



May 11, 2009

Illinois Environmental Protection Agency  
Division of Water Pollution Control  
Attn: Compliance Assurance Section  
1021 North Grand Avenue East, POB 19276  
Springfield, Illinois 62794-9276

Re: NPDES Phase II – Year Six Annual Report

To Whom it May Concern:

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

If you should have any questions or require additional information, please contact me at 847.478.9700 or email [pglenn@gha-engineers.com](mailto:pglenn@gha-engineers.com).

Sincerely,

Village of Riverwoods

Patrick J. Glenn, P.E.  
Village Engineer

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

Website address: <http://www.epa.state.il.us/water/permits/storm-water/forms/annual-facility-inspection-ms4.pdf>

Complete each section of this report.

REPORTING PERIOD FROM: MARCH, 2008	TO: MARCH 2009	ILR40
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**MS4 OPERATOR INFORMATION: (As it appears on the current permit)**

NAME: Village of Riverwoods		TELEPHONE NUMBER: 847-945-3990	
MAILING ADDRESS: 300 Portwine Road			
CITY: Riverwoods	STATE: IL	ZIP: 60015	COUNTY: Lake
CONTACT PERSON: (Person responsible for Annual Report) Russell Kraly, Village Director; Patrick J. Glenn, P.E., Village Engineer			

**NAME(S) OF GOVERNMENTAL ENTITY(IES) IN WHICH MS4 IS LOCATED: (As it appears on the current permit)**

Lake County	

**THE FOLLOWING ITEMS MUST BE ADDRESSED.**

**A. CHANGES TO BEST MANAGEMENT PRACTICES (check appropriate BMP change(s) and attach information regarding change(s) to BMP and measurable goals.)**

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

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

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

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

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

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

SIGNATURE: 	DATE: May 19, 2009
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Please submit inspection reports to:

Illinois Environmental Protection Agency, DWPC  
Compliance Assurance Section  
1021 North Grand Avenue East, POB 19276  
Springfield, Illinois 62794-9276

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

# **MS4 Annual Facility Inspection Report**

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

**Permit Year 6: March 2008 to March 2009**

***Village of Riverwoods***

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## Part A. Changes to Best Management Practices

**Note:** X indicates BMPs performed that were proposed in your NPDES permit  
 ✓ indicates changes to BMPs proposed in your NPDES permit

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

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

## **Part B. Status of Compliance with Permit Conditions**

### **1. Public Education and Outreach**

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

#### **A.1 Distributed Paper Material**

*Measurable Goals:*     *Develop a database of all stakeholders within jurisdiction.  
Make available and distribute two manuals “A Citizen's Guide to Maintaining Stormwater Best Management Practices” and “Living with Wetlands: A Handbook for Homeowners in Northeastern Illinois” to local entities such as homeowners associations and stakeholder groups.*

**The Village of Riverwoods provides informational material related to storm water, storm water management and a variety of storm water related materials on a “take away” rack at the Village Hall and on the Village’s website. In addition the Village included information in the Village Newsletter regarding Rain Gardens, Ditch Maintenance, and ways that residents can avoid polluting stormwater.**

### **2. Public Participation/Involvement**

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

#### **B.4 Public Hearing**

*Measurable Goals:*     *Present Municipal NPDES Phase II presentation to municipal or governing board.  
Present summary of ongoing program implementation at least once annually at public meeting.*

**The Village of Riverwoods conducted a public meeting regarding the nature and maintenance of the Municipal Separate Storm Sewer System owned by the Village at the regularly scheduled Board of Trustees meeting on February 5, 2008 at 8:00 pm. Notice of this meeting was publicized in the local paper, village newsletter and website.**

### **3. Illicit Discharge Detection and Elimination**

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

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

BMPs will be implemented under BMP numbers C.1, C.2, C.4, C.5 and C.7 as described below.

### **C.1 Storm Sewer Map Preparation**

*Measurable Goals: Create Village Storm Sewer Map*

**The Village has prepared a map of all village outfalls. Each outfall is inspected annually. The Village will continue to modify and update the atlas as further information is gathered to provide more detail and as new development occurs.**

### **C.2 Regulatory Control Program**

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

*Measurable Goals: Continue development of IDDE program. Identify methods, activities, enforcement and schedule to identify and remove illicit discharges. Adopt local IDDE ordinance. Establish mechanism to enforce IDDE ordinance.*

**The Village of Riverwoods has current Local Ordinances in their Municipal Code prohibiting the deposit of Litter, Garbage, Refuse and Rubbish in Public Places, the discharge of sewerage or septage into any conveyance other than a functional sanitary sewer or septic system, regulating non-stormwater discharges into the separate storm sewer system, and regulating the use of fertilizers containing phosphorus.**

### **C.4 Illicit Discharge Tracing Procedures**

The Village of Riverwoods will utilize tracing procedures, such as video inspection, smoke testing and dye testing, to detect illicit discharges.

*Measurable Goals: Pilot illicit discharge detection methods, such as dry weather screening and targeted video inspection.*

**The Village of Riverwoods has initiated an Annual Storm Sewer and Culvert Maintenance Program. An independent contractor provides the cleaning and jetting of various Village owned and maintained storm sewers and street culverts. Village staff and engineering consultants perform routine inspections and dry weather visual screening.**

### **C.5 Illicit Source Removal Procedures**

The Village of Riverwoods will implement a program and train employees to remove potential and known sources of illicit discharges.

*Measurable Goals: Provide a convenient location where the general public can dispose of common household pollutants. Begin to develop municipal employee IDDE training program. Consider targeting employees in relevant positions that will perform activities such as illicit discharge tracing procedures, visual dry weather storm water outfall screening and illicit source removal. Create and distribute materials educating public about elements of IDDE program, such as illicit discharge/illegal dumping resident notification, IDDE ordinance and SWALCO waste collection events. Coordinate with SWALCO to market waste collection events to the public and to distribute IDDE-related information during the event. Conduct event and document participation.*

**The Village of Riverwoods coordinated with the Solid Waste Agency of Lake County (SWALCO) and created events to collect waste before it enters the storm system. Numerous collection days and sites were provided for the disposal of household chemical waste, computers and electronics. Residents are notified of**

these events in the Village Newsletter and on the Village website. The Village also continues to work with the Riverwoods-Lincolnshire Fire Department and the IEPA to secure a permit to operate a Hazardous Waste collection site in the District. When illicit discharges are observed, Village staff issues written orders to desist.

#### **C.7 Visual Dry Weather Screening**

The Village of Riverwoods will conduct dry weather screening to locate illicit discharges.

*Measurable Goals: Review a pilot dry weather screening. Continue to investigate citizen illicit discharge/illegal dumping reports in the field.*

**Village staff and engineering consultants provided routine observations of Village ditches and outfalls during dry weather conditions. Outfalls that contain dry weather discharges are investigated further.**

### **4. Construction Site Runoff Control**

Lake County has adopted a Watershed Development Ordinance (WDO) that establishes the minimum storm water management requirements for development in Lake County. The WDO, which is enforced by SMC as well as by certified communities in the county, establishes standards for construction site runoff control. The enforcement of the WDO implements BMPs under BMP numbers D.1, D.2, D.3, D.4, D.5, D.6 and D.7. The status or progress for each of the measurable goals related to these BMPs is presented below.

#### **D.1 Regulatory Control Program**

*Measurable Goal: Enforce the WDO, participate in WDO revision process, and adopt amendments*

**Riverwoods as a certified community continues to enforce the WDO.**

#### **D.2 Erosion and Sediment Control BMPs**

*Measurable Goal: Enforce the WDO, participate in WDO revision process, and adopt amendments*

**Riverwoods as a certified community continues to enforce the WDO.**

#### **D.3 Other Waste Control Program**

*Measurable Goals: Enforce the WDO, participate in WDO revision process, and adopt amendments*

**Riverwoods as a certified community continues to enforce the WDO.**

#### **D.4 Site Plan Review Procedures**

*Measurable Goal: Continue to enforce the countywide WDO.*

**Riverwoods as a certified community continues to enforce the WDO.**

#### **D.6 Site Inspection/Enforcement Procedures**

*Measurable Goal: Continue to enforce the countywide WDO.*

**Riverwoods as a certified community continues to enforce the WDO.**

### **5. Post-Construction Runoff Control**

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum storm water management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or redevelopment resulting in over 0.5 acres of new impervious area. The enforcement of the WDO, in conjunction with other

SMC activities and functions, implements BMPs under BMP numbers E.2, E.3, E.4, E.5 and E.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

**E.2 Regulatory Control Program**

*Measurable Goal: Enforce the WDO, participate in WDO revision process and adopt amendments.*

**Riverwoods as a certified community continues to enforce the WDO.**

**E.3 Long Term O&M Procedures**

*Measurable Goal: Enforce the WDO, participate in WDO revision process and adopt amendments.*

**Riverwoods as a certified community continues to enforce the WDO.**

**E.4 Pre-Construction Review of BMP Designs**

*Measurable Goal: Enforce the WDO, participate in WDO revision process and adopt amendments.*

**Riverwoods as a certified community continues to enforce the WDO.**

**E.5 Site Inspections During Construction**

*Measurable Goal: Enforce the WDO and adopt amendments.*

**Riverwoods as a certified community continues to enforce the WDO.**

**E.6 Post-Construction Inspections**

*Measurable Goal: Enforce the WDO and adopt amendments.*

**Riverwoods as a certified community continues to enforce the WDO.**

**6. Pollution Prevention/Good Housekeeping**

This minimum control measure involves the development and implementation of an operation and maintenance program to reduce the discharge of pollutants from municipal operations. This program must include a training program for municipal employees. The Village of Riverwoods is committed to perform activities for BMP number F.5. The status or progress for each of the measurable goals related to these BMPs is presented below.

**F.5: Flood Management/Assess Guidelines**

The Village of Riverwoods will develop a policy for the assessment of implementing water quality functions in flood control designs.

*Measurable Goal(s): One water-quality function per flood control project constructed.*

**Riverwoods continues to review flood control projects.**

## **Part C. Information and Data Collection Results**

Year 6 activities related to illicit discharge detection and elimination consisted primarily of program planning efforts. Therefore, no information or data was collected during this period.

A program for annual upstream and downstream monitoring has been established. This includes water quality testing that will begin in year 7.

## Part D. Summary of Year 7 Storm Water Activities

The following table summarizes the BMPs committed to for Year 7. Specific BMPs and measurable goals for Year 7 Storm water Management Program development activities are presented in the sections following the table.

**Note: X indicates BMPs committed to for Year 6.**

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

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

**The QLP provided a Storm Water Management Program Plan (SWMP) template in December 2008. The Village of Riverwoods reviewed and revised the SWMP in Year 6. The Village of Riverwoods is in the process of creating tracking forms describing the commitments in the SWMP. The tracking forms will be used during Year 7 to demonstrate that the measurable goals are implemented, as stated below.**

### **1. Public Education and Outreach**

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

#### **A.1 Distributed Paper Material**

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

*Measurable Goal(s): Implement current Village of Riverwoods SWMP.  
Review and revise enhanced SWMP template, provided by QLP,  
language related to this provision by end of Year 7.*

### **2. Public Participation/Involvement**

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

#### **BMP No. B.4: Public Hearing**

The Village of Riverwoods will conduct a public meeting to present each annual report and on its proposed SWMP.

*Measurable Goal(s): Present summary of ongoing program implementation (annual report) at public meeting.  
Present enhanced SWMP at end of Year 7 for board review and approval/acceptance.*

### **3. Illicit Discharge Detection and Elimination**

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

- Develop a storm sewer system map that shows the locations of all outfalls and the

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

**BMP No. C.1: Storm Sewer Map Preparation**

The Village prepared an outfall map, under the original NOI, to allow for tracking of dry weather flow inspections and outfall maintenance.

*Measurable Goal(s): Maintain and update outfall map.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**BMP No. C.2: Regulatory Control Program**

The Village of Riverwoods adopted ordinance language to prohibit non-storm water discharges to the storm sewer or drainage system, under the original NOI. Additionally, the WDO includes provisions, which prohibit illegal dumping to the storm sewer or drainage system.

*Measurable Goal(s): Continue to enforce the ordinances.*

**BMP No. C.4: Illicit Discharge Tracing Procedures**

Implement procedures established during original NOI to trace found/observed illicit discharges to their origin. Efforts to locate illicit discharges will be documented. Enhance current plan based on SWMP template and implement plan enhancements.

*Measurable Goal(s): Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**BMP No. C.5: Illicit Source Removal Procedures**

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

*Measurable Goal(s): Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**BMP No. C.7: Visual Dry Weather Screening**

Implement dry weather screening program, established during original NOI. Continue screening storm sewer structures as part of regular cleaning and maintenance. Continue to investigate citizen illicit discharge/illegal dumping hotline reports in the field (“reactive investigation”).

Measurable Goal(s): *Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**4. Construction Site Runoff Control**

Lake County has adopted a Watershed Development Ordinance (WDO) that establishes the minimum storm water management requirements for development in Lake County. The WDO, which is enforced by SMC as well as by certified communities in the county, establishes standards for construction site runoff control. The enforcement of the WDO implements BMPs as described below.

**BMP No. D.1: Regulatory Control Program**

See QLP description (in section E.4 of this document)

Measurable Goal(s): *Enforce WDO.  
Administer the Designated Erosion Control Inspector Program as outlined by the WDO.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

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

See QLP description (in section E.4 of this document).

Measurable Goal(s): *Enforce WDO.  
Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**BMP No. D.3: Other Waste Control Program**

See QLP description (in section E.4 of this document).

Measurable Goal(s): *Enforce WDO.  
Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**BMP No. D.4: Site Plan Review Procedures**

See QLP description (in section E.4 of this document). Continue to stay in good standing with SMC. Continue to review TAC meeting minutes and provide input as applicable.

*Measurable Goal(s): Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

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

See QLP description (in section E.4 of this document). Continue current inspection and enforcement efforts.

*Measurable Goal(s): Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**5. Post-Construction Runoff Control**

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum storm water management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or redevelopment resulting in over 0.5 acres of new impervious area. The enforcement of the WDO implements BMPs as described below.

**BMP No. E.2: Regulatory Control Program**

See QLP description (in section E.4 of this document).

*Measurable Goal(s): Enforce WDO.  
Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

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

See QLP description (in section E.4 of this document). Continue existing village inspection program of detention facilities.

*Measurable Goal(s): Enforce WDO.  
Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**BMP No. E.4: Pre-Construction Review of BMP Designs**

See QLP description (in section E.4 of this document).

*Measurable Goal(s): Enforce WDO.  
Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**BMP No. E.5: Site Inspections During Construction**

See QLP description (in section E.4 of this document).

*Measurable Goal(s): Enforce WDO.  
Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**BMP No. E.6: Post-Construction Inspections**

See QLP description (in section E.4 of this document).

*Measurable Goal(s): Enforce WDO.  
Implement current Riverwoods SWMP.  
Review, revise and accept SWMP template language related to this provision by end of Year 7.*

**6. Pollution Prevention/Good Housekeeping**

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

**BMP No. F.5: Flood Management/Assess Guidelines**

The Village of Riverwoods will develop a policy for the assessment of implementing water quality functions in flood control designs.

*Measurable Goal(s): One water-quality function per flood control project constructed.*

## **Part E. Notice of Qualifying Local Program**

The Lake County Stormwater Management Commission (SMC) will serve as a Qualifying Local Program (QLP) for MS4s in Lake County. As outlined in the General Permit, SMC will perform functions related to each of the six minimum control measures. **As part of the second NOI, SMC created a SWMP template that can be reviewed and revised by each MS4, to enhance their existing program.** Part E of the Annual Report, which outlines the activities performed by SMC as the Qualifying Local Program, consists of the following 5 subparts:

- **Part E1** summarizes and describes any changes to Best Management Practices (BMPs) originally outlined for Year 6 from the Year 5 Annual Report.
- **Part E2** describes the status of BMPs and measurable goals performed in Year 6.
- **Part E3** provides the results of information or data collected during Year 6.
- **Part E4** describes BMPs and measurable goals for the program for Year 7.
- **Part E5** lists the construction projects funded by the QLP during Year 6 of the permit.

## Part E1. Changes to Best Management Practices

**Note:** X indicates BMPs performed that were proposed in your NPDES permit  
 ✓ indicates changes to BMPs proposed in your NPDES permit

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

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

## **Part E2. Status of Compliance with Permit Conditions**

The Lake County Stormwater Management Commission (SMC) will serve as a Qualifying Local Program for MS4s in Lake County. As part of ongoing services, SMC will perform functions related to each of the six minimum control measures. The status of BMPs and measurable goals performed in Year 6 are described below.

### **1. Public Education and Outreach**

#### **A.1 Distributed Paper Material**

*Measurable Goals: Distribute informational materials from “take away” rack at SMC. Upon request, distribute materials directly to municipalities for local distribution. Recommend measures to address this BMP in SWMP template.*

**Various NPDES II related information is available on SMC’s “take away” rack and on its website. This information is distributed to MS4s through mail-outs and in PDF format for use on MS4 websites.**

**SWMP template completed and distributed in December 2008.**

#### **A.3 Public Service Announcement**

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

**One article was featured in “Mainstream” on local MS4 activities. Watershed planning signs are located throughout the county.**

#### **A.4 Community Event**

*Measurable Goals: Conduct or Co-sponsor workshop on NPDES related topic. Recommend measures to address this BMP in SWMP template*

**A Workshop for Homeowners Associations on Maintenance Techniques or Practices for Subdivision Drainage Systems was held on July 14, 2008.**

**SWMP template completed and distributed in December 2008.**

#### **BMP No. A.5: Classroom Education**

*Measurable Goals: Develop and compile information for storm water educational kit for distribution upon request. Provide materials and training on storm sewer inlet stenciling kits to teachers upon request.*

**No educational materials were requested.**

### **A.6 Other Public Education**

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

*Recommend measures to address this BMP in SWMP template.*

**As information becomes available, it is posted and/or distributed to MS4s.  
SWMP template completed and distributed in December 2008.**

## **2. Public Participation/Involvement**

### **B.1 Public Panel**

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

**Notice of all public meetings was provided by SMC on their website's calendar of events. SMC tracked the number of Stormwater Management Committee Board meetings, Technical Advisory Committee (TAC) meetings, and Watershed Management Board (WMB) meetings held during the 2008 fiscal year. According to records, there were 10 SMC meetings, 11 TAC meetings, and 1 WMB meeting conducted during this period.**

### **B.3 Stakeholder Meeting**

*Measurable Goals: Provide notice of stakeholder meetings on SMC website.  
Track number of watershed planning committee meetings conducted.  
Establish watershed planning committees for each new watershed planning effort.  
Recommend measures to address this BMP in SWMP template*

**Notice of all stakeholder meetings was provided by SMC on their website's calendar of events. SMC tracked the number of stakeholder meetings for the various committees held during the 2008 fiscal year. The list below provides the stakeholder meeting and number of occurrences during the 2008 fiscal year:**

**North Branch Ecosystem Partnership BMP Selection Committee –0**

**North Branch Planning Committee – 4**

**Indian Creek –1**

**Bull's Brook/Bull Creek – 2**

**Dead River/Kellogg Creek- 2**

**SWMP template completed and distributed in December 2008.**

### **B.6 Program Coordination**

*Measurable Goals: Track number of MAC meetings conducted during Year 6.  
Prepare draft report on Qualifying Local Program activities at end of Year 6.*

Five Municipal Advisory Committee (MAC) meetings were held during Year 6 of the permit. The status of QLP activities at the end of Year 6 is provided in Part E2 of the Annual Facility Inspection Report (Annual Report) for each BMP which SMC committed to in the General Permit. The QLP measurable goals for Year 7 are in Part E4 of the Annual Report.

**BMP No. B.7: Other Public Involvement**

*Measurable Goals: Recommend measures to address this BMP in SWMP template, if appropriate.*

**SWMP template completed and distributed in December 2008.**

**3. Illicit Discharge Detection and Elimination**

**BMP No. C.1: Storm Sewer Map Preparation**

*Measurable Goals: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

**BMP No. C.2: Regulatory Control Program**

*Measurable Goal: Continue to enforce the countywide WDO.*

**SMC continues to enforce the countywide WDO.**

**BMP No. C.3: Detection/Elimination Prioritization Plan**

*Measurable Goals: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

**BMP No. C.4: Illicit Discharge Tracing Procedures**

*Measurable Goals: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

**BMP No. C.5: Illicit Source Removal Procedures**

*Measurable Goals: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

**BMP No. C.6: Program Evaluation and Assessment**

*Measurable Goals: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

**BMP No. C.7: Visual Dry Weather Screening**

*Measurable Goals: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

**BMP No. C.9: Public Notification**

*Measurable Goals: Recommended measures to address this BMP may be included in the SWMP template.*

**SWMP template completed and distributed in December 2008.**

**4. Construction Site Runoff Control**

**D.1 Regulatory Control Program**

*Measurable Goals: Continue to enforce the countywide WDO.  
Initiate and administer the Designated Inspector Program as outlined by the WDO.  
Recommend measures to address this BMP in SWMP template.*

**SMC continues to enforce the countywide WDO.  
DECI program implemented and administered.  
SWMP template completed and distributed in December 2008.**

**D.2 Erosion and Sediment Control BMPs**

*Measurable Goal: Continue to enforce the countywide WDO.  
Complete TRM updates, approve and publicize final TRM.  
Recommend measures to address this BMP in SWMP template.*

**SMC continues to enforce the countywide WDO.  
TRM update process is still ongoing. Sections 1, 2, 5 and 7 have been approved and are available for download off the SMC website.  
SWMP template completed and distributed in December 2008.**

**D.3 Other Waste Control Program**

*Measurable Goal: Enforce WDO provisions regarding the control of waste and debris at construction sites.  
Recommend measures to address this BMP in SWMP template.*

**SMC continues to enforce the countywide WDO.  
SWMP template completed and distributed in December 2008.**

**BMP No. D.4: Site Plan Review Procedures**

*Measurable Goals: Track number of enforcement officers who have passed the exam.  
Track number of communities that undergo a performance review.  
Complete Ordinance Administration Chapter of TRM.  
Recommend measures to address this BMP in SWMP template.*

**There are currently 60 EOs who have passed the EO exam.  
No communities underwent a performance review during the 2008 fiscal year.**

**Chapter 7 of the TRM, Ordinance Administration, was completed and approved. SWMP template completed and distributed in December 2008.**

**BMP No. D.5: Public Information Handling Procedures**

*Measurable Goal: Track number of complaints received and processed related to soil erosion and sediment control.  
Recommend measures to address this BMP in SWMP template.*

**5 SE/SC complaints were received and processed.  
SWMP template completed and distributed in December 2008.**

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

*Measurable Goals: Track number of site inspections conducted by SMC.  
Recommend measures to address this BMP in SWMP template.*

**Between March 2008 and March 2009, approximately 729 site inspections were conducted.  
SWMP template completed and distributed in December 2008.**

**5. Post-Construction Runoff Control**

**BMP No. E.2: Regulatory Control Program**

*Measurable Goal: Continue to enforce the countywide WDO.  
Recommend measures to address this BMP in SWMP template.*

**SMC continues to enforce the countywide WDO.  
Approximately 27 violation notifications were resolved successfully between March 2008 and March 2009.  
SWMP template completed and distributed in December 2008.**

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

*Measurable Goal: Continue to enforce the countywide WDO.  
Recommend measures to address this BMP in SWMP template.*

**SMC continues to enforce the countywide WDO.  
SWMP template completed and distributed in December 2008.**

**BMP No. E.4: Pre-Construction Review of BMP Designs**

*Measurable Goal: Continue to enforce the countywide WDO.  
Recommend measures to address this BMP in SWMP template.*

**SMC continues to enforce the countywide WDO.  
SWMP template completed and distributed in December 2008.**

**BMP No. E.5: Site Inspections During Construction**

*Measurable Goal: Continue to enforce the countywide WDO.*

*Recommend measures to address this BMP in SWMP template.*

**SMC continues to enforce the countywide WDO.  
SWMP template completed and distributed in December 2008.**

**BMP No. E.6: Post-Construction Inspections**

*Measurable Goal: Continue to enforce the countywide WDO.  
Recommend measures to address this BMP in SWMP template.*

**SMC continues to enforce the countywide WDO.  
SWMP template completed and distributed in December 2008.**

**BMP No. E.7: Other Post-Construction Runoff Controls**

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

**The annual WMB meeting was held on December 11, 2008. There were 13 BMP construction projects approved for WMB funding. Part E5 contains a list of ongoing construction projects through the WMB program.**

**6. Pollution Prevention/Good Housekeeping**

**BMP No. F.1: Employee Training Program**

*Measurable Goal: Provide list of available resources to MS4s.  
Provide employee training workshops.  
Include training recommendations in SWMP template.*

**SMC continually passes along information on training opportunities and resources to MS4's.**

**Two training workshops are scheduled for Year 7.  
SWMP template completed and distributed in December 2008.**

**BMP No. F.2: Inspection and Maintenance Program**

*Measurable Goal: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

**BMP No. F.3: Municipal Operations Storm Water Control**

*Measurable Goal: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

**BMP No. F.4: Municipal Operations Waste Disposal**

*Measurable Goal: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

**BMP No. F.5: Flood Management/Assess Guidelines**

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

**There were 24 SMC sponsored multi-objective projects reviewed.**

**BMP No. F.6: Other Municipal Operations Control**

*Measurable Goal: Recommend measures to address this BMP in SWMP template.*

**SWMP template completed and distributed in December 2008.**

### **Part E3. Information and Data Collection Results**

Year 6 activities consisted primarily of permit program planning efforts. Therefore, no information or monitoring data was collected during this period.

## Part E4. Summary of Year 7 Storm Water Activities

The table shown below summarizes the BMPs committed to for Year 7. Specific BMPs and measurable goals for Year 7 program development activities are presented in the sections following the table.

**Note:** X indicates BMPs committed to for Year 7.

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

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

**SMC has committed to revising the Stormwater Management Program Plan (SWMP) template completed in Year 6 to address new requirements in the ILR40 General Permit effective April 1, 2009. The SWMP describes QLP commitments related to the program. SMC will create 3 tracking forms describing the commitments in the SWMP (annual, as needed, and on going) for the use of the MS4s. It is anticipated that the tracking forms will be used during Year 7 by the MS4 to demonstrate that their measurable goals are implemented.**

## **1. Public Education and Outreach**

### **A.1 Distributed Paper Material**

The SMC develops and distributes a variety of materials related to storm water management in Lake County. A number of pamphlets and brochures related to BMPs and storm water management have been produced. SMC prepares a quarterly newsletter, "Mainstream" as well as an Annual Report that highlights the storm water management activities in Lake County. SMC also prepares Project Fact Sheets that provide information on ongoing and recently completed storm water management projects. SMC will develop or collaborate on manuals or manual updates related to storm water management.

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

### **A.3 Public Service Announcement**

A public service announcement related to the NPDES Phase II program will be written and included in the Quarterly Newsletter, "Mainstream." SMC will coordinate with Lake County Department of Transportation (LCDOT) to post watershed identification signage in watersheds where watershed planning activities occur.

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

### **A.4 Community Event**

The SMC sponsors technical training and public awareness workshops. SMC and the local APWA chapter will co-sponsor a workshop on management practices to protect water quality.

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

### **BMP No. A.5: Classroom Education**

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

*Measurable Goals: Develop and compile information for storm water educational kit for distribution upon request.  
Provide materials and training on storm sewer inlet stenciling kits to teachers upon request.*

### **A.6 Other Public Education**

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

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

## **2. Public Participation/Involvement**

The SMC will support Lake County MS4s by performing activities and services related to the Public Participation/Involvement minimum control measure.

### **B.1 Public Panel**

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

The Technical Advisory Committee (TAC) was started in 1992 to assist in the development, revision and review of the Watershed Development Ordinance (WDO) standards and administrative procedures. TAC is made up of representatives from the development, environmental, municipal and consultant engineering fields. TAC meetings are held monthly or on an as-needed basis.

The Municipal Advisory Committee (MAC) is made up of municipal, township, drainage district, consulting and county representatives. The MAC will continue to meet as needed during the implementation of the NPDES Phase II storm water management program.

The Watershed Management Boards (WMBs) meet yearly to make recommendations on BMP project funding. Members include chief municipal elected officials, township supervisors, drainage district chairs, and county board members from each district within the boundaries of the watersheds.

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

### **B.3 Stakeholder Meeting**

The SMC is actively involved in watershed planning throughout Lake County. SMC believes that the watershed planning process cannot happen and will not be successful without the input, interest and commitment of stakeholders. Stakeholders may include municipalities, townships, drainage districts, homeowner associations, developers, county agencies, lakes management groups, landowners and local, state and federal agencies.

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

### **B.6 Program Coordination**

The Countywide Approach to NPDES Phase II Permitting Summary identifies the role of SMC as a Qualifying Local Program. The SMC proactively formed the Municipal Advisory Committee (MAC) to facilitate coordination of the NPDES Phase II storm water program in Lake County. SMC also prepared a presentation that can be used by municipal representatives to inform their board members about the NPDES II program and how it will be implemented in Lake County through existing local resources and programs. SMC will continue to coordinate the program and provide guidance for the regulated MS4s by continuing to facilitate MAC meetings through the program implementation phase. SMC will prepare a draft report on the Qualifying Local Program activities and provide guidance to MS4s in preparing their annual reports.

*Measurable Goals: Track number of MAC meetings conducted during Year 7.  
Prepare draft report on Qualifying Local Program activities at end of Year 7.*

## **3. Illicit Discharge Detection and Elimination**

MS4s are required to perform activities related to the Illicit Discharge Detection and Elimination (IDDE) minimum control.

### **BMP No. C.2: Regulatory Control Program**

The SMC provided model ordinance examples for MS4s to consider at the local level. The model ordinance language will prohibit non-storm water discharges to the storm sewer or drainage system. Additionally, the WDO includes provisions, which prohibit illegal dumping to the storm sewer or drainage system.

*Measurable Goal: Continue to enforce the countywide WDO.*

### **BMP No. C.10: Other Illicit Discharge Controls**

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

#### **4. Construction Site Runoff Control**

Lake County has adopted a Watershed Development Ordinance (WDO) that establishes the minimum storm water management requirements for development in Lake County. The WDO, which is enforced by SMC as well as by certified communities in the county, establishes standards for construction site runoff control. The enforcement of the WDO, in conjunction with other SMC activities and functions implements BMPs, as described below.

##### **D.1 Regulatory Control Program**

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

SMC initiated a Designated Erosion Control Inspector (DECI) Program, which originated out of an assessment of WDO implementation during the original NOI period. The purpose of the DECI program is to facilitate positive communication between the permit issuing agency or community and the permit holder by creating a single point of contact for soil erosion/sediment control issues with the idea that it is easier to prevent soil erosion and sediment control problems than it is to correct them after they have occurred. Further, the program is intended to improve site conditions, minimize environmental impacts, and educate contractors/developers/inspectors about proper soil erosion/sediment control Best Management Practices. The DECI program was designed to closely mirror the inspection requirements of the IEPA NPDES Phase II permit (for individual construction sites).

*Measurable Goals: Continue to enforce the countywide WDO.  
Administer the Designated Inspector Program as outlined by the WDO.  
Revise WDO to be consistent with new ILR10 permit conditions.*

##### **D.2 Erosion and Sediment Control BMPs**

Article IV, Section B.1.j of the WDO specifies the required soil erosion and sediment control measures for any land disturbance activity. This section of the WDO includes 15 requirements for soil erosion and sediment control measures including: minimize soil disturbance; protect adjoining properties from erosion and sedimentation; complete installation of soil erosion and sediment control features prior to commencement of hydrologic disturbance; stabilize disturbed areas within 14 days of active disturbance; avoid disturbance of streams and when possible, size measures appropriate to the amount of tributary drainage area; protect functioning storm sewers from sediment; prevent sediment from being tracked onto adjoining streets; limit earthen embankments to slopes of 3H:1V; identify soil stockpile areas; and utilize statewide standards and specifications as guidance for soil erosion and sediment control.

The SMC has also prepared the Technical Reference Manual (TRM) for the WDO. The TRM is used to guide compliance with the WDO and provides detailed information on soil erosion and sedimentation control BMPs. The TRM is currently being updated and expanded to include BMP guidance chapters on Wetland Areas, Public Roadways, and Ordinance Administration and Enforcement.

*Measurable Goal: Continue to enforce the countywide WDO.  
Complete TRM updates, approve and publicize final TRM.  
Revise WDO to be consistent with new ILR10 permit conditions.*

### **D.3 Other Waste Control Program**

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

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

### **BMP No. D.4: Site Plan Review Procedures**

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

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

### **BMP No. D.5: Public Information Handling Procedures**

The SMC provides a number of opportunities for receipt and consideration of information submitted by the public. The Citizen Inquiry Response System (CIRS) documents and tracks the resolution of reported problems and citizen complaints. SMC's website provides information on "Who to call" for various problems or concerns. An Interagency Coordination Agreement between SMC and the U.S. Army Corps of Engineers, the Lake County Soil and Water Conservation District and the National Resources Conservation Service specifies that if any of these agencies receive a report of a soil erosion and sediment control issue, they will contact SMC. SMC will then investigate the report and prescribe corrective action to the property owner or coordinate with the certified community to find a solution.

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

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

Article VI of the WDO provides both the recommended and the minimum requirements for site inspection. The enforcement officers within each certified community must conduct site inspections. SMC has direct responsibility for non-certified communities, LCDOT, and the Lake County Forest Preserve. Article VII of the WDO specifies the penalties and legal action that may be imposed if the WDO is violated. If a construction site is not in compliance with the requirements of the WDO, the jurisdictional enforcement officer may issue a stop work order on all development activity on the subject property or on the portion of the activity in direct violation of the WDO. In addition, failure to comply with any of the requirements of the WDO constitutes a violation, and any person convicted thereof may be fined.

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

## **5. Post-Construction Runoff Control**

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum storm water management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or redevelopment that results in over 0.5 acres of new impervious area. The enforcement of the WDO, in conjunction with other SMC activities and functions, implements the BMPs, as described below.

### **BMP No. E.2: Regulatory Control Program**

The WDO requires that all applicants adopt a storm water management strategy for controlling post-construction runoff. The applicant must develop a storm water management strategy that minimizes the increase in runoff volumes and rates and addresses the water quality treatment requirements of the WDO. The proposed drainage plan must use the runoff reduction hierarchy in the WDO and implement BMPs as presented in the TRM. The WDO also requires the use of buffers when adjacent to existing water bodies.

*Measurable Goal: Continue to enforce the countywide WDO.*

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

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

*Measurable Goal: Continue to enforce the countywide WDO.*

**BMP No. E.4: Pre-Construction Review of BMP Designs**

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

*Measurable Goal: Continue to enforce the countywide WDO.*

**BMP No. E.5: Site Inspections During Construction**

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

*Measurable Goal: Continue to enforce the countywide WDO.*

**BMP No. E.6: Post-Construction Inspections**

(See description of the inspection program provided under E.5)

*Measurable Goal: Continue to enforce the countywide WDO.*

**BMP No. E.7: Other Post-Construction Runoff Controls**

Through the Watershed Management Board (WMB), SMC reviews and partially funds projects related to drainage and water quality improvements. The WMB representing the Lake Michigan, North Branch of the Chicago River, Fox and Des Plaines watersheds – meets yearly to make recommendations on project funding. Members include chief municipal elected officials, township supervisors, drainage district chairs, and county board members from each district within the boundaries of the watershed. The goal of the WMB is to maximize opportunities for local units of government and other groups to have input and influence in local storm water management problem solving. Projects have improved quality of water in streams and swales, and have enhanced storm water facilities.

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

**6. Pollution Prevention/Good Housekeeping**

This minimum control measure involves the development and implementation of an operation and maintenance program to reduce the discharge of pollutants from municipal operations and an associated training program.

**BMP No. F.1: Employee Training Program**

The SMC will assist MS4s in developing programs for F.1 by incorporating recommended

actions into the SWMP template. Additionally, SMC will serve as technical advisors and as a clearinghouse of information related to employee training BMPs and periodically offer training programs.

*Measurable Goal: Provide list of available resources to MS4s.  
Provide ILR-10 and ILR-40 Training Workshop.  
Purchase and make available the Excal Visual Municipal Storm Water Pollution Prevention Storm Watch Everyday Best Management Practices Software.*

**BMP No. F.5: Flood Management/Assess Guidelines**

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

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



