



LIBERTYVILLE TOWNSHIP

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SUPERVISOR

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TOWNSHIP CLERK

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ASSESSOR

Bill Morgan
HIGHWAY COMMISSIONER

Sari A. Hurtig
Richard S. Mittelman
Robin M. O'Connor
Terry A. White
TRUSTEES

May 27, 2011

Illinois Environmental Protection Agency, DWPC
Compliance Assurance Section #19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Re: NPDES Phase II – Year Eight Annual Report
Libertyville Township MS4 ILR400077

To Whom it May Concern:

On behalf of Libertyville Township, please find attached a completed IEPA Annual Facility Inspection Report for Storm Water Discharges from Municipal Separate Storm Sewer Systems (MS4) with supplemental information.

If you should have any questions or require additional information, please call me at (847) 816-6800

Sincerely,
Libertyville Township

Kathleen M. O'Connor
Libertyville Township Supervisor

cc: Marcy R. Knysz- GHA



**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
ANNUAL FACILITY INSPECTION REPORT
NPDES PERMIT FOR STORM WATER DISCHARGES
FROM MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)**

Complete each section of this report.

Reporting Period from: March, 2010 To: March, 2011 Permit Number : ILR400077

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

Name: Libertyville Township Telephone: 847-816-6800

Mailing Address: 359 Merrill Ct.

City: Libertyville State: IL Zip: 60048 County: Lake

Contact Person: Kathleen M. O'Connor, Township Supervisor

(Person responsible for Annual Report)

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

Lake County

THE FOLLOWING ITEMS MUST BE ADDRESSED.

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

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

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

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

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

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

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

Signature: Kathleen M O'Connor Date: 5/31/11

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))

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

or Mail to: Illinois Environmental Protection Agency, DWPC
Compliance Assurance Section #19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Information required by this form must be provided to comply with 415 ILCS 5/39 (1996). Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

MS4 Annual Facility Inspection Report

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

Permit Year 8: March 2010 to March 2011

Libertyville Township

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Part A. Township Changes to Best Management Practices, Year 8

Information regarding the status of all of the BMPs and measurable goals described in the Township's SWMP is provided in the following table.

Note: X indicates BMPs that were implemented in accordance with the Township's SWMP

✓ indicates BMPs that were changed during Year 8

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

Year 8	
Township	
D. Construction Site Runoff Control	
	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
	D.3 Other Waste Control Program
	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
	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
X	F.2 Inspection and Maintenance Program
	F.3 Municipal Operations Storm Water Control
X	F.4 Municipal Operations Waste Disposal
	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls

Part B. Township Status of Compliance with Permit Conditions, Year 8

Stormwater Management Activities, Year 8

The stormwater management activities that the Township performed during Year 8 and the status of each of the BMPs and measurable goals described in the Township's SWMP, as of the end of Year 8, are described below. Tracking forms were used to track the implementation of the BMPs described in the Township's SWMP.

A. Public Education and Outreach

Libertyville Township is committed to conduct Public Education and Outreach as part of its permit. Public Education and Outreach requires implementation of a program to distribute educational material to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants to storm water runoff. Libertyville Township is committed to implementation of BMPs related to A.1. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. A.1: Distributed Paper Material

The SMC develops and distributes a variety of materials related to storm water management in Lake County. A number of pamphlets and brochures related to BMP's and storm water management have been produced.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township continued to implement the Storm Water Management Program (SWMP) adopted on November 19, 2009.

B. Public Participation/Involvement

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

BMP No. B.3: Stakeholder Meeting

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

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township continued to implement the SWMP adopted on November 19, 2009.

BMP No. B.4: Public Hearing

Libertyville Township will conduct a public meeting or public hearing on its proposed storm water management plan.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township adopted a SWMP on November 19, 2009. A public meeting was conducted as part of the process.

C. Illicit Discharge Detection and Elimination

Libertyville Township is committed to perform some activities related to the Illicit Discharge Detection and Elimination (IDDE) minimum control. The majority of these activities will be related to IDDE program design. The requirements of an IDDE program include the following:

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

BMPs will be implemented under BMP numbers C.1, C.2, C.5 and C.7 as described below.

BMP No. C.1: Storm Sewer Map Preparation

Libertyville Township will prepare an outfall map to allow for tracking of dry weather flow inspections and outfall maintenance.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township created a storm sewer atlas, which included outfalls and detention basins, in the summer of 2009. Libertyville Township continued to implement the SWMP adopted on November 19, 2009.

BMP No. C.2: Regulatory Control Program

Libertyville Township will review, consider and adopt ordinance language to prohibit non-storm water discharges to the storm sewer or drainage system and to provide an enforcement mechanism for the illicit discharge detection and elimination program.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township continued to implement the SWMP adopted on November 19, 2009.

BMP No. C.5: Illicit Source Removal Procedures

Libertyville Township will implement a program and train employees to remove potential and known sources of illicit discharges.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township continued to implement the SWMP adopted on November 19, 2009.

BMP No. C.7: Visual Dry Weather Screening

Libertyville Township will conduct dry weather screening to locate illicit discharges.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township conducted an inspection of all outfalls during dry weather conditions in the summer of 2010. All outfalls with a dry weather discharge were followed up on.

D. Construction Site Runoff Control

Lake County has adopted a Watershed Development Ordinance (WDO) that establishes the minimum storm water management requirements for development in Lake County. The WDO, which is enforced by SMC as well as by certified communities in the county, establishes standards for construction site runoff control. The enforcement of the WDO implements BMPs under BMP numbers D.2 and D.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

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

Measurable Goals: Assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

Libertyville Township continued to assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

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

Measurable Goals: Assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

Libertyville Township continued to assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

E. Post-Construction Runoff Control

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum storm water management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply

to any new development or redevelopment resulting in over 0.5 acres of new impervious area. The enforcement of the WDO, in conjunction with other SMC activities and functions, implements BMPs under BMP numbers E.3, E.5, and E.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

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

Measurable Goals: Assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

Libertyville Township continued to assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

BMP No. E.5: Site Inspections During Construction

Measurable Goals: Assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

Libertyville Township continued to assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

BMP No. E.6: Post-Construction Inspections

Measurable Goals: Assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

Libertyville Township continued to assist Lake County in ensuring that all applicable developments are in compliance with the WDO.

F. Pollution Prevention/Good Housekeeping

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

BMP No. F.1: Employee Training Program

Libertyville Township will develop a training program for employees. This program may be based on existing training programs that the Township currently conducts. Any new training will be developed based on guidance that is widely available. SMC, the QLP, will serve as a clearinghouse of these materials. The training program may be updated and expanded as the Township implements its storm water management.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township continued to implement the SWMP adopted on November 19, 2009.

BMP No. F.2: Inspection and Maintenance Program

Libertyville Township will examine and subsequently alter their own actions to help ensure a reduction in the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township continued to implement the SWMP adopted on November 19, 2009.

BMP No. F.4: Municipal Operations Waste Disposal

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

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Libertyville Township continued to implement the SWMP adopted on November 19, 2009.

Stormwater Management Program Assessment, Year 8

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

During Year 9, it is anticipated that the QLP will be reviewing and revising the SWMP template, which was last revised in April 2009, to better address the annual program assessment requirements of General NPDES Permit No. ILR40. The Township will review the revised SWMP template and will incorporate changes that are beneficial to its stormwater management program into its SWMP. These changes will likely include the addition of a process for conducting an annual assessment of its stormwater management program and BMPs using environmental indicators. During Year 9, the Township anticipates that it will begin using this process to evaluate its stormwater management program and the appropriateness of its BMPs.

Part C. Township Information and Data Collection Results, Year 8

Annual Monitoring and Data Collection, Year 8

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

Water quality sampling was conducted within the receiving waters, both upstream and downstream of the Township's stormwater discharges. A total of six locations were sampled. An upstream and downstream sample was taken from the Middle Fork of the North Branch of the Chicago River, the Des Plaines River and Bull Creek. Collected water quality samples were tested for: Ammonia, Chloride, Fluoride, Dissolved Oxygen, Biochemical Oxygen Demand (5 day), Phenolics, Total Phosphorus, Total Dissolved Solids, Total Kjeldahl Nitrogen, Total Suspended Solids, Metal (Potassium), Conductivity, Temperature and pH. There was a noticeable increase Total Suspended Solids and Total Phosphorus for the Middle Fork of the North Branch Chicago River. There was a noticeable increase in Total Phosphorus for the Des Plaines River. Investigation into the possible cause of this increase is planned for Year 9.

IDDE Monitoring and Data Collection, Year 8

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

A total of 11 stormwater outfalls were inspected during dry weather dry weather conditions. No potential illicit discharges were identified at any of these locations.

Part D. Township Summary of Year 9 Stormwater Activities

The table below indicates the stormwater management activities that the Township plans to undertake during Year 9. Additional information about the BMPs and measurable goals that the Township will implement during Year 9 is provided in the section following the table.

Note: X indicates BMPs that will be implemented during Year 9

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

Year 9	
Township	
D. Construction Site Runoff Control	
	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
	D.3 Other Waste Control Program
	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
	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
X	F.2 Inspection and Maintenance Program
	F.3 Municipal Operations Storm Water Control
X	F.4 Municipal Operations Waste Disposal
	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls

The stormwater management activities that the Township plans to undertake during Year 9 are described below. The Township will use tracking forms to track the implementation of the BMPs described in the Township's SWMP.

In addition to the stormwater management activities described below, it is anticipated that the QLP will be reviewing and revising the SWMP template, which was last revised in April 2009, to better address the monitoring and program assessment requirements of General NPDES Permit No. ILR40. The Township will review the revised SWMP template and will incorporate changes that are beneficial to its stormwater management program into its existing SWMP. These changes will likely include the addition of a process for conducting an annual assessment of its stormwater management program and BMPs using environmental indicators.

A. Public Education and Outreach

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

BMP No. A.1: Distributed Paper Material

The SMC develops and distributes a variety of materials related to storm water management in Lake County. A number of pamphlets and brochures related to BMPs and storm water management have been produced. The MS4 makes these publications, at a minimum, available.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

B. Public Participation/Involvement

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

BMP No. B.3: Stakeholder Meeting

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

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

BMP No. B.4: Public Hearing

Libertyville Township will conduct a public meeting to present each annual report and on its proposed SWMP.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

C. Illicit Discharge Detection and Elimination

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

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

BMP No. C.1: Storm Sewer Map Preparation

The Township is currently preparing an outfall map to allow for tracking of dry weather flow inspections and outfall maintenance.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

BMP No. C.2: Regulatory Control Program

The WDO includes provisions, which prohibit illegal dumping to the storm sewer or drainage system.

*Measurable Goals: Implement and track progress of BMPs as described in the SWMP.
Continue to coordinate with Lake County to enforce the ordinance.*

BMP No. C.5: Illicit Source Removal Procedures

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

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

BMP No. C.7: Visual Dry Weather Screening

Implement dry weather screening program, established during original NOI. Continue screening storm sewer structures as part of regular cleaning and maintenance.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

D. Construction Site Runoff Control

Lake County has adopted a Watershed Development Ordinance (WDO) that establishes the minimum storm water management requirements for development in Lake County. The WDO, which is enforced by SMC in the county, establishes standards for construction site runoff control. The status or progress for each of the measurable goals related to these BMPs is presented below.

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

Measurable Goals: Assist Lake County with enforcement of the WDO.

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

Measurable Goals: Assist Lake County with enforcement of the WDO.

E. Post-Construction Runoff Control

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum storm water management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or redevelopment resulting in over 0.5 acres of new impervious area. The status or progress for each of the measurable goals related to these BMPs is presented below.

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

Measurable Goals: Assist Lake County with enforcement of the WDO.

BMP No. E.5: Site Inspections During Construction

Measurable Goals: Assist Lake County with enforcement of the WDO.

BMP No. E.6: Post-Construction Inspections

Measurable Goals: Assist Lake County with enforcement of the WDO.

F. Pollution Prevention/Good Housekeeping

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

BMP No. F1: Employee Training Program

Libertyville Township will develop a training program for employees. This program may be based on existing training programs that the Township currently conducts. Any new training will be developed based on guidance that is widely available. SMC, the QLP, will serve as a

clearinghouse of these materials. The training program may be updated and expanded as the Township implements its storm water management.

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

BMP No. F.2: Inspection and Maintenance Program

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

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

BMP No. F.4: Municipal Operations Waste Disposal

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

Measurable Goals: Implement and track progress of BMPs as described in the SWMP.

Part E. Notice of Qualifying Local Program

The Lake County Stormwater Management Commission (SMC) serves as a Qualifying Local Program (QLP) for Townships in Lake County. In accordance with the General Permit, 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 subparts:

- **Part E1** identifies changes to Best Management Practices (BMPs) that occurred during Year 8 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 8.
- **Part E3** summarizes the information and data collected by the QLP during Year 8.
- **Part E4** describes the stormwater management activities that the QLP plans to undertake during Year 9.
- **Part E5** lists the construction projects that were funded by the QLP during Year 8.

Part E1. QLP Changes to Best Management Practices, Year 8

Note: X indicates BMPs that were implemented as planned
 ✓ indicates BMPs that were changed during Year 8

Year 8	
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
	C.10 Other Illicit Discharge Controls

Year 8	
QLP	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
X	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
X	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
X	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
X	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
	F.2 Inspection and Maintenance Program
	F.3 Municipal Operations Storm Water Control
	F.4 Municipal Operations Waste Disposal
X	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls

Part E2. QLP Status of Compliance with Permit Conditions, Year 8

The Lake County Stormwater Management Commission (SMC) serves as a Qualifying Local Program for Townships in Lake County. In accordance with the General Permit, 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 8 are described below.

A. Public Education and Outreach

A.1 Distributed Paper Material

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

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 Townships in .PDF format for use on community websites, in community newsletters, and in community “take away” racks.

A.3 Public Service Announcement

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

SMC includes announcements highlighting community accomplishments related to the NPDES Stormwater Program on its website, in its newsletter, and through other media outlets. For example, the SMC website includes information highlighting Lake County’s new Central Permit Facility, which opened in April 2010. The facility includes a number of green infrastructure practices that reduce stormwater runoff rates, volumes, and pollutant loads and is the “greenest” project that Lake County has completed to date.

Watershed identification signage is located throughout the county.

A.4 Community Event

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

SMC sponsored or co-sponsored a number of workshops and events on stormwater-related topics between March 1, 2010 and February 28, 2011, including:

- **Designated Erosion Control Inspector (DECI) Workshops held on May 12 & 13, 2010**
- **Homeowners Association (HOA) Stormwater Workshop held on June 2, 2010**
- **Riparian Landowners Workshop held on Sept. 18, 2011**
- **Roadway De-Icing Workshop held on Sept. 22, 2010**

- North Mill Creek/Dutch Gap Canal Watershed Tour held on Sept. 25, 2010
- Presentation on US EPA's proposed Effluent Limit Guidelines (ELGs) and ongoing Stormwater Rulemaking Process at Jan. 12, 2011 MAC meeting
- Presentation on implementing Total Maximum Daily Load (TMDL) regulations in the DuPage River & Salt Creek Watersheds at Jan. 12, 2011 MAC meeting
- DECI Workshops held on Feb. 8, 9 & 16, 2011

A.5 Classroom Education

Measurable Goals: Develop and compile information for stormwater educational kit for distribution upon request.

Provide materials and training on storm sewer inlet stenciling kits to teachers upon request.

Stormwater educational materials were compiled for use at several public education events that were held between March 1, 2010 and February 28, 2011, including the Lake County Green Living Fair, held in March 2010, and Loch Lomond Lake Day, held in August 2010.

A.6 Other Public Education

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

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

B. Public Participation/Involvement

B.1 Public Panel

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

Notice of all public meetings 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 8. According to records, there were 11 SMC meetings, 10 TAC meetings, 4 MAC meetings, and 1 WMB meeting conducted during this period.

B.3 Stakeholder Meeting

*Measurable Goals: Provide notice of stakeholder meetings on SMC website.
Track number of watershed planning committee meetings conducted.*

Establish watershed planning committees for each new watershed planning effort.

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 Year 8. The list below summarizes the watershed planning committee meetings that were conducted during Year 8:

North Branch Chicago River Planning Committee – 3
Bull Creek/Bull’s Brook Watershed Council – 4
Indian Creek Watershed Committee – 2
North Mill Creek Watershed Planning Committee – 10

SMC continues to establish watershed planning committees for each new watershed planning effort.

B.6 Program Coordination

*Measurable Goals: Track number of MAC meetings conducted during Year 8.
Prepare draft report on Qualifying Local Program activities at end of Year 8.*

SMC tracked the number of Municipal Advisory Committee (MAC) meetings conducted during Year 8. According to records, there were 4 MAC meetings conducted during this period.

The stormwater management activities that the QLP performed during Year 8 are described in the Annual Facility Inspection Report (Annual Report) template that was provided to Lake County Townships. The stormwater management activities that the QLP will perform during Year 9 are described in Part E4 of the Annual Report template.

C. Illicit Discharge Detection and Elimination

C.2 Regulatory Control Program

Measurable Goal: Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

C.10 Other Illicit Discharge Controls

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

SMC sponsored or co-sponsored a number of workshops and events on stormwater-related topics between March 1, 2010 and February 28, 2011, as described under BMP No. A.4.

D. Construction Site Runoff Control

D.1 Regulatory Control Program

Measurable Goals: Continue to enforce the countywide WDO.

Administer the Designated Inspector Program as outlined by the WDO.

Revise WDO to be consistent with new ILR10 permit conditions.

SMC continues to enforce the countywide WDO.

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

A package of 83 amendments to the countywide WDO was released for public comment on Feb. 4, 2011. Since then, several additional amendments were added to address the requirements of the National Flood Insurance Program (NFIP). There are now proposed 91 amendments to the WDO. Two of these amendments will enhance the DECI program and update the DECI inspection requirements to match those of the new General NPDES Permit No. ILR10. SMC anticipates that these amendments will be approved during Year 9. Municipal adoption of the WDO amendments is also expected to occur during Year 9.

D.2 Erosion and Sediment Control BMPs

Measurable Goal: Continue to enforce the countywide WDO.

Complete TRM updates, approve and publicize final TRM.

Revise WDO to be consistent with new ILR10 permit conditions.

SMC continues to enforce the countywide WDO.

The process of updating the TRM has been deferred until after the WDO amendment process is complete.

A package of 83 amendments to the countywide WDO was released for public comment on Feb. 4, 2011. Since then, several additional amendments were added to address the requirements of the National Flood Insurance Program (NFIP). There are now proposed 91 amendments to the WDO. Two of these amendments will address the Effluent Limitation Guidelines (ELGs) currently being developed by the US EPA, including guidelines on the erosion and sediment control BMPs that will need to be implemented on construction sites to meet the ELGs. SMC anticipates that these amendments will be approved during Year 9. Municipal adoption of the WDO amendments is also expected to occur during Year 9.

D.3 Other Waste Control Program

Measurable Goal: 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 Goals: Track number of enforcement officers who have passed the exam.

Track number of communities that undergo a performance review.

Complete Ordinance Administration Chapter of TRM.

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 8, there are currently 87 EOs in Lake County.

All 55 certified and non-certified communities underwent a performance review between March 1, 2010 and February 28, 2011 as part of the community re-certification process.

The process of updating the TRM has been deferred until after the WDO amendment process is complete.

D.5 Public Information Handling Procedures

Measurable Goal: 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, 2010 and February 28, 2011, 2 SE/SC complaints were received and processed by SMC staff.

D.6 Site Inspection/Enforcement Procedures

Measurable Goals: 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, 2010 and February 28, 2011, 748 site inspections were conducted by SMC staff.

E. Post-Construction Runoff Control

E.2 Regulatory Control Program

Measurable Goal: Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

A package of 83 amendments to the countywide WDO was released for public comment on Feb. 4, 2011. Since then, several additional amendments were added to address the requirements of the National Flood Insurance Program (NFIP). There are now proposed 91 amendments to the WDO. Ten of these amendments will update the runoff volume reduction hierarchy section of the ordinance in accordance with SMC's approved runoff volume reduction guidance principles and the requirements of the new General NPDES Permit No. ILR40. SMC anticipates that these amendments will be approved during Year 9. Municipal adoption of the WDO amendments is also expected to occur during Year 9.

E.3 Long Term O&M Procedures

Measurable Goal: Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

E.4 Pre-Construction Review of BMP Designs

Measurable Goal: Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

E.5 Site Inspections During Construction

Measurable Goal: Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

E.6 Post-Construction Inspections

Measurable Goal: Continue to enforce the countywide WDO.

SMC continues to enforce the countywide WDO.

E.7 Other Post-Construction Runoff Controls

Measurable Goals: Conduct annual WMB meeting.

Contribute funding to flood reduction and water quality improvement projects, including BMP retrofits, through the WMB.

The annual WMB meeting was held on Thursday, December 9, 2010.

At the annual WMB meeting, 11 flood reduction and water quality improvement projects, including stormwater retrofit projects, were selected to receive \$146,000 of funding through the WMB.

F. Pollution Prevention/Good Housekeeping

F.1 Employee Training Program

Measurable Goal: Provide list of available resources to Townships.

Make available the Excal Visual Municipal Storm Water Pollution Prevention Storm Watch Everyday Best Management Practices Software.

SMC continues to pass along information on training opportunities and training resources and to make available the Excal Visual Storm Watch Municipal Stormwater Pollution Prevention software to Lake County Townships.

According to records, between March 1, 2010 and February 28, 2011, 1 Township borrowed the Excal Visual software.

F.5 Flood Management/Assess Guidelines

Measurable Goal: 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 8

The QLP did not collect any information or monitoring data on behalf of Lake County's Townships during Year 8. However, beginning in Year 9, the QLP anticipates reviewing the information presented by the IEPA in the Illinois Integrated Water Quality Report and 303(d) List and providing a summary of this information to Lake County Townships in an annual "state of Lake County's waters" report. This information may be used by Townships while they are preparing future Annual Reports.

Part E4. QLP Summary of Year 9 Stormwater Activities

The table below indicates the stormwater management activities that the QLP plans to undertake during Year 9. Additional information about the BMPs and measurable goals that the QLP will implement during Year 9 is provided in the section following the table.

Note: X indicates BMPs that will be implemented during Year 9

Year 9	
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 9	
QLP	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
X	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
X	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
X	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
X	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
	F.2 Inspection and Maintenance Program
	F.3 Municipal Operations Storm Water Control
	F.4 Municipal Operations Waste Disposal
X	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls

In addition to the stormwater management activities described below, during Year 9, SMC will continue to provide general support to Lake County Townships as they continue to implement their stormwater management programs. During Year 9, SMC will again review and revise the Stormwater Management Program Plan (SWMP) template, which was last revised in April 2009, to better address the monitoring and program assessment requirements of General NPDES Permit No. ILR40.

A. Public Education and Outreach

SMC will support Lake County Townships by performing activities related to the Public Education and Outreach minimum control measure.

A.1 Distributed Paper Material

SMC develops and distributes a variety of materials related to stormwater management in Lake County. SMC prepares a quarterly newsletter, “Mainstream” as well as an Annual Report that highlights stormwater management activities conducted in Lake County. SMC also prepares Project Fact Sheets that provide information on ongoing and recently completed stormwater management projects. SMC will develop or collaborate on manuals or manual updates related to stormwater management.

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

A.3 Public Service Announcement

A public service announcement related to the NPDES Phase II program will be written and included in SMC’s Quarterly Newsletter, “Mainstream.” SMC will coordinate with the Lake County Department of Transportation (LCDOT) to post watershed identification signage in watersheds where watershed planning activities occur. Upon request, SMC will provide an educational presentation on the NPDES Stormwater Management Program to Lake County Townships.

A package of 83 amendments to the countywide WDO was released for public comment on Feb. 4, 2011. Since then, several additional amendments were added to address the requirements of the National Flood Insurance Program (NFIP). There are now proposed 91 amendments to the WDO. A number of these amendments are being proposed to match the requirements of IEPA’s General NPDES Permit No. ILR10 and General NPDES Permit No. ILR40. SMC anticipates that these amendments will be approved during Year 9. SMC will host a public hearing on the proposed amendments prior to their approval.

*Measurable Goals: Include public service announcement highlighting community accomplishments related to the NPDES Phase II process in “Mainstream” once annually.
Post watershed identification signage with LCDOT.
Upon request, present “The Big Picture: Water Quality, Regulations & NPDES” to Lake County Townships.
Host a public hearing on the proposed WDO amendments.*

A.4 Community Event

SMC sponsors technical training and public awareness workshops. SMC will sponsor or co-sponsor at least one workshop on a NPDES related topic, such as best management practices that can be used to protect water quality.

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

A.5 Classroom Education

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

Measurable Goals: Develop and compile information for stormwater educational kit for distribution upon request.

Provide materials and training on storm sewer inlet stenciling kits to teachers upon request.

A.6 Other Public Education

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

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

Make “The Big Picture: Water Quality, Regulations & NPDES” presentation available to Lake County Townships.

B. Public Participation/Involvement

SMC will support Lake County Townships by performing activities related to the Public Participation/Involvement minimum control measure.

B.1 Public Panel

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

The Technical Advisory Committee (TAC) was started in 1992 to assist in the development, 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. The MAC will continue to meet as needed during the implementation of the NPDES Municipal Stormwater Program.

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

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

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

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

B.6 Program Coordination

The countywide approach that has been taken toward the implementation the NPDES Municipal Stormwater Program in Lake County places SMC in the role of a Qualifying Local Program (QLP). In this role, SMC proactively formed the Municipal Advisory Committee (MAC) as a way to coordinate the efforts of regulated Townships across Lake County. The SMC will continue to facilitate MAC meetings and will continue to provide general support to Lake County's Townships as they implement their stormwater management programs. SMC will prepare a draft report on the QLP's stormwater management activities and will provide guidance to Townships in preparing their annual reports.

*Measurable Goals: Track number of MAC meetings conducted during Year 9.
Prepare draft report on Qualifying Local Program activities at end of Year 9.*

C. Illicit Discharge Detection and Elimination

SMC will support Lake County Townships by performing activities related to the Illicit Discharge Detection and Elimination minimum control measure.

C.2 Regulatory Control Program

SMC provided model ordinances for Townships to consider at the local level. The language included in the model ordinances prohibits all non-stormwater discharges, including illegal

dumping, to the storm sewer system. Additionally, the countywide WDO includes provisions that prohibit illegal discharges to the storm sewer system.

Measurable Goal: Continue to enforce the countywide WDO.

C.10 Other Illicit Discharge Controls

SMC sponsors technical training workshops. SMC will sponsor or co-sponsor an illicit discharge detection and elimination training workshop and track the number of attendees that attend the workshop.

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

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 enforced by SMC, as well as by certified communities in Lake County, establishes standards for construction site runoff control. SMC will support Lake County Townships in the implementation of the construction site runoff control minimum control measure by enforcing the WDO and performing other stormwater activities, as described below.

D.1 Regulatory Control Program

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

SMC 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 it be SMC or a certified community, and the permit holder, by creating a single point of contact for soil erosion and sediment control issues. Furthermore, the program is intended to improve site conditions, minimize environmental impacts, and educate contractors, developers, and inspectors about proper soil erosion and sediment control BMPs. The DECI program was designed to closely mirror the inspection requirements of General NPDES Permit No. ILR10.

A package of 83 amendments to the countywide WDO was released for public comment on Feb. 4, 2011. Since then, several additional amendments were added to address the requirements of the National Flood Insurance Program (NFIP). There are now proposed 91 amendments to the WDO. Two of these amendments will enhance the DECI program and update the DECI inspection requirements to match those of the new General NPDES Permit No. ILR10. SMC anticipates that these amendments will be approved during Year 9. Municipal adoption of the WDO amendments is also expected to occur during Year 9.

*Measurable Goals: Continue to enforce the countywide WDO.
Administer the Designated Inspector Program as outlined by the WDO.
Adopt WDO amendments
Conduct or co-sponsor training sessions on the WDO amendments.*

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 activity. This section of the WDO specifies 15 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 14 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 sedimentation control BMPs. The TRM is currently being updated and expanded to include guidance on wetland areas, public roadways, and ordinance administration and enforcement.

A package of 83 amendments to the countywide WDO was released for public comment on Feb. 4, 2011. Since then, several additional amendments were added to address the requirements of the National Flood Insurance Program (NFIP). There are now proposed 91 amendments to the WDO. Two of these amendments will address the Effluent Limitation Guidelines (ELGs) currently being developed by the US EPA, including guidelines on the erosion and sediment controls that will need to be implemented on construction sites to meet the ELGs. SMC anticipates that these amendments will be approved during Year 9. Municipal adoption of the WDO amendments is also expected to occur during Year 9.

*Measurable Goal: Continue to enforce the countywide WDO.
Complete TRM update and work toward the approval and publication of the TRM.
Adopt WDO amendments.
Conduct or co-sponsor training sessions on the WDO amendments.*

D.3 Other Waste Control Program

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

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

D.4 Site Plan Review Procedures

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

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

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 reported problems and citizen complaints. SMC's website provides information on "who to call" for various problems and concerns. An Interagency Coordination Agreement between SMC, the US Army Corps of Engineers, the Lake County Soil and Water Conservation District, and the National Resources Conservation Service specifies that if any of these agencies receive a report of a soil erosion and sediment control issue, they will contact SMC. SMC will then investigate the report and prescribe corrective actions. This information is provided directly to the property owner. Where applicable, investigations are coordinated with the certified community.

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

D.6 Site Inspection/Enforcement Procedures

Article VI of the WDO provides both the recommended and the minimum requirements for site inspection. The enforcement officers within each certified community must conduct site inspections; SMC is responsible for conducting site inspections in non-certified communities and on LCDOT and Lake County Forest Preserve District (LCFPD) projects. Article VII of the WDO specifies the penalties and legal actions that may be imposed if the WDO is violated. If a construction site is not in compliance with the requirements of the WDO, the enforcement officer may issue a stop work order on all development activity on the subject property or on the 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, and any person convicted thereof may be fined.

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

E. Post-Construction Runoff Control

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum stormwater management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or redevelopment that results in over 0.5 acres of new impervious

area. SMC will support Lake County Townships in the implementation of the post-construction runoff control minimum control measure by enforcing the WDO and performing other stormwater activities, as described below.

E.2 Regulatory Control Program

The WDO requires all applicants to adopt a stormwater management strategy for controlling post-construction stormwater runoff. The applicant must develop a stormwater management strategy that minimizes the increase in stormwater runoff rates and volumes and addresses the water quality treatment requirements of the WDO. The proposed drainage plan must use the runoff reduction hierarchy included in the WDO and must implement BMPs in accordance with the guidance provided in the TRM.

A package of 83 amendments to the countywide WDO was released for public comment on Feb. 4, 2011. Since then, several additional amendments were added to address the requirements of the National Flood Insurance Program (NFIP). There are now proposed 91 amendments to the WDO. Ten of these amendments will update the runoff volume reduction hierarchy section of the ordinance in accordance with SMC's approved runoff volume reduction guidance principles and the requirements of the new General NPDES Permit No. ILR40. SMC anticipates that these amendments will be approved during Year 9. Municipal adoption of the WDO amendments is also expected to occur during Year 9.

*Measurable Goal: Continue to enforce the countywide WDO.
Adopt WDO amendments.
Conduct or co-sponsor training sessions on the WDO amendments.*

E.3 Long Term O&M Procedures

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

Measurable Goal: Continue to enforce the countywide WDO.

E.4 Pre-Construction Review of BMP Designs

Within each jurisdiction, one of the primary duties of the enforcement officer is to review all Watershed Development Applications and to issue permits for those projects that are in compliance with the provisions of the WDO. This includes a review of the BMPs that will be used for post-construction runoff control.

Measurable Goal: Continue to enforce the countywide WDO.

E.5 Site Inspections During Construction

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

Measurable Goal: Continue to enforce the countywide WDO.

E.6 Post-Construction Inspections

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

Measurable Goal: Continue to enforce the countywide WDO.

E.7 Other Post-Construction Runoff Controls

Through the Watershed Management Board (WMB), SMC provides partial funding for flood control and 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 yearly to review potential projects and to make recommendations on project funding. Members of the WMB include chief municipal elected officials, township supervisors, drainage district chairs, 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 improved water quality in Lake County's streams, lakes, and wetlands, and have enhanced existing stormwater management facilities.

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

F. Pollution Prevention/Good Housekeeping

SMC will support Lake County Townships by performing activities related to the Pollution Prevention/Good Housekeeping minimum control measure.

F.1 Employee Training Program

SMC will assist Townships in employee training programs by incorporating recommended actions into the SWMP template. Additionally, SMC will serve as a technical advisor and as a clearinghouse of information related to employee training. SMC will sponsor or co-sponsor employee training programs.

*Measurable Goal: Provide list of available resources to Townships.
Make available the Excal Visual Municipal Storm Water
Pollution Prevention Storm Watch Everyday Best Management
Practices Software.*

F.5 Flood Management/Assess Guidelines

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

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

