormwater management programs. SMC will prepare an annual report on its stormwater management activities and will provide guidance to Lake County MS4s in preparing their own annual reports.

*Measurable Goal(s): Track number of MAC meetings conducted.
Prepare annual report on Qualifying Local Program stormwater management activities.
Prepare template for use by Lake County MS4s in creating their own annual reports.*

C. Illicit Discharge Detection and Elimination

SMC will continue to support Lake County MS4s in the development and implementation of their stormwater management programs by performing activities related to the Illicit Discharge Detection and Elimination minimum control measure, as described below. Note, however, that the primary responsibility for the implementation of the Illicit Discharge Detection and Elimination minimum control measure lies with the MS4.

C.2 Regulatory Control Program

SMC provides local MS4s with model and example illicit discharge ordinances that prohibit all non-stormwater discharges, including illegal dumping, to the storm sewer system. Additionally, the WDO includes provisions that prohibit illicit discharges to the storm sewer system during construction (i.e., prior to final site stabilization) on development sites.

*Measurable Goal(s): Provide model and example illicit discharge ordinances to Lake County MS4s.
Continue to administer and enforce the WDO.*

C.10 Other Illicit Discharge Controls

SMC regularly sponsors and co-sponsors educational and technical training workshops on a variety of stormwater management-related topics. Each year, SMC will sponsor or co-sponsor an illicit discharge detection and elimination workshop or other training workshop related to IEPA's NPDES Stormwater Program and track the number of attendees that attend the workshop.

Additionally, as part of its public education and outreach efforts, SMC distributes informational materials throughout Lake County about the hazards associated with illegal discharges and the improper disposal of waste.

Measurable Goal(s): Sponsor or co-sponsor and track the number of attendees at an Illicit Discharge Detection and Elimination workshop or other training workshop related to IEPA's NPDES Stormwater Program. Distribute informational materials about the hazards of illicit discharges and illegal dumping from "take away" rack at SMC and SMC website.

D. Construction Site Runoff Control

Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County, including requirements for construction site runoff control. SMC will continue to support Lake County MS4s in the implementation of the Construction Site Runoff Control minimum control measure by administering and enforcing the WDO and performing other stormwater management activities, as described below. Note, however, that the primary responsibility for the implementation of the Construction Site Runoff Control minimum control measure in certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO) lies with the MS4.

D.1 Regulatory Control Program

The WDO is the regulatory mechanism that requires the use of soil erosion and sediment controls on development sites throughout Lake County. The soil erosion and sediment control provisions of the WDO are included in Article IV, Section B.1.j. of the ordinance. At a minimum, these standards apply to any development project that hydrologically disturbs 5,000 square feet of land or more.

SMC has also created a Designated Erosion Control Inspector (DECI) program. The purpose of the program is to facilitate positive communication between the permit issuing agency, whether such agency be SMC or a certified community, and the permit holder, by creating a single point of contact for the discussion and resolution of site soil erosion and sediment control issues and concerns. Furthermore, the program is intended to improve site conditions, minimize environmental impacts, and educate contractors, developers, and inspectors about the use of soil erosion and sediment control BMPs. It is worth noting that the DECI program was designed to closely mirror the inspection requirements of IEPA's General NPDES Permit No. ILR10.

Measurable Goal(s): Continue to administer and enforce the WDO. Continue to administer the Designated Erosion Control Inspector (DECI) program outlined by the WDO.

D.2 Erosion and Sediment Control BMPs

Article IV, Section B.1.j of the WDO specifies the soil erosion and sediment control measures that must be used in conjunction with any land disturbing activities conducted on a

development site. It specifies the use of a variety of soil erosion and sediment control BMPs, 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 7 days of active disturbance; avoid disturbance of streams whenever possible; use controls that are appropriate for the size of the 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.

SMC has also prepared a Technical Reference Manual (TRM) to accompany the WDO. The TRM is used to guide the creation of development plans that are in compliance with the provisions of the WDO and provides detailed information on the use of soil erosion and sediment control BMPs. It is currently being updated by the Technical Advisory Committee (TAC).

*Measurable Goal(s): Continue to administer and enforce the WDO.
Continue to work on updates to the Technical Reference Manual (TRM) and toward publication of the updated document.*

D.3 Other Waste Control Program

Article IV, Section B.1.j. of the WDO includes provisions related to the control of waste and debris during construction on development sites.

Measurable Goal(s): Continue to administer and enforce the provisions of the WDO related to the control of waste and debris during construction on development sites.

D.4 Site Plan Review Procedures

A community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provision of the WDO. Within certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO), responsibility for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO lies with the MS4; within non-certified communities, the designated enforcement officer is SMC's chief engineer. All designated enforcement officers must pass an exam in order to qualify to act as such. SMC administers this enforcement officer program, providing training on an as-needed basis to all enforcement officers to assist them in passing the exam, and maintains an up-to-date list identifying each community's designated enforcement officer. In addition to administering the enforcement officer program, SMC periodically reviews each community's WDO administration and enforcement records, using the results of such review to evaluate the performance of certified communities and designated enforcement officers.

SMC has also prepared a Technical Reference Manual (TRM) to accompany the WDO. The TRM is used to guide the creation of development plans that are in compliance with the provisions of the WDO and provides additional guidance on the administration and

enforcement of the ordinance. It is currently being updated by the Technical Advisory Committee (TAC).

*Measurable Goal(s): Administer the Enforcement Officer (EO) program outlined by the WDO.
Maintain an up-to-date list identifying each community's designated enforcement officer.
Periodically review each community's WDO administration and enforcement records.
Continue to work on updates to the Technical Reference Manual (TRM) and toward publication of the updated document.*

D.5 Public Information Handling Procedures

SMC provides a number of opportunities for the receipt and consideration of information submitted by the public. SMC's Citizen Inquiry Response System (CIRS) documents and tracks the resolution of problems and complaints reported by the public. SMC's website provides information on "who to call" for various stormwater-related problems and concerns. An Interagency Coordination Agreement between SMC, the US Army Corps of Engineers, and the Natural Resources Conservation Service specifies that if any of these agencies receive a report of a soil erosion and sediment control issue, they will relay such report to SMC. SMC will then investigate the report and prescribe appropriate corrective actions, sharing the results of such investigation with the property owner and any applicable local, state, or federal agencies. Within certified communities, such investigations are coordinated with the community's designated enforcement officer.

Measurable Goal(s): Document and track the number of soil erosion and sediment control-related complaints received and processed by SMC.

D.6 Site Inspection/Enforcement Procedures

Article VI of the WDO contains both recommended and minimum requirements for the inspection of development sites. Within certified communities, the community's designated enforcement officer is responsible for conducting these inspections; within certified communities, SMC's chief engineer is responsible for conducting these inspections. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls.

Article VII of the WDO specifies the legal actions that may be taken and the penalties that may be imposed if the provisions of the WDO are violated. If development activities on a development site are not in compliance with the requirements of the WDO, the enforcement officer may issue a stop work order on all development activity on the development site or on the development activities that are in direct violation of the WDO. In addition, failure to

comply with any of the requirements of the WDO constitutes a violation of the WDO, and any person convicted of violating the WDO may be fined.

Measurable Goal(s): Document and track the number of site inspections conducted by SMC.

E. Post-Construction Runoff Control

As described above, Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County, including requirements for post-construction runoff control. SMC will continue to support Lake County MS4s in the implementation of the Post-Construction Runoff Control minimum control measure by administering and enforcing the WDO and performing other stormwater management activities, as described below. Note, however, that the primary responsibility for the implementation of the Post-Construction Runoff Control minimum control measure in certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO) lies with the MS4.

E.2 Regulatory Control Program

The WDO requires all applicants to adopt stormwater management strategies for controlling post-construction stormwater runoff on development sites. As outlined in Article IV, Section B.1 of the WDO, all applicants must adopt stormwater management strategies that minimize increases in stormwater runoff rates, volumes, and pollutant loads from development sites. Proposed stormwater management strategies must address the runoff volume reduction requirements described in Article IV, Section B.1.d. of the WDO and must include appropriate stormwater BMPs to address the other applicable post-construction runoff control requirements of the WDO.

Measurable Goal(s): Continue to administer and enforce the WDO.

E.3 Long Term O&M Procedures

The WDO requires that maintenance plans be developed for all stormwater management systems designed to serve major developments, as defined by the WDO. Such maintenance plans must include: a description of all maintenance tasks; an identification of the party or parties responsible for performing such maintenance tasks; a description of all permanent maintenance easements or access agreements, overland flow paths, and compensatory storage areas; and, a description of dedicated sources of funding for the required maintenance. The WDO also requires that all stormwater management systems be located within a deed or plat restriction (e.g., easement) to ensure that the system remains in place in perpetuity and that access to the system is maintained in perpetuity for inspection and maintenance purposes.

Measurable Goal(s): Continue to administer and enforce the WDO.

E.4 Pre-Construction Review of BMP Designs

As described above, a community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO. This includes a review of the stormwater BMPs that will be used to meet the post-construction runoff control requirements of the WDO.

Measurable Goal(s): Continue to administer and enforce the WDO.

E.5 Site Inspections During Construction

As described above, Article VI of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls.

Measurable Goal(s): Continue to administer and enforce the WDO.

E.6 Post-Construction Inspections

As described above, Article VI of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process, including after final stabilization and landscaping, after the removal of soil erosion and sediment controls. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls.

Measurable Goal(s): Continue to administer and enforce the WDO.

E.7 Other Post-Construction Runoff Controls

Through the Watershed Management Board (WMB), SMC provides partial funding for flood damage reduction and surface water quality improvement projects. The WMB, which includes representatives from the Lake Michigan, North Branch of the Chicago River, Fox River, and Des Plaines River watersheds, meets annually to review potential projects and to make recommendations on stormwater BMP project funding. Members of the WMB include chief municipal elected officials, township supervisors, drainage district chairmen, and county board members from each district found within each of Lake County's four major watersheds. The goal of the WMB program is to maximize opportunities for local units of government and other groups to have input and influence on the solutions used to address local stormwater management problems. Previous WMB-funded projects have reduced flooding, improved surface water quality, and enhanced existing stormwater management facilities throughout Lake County.

*Measurable Goal(s): Conduct annual WMB meeting.
Contribute funding to flood damage reduction and water quality improvement projects through the WMB.*

F. Pollution Prevention/Good Housekeeping

SMC will continue to support Lake County MS4s in the development and implementation of their stormwater management programs by performing activities related to the Pollution Prevention/Good Housekeeping minimum control measure, as described below. Note, however, that the primary responsibility for the implementation of the Pollution Prevention/Good Housekeeping minimum control measure lies with the MS4.

F.1 Employee Training Program

SMC will assist Lake County MS4s with the development and implementation of their employee training programs by maintaining a list of known employee training resources and opportunities, making available a software-based employee training program, and providing, upon request, technical assistance to local MS4s in developing and implementing their employee training programs. In addition, each year, SMC will sponsor or co-sponsor a training workshop related to pollution prevention/good housekeeping or other training workshop related to IEPA's NPDES Stormwater Program.

*Measurable Goal(s): Maintain a list of known employee training resources and opportunities.
Make available the Excal Visual Storm Watch: Municipal Storm Water Pollution Prevention software-based employee training program.
Sponsor or co-sponsor a training workshop related to pollution prevention/good housekeeping or other training workshop related to IEPA's NPDES Stormwater Program.*

F.5 Flood Management/Assess Guidelines

In working toward meeting its primary goals of flood damage reduction and surface water quality improvement, SMC follows a set of stormwater management policies that were created to define its roles and responsibilities for stormwater management in Lake County. One of these policies is to integrate multi-objective opportunities (e.g., flood damage reduction, surface water quality improvement, environmental enhancement) into SMC-sponsored projects. In accordance with this policy, SMC will evaluate all SMC-sponsored projects multi-objective opportunities.

Measurable Goal(s): Track number of SMC-sponsored projects that are reviewed for multi-objective opportunities.

Part F. MS4 Construction Projects Conducted During Year 12

Project Name	Project Size (acres)	Construction Start Date	Construction End Date

Project Name	Project Size (acres)	Construction Start Date	Construction End Date