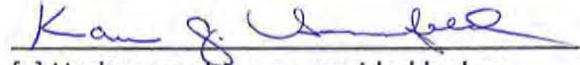


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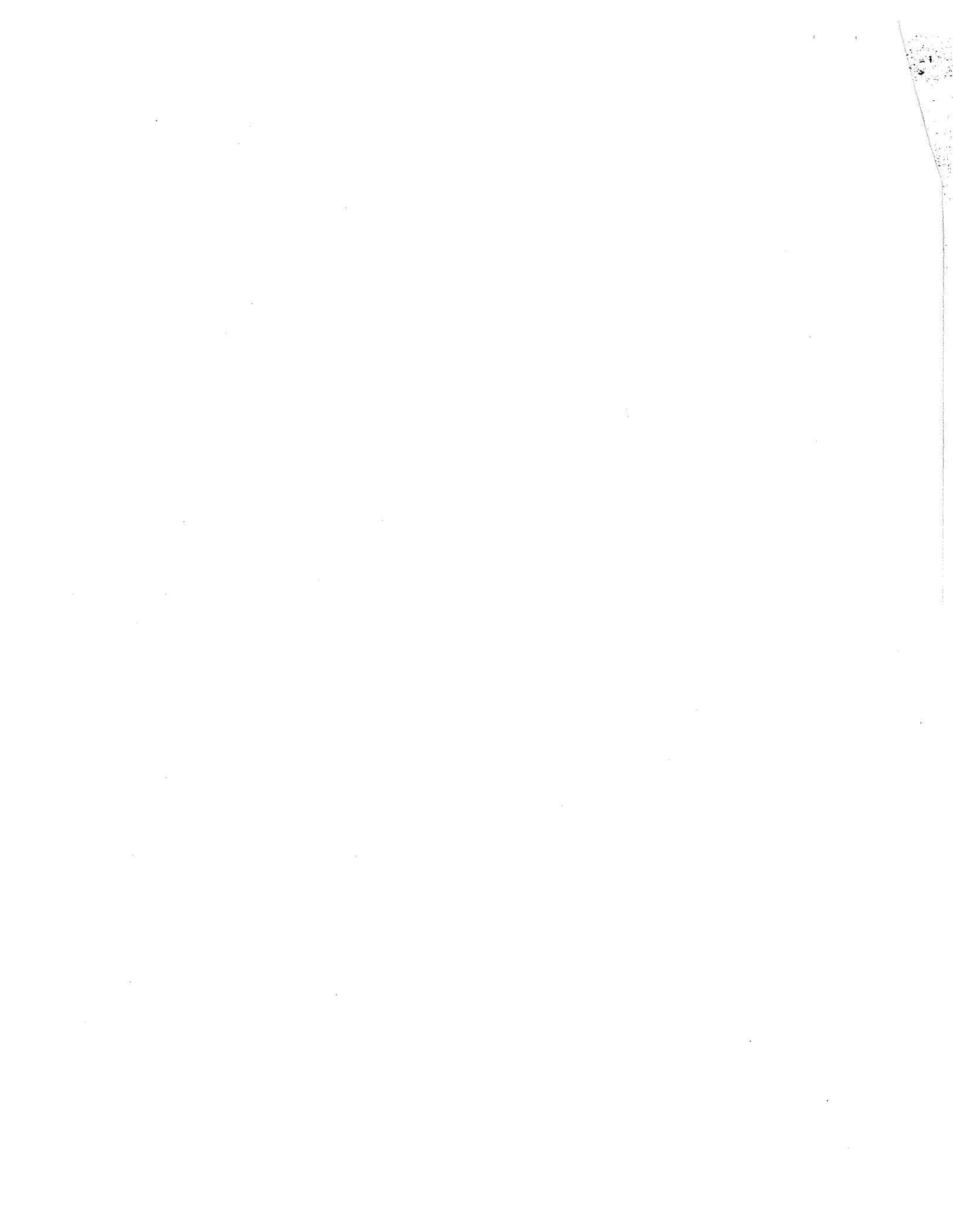
CERTIFICATE OF SERVICE

The undersigned, a non-attorney, certify that I have served the foregoing **Notice of Filing and Petition for Variance** referred to therein upon the parties shown on the attached **Service List** by depositing same in the U.S. Mail located at 233 South Wacker Drive, Chicago, IL 60606, before 5:00 p.m. on the **21st day of July, 2015**, with proper postage prepaid.



Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein as true and correct.

Dated: July 21, 2015



SERVICE LIST

Village of Wilmette v. Illinois Environmental Protection Agency

10288-118

Senator Daniel Biss M121 Capitol Building Springfield, IL 62706 E-Mail: biss@senatedem.illinois.gov	Representative Robyn Gabel 248-W Stratton Office Building Springfield, IL 62706 E-Mail: robyn@robbygabel.com
Toni Preckwinkle Cook County Board of Commissioners 118 N. Clark St. Room 537 Chicago, IL 60602	Anita Alvarez Cook County State's Attorney 69 W. Washington Suite 3200 Chicago, IL 60602 E-Mail: statesattorney@cookcountyil.gov
Daniel Gallagher Cook County State's Attorney Civil Actions Bureau 50 W. Washington Office 500 Chicago, IL 60602 E-Mail: statesattorney@cookcountyil.gov	Division of Legal Counsel Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276
Division Chief of Environmental Enforcement Office of the Attorney General 100 West Randolph Street, Suite 1200 Chicago, IL 60601	

II. FACTS

In Docket 2008-009, the Board has been engaged in an extensive and detailed rulemaking process regarding uses, effluent limitations and water quality standards for the CAWS. Subdocket D has involved the setting of water quality standards for the protection of aquatic life. The Board adopted final aquatic life water quality standards for the CAWS, effective July 1, 2015. (39 Ill. Reg. 9388, 9423, 9433 (July 10, 2015)). Included in that rulemaking are new standards for chlorides.

During the rulemaking, it was noted that most parts of the CAWS are not currently meeting the new chlorides standards. Regulated parties pointed out that effluent limits based on the new standards may be difficult or impossible to meet, and the costs of installing technological controls at their facilities would be enormous. Therefore, it was requested that the Board provide a delay in the application of the new standards, so stakeholders could convene and develop options for addressing these concerns while making progress in reducing chloride levels in the CAWS. The Board granted this request, deciding that the new chlorides standards would not apply until July 1, 2018.

The Illinois Environmental Protection Agency (“IEPA”) asked the Metropolitan Water Reclamation District (“MWRD”), due to its role as a significant stakeholder on CAWS issues, to convene and lead a Work Group to address chloride issues during the 3-year time period provided by the Board. An initial stakeholder meeting was held on January 27, 2015, and the next meeting will be held on August 4, 2015. The Village is a member of the Work Group and is committed to working with IEPA and the other stakeholders to move this process forward. The Village understands that the goals of the Work Group would be that, before the end of the 3-year period provided by the Board,

the stakeholders will have developed, and begun implementing, a set of best management practices (BMPs) for addressing chloride issues, and will have taken action to develop and propose, for adoption by the Board, appropriate mechanisms to address compliance issues, possibly including a water quality variance.

The Village appreciates the Board's willingness to provide the 3-year time period before compliance with the new chloride standards is required. However, some confusion has arisen regarding the legal character of that delay in the compliance requirement. As the Board is aware, and has noted recently in the rulemaking, applicable statutes provide that, if a party wants to obtain a stay of the application of a Board rule, then that party must apply for a variance, or adjusted standard, apparently not applicable here, within 20 days of the effective date of the rule. In this situation, it is not entirely clear whether the "effective date" of the new chloride standards is July 1, 2015 or July 1, 2018. The new standards clearly do not apply until 2018. However, the full CAWS rule, as adopted in the Illinois Register, specifies that the effective date is July 1, 2015. And the chloride provision does not clearly state otherwise. Therefore, for the purpose of this petition, the Village understands that the effective date is 2015, and, in order to obtain a stay, a variance application must be filed by July 21, 2015.

The Village also understands that, based on how the Board adopted the CAWS rule, the new chloride standards do not apply to the CAWS, and may not be implemented in the Village's permit, if at all, until after July 1, 2018. By that date, the Village understands and expects that the Work Group will have completed its efforts successfully, including by securing a variance or other relief mechanism to address compliance concerns. However, it is not guaranteed that the entire Work Group process,

and the variance, or other relief. process will be completed by then, including by obtaining US EPA approval of any variance. Therefore, there is a risk that, after the 3-year period has passed, the chloride standards will become effective and compliance with those standards will be required without any final mechanism being in place to address the compliance concerns. If that happens, stakeholders could be faced with substantial compliance and liability issues. A stakeholder could be subject to penalties for not meeting standards that, based on currently available information, may be very difficult or impossible to meet, and which, at a minimum, could require installation of extensive new controls, at potentially very significant costs, over a period of many years. In order to avoid that result, the Village is submitting this request for a variance, within the timeframe which it believes is provided for obtaining a stay of the chloride standards.

Other regulated parties located on the CAWS will face similar risks. Therefore, it is respectfully suggested that the Board consider issuing a variance and stay of the chloride standards that applies to all dischargers into the CAWS. This would ensure that the dischargers are not unfairly penalized if the chloride Work Group process has not been completed by the end of the 3-year compliance period. This relief would only be needed on an interim basis, since once the Work Group has completed its work, it is expected that a number of BMPs would have been developed, and implementation begun, and a permanent regulatory mechanism, whether a variance or some other device, would have been developed, applied for, and obtained, with all required approvals. At that point, the permanent regulatory structure would replace the temporary variance and stay.

This process would ensure that, while on the path toward ultimate resolution of the chloride issue, improvements in discharge levels would be made, while undue compliance risks and unnecessary costs would be avoided. If the Board determines that it cannot grant this relief to all dischargers to the CAWS, then it is respectfully suggested that, at a minimum, the Board issue a variance to the Village, based on this petition, and to all other dischargers to the CAWS that submit appropriate variance petitions.

III. REQUIREMENTS FROM WHICH A VARIANCE IS SOUGHT

- A. A statement describing the regulation, requirement, or order of the Board from which a variance is sought. If variance from a regulation is sought, the statement must include the Illinois Administrative Code citation to the regulation as well as the effective date of that regulation. If variance from a requirement or order of the Board is sought, the statement must include the citation to that requirement or order of the Board promulgating that requirement, including docket number;

As noted above, the Board has adopted new aquatic life standards for the CAWS, including for chlorides. These standards were adopted by an Opinion and Order of the Board in Docket R2008-09, Subdocket D, dated June 18, 2015. The final rules appeared in the Illinois Register on July 10, 2015 (30 Ill. Reg. 9388, 9423, 9433). The Village understands that the chlorides standards, which are in 35 IAC 302.407(g)(2) and (g)(3), are not currently met on a consistent basis and cannot be met on a consistent basis during the term of the requested variance.

The Village has been issued an NPDES permit, General NPDES Permit No. ILR40, a copy of which is attached as Exhibit 1 and for which renewal is pending. The permit states that the Village's discharges cannot cause or contribute to violation of applicable water quality standards. Therefore, the Village seeks a five-year variance for its permit in the form suggested in this Petition in order to avoid the imposition of an arbitrary or unreasonable hardship.

B. A complete and concise description of the nature of petitioner's activity that is the subject of the proposed variance, including:

1. The location of, and area affected by, the petitioner's activity.

The facility name and address for this matter is set out in the attached NPDES permit. The area affected is the receiving waters identified.

2. The location of points of discharge, and, as applicable, the identification of the receiving waterway or land, or, if known, the location of the nearest air monitoring station maintained by the Agency.

See the attached NPDES permit and the drawing of the Village's stormwater system attached as Exhibit 2. The nearest air monitoring station is not known and not relevant for the requested variance.

3. An identification, including docket number, of any prior variance issued to the petitioner and, if known, the petitioner's predecessors, concerning similar relief.

There have been no variances issued to the Village for similar relief.

4. An identification, including number, of the environmental permits held by petitioner for the activity which may be affected by grant of variance.

See the attached NPDES permit.

5. The number of persons employed by the petitioner's facility at issue and the age of that facility.

The Village's storm water system has been in place for over approximately 80 years. The Village employs about 27 people in its public works department. Some of their time is devoted to maintaining the storm water system.

6. The nature and amount of the materials used in the process or activity for which the variance is sought and a full description of the particular process or activity in which the materials are used.

The storm water discharges result from storm water flows during and following precipitation events, including snow and ice melt. See the attached NPDES permit.

7. A description of the relevant pollution control equipment already in use.

See attached Village of Wilmette Annual Facility Inspection Report for March, 2014, to March, 2015, attached as Exhibit 3.

8. The nature and amount of emissions, discharges or releases of the constituent in question currently generated by the petitioner's activity.

The Village incorporates by reference variance petitions by other petitioners including data regarding the nature and amount of storm water discharges. This incorporation includes the Petition for Variance submitted by the MWRD.

- C. Data describing the nature and extent of the present or anticipated failure to meet the regulation, requirement, or order of the Board from which variance is sought and facts that support petitioner's argument that compliance with the regulation, requirement, or order of the Board was not or cannot be achieved by any required compliance date;

The Village understands chloride standards may not always be met in the receiving waters, which could result in stringent effluent limits being imposed on the Village.

The Village also understands that there may be only two ways that chloride levels in effluents can be reduced: applying end-of-pipe controls or reducing chloride inputs. End-of-pipe controls can involve considerable equipment and land and very high costs. They also require large amounts of energy, which would impose large operational costs.. This would significantly increase the Village's carbon footprint, thereby creating environmental problems rather than solving them. It is also thought that the design, installation and commencing operation of such systems would take considerable time. For all of these reasons, using an end-of-pipe control to meet the new chloride standards is not a viable option for the Village.

The other compliance option would be to reduce the level of chlorides coming into the Village's sewer system. This would be done primarily through implementation

of practices that reduce use of road salt during the winter, including, where appropriate, substitution of other materials to address ice and snow on the roads. A number of communities in the Northern U.S and Canada have been researching and applying these types of practices to address chloride water quality concerns.² The effectiveness of these practices in reducing chloride loadings to waterways, and in reducing ambient chloride levels in those waterways, has varied significantly across communities and programs.³ There are apparently many factors that will affect the success of these programs. In order to be effective, a program needs to be developed on a watershed-specific basis, taking into account the unique factors that are present in that situation, including consideration of any public safety issues that could result from reducing use of road salt for deicing operations. Even with such a tailored program, there can be a lag time between implementation of the program and seeing a significant improvement in water quality.⁴ It is critical to include, as a component of the program, an adaptive management element, so that as results are seen, or not seen, the program can be adjusted to improve the long-term situation.

The Village does not think the right mix of chlorides BMPs for the CAWS can be determined now, immediately after the new standards have been adopted. It will take time and effort, involving the regulatory agencies and stakeholders, to review data, assess

² See, for example, Kilgore, Gharabaghi, Perera, *Ecological benefit of the road salt code of practice* (2013); Transportation Association of Canada, *Syntheses of Best Practices – Road Salt Management, Chapter 11 – Successes in Road Salt Management: Case Studies* (April 2013); DuPage River Salt Creek Workgroup/CDM, *Chloride Usage Education and Reduction Program Study: Final Report* (Aug. 16, 2007); New Hampshire Department of Environmental Services, *Chloride Reduction Implementation Plan for Dinsmore Brook Watershed, Windham, NH* (attached as Exhibits 17-20).

³ See Stone, Emelko, Marsalek, Price, Rudolph, Saini, Tighe, *Assessing the Efficacy of Current Road Salt Management Programs* (July 26, 2010), for University of Waterloo and National Water Research Institute (attached as Exhibit 21).

⁴ Meals, Dressing, Davenport, *Lag Time in Water Quality Response to Best Management Practices: A Review*, J. Environ. Qual. 39:85-96 (2010) (attached as Exhibit 22).

various options, and come to a consensus as to the proper measures that should be applied, and as to the schedule for implementation. That work will be the primary function of the Work Group that the MWRD, at the request of IEPA, has already convened. The materials provided to the participants in the first Work Group meeting, attached to the MWRD's Petition for Variance, make it clear that development of an effective set of BMPs for the CAWS is the main goal of the Work Group. That BMP program will then be the foundation for a legally and scientifically sound regulatory compliance structure for chlorides in the CAWS. Whether that turns out to be some kind of "group" or "waterbody" variance, or individual variances for specific dischargers that are all based on a common program, or some other type of mechanism, will be determined by the group, in consultation with the regulatory agencies. The goal will be to get all of this work – the development of the BMP program, as well as the creation and regulatory approval of the compliance structure - complete before July 1, 2018, when the new chlorides standards will become legally applicable. That way, there will be a seamless transition between the 3-year "work period" and the later "compliance period." Measures to reduce chloride loadings will be developed, then implemented, then assessed for effectiveness so that necessary adjustments can be made.

- D. A description of the efforts that would be necessary for the petitioner to achieve immediate compliance with the regulation, requirement, or Board order at issue. All possible compliance alternatives, with the corresponding costs for each alternative, must be set forth and discussed. The discussion of compliance alternatives must include the availability of alternate methods of compliance, the extent that the methods were studied, and the comparative factors leading to the selection of the control program proposed for compliance. The discussion of the costs of immediate compliance may include the overall capital costs and the annualized capital and operating costs:

See the discussion above. The cost of compliance alternatives has not yet been developed but can be part of the work to be performed by the Work Group.

- E. Facts that set forth the reasons the petitioner believes that immediate compliance with the regulation, requirement, or order of the Board would impose an arbitrary or unreasonable hardship;

As explained, immediate compliance with the new chlorides standards does not appear to be possible. An effective BMP program, developed over the next 3 years by the Work Group, should be able to bring about compliance with the new chlorides standards or develop an effective and reasonable alternative, but that determination can only be made when the full BMP program is developed. Therefore, at this time, there is no method available to bring about compliance with the new chlorides standards that would not create an arbitrary and unreasonable hardship.

- F. A detailed description of the compliance plan, including:
 - 1. A discussion of the proposed equipment or proposed method of control to be undertaken to achieve full compliance with the regulation, requirement, or order of the Board.

The Village understands that there is no equipment or method of control available to achieve full compliance with the new chlorides standards. Over the next 3 years, or longer if necessary, the Village expects the Work Group, lead by the MWRD, to work with IEPA and other stakeholders. During this process, it is expected that the Work Group will develop an effective BMP program to reduce chloride loadings to the CAWS, as well as to develop, and secure regulatory adoption and approval of, a compliance mechanism to address chloride issues as presented in NPDES permits for dischargers to the CAWS. During this time period, periodic reports can be provided to the Board as to the status of the Work Group's discussions and efforts. At the conclusion of this process,

the stakeholders can provide a final report to the Board, including recommendations and any proposed changes to regulations that are necessary in order to implement the recommendations. The joint efforts of the members of the Work Group should achieve results superior to the efforts of any one Work Group member.

2. A time schedule for the implementation of all phases of the control program from initiation of design to program completion.

The Work Group is expected to pursue these efforts over the next 3 years, and longer if necessary, to address chlorides issues in the CAWS. Periodic status reports can be filed with the Board, and a final report can be filed at the conclusion of the Work Group's at the conclusion of the work.

3. The estimated costs involved for each phase and the total cost to achieve compliance.

The costs for the Work Group efforts have not been estimated, nor have the cost of an effective BMP program for the CAWS area. It is expected that the Work Group will address these issues.

- G. A description of the environmental impact of the petitioner's activity including:

- 1) The nature and amount of emissions, discharges, or releases of the constituent in question if the requested variance is granted, compared to that which would result if immediate compliance is required;

Immediate compliance with the new chloride standards would be technically very difficult or impossible, would involve great costs and would take time. Additional energy needs to run additional equipment would be significant and would increase the Village's carbon footprint, thereby possibly causing adverse environmental impacts. In contrast, we do not believe that any current discharges of chlorides causes any significant adverse environmental impacts, as compared to levels provided in the new standards.

- 2) The qualitative and quantitative description of the impact of petitioner's activity on human health and the environment if the requested variance is granted, compared to the impact of petitioner's activity if immediate compliance is required. Cross-media impacts, if any, must be discussed; and

See (1) above.

- 3) A statement of the measures to be undertaken during the period of the variance to minimize the impact of the discharge of contaminants on human, plant, and animal life in the affected area, including the numerical interim discharge limitations that can be achieved during the period of the variance;

The interim measures that would be taken during the period of the variance to address chloride issues are described above.

- H. Citation to supporting documents or legal authorities whenever they are used as a basis for the petition. Relevant portions of the documents and legal authorities other than Board decisions, reported state and federal court decisions, or state and federal regulations and statutes must be appended to the petition;

See attached documents and the MWRD's Petition for Variance, which is incorporated by reference to this petition.

- I. If the requested variance involves an existing permit or a pending permit application, a copy of the material portion of the permit or permit application must be appended to the petition;

See the attached NPDES permit.

- J. Any conditions petitioner suggests for the requested variance;

The Village understands that the stakeholders will continue to work with IEPA and other stakeholders in the MWRD lead Work Group. The goal will be to develop an effective BMP program to reduce chloride loadings to the CAWS, as well as to develop, and secure regulatory adoption and approval of, a compliance mechanism to address chloride issues as presented in NPDES permits for dischargers to the CAWS. During this time period, periodic reports can be provided to the Board as to the status of the Work

Group's discussions. At the conclusion of the Work Group's efforts, a final report can be provided to the Board, including recommendations and any proposed changes to regulations that are necessary in order to implement the recommendations.

- K. A proposed beginning and ending date for the variance. If the petitioner requests that the term of the variance begin on any date other than the date on which the Board takes final action on the petition, a detailed explanation and justification for the alternative beginning date;

The proposed beginning date for the variance can be determined in order to provide legal protections to the Village and other stakeholders. The term for the variance would be for a maximum of five years, ending no later than the effective date of any regulatory changes that are adopted by the Board to address chloride issues in the CAWS, after submittal of the final report of the CAWS chlorides Work Group, but in any event no later than the expiration date of the applicable Permit.

- L. A discussion of consistency with federal law, including an analysis of applicable federal law and facts that may be necessary to show compliance with federal law as set forth in Section 104.208 of this Part;

Under Title IX of the Act (415 ILCS 5/35-38), the Board is responsible for granting variances when a petitioner demonstrates that immediate compliance with the Board regulation(s) would impose an "arbitrary or unreasonable hardship" on the petitioner. 415 ILCS 5/35(a). The Board may grant a variance, however, only to the extent consistent with applicable federal law. *Id.*

Section 104.28(b) of the Board rules states the following with regard to consistency with federal law for all petitions for variances from the Board's water pollution regulations:

- (b) All petitions for variances from Title III of the Act, from 35 Ill. Adm. Code Subtitle C, Ch. I "Water Pollution", or from water pollution related requirements of any other

Title of the Act or Chapter of the Board's regulations, must indicate whether the Board may grant the relief consistent with the Clean Water Act (CWA) (33 USC 1251 et seq.), USEPA effluent guidelines and standards, any other federal regulations, or any area-wide waste treatment management plan approved by the Administrator of USEPA pursuant to Section 208 of the CWA (33 USC 1288).

The requested variances in this matter will be consistent with federal law. More specifically, the variance must meet one or more of the conditions in 40. C.F.R. § 131.10(g) which provides:

(g) States may remove a designated use which is not an existing use, as defined in Sec. 131.3, or establish sub-categories of a use if the State can demonstrate that attaining the designated use is not feasible because:

- (1) Naturally occurring pollutant concentrations prevent the attainment of the use; or
- (2) Natural, ephemeral, intermittent or low flow conditions or water levels prevent the attainment of the use, unless these conditions may be compensated for by the discharge of sufficient volume of effluent discharges without violating State water conservation requirements to enable users to be met; or
- (3) Human caused conditions or sources of pollution prevent the attainment of the use and cannot be remedied or would cause more environmental damage to correct than to leave in place; or
- (4) Dams, diversions or other types of hydrologic modifications preclude the attainment of the use, and it is not feasible to restore the water body to its original condition or to operate such modification in a way that would result in the attainment of the use; or
- (5) Physical conditions related to the natural features of the water body, such as the lack of a proper substrate, cover, flow, depth, pools, riffles, and the like, unrelated to water quality, preclude attainment of aquatic life protection uses; or

- (6) Controls more stringent than those required by sections 301(b) and 306 of the Act would result in substantial and widespread economic social impact.

Under the circumstances here, there are natural conditions, man-caused conditions, hydrologic modifications, and physical conditions as to the CAWS that will prevent attainment of the use during the time period covered by this variance. Therefore, the variance would be justified pursuant to 131.10(g)(2), (g)(3),(g)(4) and (g)(5).

- M. An affidavit verifying any facts submitted in the petition

An affidavit by Timothy Frenzer is attached.

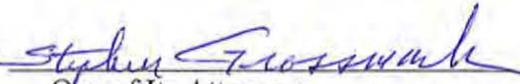
- N. A statement requesting or denying that a hearing should be held in this matter.

The Village requests that a hearing be held in this matter.

WHEREFORE, the Village of Wilmette respectfully requests issuance of a Variance as requested in this Petition and for other relief that is just.

Respectfully submitted,

Village of Wilmette

By: 
One of Its Attorneys

Stephen T. Grossmark, Esq.
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Attorneys for Village of Wilmette

July 21, 2015

645193

General NPDES Permit No. ILR40

Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North Grand East
P.O. Box 19276
Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

**General NPDES Permit
For
Discharges from Small Municipal Separate Storm Sewer Systems**

Expiration Date: March 31, 2014

Issue Date: February 20, 2009

Effective Date: April 1, 2009

In compliance with the provisions of the Illinois Environmental Protection Act, the Illinois Pollution Control Board Rules and Regulations (35 Ill. Adm. Code, Subtitle C, Chapter 1) and the Clean Water Act, the following discharges may be authorized by this permit in accordance with the conditions herein:

Discharges of only storm water from small municipal separate storm sewer systems, as defined and limited herein. Storm water means storm water runoff, snow melt runoff, and surface runoff and drainage.

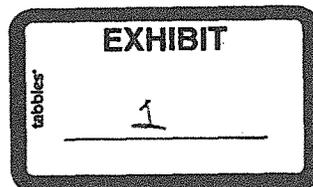
Receiving waters: Discharges may be authorized to any surface water of the State.

To receive authorization to discharge under this general permit, a facility operator must submit an application as described in the permit conditions to the Illinois Environmental Protection Agency. Authorization, if granted, will be by letter and include a copy of this permit.



Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

ILR40.wpd



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PART I. COVERAGE UNDER THIS PERMIT

A. Permit Area

This permit covers all areas of the State of Illinois.

B. Eligibility

1. This permit authorizes discharges of storm water from small municipal separate storm sewer systems (MS4s) as defined in 40 CFR 122.26(b)(16) as designated for permit authorization pursuant to 40 CFR 122.32.

2. This permit authorizes the following non-storm water discharges provided they have been determined not to be substantial contributors of pollutants to a particular small MS4 applying for coverage under this permit:

- water line and fire hydrant flushing,
- landscape irrigation water,
- rising ground waters,
- ground water infiltration,
- pumped ground water,
- discharges from potable water sources, (excluding wastewater discharges from water supply treatment plants)
- foundation drains,
- air conditioning condensate,
- irrigation water, (except for wastewater irrigation),
- springs,
- water from crawl space pumps,
- footing drains,
- storm sewer cleaning water,
- water from individual residential car washing,
- routine external building washdown which does not use detergents,
- flows from riparian habitats and wetlands,
- dechlorinated pH neutral swimming pool discharges,
- residual street wash water,
- discharges or flows from fire fighting activities
- dechlorinated water reservoir discharges, and
- pavement washwaters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed).

3. Any municipality covered by this general permit is also granted automatic coverage under Permit No. ILR10 for the discharge of storm water associated with construction site activities for municipal construction projects disturbing one acre or more. The permittee is granted automatic coverage 30 days after Agency receipt of a Notice of Intent to Discharge Storm Water from Construction Site Activities from the permittee. The Agency will provide public notification of the construction site activity and assign a unique permit number for each project during this period. The permittee shall comply with all the requirements of Permit ILR10 for all such construction projects.

C. Limitations on Coverage

The following discharges are not authorized by this permit:

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 - footing drains,
 - storm sewer cleaning water,
 - water from individual residential car washing,
 - routine external building washdown which does not use detergents,
 - flows from riparian habitats and wetlands,
 - dechlorinated pH neutral swimming pool discharges,
 - residual street wash water,
 - discharges or flows from fire fighting activities
 - dechlorinated water reservoir discharges, and
 - pavement washwaters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed).
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C. Limitations on Coverage

The following discharges are not authorized by this permit:

1. Storm water discharges that are mixed with non-storm water or storm water associated with industrial activity unless such discharges are:
 - a. in compliance with a separate NPDES permit, or
 - b. identified by and in compliance with Part I.B.2 of this permit.
2. Storm water discharges that the Agency determines are not appropriately covered by this general permit. This determination may include discharges identified in Part 1.B.2.
3. Storm water discharges to any receiving water specified under 35 Ill. Adm. Code 302.105(d)(6).

D. Obtaining Authorization

In order for storm water discharges from small municipal separate storm sewer systems to be authorized to discharge under this general permit, a discharger must:

1. Submit a Notice of Intent (NOI) in accordance with the requirements of Part II using an NOI form provided by the Agency (or a photocopy thereof) or the appropriate U.S. EPA NOI form.
2. Submit a new NOI in accordance with Part II within 30 days of a change in the operator or the addition of a new operator.
3. Unless notified by the Agency to the contrary, submit an NOI in accordance with the requirements of this permit to be authorized to discharge storm water from small municipal separate storm sewer systems under the terms and conditions of this permit 30 days after the date that the NOI is received. The Agency may deny coverage under this permit and require submittal of an application for an individual NPDES permit based on a review of the NOI or other information.

PART II. NOTICE OF INTENT REQUIREMENTS

Deadlines for Notification

1. If you were automatically designated under 40 CFR 122.32(a)(1) to obtain permit coverage, then you were required to submit an NOI or apply for an individual permit by March 10, 2003.
2. If you have coverage under the previous general permit for storm water discharges from small MS4s, you must renew your permit coverage under this part. You must submit a NOI within 90 days of the effective date of this reissued general permit for storm water discharges from small MS4s to renew your NPDES permit coverage.
3. If you are designated by IEPA under Section 122.32 (a)(2) during the term of this general permit, then you are required to submit an NOI within 180 days of such notice.
4. You are not prohibited from submitting an NOI after established deadlines for NOI submittals. If a late NOI is submitted, your authorization is only for discharges that occur after permit coverage is granted. IEPA reserves the right to take appropriate enforcement actions against MS4s that have not submitted a timely NOI.

B. Contents of Notice of Intent

Dischargers seeking coverage under this permit shall submit either the Illinois MS4 NOI form or the U.S. EPA MS4 NOI form. The Notice(s) of Intent shall be signed in accordance with Standard Condition 11 of this permit and shall include the following information:

1. The street address, county, and the latitude and longitude of the municipal office for which the notification is submitted;
2. The name, address, and telephone number of the operator(s) filing the NOI for permit coverage;
3. The name of the receiving water(s), their impairments from any approved 303(d) list and any appropriate TMDL or alternate water quality study; and
4. The following shall be provided as an attachment to the NOI:
 - a. a description of the best management practices (BMPs) to be implemented and the measurable goals for each of the storm water minimum control measures in paragraph IV. B. of this permit designed to reduce the discharge of pollutants to the maximum extent practicable;

- b. the month and year in which you implemented any BMPs of the six minimum control measures, and the month and year in which you will start and fully implement any new minimum control measures or indicate the frequency of the action;
 - c. for existing permittees, provide adequate information or justification on any BMPs from previous NOIs that could not be implemented; and
 - d. identification of a local qualifying program, or any partners of the program if any.
5. For existing permittees, certification that states the permittee has implemented necessary BMPs of the six minimum control measures.
- C. All required information for the NOI shall be submitted electronically to the following email and office addresses:

epa.ms4noipermit@illinois.gov

Illinois Environmental Protection Agency
 Division of Water Pollution Control
 Permit Section
 Post Office Box 19276
 Springfield, Illinois 62794-9276

D. Shared Responsibilities

You may partner with other MS4s to develop and implement your storm water management program. You may also jointly submit an NOI with one or more MS4s. Each MS4 must fill out the NOI form. The description of your storm water management program must clearly describe which permittees are responsible for implementing each of the control measures. Each permittee is responsible for implementation of Best Management Practices for the Storm Water Management Program within its jurisdiction.

PART III. SPECIAL CONDITIONS

- A. Your discharges, alone or in combination with other sources, shall not cause or contribute to a violation of any applicable water quality standard outlined in 35 Ill. Adm. Code 302.
- B. If there is evidence indicating that the storm water discharges authorized by this permit cause, or have the reasonable potential to cause or contribute to a violation of water quality standards, you may be required to obtain an individual permit or an alternative general permit or the permit may be modified to include different limitations and/or requirements.
- C. If a total maximum daily load (TMDL) allocation or watershed management plan is approved for any water body into which you discharge, you must review your storm water management program to determine whether the TMDL or watershed management plan includes requirements for control of storm water discharges. If you are not meeting the TMDL allocations, you must modify your storm water management program to implement the TMDL or watershed management plan within eighteen months of notification by the Agency of the TMDL or watershed management plan approval. Where a TMDL or watershed management plan is approved, you must:
 - 1. Determine whether the approved TMDL is for a pollutant likely to be found in storm water discharges from your MS4.
 - 2. Determine whether the TMDL includes a pollutant waste load allocation (WLA) or other performance requirements specifically for storm water discharge from your MS4.
 - 3. Determine whether the TMDL addresses a flow regime likely to occur during periods of storm water discharge.
 - 4. After the determinations above have been made and if it is found that your MS4 must implement specific WLA provisions of the TMDL, assess whether the WLAs are being met through implementation of existing storm water control measures or if additional control measures are necessary.
 - 5. Document all control measures currently being implemented or planned to be implemented to comply with TMDL waste load allocation(s). Also include a schedule of implementation for all planned controls. Document the calculations or other evidence that shows that the WLA will be met.
 - 6. Describe and implement a monitoring program to determine whether the storm water controls are adequate to meet the WLA.
 - 7. If the evaluation shows that additional or modified controls are necessary, describe the type and schedule for the control additions/revisions.

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8. Continue Paragraphs 4 above through 7 until two continuous monitoring cycles show that the WLAs are being met or that WQ standards are being met.
- D. If this permit is not reissued or replaced prior to the expiration date, it will be administratively continued in accordance with the Administrative Procedures Act and remain in force and effect. Any permittee who was granted permit coverage prior to the expiration date will automatically remain covered by the continued permit until the earlier of:
1. Reissuance or replacement of this permit, at which time you must comply with the Notice of Intent conditions of the new permit to maintain authorization to discharge; or
 2. Your submittal of a Notice of Termination; or
 3. Issuance of an individual permit for your discharges; or
 4. A formal permit decision by the Agency not to reissue this general permit at which time you must seek coverage under an alternative general permit or an individual permit.
 5. The permittee shall submit a revised or updated NOI to the Agency no later than 180 days prior to the expiration date of this permit in order for permit coverage to be administratively continued.
- E. The Agency may require any person authorized to discharge by this permit to apply for and obtain either an individual NPDES permit or an alternative NPDES general permit. Any interested person may petition the Agency to take action under this paragraph. The Agency may require any owner or operator authorized to discharge under this permit to apply for an individual NPDES permit only if the owner or operator has been notified in writing that a permit application is required. This notice shall include a brief statement of the reasons for this decision, an application form, a statement setting a deadline for the owner or operator to file the application, and a statement that on the effective date of the individual NPDES permit or the alternative general permit as it applies to the individual permittee, coverage under this general permit shall automatically terminate. The Agency may grant additional time to submit the application upon request of the applicant. If an owner or operator fails to submit in a timely manner an individual NPDES permit application required by the Agency under this paragraph, then the applicability of this permit to the individual NPDES permittee is automatically terminated at the end of the day specified for application submittal.
- F. Any owner or operator authorized by this permit may request to be excluded from the coverage of this permit by applying for an individual permit. The owner or operator shall submit an individual application with reasons supporting the request, in accordance with the requirements of 40 CFR 122.28, to the Agency. The request will be granted by issuing an individual permit or an alternative general permit if the reasons cited by the owner or operator are adequate to support the request.
- G. When an individual NPDES permit is issued to an owner or operator otherwise subject to this permit, or the owner or operator is approved for coverage under an alternative NPDES general permit, the applicability of this permit to the individual NPDES permittee is automatically terminated on the issue date of the individual permit or the date of approval for coverage under the alternative general permit, whichever the case may be.
- H. When an individual NPDES permit is denied to an owner or operator otherwise subject to this permit, or the owner or operator is denied coverage under an alternative NPDES general permit the applicability of this permit to the individual NPDES permittee is automatically terminated on the date of such denial, unless otherwise specified by the Agency.

PART IV. STORM WATER MANAGEMENT PROGRAMS

A. Requirements

The permittee must develop, implement, and enforce a storm water management program designed to reduce the discharge of pollutants from your small municipal separate storm sewer system to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Illinois Pollution Control Board Rules and Regulations (35 Ill. Adm. Code, Subtitle C, Chapter 1) and the Clean Water Act. Your storm water management program must include the minimum control measures described in section B of this Part. For new permittees, the permittee must develop and implement a program by the date specified in your coverage letter. The U.S. Environmental Protection Agency's National Menu of Storm Water Best Management Practices (<http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>) and the most recent version of the Illinois Urban Manual should be consulted regarding the selection of appropriate BMPs.

B. Minimum Control Measures

The 6 minimum control measures to be included in your storm water management program are:

1. Public education and outreach on storm water impacts

The permittee must:

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- a. implement a public education program to distribute educational materials 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 in storm water runoff; the permittee should incorporate into its education materials information about green infrastructure strategies such as green roofs, rain gardens, rain barrels, bioswales, permeable piping, dry wells, permeable pavement, that mimic natural processes and direct storm water to areas where it can be infiltrated, evaporated or reused, discuss the benefits and costs of such strategies and provide guidance to the public on how to implement them; and
- b. define appropriate BMPs for this minimum control measure and measurable goals for each BMP. These measurable goals must ensure the reduction of all of the pollutants of concern in your storm water discharges to the maximum extent practicable.

2. Public Involvement/Participation

The permittee must:

- a. at a minimum, comply with State and local public notice requirements when implementing a public involvement/participation program; and
- b. define appropriate BMPs for this minimum control measure and measurable goals for each BMP, which must ensure the reduction of all of the pollutants of concern in your storm water discharges to the maximum extent practicable.

3. Illicit discharge detection and elimination

The permittee must:

- a. develop, implement and enforce a program to detect and eliminate illicit discharges into your small MS4;
- b. develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters that receive discharges from those outfalls;
- c. to the extent allowable under state or local law, effectively prohibit, through ordinance, or other regulatory mechanisms, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions, including enforceable requirements for the prompt reporting to the MS4 of all releases, spills and other unpermitted discharges to the separate storm sewer system, and a program to respond to such reports in a timely manner.
- d. develop, implement, and adequately fund a plan to detect and address non-storm water discharges, including illegal dumping, to your system;
- e. inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste and the requirement and mechanism for reporting such discharges;
- f. address the categories of non-storm water discharges listed in Section I.B.2 only if you identify them as significant contributor of pollutants to your small MS4 (discharges or flows from the fire fighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants to waters of the United States); and
- g. define appropriate BMPs for this minimum control measure and measurable goals for each BMP. These measurable goals must ensure the reduction of all of the pollutants of concern in your storm water discharges to the maximum extent practicable.
- h. conduct periodic (annual is recommended) inspections of the storm sewer outfalls for detection of non-storm water discharges and illegal dumping.

4. Construction site storm water runoff control

The permittee must:

- a. develop, implement, and enforce a program to reduce pollutants in any storm water runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Control of storm water discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more or has been designated by the permitting authority.

Your program must include the development and implementation of, at a minimum:

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- i. an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under state or local law;
 - ii. requirements for construction site operators to implement appropriate erosion and sediment control best management practices, including green infrastructure storm water management techniques where appropriate and practicable;
 - iii. requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
 - iv. require all regulated construction sites to have a storm water pollution prevention plan that meets the requirements of Part IV of NPDES permit No. ILR10 including management practices, controls, and other provisions at least as protective as the requirements contained in the Illinois Urban Manual, 2002, or as amended including green infrastructure techniques where appropriate and practicable;
 - v. procedures for site plan review which incorporate consideration of potential water quality impacts and review of individual pre-construction site plans to ensure consistency with local sediment and erosion control requirements;
 - vi. procedures for receipt and consideration of information submitted by the public; and
 - vii. procedures for site inspections and enforcement of control measures.
- b. define appropriate BMPs for this minimum control measure and measurable goals for each BMP. These measurable goals must ensure the reduction of all of the pollutants of concern in your storm water discharges to the maximum extent practicable.
5. Post-construction storm water management in new development and redevelopment

The permittee must:

- a. develop, implement, and enforce a program to address and minimize storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale or that have been designated to protect water quality, that discharge into your small MS4 within the MS4 jurisdictional control. Your program must ensure that appropriate controls are in place that would protect water quality and reduce the discharge of pollutants to the maximum extent practicable. In addition, each permittee should adopt strategies that incorporate storm water infiltration, reuse and evapotranspiration of storm water into the project to the maximum extent practicable;
- b. develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for all projects within your community for all new development and redevelopment that will reduce the discharge of pollutants, the volume and velocity of storm water flow to the maximum extent practicable. When selecting BMPs to comply with requirements contained in this Part, the permittee should adopt one or more of the following general strategies, in order of preference. Proposal of a strategy should include a rationale for not selecting an approach from among those with a higher preference. When approving a plan for development, redevelopment, highway construction, maintenance, replacement or repair on existing developed sites or other land disturbing activity covered under this Part, the permittee should require the person responsible for that activity to adopt one or more of these strategies, in order of preference, or provide a rationale for selecting a more preferred strategy.
 - i. preservation of the natural features of development sites, including natural storage and infiltration characteristics;
 - ii. preservation of existing natural streams, channels, and drainage ways,
 - iii. minimization of new impervious surfaces;
 - iv. conveyance of storm water in open vegetated channels;
 - v. construction of structures that provide both quantity and quality control, with structures serving multiple sites being preferable to those serving individual sites; and
 - vi. construction of structures that provide only quantity control, with structures serving multiple sites being preferable to those serving individual sites.

- c. develop and implement a program to minimize the volume of storm water runoff and pollutants from public highway streets, roads, parking lots and sidewalks (public surfaces) through the use of BMPs that alone or in combination result in physical, chemical or biological pollutant load reduction, increased infiltration, evapotranspiration and reuse of storm water. The program shall include, but not be limited to the following elements:
- i. appropriate training for all MS4 employees who manage or are directly involved in (or who retain others who manage or are directly involved in) the routine maintenance, repair or replacement of public surfaces in current green infrastructure or low impact design techniques applicable to such projects.
 - ii. appropriate training for all contractors retained to manage or carry out routine maintenance, repair or replacement of public surfaces in current green infrastructure or low impact design techniques applicable to such projects. Contractors may provide training to their employees for projects which include green infrastructure or low impact design techniques.
- d. develop and implement a program to minimize the volume of storm water runoff and pollutants from existing privately owned developed property that contributes storm water to the MS4 within the MS4 jurisdictional control. Such program may contain the following elements:
- i. source identification – establishment of an inventory of storm water and pollutants discharged to the MS4
 - ii. implementation of appropriate BMPs to accomplish the following:
 - A. education on green infrastructure BMPs
 - B. identify a relevant set of BMPs for all departments
 - C. evaluation of existing flood control techniques to determine the feasibility of pollution control retrofits
 - D. implementation of additional controls for special events expected to generate significant pollution (fairs, parades, performances)
 - E. implementation of appropriate maintenance programs, including maintenance agreements, for structural pollution control devices or systems
 - F. management of pesticides and fertilizers
 - G. street cleaning in targeted areas
- e. use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects, public surfaces and existing developed property as set forth above to the extent allowable under state or local law; and
- f. require all regulated construction sites to have post-construction management plans that meets or exceeds the requirements of Section IV (D)(2)(b) of NPDES permit No. ILR10 including management practices, controls, and other provisions at least as protective as the requirements contained in the Illinois Urban Manual, 2002;
- g. ensure adequate long-term operation and maintenance of BMPs; and
- h. define appropriate BMPs for this minimum control measure and measurable goals for each BMP. These measurable goals must ensure the reduction of all of the pollutants of concern in your storm water discharges to the maximum extent practicable.
6. Pollution prevention/good housekeeping for municipal operations

The permittee must:

- a. develop and implement an operation and maintenance program that includes a training component and is designed to prevent and reduce the discharge of pollutants to the maximum extent practicable;
- b. using training materials that are available from EPA, the state of Illinois, or other organizations, your program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, operation of storage yards, snow disposal, new construction and land disturbances, and storm water system maintenance procedures for proper disposal of street cleaning debris and catch basin material, address ways that flood management projects impact water quality, non-point source pollution control, green infrastructure controls, and aquatic habitat; and
- c. define appropriate BMPs for this minimum control measure and measurable goals for each BMP. These measurable

goals must ensure the reduction of all of the pollutants of concern in your storm water discharges to the maximum extent practicable.

Qualifying State, County, or Local Program

If an existing qualifying local program requires you to implement one or more of the minimum control measures of B. above, you may follow that qualifying program's requirements rather than the requirements of B. above. A qualifying local program is a local, county or state municipal storm water management program that imposes, at a minimum, the relevant requirements of Section B. Any qualifying local programs that you intend to follow shall be specified in your storm water management plan.

D. Sharing Responsibility

1. Implementation of one or more of the minimum measures may be shared with another entity, or the entity may fully take over the measure. You may rely on another entity only if:
 - a. the other entity, in fact, implements the control measure;
 - b. the particular control measure, or component of that measure is at least as stringent as the corresponding permit requirement;
 - c. the other entity agrees to implement the control measure on your behalf. Written acceptance of this obligation is expected. This obligation must be maintained as part of the description of your storm water management program. If the other entity agrees to report on the minimum measure, you must supply the other entity with the reporting requirements contained in Section V (C) of this permit. If the other entity fails to implement the control measure on your behalf, then you remain liable for any discharges due to that failure to implement.

E. Reviewing and Updating Storm Water Management Programs

1. Storm Water Management Program Review: You must do an annual review of your Storm Water Management Program in conjunction with preparation of the annual report required under Part V.(C).
2. Storm Water Management Program Update: You may change your Storm Water Management Program during the life of the permit in accordance with the following procedures:
 - a. changes adding (but not subtracting or replacing) components, controls, or requirements to the Storm Water Management Program may be made at any time upon written notification to the Agency; and
 - b. changes replacing an ineffective or unfeasible BMP specifically identified in the Storm Water Management Program with an alternate BMP may be requested at any time. Unless denied by the Agency, changes proposed in accordance with the criteria below shall be deemed approved and may be implemented 60 days from submittal of the request. If request is denied, the Agency will send you a written response giving a reason for the decision. Your modification requests must include the following:
 - i. an analysis of why the BMP is ineffective or infeasible (including cost prohibitive);
 - ii. expectations on the effectiveness of the replacement BMP; and
 - iii. an analysis of why the replacement BMP is expected to achieve the goals of the BMP to be replaced.
 - c. changes replacing or modifying any ordinances relative to the storm water management program;
 - d. change requests or notifications must be made in writing and signed in accordance with Standard Condition II of Attachment H.
3. Storm Water Management Program Updates Required by the Agency. The Agency may require changes to the Storm Water Management Program as needed to:
 - a. address impacts on receiving water quality caused, or contributed to, by discharges from the municipal separate storm sewer system;
 - b. include more stringent requirements necessary to comply with new federal statutory or regulatory requirements; or
 - c. include such other conditions deemed necessary by the Agency to comply with the goals and requirements of the Clean Water Act.

- d. changes requested by the Agency must be made in writing, set forth the time schedule for you to develop the changes, and offer you the opportunity to propose alternative program changes to meet the objective of the requested modification. All changes required by the Permitting Authority will be made in accordance with 40 CFR 124.5, 40 CFR 122.62, or as appropriate 40 CFR 122.63.

PART V. MONITORING, RECORDKEEPING AND REPORTING

A. Monitoring

The permittee must evaluate program compliance, the appropriateness of your identified best management practices, and progress towards achieving your identified measurable goals, which must include reducing the discharge of pollutants to the maximum extent practicable (MEP). Monitoring shall include at least annual monitoring of receiving waters upstream and downstream of the MS4 discharges, use of indicators to gauge the effects of storm water discharges on the physical/habitat-related aspects of the receiving waters, and/or monitoring of the effectiveness of BMPs.

B. Recordkeeping

The permittee must keep records required by this permit for the duration of this permit. All records shall be kept onsite or locally available and shall be made accessible to the Agency for review at the time of an on-site inspection. Except as otherwise provided in this permit, you must submit your records to the Agency only when specifically asked to do so. You must post your notice of intent (NOI), your storm water management plan and your annual reports on your website. You must make your records, including your notice of intent (NOI) and your storm water management plan, available to the public at reasonable times during regular business hours within 10 working days of its approval by the permitting authority. (You may assess a reasonable charge for copying. You may require a member of the public to provide advance notice, not to exceed seven working days.) Storm sewer maps may be withheld for security reasons.

C. Reporting

The permittee must submit annual reports to the Agency by the first day of June for each year that this permit is in effect. If the permittee maintains a website, a copy of the annual report shall be posted on the website by the first day of June of each year. Each report shall cover the period from March of the previous year through March of the current year. Your report must include:

1. 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;
2. Results of information collected and analyzed, including monitoring data, if any, during the reporting period;
3. A summary of the storm water activities you plan to undertake during the next reporting cycle (including an implementation schedule);
4. A change in any identified best management practices or measurable goals that apply to the program elements; and
5. Notice that you are relying on another government entity to satisfy some of your permit obligations (if applicable).
6. The annual reports shall be submitted to the following email and office addresses: epa.ms4annualinsp@illinois.gov.

Illinois Environmental Protection Agency
 Division of Water Pollution Control
 Compliance Assurance Section
 Municipal Annual Inspection Report
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, Illinois 62794-9276

PART VI. DEFINITIONS AND ACRONYMS (SEE ALSO SPECIAL CONDITIONS)

All definitions contained in Section 502 of the Clean Water Act, 40 CFR 122, and 35 Ill. Adm. Code 309 shall apply to this permit and are incorporated herein by reference. For convenience, simplified explanations of some regulatory/statutory definitions have been provided, but in the event of a conflict, the definition found in the statute or regulation takes precedence.

Best Management Practices (BMPs) means structural or nonstructural controls; schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the state. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

BMP is an acronym for "Best Management Practices."

CFR is an acronym for "Code of Federal Regulations."

Control Measure as used in this permit, refers to any Best Management Practice or other method used to prevent or reduce storm water runoff or the discharge of pollutants to waters of the State.

CWA or The Act means the Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Pub. L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. 96-483 and Pub. L. 97-117, 33 U.S.C. 1251 et seq.

Discharge, when used without a qualifier, refers to discharge of a pollutant as defined at 40 CFR 122.2.

Green Infrastructure means wet weather management approaches and technologies that utilize, enhance or mimic the natural hydrologic cycle processes of infiltration, evapotranspiration and reuse. Green infrastructure approaches currently in use include green roofs, trees and tree boxes, rain gardens, vegetated swales, pocket wetlands, infiltration planters, porous and permeable pavements, porous piping systems, dry wells, vegetated median strips, reforestation/revegetation, rain barrels and cisterns and protection and enhancement of riparian buffers and floodplains.

Illicit Connection means any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

Illicit Discharge is defined at 40 CFR 122.26(b)(2) and refers to any discharge to a municipal separate storm sewer that is not composed entirely of storm water, except discharges authorized under an NPDES permit (other than the NPDES permit for discharges from the MS4) and discharges resulting from fire fighting activities.

MEP is an acronym for "Maximum Extent Practicable," the technology-based discharge standard for Municipal Separate Storm Sewer Systems to reduce pollutants in storm water discharges that was established by CWA Section 402(p). A discussion of MEP as it applies to small MS4s is found at 40 CFR 122.34.

MS4 is an acronym for "Municipal Separate Storm Sewer System" and is used to refer to a Large, Medium, or Small Municipal Separate Storm Sewer System (e.g. "the Dallas MS4"). The term is used to refer to either the system operated by a single entity or a group of systems within an area that are operated by multiple entities (e.g., the Houston MS4 includes MS4s operated by the city of Houston, the Texas Department of Transportation, the Harris County Flood Control District, Harris County, and others).

Municipal Separate Storm Sewer is defined at 40 CFR 122.26(b)(8) and means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of the CWA that discharges to waters of the United States; (ii) Designed or used for collecting or conveying storm water; (iii) Which is not a combined sewer; and (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

NOI is an acronym for "Notice of Intent" to be covered by this permit and is the mechanism used to "register" for coverage under a general permit.

NPDES is an acronym for "National Pollutant Discharge Elimination System."

Outfall is defined at 40 CFR 122.26(b)(9) and means a point source as defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges to waters of the United States and does not include open conveyances connecting two municipal storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other waters of the United States and are used to convey waters of the United States.

Owner or Operator is defined at 40 CFR 122.2 and means the owner or operator of any "facility or activity" subject to regulation under the NPDES program.

Permitting Authority means the Illinois EPA.

Point Source is defined at 40 CFR 122.2 and means any discernable, confined and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural storm water runoff.

Qualifying Local Program is defined at 40 CFR 122.34(c) and means a local, state, or Tribal municipal storm water management program that imposes, at a minimum, the relevant requirements of paragraph (b) of Section 122.34.

Small Municipal Separate Storm Sewer System is defined at 40 CFR 122.26(b)(16) and refers to all separate storm sewers that are owned or operated by the United States, a State [sic], city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State [sic] law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of the CWA that discharges waters of the United States, but is not defined as "large" or "medium" municipal separate storm sewer system. This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

Storm Water is defined at 40 CFR 122.26(b)(13) and means storm water runoff, snowmelt runoff, and surface runoff and drainage.

Storm Water Management Program (SWMP) refers to a comprehensive program to manage the quality of storm water discharged from the municipal separate storm sewer system.

SWMP is an acronym for "Storm Water Management Program."

TMDL is an acronym for "Total Maximum Daily Load."

Waters (also referred to as waters of the state or receiving water) is defined at Section 301.440 of Title 35: Subtitle C: Chapter I of the Illinois Pollution Control Board Regulations and means all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon the State of Illinois, except that sewers and treatment works are not included except as specially mentioned; provided, that nothing herein contained shall authorize the use of natural or otherwise protected waters as sewers or treatment works except that in-stream aeration under Agency permit is allowable.

"**You**" and "**Your**" as used in this permit is intended to refer to the permittee, the operator, or the discharger as the context indicates and that party's responsibilities (e.g., the city, the county, the flood control district, the U.S. Air Force, etc.).

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Attachment H
Standard Conditions
Definitions

Act means the Illinois Environmental Protection Act, 415 ILCS 5 as Amended.

Agency means the Illinois Environmental Protection Agency.

Board means the Illinois Pollution Control Board.

Clean Water Act (formerly referred to as the Federal Water Pollution Control Act) means Pub. L. 2-500, as amended. 33 U.S.C. 1251 et seq.

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- (5) Proper operation and maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up, or auxiliary facilities, or similar systems only when necessary to achieve compliance with the conditions of the permit.
- (6) Permit actions. This permit may be modified, revoked and reissued, or terminated for cause by the Agency pursuant to 40 CFR 122.62. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- (7) Property rights. This permit does not convey any property rights of any sort, or any exclusive privilege.
- (8) Duty to provide information. The permittee shall furnish to the Agency within a reasonable time, any information which the Agency may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. The permittee shall also furnish to the Agency, upon request, copies of records required to be kept by this permit.
- (9) Inspection and entry. The permittee shall allow an authorized representative of the Agency, upon the presentation of credentials and other documents as may be required by law, to:
 - (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - (d) Sample or monitor at reasonable times, for the purpose of assuring permit compliance, or as otherwise authorized by the Act, any substances or parameters at any location.
- (10) Monitoring and records.
 - (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
 - (b) The permittee shall retain records of all monitoring information, including all calibration and maintenance records, and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of this permit, measurement, report or application. This period may be extended by request of the Agency at any time.
 - (c) Records of monitoring information shall include:
 - (1) The date, exact place, and time of sampling or measurements;
 - (2) The individual(s) who performed the sampling or measurements;
 - (3) The date(s) analyses were performed;
 - (4) The individual(s) who performed the analyses;
 - (5) The analytical techniques or methods used; and
 - (6) The results of such analyses.
 - (d) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit. Where no test procedure under 40 CFR Part 136 has been approved, the permittee must submit to the Agency a test method for approval. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements.
- (11) Signatory requirement. All applications, reports or information submitted to the Agency shall be signed and certified.
 - (a) Application. All permit applications shall be signed as follows:
 - (1) For a corporation: by a principal executive officer of at least the level of vice president or a person or position having overall responsibility for environmental matters for the corporation;
 - (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or

(3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.

(b) Reports. All reports required by permits, or other information requested by the Agency shall be signed by a person described in paragraph (a) or by a duly authorized representative of that person. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described in paragraph (a); and

(c) Changes of Authorization. If an authorization under (b) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of (b) must be submitted to the Agency prior to or together with any reports, information, or applications to be signed by an authorized representative.

(12) Reporting requirements.

(a) Planned changes. The permittee shall give notice to the Agency as soon as possible of any planned physical alterations or additions to the permitted facility.

(b) Anticipated noncompliance. The permittee shall give advance notice to the Agency of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

(c) Compliance schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

(d) Monitoring reports. Monitoring results shall be reported at the intervals specified elsewhere in this permit.

(1) Monitoring results must be reported on a Discharge Monitoring Report (DMR).

(2) If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR 136 or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.

(3) Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Agency in the permit.

(e) Twenty-four hour reporting. The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and time; and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The following shall be included as information which must be reported within 24 hours:

(1) Any unanticipated bypass which exceeds any effluent limitation in the permit;

(2) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Agency in the permit to be reported within 24 hours.

The Agency may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

(f) Other noncompliance. The permittee shall report all instances of noncompliance not reported under paragraphs (12)(c), (d), or (e), at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph (12)(e).

(g) Other information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such facts or information.

(13) Transfer of permits. A permit may be automatically transferred to a new permittee if:

(a) The current permittee notifies the Agency at least 30 days in advance of the proposed transfer date;

(b) The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittees; and

(c) The Agency does not notify the existing permittee and the proposed new permittee of its intent to modify or revoke and reissue the permit. If this notice is not received, the transfer is effective on the date specified in the agreement.

(2) The authorization specifies either an individual or a position responsible for the overall operation of the facility, from which the discharge originates, such as a plant manager, superintendent or person of equivalent responsibility; and

(3) The written authorization is submitted to the Agency.

(14) All manufacturing, commercial, mining, and silvicultural dischargers must notify the Agency as soon as they know or have reason to believe:

(a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant identified under Section 307 of the Clean Water Act which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:

(1) One hundred micrograms per liter (100 ug/l);

(2) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony.

(3) Five (5) times the maximum concentration value reported for that pollutant in the NPDES permit application; or

(4) The level established by the Agency in this permit.

(b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the NPDES permit application.

(15) All Publicly Owned Treatment Works (POTWs) must provide adequate notice to the Agency of the following:

(a) Any new introduction of pollutants into that POTW from an indirect discharge which would be subject to Sections 301 or 306 of the Clean Water Act if it were directly discharging those pollutants; and

(b) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

(c) For purposes of this paragraph, adequate notice shall include information on (i) quality and quantity of effluent introduced into the POTW, and (ii) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

(16) If the permit is issued to a publicly owned or publicly regulated treatment works, the permittee shall require any industrial user of such treatment works to comply with federal requirements concerning:

(a) User charges pursuant to Section 204(b) of the Clean Water Act, and applicable regulations appearing in 40 CFR 35;

(b) Toxic pollutant effluent standards and pretreatment standards pursuant to Section 307 of the Clean Water Act; and

(c) Inspection, monitoring and entry pursuant to Section 308 of the Clean Water Act.

(17) If an applicable standard or limitation is promulgated under Section 301(b)(2)(C) and (D), 304(b)(2), or 307(a)(2) and that effluent standard or limitation is more stringent than any effluent limitation in the permit, or controls a pollutant not limited in the permit, the permit shall be promptly modified or revoked, and reissued to conform to that effluent standard or limitation.

(18) Any authorization to construct issued to the permittee pursuant to 35 Ill. Adm. Code 309.154 is hereby incorporated by reference as a condition of this permit.

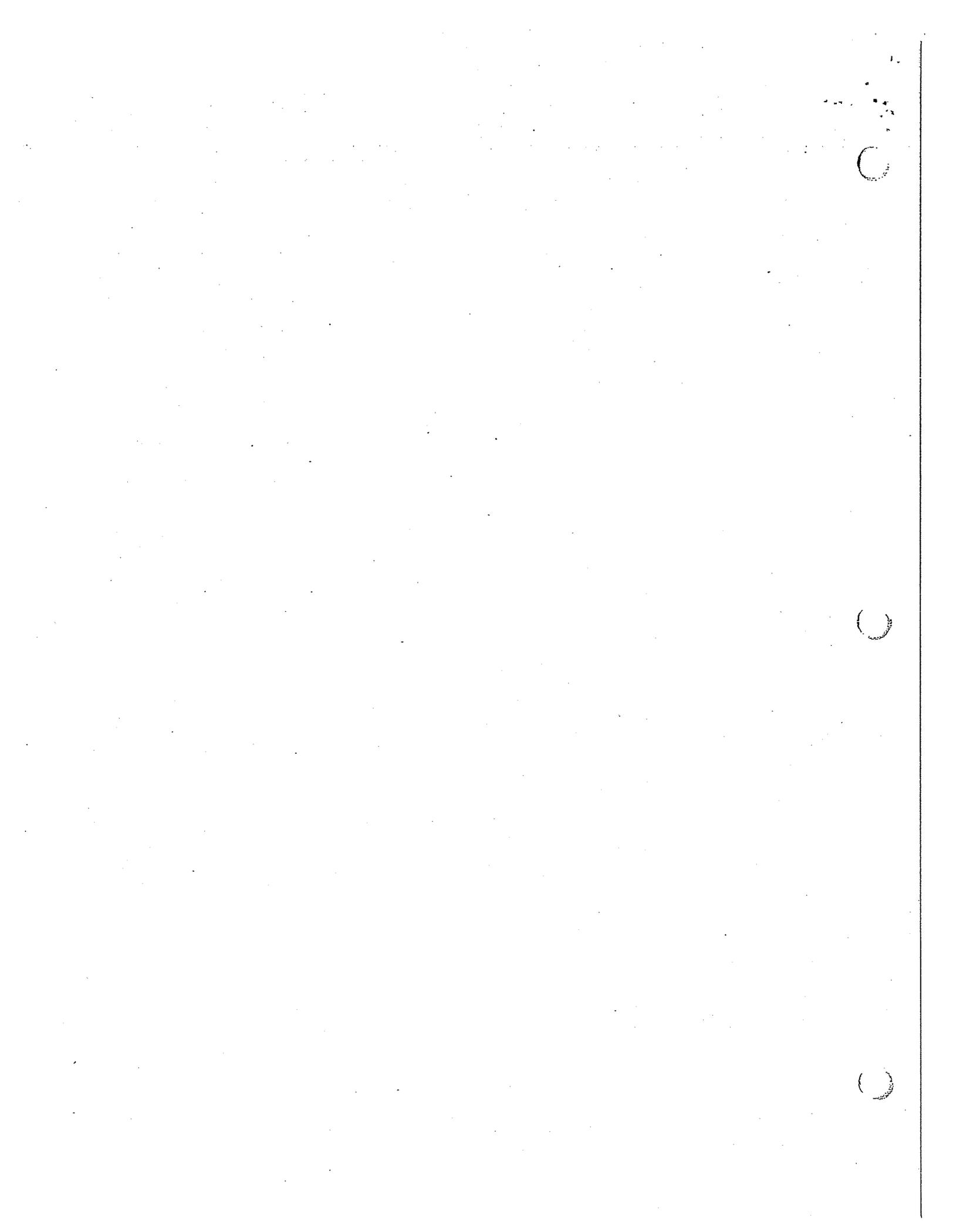
(19) The permittee shall not make any false statement, representation or certification in any application, record, report, plan or other document submitted to the Agency or the USEPA, or required to be maintained under this permit.

(20) The Clean Water Act provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Clean Water Act is subject to a civil penalty not to exceed \$10,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing Sections 301, 302, 306, 307, or 308 of the Clean Water Act is subject to a fine of not less than \$2,500 nor more than \$25,000 per day of violation, or by imprisonment for not more than one year or both.

(21) The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under permit shall, upon conviction, be punished by a fine of not more than \$10,000 per

violation, or by imprisonment for not more than 6 months per violation, or by both.

- (22) The Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit shall, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.
- (23) Collected screenings, slimes, sludges, and other solids shall be disposed of in such a manner as to prevent entry of those wastes (or runoff from the wastes) into waters of the State. The proper authorization for such disposal shall be obtained from the Agency and is incorporated as part hereof by reference.
- (24) In case of conflict between these standard conditions and any other condition(s) included in this permit, the other condition(s) shall govern.
- (25) The permittee shall comply with, in addition to the requirements of the permit, all applicable provisions of 35 Ill. Adm. Code, Subtitle C, Subtitle D, Subtitle E, and all applicable orders of the Board.
- (26) The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit is held invalid, the remaining provisions of this permit shall continue in full force and effect.

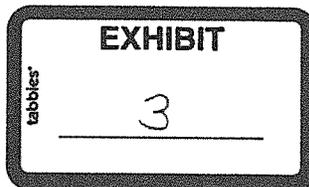




Village of Wilmette Annual Facility Inspection Report

Illinois Environmental Protection Agency
NPDES Permit for Storm Water Discharges from Separate Storm Sewer Systems
(MS4)

Reporting Period: March 2014 to March 2015 (Permit Year 12)



Part A: Changes to the Best Management Practices (BMPs)

No changes were made to BMPs for the 2014-2015 reporting cycle.

Part B: Status of Compliance with Permit Conditions

BMP A: PUBLIC EDUCATION & OUTREACH

A.1 – DISTRIBUTED PAPER MATERIAL

BMP No. A.1: Public Works Department – Administration

Brief Description of BMP: Existing Solid Waste Program – Chapter 7 of the Village Code addresses the collection of refuse, recycling and yard waste. The Village Staff has prepared a public information brochure highlighting the various programs. Wilmette is a member of the Solid Waste Agency of Northern Cook County (SWANCC), a unit of government that is responsible for the management of solid waste for its members. The Village takes advantage of SWANCC services to coordinate and publicize such events. The Village communicates these programs to residents through the Village newsletter, website, E-news and brochures.

Measurable Goal(s), including frequencies: Communicate information to residents via Village Newsletter, *The Communicator*, website, CTV6, E-news, New Resident Handbook, and brochures.

Milestones

Year 11 Compliance Activities:

- 1) New residents continue to receive a packet of information which includes the Village's *Residential Guide for Waste & Recycling Collection*; residents are informed of the Village's website for information regarding "green initiatives" containing a description of the solid waste program. Residents are can also subscribe to the Village's e-news, and automatically receive the Village's newsletter, *The Communicator*, on a quarterly basis.
- 2) The Village "Green Initiatives" link on the website provides residents with information on recycling, water conservation and environmental friendly cleaning solutions. The categories under this link display the following information:
 - a) The Recycling link contains information for: CFLs, Small Electronics, Automotive Materials, Computer Recycling, Chemical Disposal, Battery Recycling, and Prescription Drug Disposal.
 - b) The Water Conservation link informs residents about: Rain Barrels, Rain Gardens, Indoor Water Conservation Tips, and Outdoor Water Conservation Tips.
 - c) The Eco-Cleaning links offers SWANCC's recommendations for homemade cleaning products as a safe alternative to using cleaning products.
- 3) The Village maintains a link to SWANCC's website on its homepage under "Quick Links." In addition, members of the Public Works Department are well versed and inform residents of any upcoming events for proper disposal and recycling processes.

- 4) As a continued member of SWANCC, the village advertised the following events via Website, *The Communicator*, Cable TV (WCTV-6) and/or e-news.
 - a) Recycled 950 lbs. of Holiday Lights.
 - b) Recycle household batteries; a permanent drop-off location at the Village Hall.
 - c) Drop-off location for proper disposal of prescription drugs at the Police Department,
 - d) Drop-off location for proper recycling of small electronics and compact fluorescent bulbs located at the Village Hall.
- 5) The Village collaborated efforts with other entities to promote recycling through the following events:
 - a) The Village co-sponsored a program with Go Green Wilmette to recycle Styrofoam in Dec 2013 to Jan 2014, which was advertised on the Village website and e-news.
 - b) The Village partnered with SWANCC to host a dual Document Destruction & Electronics Recycling Event on Sept 21, 2013. Recycled 16,780 lbs. of documents and 18,673 lbs. of electronics.
- 6) Continue to remind residents of new legislation adopted for electronic recycling that went into effect on Jan 1, 2012, advising residents they cannot place electronics in the garbage for disposal. This information is maintained on the Village's website. Also, residents are provide with a link and web address to the Solid Waste Agency of Northern Cook County (SWANCC) who hosts electronic recycling events throughout the year.

Year 12 Compliance Activities:

- 1) New residents continue to receive a packet of information which includes the Village's *Residential Guide for Waste & Recycling Collection*, an updated version of which was published in March of 2014. Residents are informed of the Village's website for information regarding "green initiatives" containing a description of the solid waste program. Public Works maintains a Frequently Asked Questions section on their website, which was updated in June of 2014. Residents are can also subscribe to the Village's e-news, and automatically receive the Village's newsletter, *The Communicator*, on a quarterly basis.
- 2) The Village "Green Initiatives" link on the website provides residents with information on recycling, water conservation, and environmental friendly cleaning solutions. The categories under this link display the following information:
 - a) The Recycling link contains information for: CFLs, Small Electronics, Automotive Materials, Computer Recycling, Chemical Disposal, Battery Recycling, and Prescription Drug Disposal. The Chemical Disposal section was updated in 2014 with a new SWANCC handout providing residents with the most current information regarding Household Chemical Waste Disposal. The Prescription Drug Disposal section was also updated in 2014 to include details about controlled substance disposal events.
 - b) The Water Conservation link informs residents about: Rain Barrels, Rain Gardens, Indoor Water Conservation Tips, and Outdoor Water Conservation Tips.

- c) The Eco-Cleaning links offers SWANCC's recommendations for homemade cleaning products as a safe alternative to using cleaning products.
- 3) The Village maintains a link to SWANCC's website on its homepage under "Quick Links." In addition, members of the Public Works Department are well versed and inform residents of any upcoming events for proper disposal and recycling processes.
- 4) As a continued member of SWANCC, the village advertised the following events via Website, *The Communicator*, Cable TV (WCTV-6) and/or e-news.
 - a) Recycled 1,678 lbs of Holiday Lights.
 - b) Recycle household batteries; a permanent drop-off location at the Village Hall.
 - c) Drop-off location for proper disposal of prescription drugs at the Police Department,
 - d) Drop-off location for proper recycling of small electronics and compact fluorescent bulbs located at the Village Hall.
- 5) The Village collaborated efforts with other entities to promote recycling through the following events:
 - a) The Village co-sponsored a program with Go Green Wilmette to recycle Styrofoam in Dec 2014 to Jan 2015, which was advertised on the Village website and e-news.
 - b) The Village partnered with SWANCC to host a dual Document Destruction & Electronics Recycling Event on Sept 6, 2014. Residents recycled 19,200 lbs. of documents and 15,211 lbs. of electronics.
- 6) Continue to remind residents they cannot dispose of electronics in the curbside refuse program, in accordance with electronic recycling legislation that went into effect in 2012. This information is maintained on the Village's website. Also, residents are provided with a link to the website of the Solid Waste Agency of Northern Cook County (SWANCC), which hosts electronic recycling events throughout the year.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. A.1: Public Works and Community Development Departments

Brief Description of BMP: Existing Pet Waste Management Ordinance - Chapter 20 of the Village Code discusses regulations pertaining to pets. The Village notifies resident/pet owners through various means including articles in its resident newsletter, website and brochures.

Measurable Goal(s), including frequencies: Continue information campaign and code enforcement.

Milestones

Year 11 Compliance Activities: Revise the Village's Ordinance Chapter 20 to include pet waste management (previously contained in Chapter 4). Violations of this ordinance are handled

by the Community Development Code Enforcement Officer, there were no citations issued during this reporting period. The Public Works Department continues to maintain a pet waste Article, "Managing Pet Waste – Scoop it Up" on the Public Works main page of the Village's website throughout the year which discusses the dangers of pet waste entering our waterways.

Year 12 Compliance Activities: Article 20 of the Village Code (the zoning ordinance) was amended to include a new section regulating dog runs (20-13.4.E). Article 4 of the Village Code continues to contain regulations pertaining to animal-related nuisances such as pet waste and now directs dog run regulations to the appropriate section of the zoning ordinance. Violations of this ordinance are handled by the Community Development Code Enforcement Officer, there were no citations issued during this reporting period. The Public Works Department continues to maintain a pet waste article, "Managing Pet Waste – Scoop it Up" on the Public Works main page of the Village's website, which discusses the dangers of pet waste entering our waterways.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. A.1: Village Hall – Village Manager's Office, Engineering Department, and Public Works Department – Water/Sewer Division

Brief Description of BMP: Stormwater Article in Village Newsletter - Periodically publish Stormwater educational articles in the resident newsletter and maintain updated information on the website. The articles will have tips for homeowners and businesses to take in order to reduce the number of pollutants that are discharged into our waterways.

Measurable Goal(s), including frequencies: Publish articles in the resident newsletter, *The Communicator*, and maintain updated information on the website.

Milestones

Year 11 Compliance Activities:

- 1) The Village continues to maintain a dedicated section on the website regarding Stormwater Management Program which includes suggestions for resident on how to address stormwater management and flood control issues.
- 2) *Is Your Lawn Sprinkler System in Compliance?* articles were published in *The Communicator* in the Feb/May 2013 and 2014 issues, reminding residents that according to IEPA and the Illinois plumbing and Village Codes require cross connection controls to protect our water supply.
- 3) Information regarding a series of sewer project within the separate sewer areas were announced in *The Communicator*, Feb/May 2013 issue.
- 4) Separate Storm Study GIS Development and Hydraulic Modeling was announced to residents in *The Communicator*, Feb/May 2014 issue.
- 5) The Village aired on WCTC-channel 6, a segment on Wilmette's Sewers and Stormwater (Aug 15, 2013); and the League of Women's Voters segment on Stormwater (Aug 16, 2013).

Year 12 Compliance Activities:

- 1) The Village continues to maintain a dedicated section on the website regarding Stormwater Management Program, which includes suggestions for residents on how to address stormwater management and flood control issues.
- 2) *Is Your Lawn Sprinkler System in Compliance?* article was published in the February – May 2014 issue of *The Communicator*, reminding residents that according to IEPA and the Illinois plumbing and Village Codes require cross connection controls to protect our water supply.
- 3) The Village President updated residents on the status of the Stormwater Action Plan in the June – September 2014 and October 2014 – January 2015 issues of *The Communicator*. Approved by the Village Board in 2013, the Stormwater Action Plan aims to improve residents’ quality of life by modernizing Wilmette’s stormwater and sanitary sewer infrastructure.
- 4) The Engineering Department continues to maintain a dedicated section on their Department’s website regarding Current Projects, including sanitary sewer improvements, manhole rehabilitation, and the West Park Sanitary Storage Project
- 5) Separate Storm Study GIS Development and Hydraulic Modeling was announced to residents in the February – May 2014 issue of *The Communicator*.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. A.1: Community Development and Finance Departments

Brief Description of BMP: Insert stormwater protection guides in the contractor and business owners renewal application forms. Insert guides are a tool that will provide tips on ways to reduce stormwater pollution. The Finance Department will mail insert with the annual renewal license forms.

Measurable Goal(s), including frequencies: 1 insert per year or as needed.

Milestones

Year 11 Compliance Activities: The Community Development Department prepared an insert for business owners and an insert for contractors. The Finance Department distributed the inserts with the business license and contractor license renewals that were mailed in November 2013.

Year 12 Compliance Activities: The Community Development Department prepared an insert for business owners and an insert for contractors. The Finance Department distributed the inserts with the business license and contractor license renewals that were mailed in November 2014.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

A.2 – SPEAKING ENGAGEMENT

BMP No. A.2: Public Works Department – Water/Sewer Division

Brief Description of BMP: Educate children on stormwater pollution prevention - The Public Works staff teaches school children about the importance of stormwater pollution prevention and recycling to build environmental awareness and interest.

Measurable Goal(s), including frequencies: Speak to schoolchildren once a year.

Milestones

Year 11 Compliance Activities: The Village Foresters and the Water/Sewer NPDES representative (Joe Conrad) visited Central School for Arbor Day (Apr 24, 2014). He spoke to approximately 120 school children (3rd graders) regarding stormwater pollution prevention.

Year 12 Compliance Activities: The Village Foresters and the Water/Sewer NPDES representative (Joe Conrad) visited the Baker Demonstration School for Arbor Day (Apr 24, 2015). He spoke to approximately 34 school children (3rd graders) regarding stormwater pollution prevention.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. A.2: Fire Department

Brief Description of BMP: Handout Pamphlets - The Fire Department educates grammar and middle school students on the importance of safety and environmental issues. Educating children at school is an effective way to pass environmental awareness to their parents and throughout the entire community.

Measurable Goal(s), including frequencies: Continue existing program.

Milestones

Year 11 Compliance Activities: The most effective method of fire prevention is public education. Through the Department's public education program, the Assistant to the Fire Chief and members of the Public Education team visit both private and public schools to promote fire safety to approximately 3000 children. They also visit the local pre-schools on an annual basis to teach fire safety to another 550 kids. In the past few years the Department has started visiting block parties to better educate our residents.

The Public Education Team also participates in many of the Park Districts programs to promote fire safety. Participation in both parades held in town is another activity the Department does annually. The Fire Safety House, a mobile classroom regularly visits parks and other community events such as the Independence Day celebration held at Gillson Park, further promoting fire safety. The Department also provides public education to many senior citizen organizations in Wilmette. The department reached 850 children and adults in 33 events ranging from block parties, fire truck pumper demos, and safety classes.

However, the largest public education event of the year is the Fire Department's annual open house. This event is held each October to kick off Fire Prevention week. At this event, all apparatus is on display, special team members demonstrate the tools and equipment used in rescue operations, public education material is handed out, educational videos are shown, and the Fire Safety House is set up. Each year for the past few years this event has drawn over 2000 people.

The Fire Department continues to participate in public education activities described in detail in Year 9. The department is researching ways to distribute this information through social media (i.e. twitter, Facebook).

Year 12 Compliance Activities: The most effective method of fire prevention is public education. Through the Department's public education program, the Assistant to the Fire Chief and members of the Public Education team visit both private and public schools to promote fire safety to approximately 3000 children. They also visit the local pre-schools on an annual basis to teach fire safety to another 550 kids. In the past few years the Department has started visiting block parties to better educate our residents.

The Public Education Team also participates in many of the Park Districts programs to promote fire safety. Participation in both parades held in town is another activity the Department does annually. The Fire Safety House, a mobile classroom regularly visits parks and other community events such as the Independence Day celebration held at Gilson Park, further promoting fire safety. The Department also provides public education to many senior citizen organizations in Wilmette. The department reached 1528 children and adults in 123 events ranging from block parties, fire truck pumper demos, and safety classes.

However, the largest public education event of the year is the Fire Department's annual open house. This event is held each October to kick off Fire Prevention week. At this event, all apparatus is on display, special team members demonstrate the tools and equipment used in rescue operations, public education material is handed out, educational videos are shown, and the Fire Safety House is set up. Each year for the past few years this event has drawn over 2000 people.

The Fire Department continues to participate in public education activities described in detail in Year 11. The department is researching ways to distribute this information through social media (i.e. twitter, Facebook).

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP B: PUBLIC PARTICIPATION/INVOLVEMENT

B.7 – OTHER PUBLIC INVOLVEMENT

BMP No. B.7: Engineering Department and Public Works Department – Forestry Division

Brief Description of BMP: Through the grading permit process educate stakeholder regarding the Village's Tree Protection and Tree Canopy Ordinances. Provide residents with information about the pruning, removal, planting, disease control and care for sick and damaged trees on

public property. Continue to offer the Cooperative Tree Planting program for residents (budget dependent).

Measurable Goal(s), including frequencies: Maintain the Village Code and tree inspection program on the website, and provide education information during the grading permit process.

Milestones

Year 11 Compliance Activities: During the permit process for new homes, the Engineering Department verifies that the project conforms to the requirements of the Tree Canopy Ordinance. The applicant is required to submit the *Tree Canopy Calculation Worksheet* for review. All new development projects are reviewed for proper protection/preservation of existing trees to remain. The Village offered cooperative tree planting in both spring and fall of 2013 and received funds towards the planting of 185 parkway trees. The Village earned its 30th Tree City USA award from the Arbor Day Foundation.

Year 12 Compliance Activities: During the permit process for new homes, the Engineering Department verifies that the project conforms to the requirements of the Tree Canopy Ordinance. The applicant is required to submit the *Tree Canopy Calculation Worksheet* for review. All new development projects are reviewed for proper protection/preservation of existing trees to remain. The Village offered cooperative tree planting in both spring and fall of 2014 and received funds towards the planting of 114 parkway trees. The Village earned its 31st Tree City USA award from the Arbor Day Foundation.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. B.7: Village Hall – Village Manager’s Office and Finance Department

Brief Description of BMP: New Resident Handbook and Citizen Contact/Service Request Information. The Resident Handbook (updated as needed) contains information regarding the Solid Waste Program, permits, Tree Planting, to include contact information for each department. The Village’s website contains the electronic version of the Resident Handbook, Stormwater Management information and an electronic “Service Request” option.

Measurable Goal(s), including frequencies: The Village Manager’s Office will review and update the Resident Handbook as needed. The Finance Department will distribute the updated Resident Handbooks and refer them to the Village’s website.

Milestones

Year 11 Compliance Activities: Review and Update Village Handbook. The Village Manager’s Office updated the New Resident Handbook on Sep 11, 2013.

Year 12 Compliance Activities: Review and Update Village Handbook. The Village Manager’s Office updated the New Resident Handbook on March 13, 2015 which is located on the Village’s website at www.wilmette.com. The Finance Department will distribute the updated Resident Handbooks and refer them to the Village’s website.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. B.7: Public Works Department – Administration

Brief Description of BMP: Publicize Hazardous Waste Disposal Events coordinated through SWANCC. Publicize SWANCC programs and events in the resident newsletter, website, e-news, and cable TV to increase participation in recycling and proper disposal of household hazardous waste.

Measurable Goal(s), including frequencies: Publicize hosted events.

Milestones

Year 11 Compliance Activities: The Village continues to maintain a link to SWANCC's website where residents have access to upcoming events, in particular household hazardous waste. The Village has a permanent "Green Initiatives" section on the website for proper "Chemical Disposal." Informed residents of Village's participation with SWANCC and Elgin Recycling to recycle Holiday Lights of which the Village collected 950 lbs. of lights (program dates: Nov 25, 2013 thru Jan 31, 2014). The information was posted on the website and advertised on the local cable channel and in the e-news letter. Wilmette also co-sponsored with Go Green Wilmette a Styrofoam recycling program in efforts to reduce the amount of Styrofoam that enters the landfills (program dates: Dec 26, 2013 thru Jan 6, 2014). The Village hosted a dual Document Destruction & Electronics Recycling Event on Sept 21, 2013 which was advertised on the Village website, in the e-news letter, and in the Village newsletter, *The Communicator* (ed. Jun/ Sept 2013).

Year 12 Compliance Activities: The Village continues to maintain a "Quick Link" to SWANCC's website, where residents have access to upcoming events, including household hazardous waste disposal information. The Village maintains a "Green Initiatives" section on the website for proper "Chemical Disposal."

Public Works informed residents of the Village's partnership with SWANCC and Elgin Recycling to host a Holiday Lights Recycling drop-off, during which the Village collected 1,678 lbs. of lights (program dates: Nov 24, 2014 thru Jan 30, 2015). The information was posted on the Village website and advertised on the local cable channel, in the e-newsletter, and in the Village newsletter, *The Communicator* (ed. Oct 2014/ Jan 2015).

Wilmette also partnered with Go Green Wilmette to host a Styrofoam recycling program in efforts to reduce the amount of Styrofoam that enters the landfills (program dates: Dec 26, 2014 thru Jan 5, 2015). This was advertised in the e-newsletter and on the Village website.

The Village hosted a dual Document Destruction & Electronics Recycling Event on Sept 6, 2014 which was advertised on the Village website, in the e-newsletter, and in the Village newsletter, *The Communicator* (ed. Jun/ Sept 2014).

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. B.7: Village Hall – Village Manager’s Office

Brief Description of BMP: Village Listening Post - Communication program where residents can either write-in or meet with Village officials and address residents' concerns. This venue creates a face-to-face opportunity to educate the residents on stormwater pollution prevention measures.

Measurable Goal(s), including frequencies: Host Village listening weekly during the summer months. Provide residents with stormwater educational material.

Milestones

Year 11 Compliance Activities: Maintain current program.

- 1) Village Staff and Board of Trustees hosted eleven (11) listening post meetings between June 1, 2013 and August 24, 2013.
- 2) Village Staff had stormwater management pamphlets and bookmarks available for residents.

Year 12 Compliance Activities:

- 1) Village Board of Trustees and Staff hosted ten (10) listening post meetings between June 7, 2014 and August 23, 2014.
- 2) Village representatives were able to address resident concerns regarding stormwater management and distributed stormwater management materials available which is located on the Village’s website at www.wilmette.com.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP C: ILLICIT DISCHARGE DETECTION & ELIMINATION

C.1 – STORM SEWER MAP PREPARATION

BMP No. C.1: Engineering Department

Brief Description of BMP: Storm Sewer System Map – Add outfall data to existing maps. The updated maps will allow employees to inspect, clean and maintain structures.

Measurable Goal(s), including frequencies: Update outfalls on maps as needed.

Milestones

Year 11 Compliance Activities: Continue map updates. The Engineering Department continues to use AutoCAD to track the existing storm sewer systems by adding sewers or outfalls to the current file. No new outfalls were constructed in 2013.

Year 12 Compliance Activities: Continue map updates. The Engineering Department continues to use AutoCAD to track the existing storm sewer systems by adding sewers or outfalls to the current file. In addition, the Village hired a consultant to survey the storm sewers and create a

GIS map and performed a hydraulic study of the storm sewer system. No new outfalls were constructed in 2014.

Year 13: Continue map updates.

Year 14: Continue map updates.

Year 15: Continue map updates.

C.2 – REGULATORY CONTROL PROGRAM

BMP No. C.2: Engineering Department, Community Development Department, and Public Works Department – Water/Sewer Division

Brief Description of BMP: Illicit connection ordinance – Enforce the Cross Connection Control Ordinance which prohibits discharge of pollutants to stormwater drainage systems.

Measurable Goal(s), including frequencies: Enforce the Ordinance.

Milestones

Year 11 Compliance Activities: The Engineering Department continues with current procedures, reviews, and inspections, in addition implemented a pilot smoke testing project in Oct 2013 to detect any potential infiltration and cross connections into the sanitary sewer system. The project was successful and will likely be implemented in other flood-prone areas of the Village. There were 23 cross connections confirmed with downspouts connected to the sanitary sewer system. Village staff is working with residents to make the corrections.

Year 12 Compliance Activities: The Engineering Department continues with current procedures, reviews, and inspections to detect any potential infiltration and cross connections into the sanitary sewer system. The Code Enforcement Officer sends notice of violations as needed. The Code Enforcement Officer issued a citation for one illegal cross connection discovered in the fall of 2014; the case is currently in litigation.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

C.4 – ILLICIT DISCHARGE TRACING PROCEDURES

BMP No. C.4: Engineering and Community Development Departments

Brief Description of BMP: New Construction Inspection - Village will continue to strictly inspect new construction sites. This practice ensures that no illicit connections are made during new service installation thereby eliminating wastewater entry into storm sewers.

Measurable Goal(s), including frequencies: Maintain inspection program for new construction.

Milestones

Year 11 Compliance Activities:

- 1) The Engineering Department and the Community Development Department inspect new construction sites for illicit connections during routine building inspections. The Code Enforcement Officer is responsible for citing residents for these violations.
- 2) Per the IEPA, the village ensured that new developments disturbing more than one acre received an NPDES permit prior to any construction. For this reporting period, Wilmette Circle subdivision received NPDES permit no. ILR10s783.

Year 12 Compliance Activities:

- 1) The Engineering Department and the Community Development Department inspect new construction sites for illicit connections during routine building inspections. The Code Enforcement Officer is responsible for citing residents for these violations.
- 2) Per the IEPA, the village ensured that new developments disturbing more than one acre received an NPDES permit prior to any construction. For this reporting period, one NPDES permit was issued for the West Park Sanitary Storage Project, a project for the Village of Wilmette.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. C.4: Engineering Department and Public Works Dept. – Water/Sewer Division

Brief Description of BMP: Detection & Enforcement Program – Continue to annually inspect 10% of the storm sewers and conduct dye testing to verify proper connections to Village sewers. Inspect sewer systems as part of the road resurfacing program.

Measurable Goal(s), including frequencies: Annually inspect 10% of the storm sewers and conduct dye testing as needed. Inspect sewer systems in conjunction with the road resurfacing program.

Milestones

Year 11 Compliance Activities:

- 1) The Engineering Department continues to review videos of televised sewers that are located within proposed public construction projects. In 2013, the department reviewed 19,373 feet of storm sewers. There were no illegal sewer connections detected.
- 2) The Public Works Department inspected 256 or 20% of the 1,291 storm sewer manholes. The Village crew televised and inspected 3,911 LF of storm sewer.

Year 12 Compliance Activities:

- 1) The Engineering Department continues to review videos of televised sewers that are located within proposed public construction projects. In 2014, the department reviewed 27,261 feet of storm sewers. There were no illegal sewer connections detected.
- 2) The Public Works Department inspected 198 or 15% of the 1,291 storm sewer manholes. The Village crew televised and inspected 1,072 LF of storm sewer.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. C.4: Engineering Department

Brief Description of BMP: Detection & Enforcement Program - Inspect for compliance from commercial and industrial facilities with NPDES permits while enforcing the Cross Connection Control Ordinance.

Measurable Goal(s), including frequencies: Ensure that commercial and industrial facilities are in compliance of their NPDES permits and the Cross Connection Control Ordinance.

Milestones

Year 11 Compliance Activities: Maintain current program. The Engineering Department hires an outside consultant, to ensure compliance with commercial NPDES permits and cross connection control ordinance. For this reporting period, the Village hired Gewalt Hamilton to inspect storm sewer construction, at the newly constructed Residence Inn Marriott Wilmette to ensure compliance.

Year 12 Compliance Activities: Maintain current program. The Engineering Department hires an outside consultant, to ensure compliance with commercial NPDES permits and cross connection control ordinance. For this reporting period, the Village hired Christopher B. Burke, Engineering, LTD. to inspect storm sewer construction, at the new Wilmette Circle subdivision to ensure compliance.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. C.4: Public Works Department – Water/Sewer Division

Brief Description of BMP: Training and Education of Public Employees - Continue to train the Public Works Water/Sewer Division employees on proper procedures to inspect storm sewer systems and conduct dye testing. Trained employees are more aware and more likely to find illicit connections. Training should be done as soon as possible for new employees and refresher training should be done periodically for permanent employees.

Measurable Goal(s), including frequencies: Train new employees and provide refresher training every two years.

Milestones

Year 11 Compliance Activities:

- 1) Continued training of employees. The Assistant Director of Engineering attended the Pipe Stormwater infrastructure condition rating systems and Stormwater and Nutrient Reduction classes at the APWA Expo in Schaumburg, IL in 2013.

- 2) The Engineering and Community Development Departments continues to use the *Project Stormwater Management and Maintenance Inspection Checklist* during pre-construction, compliance, and post-construction inspections.
- 3) Public Works crews inspected 256 storm sewer manholes and televised 3,911 L.F. of storm sewers with emphasis on identifying illicit connections and proper inspection procedures.
- 4) The Public Works Department - Water/Sewer Supervisor conducts annual (March) refresher training for storm sewer manhole inspections, and decanting procedures for sewer maintenance trucks with division employees. In addition, five Water/Sewer employees attended an Inflow & Infiltration Workshop on November 7, 2013 related to private sector flow reduction.

Year 12 Compliance Activities:

- 1) Continued training of employees. The Assistant Director of Engineering stays current on stormwater trends by subscribing to Storm Water Solutions Magazine, a publication related to stormwater.
- 2) The Engineering and Community Development Departments continues to use the *Project Stormwater Management and Maintenance Inspection Checklist* during pre-construction, compliance, and post-construction inspections.
- 3) Public Works crews inspected 198 storm sewer manholes and televised 1,072 LF of storm sewers with emphasis on identifying illicit connections and proper inspection procedures.
- 4) The Public Works Department - Water/Sewer Supervisor conducts annual (March) refresher training for storm sewer manhole inspections, and decanting procedures for sewer maintenance trucks with division employees. In addition, two Water/Sewer employees attended an Inflow & Infiltration Workshop titled "When Wet-Weather Flow Reduction Isn't Enough" on November 6, 2014 hosted by RJN Group.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. C.4: Engineering and Community Development Departments

Brief Description of BMP: Plan Reviews - Review plans from other government agencies (School District Library) when connection to the Village sewer system is requested. This practice provides assurance that no illicit connections are made during new service installations.

Measurable Goal(s), including frequencies: Maintain current practice as needed.

Milestones

Year 11 Compliance Activities: The Engineering Department and the Community Development Department reviews plans from other governmental agencies when a connection to the Village sewer system is requested. In 2013, there were no government permits submitted for review any connection to the village sewer systems.

Year 12 Compliance Activities: The Engineering Department and the Community Development Department reviews plans from other governmental agencies when a connection to

the Village sewer system is requested. In 2014, there were no government permits submitted for review any connection to the village sewer systems.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. C.4: Community Development Department

Brief Description of BMP: Building Inspections - Building inspections are performed by state certified Plumbing Inspectors. The certified inspectors will conduct plumbing inspections to ensure the work being performed conforms to current plumbing standards.

Measurable Goal(s), including frequencies: Maintain current program.

Milestones

Year 11 Compliance Activities: The Community Development Department outsources plumbing inspections to a third party whose plumbing inspectors are all certified by the State of Illinois.

Year 12 Compliance Activities: The Community Development Department outsources plumbing inspections to a third party whose plumbing inspectors are all certified by the State of Illinois.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. C.4: Fire Department

Brief Description of BMP: Hazardous Materials Response Team - The Fire Department has a fully trained and equipped team to respond to problem sits. The Fire Department also inspects commercial establishments where hazardous materials are used or stored.

Measurable Goal(s), including frequencies: Maintain current hazardous materials response program.

Milestones

Year 11 Compliance Activities: Maintain current program. The department replaced all of the front line *Gas Meters* and *Gas Tracs* in 2013. No new purchases are planned for 2014. All personnel have been trained at a minimum to the Hazmat Operational level. The fire department conducts over 700 annual fire inspections in commercial and multifamily occupancies to reduce and eliminate safety hazards. The department keeps a data base of pre-plans for all commercial occupancies in the Village. This includes hazards associated with the occupancy. These are available on the station computers as well as the mobile data computers in the responding apparatus.

Year 12 Compliance Activities: Maintain current program. All personnel have been trained at a minimum to the Hazmat Operational level. The fire department conducts over 700 annual fire inspections in commercial and multifamily occupancies to reduce and eliminate safety hazards. The department keeps a data base of pre-plans for all commercial occupancies in the Village. This includes hazards associated with the occupancy. These are available on the station computers as well as the mobile data computers in the responding apparatus.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

C.5 – ILLICIT SOURCE REMOVAL PROCEDURES

BMP No. C.5: Engineering and Community Development Departments, and Public Works Department – Water/Sewer Division

Brief Description of BMP: Illicit Connection Removal Program - Water/Sewer Division coordinates with the Engineering Department to help identify illicit connection during the street resurfacing program. The Community Development Department is responsible for enforcing that homeowners correct the illicit connection.

Measurable Goal(s), including frequencies: Continue program and enforce that homeowners correct illicit connections.

Milestones

Year 11 Compliance Activities: Maintain current program. The Engineering Department continues to review sewer videos in conjunction with construction projects and identifies illicit connection as they are discovered. No indications of illicit connections were observed in review of the sewer videos during this reporting period. The Code Enforcement Officer is responsible for citing residents for any violations.

Year 12 Compliance Activities: Maintain current program. The Engineering Department continues to review sewer videos in conjunction with construction projects and identifies illicit connection as they are discovered. No indications of illicit connections were observed in review of the sewer videos during this reporting period. The Code Enforcement Officer is responsible for citing residents for any violations.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. C.5: Fire Department

Brief Description of BMP: Hazardous Materials Cleanup Program - Fire Department arranges for the clean up of materials or spill through the responsible party or IEPA.

Measurable Goal(s), including frequencies: Ensure the proper clean-up of hazardous materials and secure the incident scene for public safety measures.

Milestones

Year 11 Compliance Activities: Maintain current program. There were no reportable incidents to IEPA in 2013. From Jan 1, 2013 to Dec 31, 2013 the Wilmette Fire Department responded to 150 hazardous condition calls to include 8 flammable liquid spills, 51 natural gas leaks, and 18 carbon monoxide incidents.

Year 12 Compliance Activities: Maintain current program. There were no reportable incidents to IEPA in 2014. From Jan 1, 2014 to Dec 31, 2014 the Wilmette Fire Department responded to 180 hazardous condition calls to include 2 flammable liquid spills, 70 natural gas leaks, and 17 carbon monoxide incidents.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

C.9 – PUBLIC NOTIFICATION

BMP No. C.9: Fire, Police, and Community Development Departments

Brief Description of BMP: Illicit Discharge Hotline – Public Reporting/Illicit Discharge Hotline (911) - Chapter 7 of the Village Code addresses illegal dumping and trash management activities. The Fire Department is the first responder followed by Code Enforcement from Community Development. Using the illicit discharge hotline will offset inspection costs, and reduce illegal discharges and dumping through public education. Information will be maintained on the Village’s website, and disseminated via Village Newsletter and Cable TV.

Measurable Goal(s), including frequencies: Continue current program.

Milestones

Year 11 Compliance Activities: Maintain current program. The Fire Department did not receive any calls through the hotline in 2013. The department would more than likely receive a call through 911. No calls for this type of violation were received by Code Enforcement personnel during this reporting period

Year 12 Compliance Activities: Maintain current program. In 2014, the Police Department responded to three incidents related to illegal dumping categorized as Safety/Health Hazard and Ordinance Violations in the Law Enforcement Records Management System (LERMS). The Fire Department did not receive any calls through the hotline in 2014. The department would more than likely receive a call through 911. No calls for this type of violation were received by Code Enforcement personnel during this reporting period.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. C.9: Fire Department

Brief Description of BMP: Mutual Aid Box Alarm System (MABAS) - The Village is part of a multiple community sophisticated response system. This system provides back-up emergency support from surrounding communities if needed.

Measurable Goal(s), including frequencies: Continue existing participation in program.

Milestones

Year 11 Compliance Activities: Maintain current program. Wilmette continues its MABAS agreements and participates in quarterly MABAS Division 3 joint training. Wilmette Fire Department received mutual aid from other departments on 31 incidents and provided mutual aid on 84 incidents for out of town calls. The calls range from fires, auto accidents, and multi-patient EMS incidents.

Year 12 Compliance Activities: Maintain current program. Wilmette continues its MABAS agreements and participates in quarterly MABAS Division 3 joint training. In 2014 The Wilmette Fire Department received mutual aid from other departments on 120 incidents and provided mutual aid on 225 incidents for out of town calls. The calls range from fires, auto accidents, and multi-patient EMS incidents.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP D: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

D.1 – REGULATORY CONTROL PROGRAM

BMP No. D.1: Engineering and Community Development Departments

Brief Description of BMP: Construction Site Stormwater Runoff controls – the Grading Ordinance provides measures for compliance of construction sites. The ordinance mandates the submission of a separate stormwater management plan (SWMP) prior to the approval of a construction permit.

Measurable Goal(s), including frequencies: Enforcement and compliance of the Grading Ordinance.

Milestones

Year 11 Compliance Activities: Enforce Grading Ordinance. The Engineering Department continues to enforce the current practices to review new residential and commercial building projects. Inspection results and violations are annotated on the *Project Stormwater Management and Maintenance Inspection Checklist* for follow-up. The Village maintains copies of these violations with the Community Development Code Enforcement Officer.

Year 12 Compliance Activities: Enforce Grading Ordinance. The Engineering Department continues to enforce the current practices to review new residential and commercial building projects. Inspection results and violations are annotated on the *Project Stormwater Management*

and Maintenance Inspection Checklist for follow-up. The Village maintains copies of these violations with the Community Development Code Enforcement Officer.

Year 13: Enforce Grading Ordinance.

Year 14: Enforce Grading Ordinance.

Year 15: Enforce Grading Ordinance.

BMP No. D.1: Engineering Department

Brief Description of BMP: Educate Stakeholders, Developers and Contractors during the construction phase - Provide guidance material to stakeholders, developers and contractors during the building permit process. The material will help stakeholders understand the importance of Stormwater Management. The information is available on the Village's website and with the Engineering Department.

Measurable Goal(s), including frequencies: Provide guidance material in person or via the Village website.

Milestones

Year 11 Compliance Activities: Maintain current program. The Engineering Department continues its current practice of maintaining and updating applicable construction resources on the Village's website.

Year 12 Compliance Activities: Maintain current program. The Engineering Department continues its current practice of maintaining and updating applicable construction resources on the Village's website.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

D.4 – SITE PLAN REVIEW PROCEDURES

BMP No. D.4: Engineering and Community Development Departments

Brief Description of BMP: Storm Water Runoff Best Management Practice (BMP): Site Plan Reviews - The Engineering staff conducts professional reviews and incorporates pertinent comments received from Stakeholders. The Stakeholder's comments are solicited via a grading notice which is part of the grading permit process. Any comments during the Board or Commissions meetings may be incorporated to strengthen the Village Site Review process.

Measurable Goal(s), including frequencies: BMPs are suggested and documented during the site plan review process on a permit by permit basis.

Milestones

Year 11 Compliance Activities: Maintain current program.

- 1) Community Development continues to receive Stakeholder input at public meetings through the Appearance Review Commission (ARC) and Village Board meetings.
- 2) Village staff will continue to monitor and inspect construction sites for compliance with stormwater management plans, and annotate findings, violations and follow-up compliance inspections using the *Project Stormwater Management Inspection Checklist*.
- 3) BMPs related to soil erosion control are required during the site plan review process on a permit by permit basis to ensure that silt fence, catch basin traps and construction entrances are properly protected. During the plan review process, green infrastructure is strongly encouraged by staff to promote low impact development (LID). Examples of LID recommendations include rain gardens, bio-swales, depressed parking lot islands, permeable pavements and perimeter landscaping. Documentation of the site plan reviews are kept by the Community Development Department.

Year 12 Compliance Activities: Maintain current program.

- 1) Community Development continues to receive Stakeholder input at public meetings through the Appearance Review Commission (ARC) and Village Board meetings.
- 2) Village staff will continue to monitor and inspect construction sites for compliance with stormwater management plans, and annotate findings, violations and follow-up compliance inspections using the *Project Stormwater Management Inspection Checklist*.
- 3) BMPs related to soil erosion control are required during the site plan review process on a permit by permit basis to ensure that silt fence, catch basin traps and construction entrances are properly protected. During the plan review process, green infrastructure is strongly encouraged by staff to promote low impact development (LID). Examples of LID recommendations include rain gardens, bio-swales, depressed parking lot islands, permeable pavements and perimeter landscaping. Documentation of the site plan reviews are kept by the Community Development Department.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

D.6 – SITE INSPECTIONS DURING CONSTRUCTION

BMP No. D.6: Engineering and Community Development Departments

Brief Description of BMP: BMP Installation and Inspection Training - The Engineering and Community Development Departments inspect developments prior to, after and during construction. Ensure that construction sites are maximizing the use of best management practices as listed or identified on their Stormwater Pollution Prevention Plan (SWPPP). The appropriate village staff should be trained on the proper installation and maintenance procedures for BMPs used within the village.

Measurable Goal(s), including frequencies: The Village Staff will receive new or refresher training on BMPs and inspection procedures as needed.

Milestones

Year 11 Compliance Activities: The Engineering Department and Community Development Department conduct inspections of developments to ensure that construction sites are using best practices and/or following their SWPPP. The Engineering Department annually reviews the SWPPP procedures during staff meetings.

Year 12 Compliance Activities: The Engineering Department and Community Development Department conduct inspections of developments to ensure that construction sites are using best practices and/or following their SWPPP. The Engineering Department annually reviews the SWPPP procedures during staff meetings.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. D.6: Engineering and Community Development Departments

Brief Description of BMP: Site Inspection and Enforcement - Enforce new grading ordinance adopted in 2003 to increase the rate of compliance. The appropriate staff must be familiar with the new grading ordinance in order to enforce it.

Measurable Goal(s), including frequencies: Enforce new grading ordinance through site inspections.

Milestones

Year 11 Compliance Activities: Maintain current program. The Village continues to verify compliance of new construction sites with the proposed construction plans and stormwater plans submitted by developers. The Engineering Department and Village's private consultant, Christopher B. Burke Engineering, LTD. (CBBEL) inspect grading work associated with permits as required by code. The Code Enforcement Officer enforces violations per the Ordinance as needed.

Year 12 Compliance Activities: Maintain current program. The Village continues to verify compliance of new construction sites with the proposed construction plans and stormwater plans submitted by developers. The Engineering Department and Village's private consultant, Christopher B. Burke Engineering, LTD. (CBBEL) inspect grading work associated with permits as required by code. The Code Enforcement Officer enforces violations per the Ordinance as needed.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

D.7 – OTHER CONSTRUCTION SITE RUNOFF CONTROLS

BMP No. D.7 Engineering and Community Development Departments

Brief Description of BMP: During on-site visit, inspector will address any illegal dumping and trash management activities. The problem will be annotated on the Village's *Project Stormwater Management and Maintenance Inspection Checklist* for re-inspection.

Measurable Goal(s), including frequencies: Maintain and enforce current program.

Milestones

Year 11 Compliance Activities: The Engineering Department and the Community Development Department inspectors address any illegal dumping and trash management activities when observed during routine inspections. The Village will continue to monitor and inspect construction sites for compliance with stormwater management plans, and annotate findings, violations and follow-up compliance inspections using the *Project Stormwater Management Inspection Checklist*.

Year 12 Compliance Activities: The Engineering Department and the Community Development Department inspectors address any illegal dumping and trash management activities when observed during routine inspections. The Village will continue to monitor and inspect construction sites for compliance with stormwater management plans, and annotate findings, violations and follow-up compliance inspections using the *Project Stormwater Management Inspection Checklist*.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP E: POST-CONSTRUCTION RUNOFF CONTROL

E.1 – COMMUNITY CONTROL STRATEGY

BMP No. E.1: Engineering Department

Brief Description of BMP: Post Construction Runoff Controls - Chapter 9 of the Village Code includes requirements for projects that are subject to review and approval. This program provides structure for compliance and enforcement of post-construction and reconstruction runoff controls.

Measurable Goal(s), including frequencies: Enforce current Ordinance.

Milestones

Year 11 Compliance Activities: Maintain current program. The Village's consultant reviews runoff controls to ensure compliance with the Villager Code as it relates to responsible stormwater management. During the construction of the project, the staff periodically inspects the sites to ensure the runoff controls are intact and if not, seeks immediate remediation. Upon completion of the project, the consultant requires submittal of final grading record drawings and conducts an on-site inspection to verify compliance.

Year 12 Compliance Activities: Maintain current program. The Village's consultant reviews runoff controls to ensure compliance with the Villager Code as it relates to responsible

stormwater management. During the construction of the project, the staff periodically inspects the sites to ensure the runoff controls are intact and if not, seeks immediate remediation. Upon completion of the project, the consultant requires submittal of final grading record drawings and conducts an on-site inspection to verify compliance.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. E.1: Community Development and Engineering Departments, and Public Works Department – Forestry Division

Brief Description of BMP: Tree Preservation Ordinance - during the post-construction phase, continue to enforce the Tree Protection and Tree Canopy Preservation Ordinances. Trees intercept water and reduce storm runoff and the possibility of flooding.

Measurable Goal(s), including frequencies: Enforce current Ordinances.

Milestones

Year 11 Compliance Activities: The Engineering Department ensures that a conforming tree canopy is provided for on the grading plans for new single-family construction prior to permit issuance. The Community Development Department and the Forestry Division enforce adequate tree protection measures throughout construction on all applicable projects.

Year 12 Compliance Activities: The Engineering Department ensures that a conforming tree canopy is provided for on the grading plans for new single-family construction prior to permit issuance. The Community Development Department and the Forestry Division enforce adequate tree protection measures throughout construction on all applicable projects.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. E.1: Engineering Department

Brief Description of BMP: Technical Manual - Develop a manual with technical guidelines to provide guidance for post construction site runoff control. This is being accomplished in conjunction with the Metropolitan Water Reclamation District of Greater Chicago (DISTRICT) which will incorporate a county-wide Watershed Management Ordinance (WMO) and will provide the supporting technical documents.

Measurable Goal(s), including frequencies: Provide instructions to stakeholders, developers, their engineers and contractors on new regulations and procedures required by the WMO. In the interim, the Village Engineers provide residents and contractors with acceptable best management practices and guidance per the Village Code.

Milestones

Year 11 Compliance Activities: Maintain current program. The County-wide watershed management ordinance will be adopted on May 1, 2014. MWRD staff is currently working on a technical manual which will also be used by Wilmette to ensure compliance with the ordinance.

Year 12 Compliance Activities: Maintain current program. The County-wide watershed management ordinance (WMO) was adopted on May 1, 2014 and amended July 10, 2014. The Village adopted an ordinance adopting the amended WMO. MWRD staff is currently working on a technical manual which will also be used by Wilmette to ensure compliance with the ordinance.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. E.1: Engineering and Community Development Departments

Brief Description of BMP: Educate Stakeholders, Developers and Contractors - Provide information to stakeholders, developers and contractors on new regulations and procedures when they apply for a permit. The information will be available on the Village's website and a pamphlet.

Measurable Goal(s), including frequencies: Provide verbal information to stakeholders, developers, and contractors on any new regulation and procedure. Distribute pamphlets and make the information available on the Village's website.

Milestones

Year 11 Compliance Activities: Distribute pamphlets and publish information on the Village's website. The Engineering Department has posted construction requirements, permits and codes on the Village's website for easy accessibility by Stakeholders. The stormwater protection brochures (*Business Owner's Guide to Stormwater Protection* and *Contractor's Guide to Stormwater Protection*) are distributed annually through business license renewal mailing and available at the Village Hall.

Year 12 Compliance Activities: Distribute pamphlets and publish information on the Village's website. The Engineering Department has posted construction requirements, permits and codes on the Village's website for easy accessibility by Stakeholders. The stormwater protection brochures (*Business Owner's Guide to Stormwater Protection* and *Contractor's Guide to Stormwater Protection*) are distributed annually through business license renewal mailing and available at the Village Hall.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

E.6 – POST-CONSTRUCTION INSPECTIONS

BMP No. E.6: Engineering and Community Development Departments

Brief Description of BMP: BMP Post-Construction Inspections - During the post-construction site visit - ensure construction was completed in accordance to site plans and storm water BMPs were followed.

Measurable Goal(s), including frequencies: Maintain current program.

Milestones

Year 11 Compliance Activities: The Engineering and Community Development Departments conduct final inspections of developments to ensure that best practices were implemented. In addition, the Village's private consultant, CBBEL assists with reviewing, inspecting and verifying compliance of stormwater BMPS for residential and commercial building projects. Upon completion of the project, the consultant requires submittal of final grading record drawings and conducts an on-site inspection to verify compliance. In 2013, the Village hired an engineering firm, Gewalt Hamilton and Associates to oversee the construction and site maintenance of stormwater management compliance associated with the construction of the Marriott Residence Inn which will be completed in May 2014.

Year 12 Compliance Activities: The Engineering and Community Development Departments conduct final inspections of developments to ensure that best practices were implemented. In addition, the Village's private consultant, CBBEL assists with reviewing, inspecting and verifying compliance of stormwater BMPS for residential and commercial building projects. Upon completion of the project, the consultant requires submittal of final grading record drawings and conducts an on-site inspection to verify compliance.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP F: POLLUTION PREVENTION/GOOD HOUSEKEEPING

F.1 – EMPLOYEE TRAINING PROGRAM

BMP No. F.1: Public Works Department - Administration

Brief Description of BMP: Enforce Good Housekeeping practices – the Job Safety Analysis (JSA) program has incorporated Good Housekeeping procedures specific to each job. Review and update existing Good Housekeeping measures for the JSA program. Well written procedures provide established guidelines for regular maintenance programs.

Measurable Goal(s), including frequencies: Revise and/or create five (5) JSAs per year.

Milestones

Year 11 Compliance Activities: The Public Works Department published the following JSAs: *Entering & Exiting Garages, Establishing a Worksite for a Non-Emergency Inspection,* and

Aerial Truck Use. The Public Works Department also updated the following JSAs: *Loading/Unloading Trailer and Equipment* and *Backing Up*. Each JSA addresses NPDES good house-keeping procedures.

Year 12 Compliance Activities: The Public Works Department drafted the following JSAs: *Liquid Herbicide Application with a Backpack Sprayer* and *Cleaning Out Salt Tanks*. Each JSA addresses NPDES good house-keeping procedures.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. F.1 Public Works Department – Water/Sewer Division

Brief Description of BMP: Refresher Employee Training - Train the appropriate staff to operate using the newly adopted NPDES Good Housekeeping procedures.

Measurable Goal(s), including frequencies: Train employees on newly adopted NPDES Good Housekeeping procedures.

Milestones

Year 11 Compliance Activities: Newly published JSAs address NPDES Good Housekeeping procedures that are reviewed with Public Works employees, posted on the Safety Bulletin Board, and maintained in each Division's JSA binder.

Year 12 Compliance Activities: Newly published JSAs address NPDES Good Housekeeping procedures that are reviewed with Public Works employees, posted on the Safety Bulletin Board, and maintained in each Division's JSA binder.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

F.2 - INSPECTION AND MAINTENANCE PROGRAM

BMP No. F.2: Public Works Department – Water/Sewer Division

Brief Description of BMP: Storm Sewer Inspection/Cleaning - Continue to inspect and clean 10% of the mainline storm sewer system annually. The goal is to reduce stormwater pollution.

Measurable Goal(s), including frequencies: Continue existing program.

Milestones

Year 11 Compliance Activities: Completed and exceeded the 10% required percentage of inspections and cleaning of storm catch basins with in-house crews. The Public Works

Water/Sewer Division cleaned and televised 3,911 LP of the storm sewer system and inspected 256 storm sewer manholes.

Year 12 Compliance Activities: Completed and exceeded the 10% required percentage of inspections and cleaning of storm catch basins with in-house crews. The Public Works Water/Sewer Division cleaned and televised 1,072 LF of the storm sewer system and inspected 198 storm sewer manholes.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. F.2: Public Works Department – Water/Sewer Division

Brief Description of BMP: Detention Pond Inspection and Maintenance of restrictor in the outfall pipe - Continue existing practice of inspecting the detention pond after every rain event. Clean and repair the detention pond restrictor as needed. The Detention Pond is located on the east side of the Public Works facility at 711 Laramie Avenue, Wilmette, IL.

Measurable Goal(s), including frequencies: Maintain current practice.

Milestones

Year 11 Compliance Activities: Detention pond and restrictor at Village Yard, 711 Laramie Avenue is inspected by Water/Sewer personnel after rain events and cleaned once a year or as needed. Inspection reports are maintained at the Public Works Facility.

Year 12 Compliance Activities: Detention pond and restrictor at Village Yard, 711 Laramie Avenue is inspected by Water/Sewer personnel after rain events and cleaned once a year or as needed. Inspection reports are maintained at the Public Works Facility.

Year 13: Maintain current practice.

Year 14: Maintain current practice.

Year 15: Maintain current practice.

BMP No. F.2: Public Works Department – Water/Sewer Division

Brief Description of BMP: Outfall Structures Inspection and Repair - Continue existing practice of inspecting outfall structures after 0.2 inches of rainfall. Schedule inspections and cleaning every 3 years for preventive control measures.

Measurable Goal(s), including frequencies: Continue existing program.

Milestones

Year 11 Compliance Activities: The Village inspected eight outfall structures to the North Branch of the Chicago River after major rain events. During this reporting period, the Village inspected the outfalls 9 times and determined that no cleaning was required. Documentation is maintained at the Public Works Facility.

Year 12 Compliance Activities: The Village inspected eight outfall structures to the North Branch of the Chicago River after major rain events. During this reporting period, the Village inspected the outfalls 11 times and determined that no cleaning was required. Documentation is maintained at the Public Works Facility.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. F.2: Public Works Department – Water/Sewer Division

Brief Description of BMP: Catch Basin/Inlet Cleaning - Continue existing program of cleaning catch basin and inlets every 5 years. This practice will serve as a preventative control measure to eliminate any potential debris from blocking the storm sewer drains.

Measurable Goal(s), including frequencies: Continue existing annual monitoring and cleaning program.

Milestones

Year 11 Compliance Activities: The Water/Sewer Division monitored the Village's inlets after 0.2 inches of rainfall. In 2013, the Water/Sewer Division cleaned 44 catch basins. The Village's contractor United Septic, Inc. inspected and cleaned a total of 693 catch basins, approximately 50% or 347 are attributed to storm sewer drains.

Year 12 Compliance Activities: The Water/Sewer Division monitored the Village's inlets after 0.2 inches of rainfall. In 2014, the Water/Sewer Division cleaned 26 catch basins. The Village's contractor United Septic, Inc. inspected and cleaned a total of 693 catch basins, approximately 50% or 347 are attributed to storm sewer drains.

Year 13: Maintain current practice.

Year 14: Maintain current practice.

Year 15: Maintain current practice.

F.4 – MUNICIPAL OPERATIONS WASTE DISPOSAL

BMP No. F.4: Public Works Department – Water/Sewer Division

Brief Description of BMP: Vehicle Wash Facility - The facility has drains that connect to the sanitary sewer structures to eliminate wastewater from entering the storm drains.

Measurable Goal(s), including frequencies: Drain and clean the pit twice per year.

Milestones

Year 11 Compliance Activities: The wash bay facility was fully operational as of March 2010. The drains are periodically inspected to ensure proper drainage and no overflow filters into the storm drain. The Water/Sewer Superintendent ensures that the drains are cleaned once per month

in addition to cleaning them 12-15 times between April and May when a private contractor is hired to clean the catch basins throughout the Village and dumps debris into the spoils bin.

Year 12 Compliance Activities: The wash bay facility drains are periodically inspected to ensure proper drainage and no overflow filters into the storm drain. The Water/Sewer Superintendent ensures that the drains are cleaned once per month in addition to cleaning them 12-15 times between April and May when a private contractor is hired to clean the catch basins throughout the Village and dumps debris into the spoils bin.

Year 13: Maintain current practice.

Year 14: Maintain current practice.

Year 15: Maintain current practice.

BMP No. F.4: Public Works Department – Street Division

Brief Description of BMP: Street Sweeping - Continue sweeping business streets weekly and residential streets monthly throughout the year as weather permits.

Measurable Goal(s), including frequencies: Continue existing street sweeping program.

Milestones

Year 11 Compliance Activities: Swept all Village streets on nine occasions and the alleys were swept twice. For 2013, the early morning route was swept on 14 occasions. Overall, sweeping operations collected over 580 cubic yards of debris from Village roadways.

Year 12 Compliance Activities: Swept all Village streets on five occasions and the alleys were swept twice. For 2014, the early morning route was swept on 8 occasions. Overall, sweeping operations collected over 840 cubic yards of debris from Village roadways.

Year 13: Maintain current practice.

Year 14: Maintain current practice.

Year 15: Maintain current practice.

BMP No. F.4: Engineering Department and Public Works – Water/Sewer Division

Brief Description of BMP: Resurfacing Operations - Continue existing program of dry weather paving using staging techniques. This practice will help reduce the amount of solids and large volumes of stormwater runoff from entering the storm sewer drainage structures.

Measurable Goal(s), including frequencies: Continue dry weather paving techniques as needed.

Milestones

Year 11 Compliance Activities: Maintain current practice. The Engineering Department continues to ensure that construction is performed during dry weather and staging areas are

maintained away from the street. Filter baskets or filter material is required to be installed in catch basins and inlets in order to reduce silt and debris from entering Village sewers.

Year 12 Compliance Activities: Maintain current practice. The Engineering Department continues to ensure that construction is performed during dry weather and staging areas are maintained away from the street. Filter baskets or filter material is required to be installed in catch basins and inlets in order to reduce silt and debris from entering Village sewers.

Year 13: Maintain current practice.

Year 14: Maintain current practice.

Year 15: Maintain current practice.

F.6 – OTHER MUNICIPAL OPERATIONS CONTROLS

BMP No. F.6: Public Works Department – Forestry and Street Divisions

Brief Description of BMP: Maintain Roadside Vegetation - Continue existing program of mowing, weed control, tree planting, organic fertilization, irrigation and maintenance using good housekeeping practices. This practice will help reduce runoff and minimize debris from entering into the storm systems.

Measurable Goal(s), including frequencies: Continue roadside vegetation existing program.

Milestones

Year 11 Compliance Activities:

- 1) The Village contractually planted 247 trees (181 cooperative participants included) and 15 private property plantings.
- 2) Contractual service mowed the grass at 24 public right-of-way locations 21 times. Our in-house Public Works crew mowed the grass at 9 public right-of-way locations 13 times (includes 611 Green Bay road property).
- 3) Contractual service weeded 13 public right-of-way locations 32 times between Apr 8, 2013 and Nov 15, 2013. Collected debris is properly disposed to prevent vegetation from entering the sewer drains.

Year 12 Compliance Activities:

- 1) The Village contractually planted 420 parkway trees (114 cooperative participants included) and 5 private property plantings.
- 2) Contractual service mowed the grass at 25 public right-of-way locations 20 times. In-house Public Works crew mowed the grass at 8 public right-of-way locations 9 times.
- 3) Contractual service weeded 15 public right-of-way locations 30 times between April 28, 2014 and November 21, 2014. Collected debris is properly disposed to prevent vegetation from entering the sewer drains.

Year 13: Maintain current practice.

Year 14: Maintain current practice.

Year 15: Maintain current practice.

BMP No. F.6: Public Works Department – Forestry and Street Divisions

Brief Description of BMP: Controlled Application of Pesticides and Herbicides - Continue existing program of using only licensed applicators and operators from the Illinois Department of Agriculture. Continue the practice of using minimal applications of organic fertilizers and pesticides at Village facilities. Continue the practice of having minimal fertilizer and organic pesticides applied in Village rights of way, only as needed.

Measurable Goal(s), including frequencies: Continue existing controlled application of pesticides and herbicides program.

Milestones

Year 11 Compliance Activities:

- 1) Two (2) Street Division employees renewed their Illinois Dept. of Agriculture (IDA) pesticide applicator licenses and one employee renewed their IDA pesticide operator license.
- 2) Two (2) Forestry Division employees renewed their IDA pesticide applicator licenses.
- 3) The Village applied organic fertilizer at the Village Hall on five (5) separate occasions (9th year program) and no applications of organic weed control (9th year program).
- 4) The Village applied organic fertilizer at the Public Works Facility on five (5) separate occasions (8th year program) and no applications of organic weed control (8th year program).

Year 12 Compliance Activities:

- 1) One (1) Water/Sewer Division employee renewed their Illinois Department of Agriculture (IDA) pesticide applicator license and one Admin Division employee applied for and received an IDA applicator license in May of 2014. One (1) Admin Division employee renewed their IDA pesticide operator license.
- 2) Two (2) Forestry Division employees renewed their IDA pesticide applicator licenses.
- 3) The Village's contractor, Fertilizer King applied organic fertilizer at the Village Hall on five (5) separate occasions (10th year program) and no applications of organic weed control (10th year program).
- 4) The Village's contractor, Fertilizer King applied organic fertilizer at the Public Works Facility on five (5) separate occasions (9th year program) and no applications of organic weed control (9th year program).
- 5) In April of 2014, a licensed applicator in the Forestry Division performed spot applications of Garlon (herbicide) on the stumps of recently removed trees, as part of the Engineering Department's restoration of the Elmwood Dunes.

Year 13: Maintain current practice.

Year 14: Maintain current practice.

Year 15: Maintain current practice.

BMP No. F.6: Public Works Department – Forestry Division

Brief Description of BMP: Re-vegetation of Natural Areas - Continue existing program of placing natural vegetation in areas appropriate for this practice. Natural vegetation reduces the need for pesticides and herbicides.

Measurable Goal(s), including frequencies: Continue existing re-vegetation program.

Milestones

Year 11 Compliance Activities: Contractually planted 247 trees (181 cooperative participants included) & 15 private property plantings. In addition, the Village earned its 30th Tree City USA recognition for 2013.

Year 12 Compliance Activities: Contractually planted 420 trees (114 cooperative participants included) and 5 private property plantings. In addition, the Village earned its 31st Tree City USA recognition for 2014.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. F.6: Public Works Department – Vehicle Maintenance Division

Brief Description of BMP: Automobile Maintenance - Continue existing program of recycling used oil and used oil filter products, implement the use of triple basins and floor drains that go into the sanitary sewer system. Maintain a safe and dry work environment, conduct liquid cleaning in a centralized area, use non-chlorinated organic solvents and non-hazardous cleaners.

Measurable Goal(s), including frequencies: Continue automobile maintenance practices.

Milestones

Year 11 Compliance Activities:

- 1) Disposal of waste oil was 890 gallons; and used anti-freeze was 0 gallons.
- 2) Solvent and cleaning products used are non-chlorinated and non-hazardous.
- 3) Liquid cleaning is performed in a centralized area.
- 4) Maintenance of vehicles and equipment are conducted indoors where the triple catch basins and floor drains are connected to the sanitary sewer.

Year 12 Compliance Activities:

- 1) In 2014, disposal of waste oil was 1,240 gallons; waste anti-freeze was 220 gallons.
- 2) Solvent and cleaning products used are non-chlorinated and non-hazardous.
- 3) Liquid cleaning is performed in a centralized area.
- 4) Maintenance of vehicles and equipment are conducted indoors where the triple catch basins and floor drains are connected to the sanitary sewer.

Year 13: Maintain current practices.

Year 14: Maintain current practices.

Year 15: Maintain current practices.

BMP No. F.6: Engineering Department and Public Works – Forestry Division

Brief Description of BMP: Erosion Control and Mitigation - Chapter 9, Appendix 9A, of the Village Code addresses the buffer zone requirement along Lake Michigan to minimize erosion into surface waters.

Measurable Goal(s), including frequencies: Continue enforcing the buffer zones as specified in Chapter 9 along the lakefront.

Milestones

Year 11 Compliance Activities: Maintain current program. The Engineering Department continues to enforce Chapter 9, Section 802.3 (k) of the Village Code, which regulates activities in the floodway with the potential for erosion and/or sediment into surface water. The Village did not issue any permits within the buffer zone.

Year 12 Compliance Activities: Maintain current program. The Engineering Department continues to enforce Chapter 9, Section 802.3 (k) of the Village Code, which regulates activities in the floodway with the potential for erosion and/or sediment into surface water. The Village did not issue any permits within the buffer zone.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. F.6: Public Works Department - Water/Sewer, Vehicle Maintenance, Street, and Forestry Divisions

Brief Description of BMP: Materials Management Program - Continue existing practice of properly storing materials to include coverage for the salt dome, hazardous materials, and used oil.

Measurable Goal(s), including frequencies: Continue existing materials management program.

Milestones

Year 11 Compliance Activities:

- 1) Water and Sewer backfill materials are stored in covered bins.
- 2) Excavated spoil material is stored in concrete spoil bins with stormwater runoff draining to the sanitary sewer system. The Village's private contractor, KLF Trucking Company (2013-14) hauls spoil material to landfills (Advanced Disposal Landfill in Zion, IL or Waste Management Landfill in Grayslake, IL).
- 3) Street Division stores street sweeping debris in spoil bin.

- 4) Contractor hauls and disposes of on a regular basis to a licensed landfill.
- 5) Street Division collects leaves throughout the Village during the fall and stores them in a holding area for no more than 24 hours (IEPA permit – transfer station). Contractor (Waste Management) removes the leaves and hauls them to a licensed composting site (Harbor View Compost Facility, Chicago, IL in 2013).
- 6) Street Division has rock salt delivered to the Public Works Facility which is stored inside a covered salt dome for use during winter storm events. Additional salt volume was stored in the covered material bins.

Year 12 Compliance Activities:

- 1) Water and Sewer backfill materials are stored in covered bins.
- 2) Excavated spoil material is stored in concrete spoil bins with stormwater runoff draining to the sanitary sewer system. The Village's private contractor, KLF Trucking Company (2014-15) hauls spoil material to landfills (Advanced Disposal Landfill in Zion, IL or Waste Management Landfill in Grayslake, IL).
- 3) Street Division stores street sweeping debris in spoil bin.
- 4) Contractor hauls and disposes of on a regular basis to a licensed landfill.
- 5) Street Division collects leaves throughout the Village during the fall and stores them in a holding area for no more than 24 hours (IEPA permit – transfer station). Contractor (Waste Management) removes the leaves and hauls them to a licensed composting site (Harbor View Compost Facility, Chicago, IL in 2014).
- 6) Street Division has rock salt delivered to the Public Works Facility which is stored inside a covered salt dome for use during winter storm events. Additional salt volume was stored in the covered material bins.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

BMP No. F.6: Public Works Department – Street and Water/Sewer Divisions

Brief Description of BMP: Materials Yard Inlet Protection - Place inlet protection (triple catch basins) in the maintenance yard to prevent refuse runoff from entering into the storm sewers. The intent is to incorporate preventative measures.

Measurable Goal(s), including frequencies: Place inlet protection on yard drainage structures, as needed.

Milestones

Year 11 Compliance Activities: The Public Works Department continues to monitor and clean the triple basin as needed. As previously observed, during leaf collection season hay bales are placed around the inlets to prevent any leaves or debris from entering the drains.

Year 12 Compliance Activities: The Public Works Department continues to monitor and clean the triple basin as needed. As previously observed, during leaf collection season hay bales are placed around the inlets to prevent any leaves or debris from entering the drains.

Year 13: Maintain current program.

Year 14: Maintain current program.

Year 15: Maintain current program.

Part C: Information and Data Collection Results

There was no information or data collection required during this reporting period. The Village did not collect stormwater samples. The Village maintains a database of observed and reported storm and sanitary sewer problems for immediate or planned corrective action to respond to illicit discharge to the storm sewers.

Part D: Summary of Year 13 Stormwater Activities

The Village will continue its current stormwater activity practices during the next reporting cycle (Permit Year 13: March 2015 – March 2016), as indicated in the revised Notice of Intent (NOI) submitted on September 27, 2013.

Part E: Notice of Qualifying Local Program

As mutually agreed, the Village of Wilmette is relying on the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) for monitoring of stormwater management activities (per letter of agreement dated October 12, 2005).

Part F: Village's Construction Projects Conducted During Year 12

The Village continues televising, lining, and repairing sewers in an effort to reduce infiltration and cross connections. The sewer projects were permitted through MWRDGC and passed final construction inspection.

Certification

I/we certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am / we are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certified by: Guy Lam
Acting Director of Public Works

Date

Certified by: Brigitte Berger, P.E.
Director of Engineering Services

Date

Certified by: John Adler
Director of Community Development

Date

