



Illinois Environmental Protection Agency

Bureau of Water • 1021 N. Grand Avenue E. • P.O. Box 19276 • Springfield • Illinois • 62794-9276

Division of Water Pollution Control ANNUAL FACILITY INSPECTION REPORT

for NPDES Permit for Storm Water Discharges from Separate Storm Sewer Systems (MS4)

This fillable form may be completed online, a copy saved locally, printed and signed before it is submitted to the Compliance Assurance Section at the above address. Complete each section of this report.

Report Period: From March, 2012 To March, 2013

Permit No. ILR40 400427

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

Name: City of Prospect Heights Mailing Address 1: 8 N. Elmhurst Road

Mailing Address 2: _____ County: Cook

City: Prospect Heights State: IL Zip: 60070 Telephone: 847-398-6070

Contact Person: Anne Marrin, City Administrator Email Address: amarrin@prospect-heights.org
(Person responsible for Annual Report)

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

City of Prospect Heights

THE FOLLOWING ITEMS MUST BE ADDRESSED.

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

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

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

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

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

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

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

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Anne Marrin
Owner Signature:

5.31.13
Date:

Anne Marrin
Printed Name:

City Administrator
Title:

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

or Mail to: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
WATER POLLUTION CONTROL
COMPLIANCE ASSURANCE SECTION #19
1021 NORTH GRAND AVENUE EAST
POST OFFICE BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

IL 532 2585
WPC 691 Rev 6/10
This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42) and may also prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

MS4 Annual Facility Inspection Report

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

Permit Year 10: March 2012 to February 2013

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Part A. MS4 Changes to Best Management Practices, Year 10

Information regarding the status of all of the BMPs and measurable goals described in the MS4's SMPP is provided in the following table.

Note: X indicates BMPs that were implemented in accordance with the MS4's SMPP
 ✓ indicates BMPs that were changed during Year 10

Year 10	
MS4	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
X	A.3 Public Service Announcement
X	A.4 Community Event
	A.5 Classroom Education Material
X	A.6 Other Public Education
B. Public Participation/Involvement	
X	B.1 Public Panel
	B.2 Educational Volunteer
X	B.3 Stakeholder Meeting
X	B.4 Public Hearing
X	B.5 Volunteer Monitoring
X	B.6 Program Coordination
X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination	
X	C.1 Storm Sewer Map Preparation
X	C.2 Regulatory Control Program
X	C.3 Detection/Elimination Prioritization Plan
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
X	C.8 Pollutant Field Testing
X	C.9 Public Notification
	C.10 Other Illicit Discharge Controls

Year 10	
MS4	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
X	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
X	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
X	F.2 Inspection and Maintenance Program
X	F.3 Municipal Operations Storm Water Control
X	F.4 Municipal Operations Waste Disposal
X	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls

Part B. MS4 Status of Compliance with Permit Conditions, Year 10

Stormwater Management Activities, Year 10

The stormwater management activities that the MS4 performed during Year 10 and the status of each of the BMPs and measurable goals described in the MS4's SMPP, as of the end of Year 10, are described below.

A. Public Education and Outreach

Prospect Heights continues to implement the BMPs described in its SMPP and to track progress in implementing its stormwater management program. Prospect Heights is committed to implementing this component of the program by distributing educational material to the community and conducting outreach activities regarding the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants from stormwater runoff.

BMP A.1 – Distributed Paper Material

Prospect Heights currently distributes information and pamphlets at public events as well as having BMP brochures at City Hall. This information includes water quality/stormwater articles. Prospect Heights also includes pertinent stormwater management articles in its quarterly newsletter and works with MWRDGC in distributing pamphlets promoting the Rain Barrel Program.

BMP A.3 – Public Service Announcement

Prospect Heights continues to broadcast on its public access channel (PAC) information regarding water quality/stormwater management and procedures to report illicit discharges.

BMP A.4 – Community Event

Prospect Heights co-sponsors events with the Prospect Heights Park District, Prospect Heights Garden Club, and Friends of McDonald Creek. Events may include environmental and creek cleaning, and illicit discharge detection.

BMP A.6 – Other Public Education

Prospect Heights co-sponsors events with the SWANCC for the collection and proper disposal of hazardous materials. Also, Prospect Heights established and publicized e-waste disposal at the Public Works facility.

B. Public Participation/Involvement

BMP B.1 – Public Panel

The City's Ad Hoc Flooding and Street Committee continues to meet on a regular basis to address storm water runoff, monitor flooding and drainage issues, and evaluate BMPs to resolve the issues. The City's Water Committee regularly meets to address NPDES, illicit discharges, IEPA issues, drainage and water quality. The Water Committee also updates the City's Surface Water Protection Program, as needed. The activities of both committees are regularly updated on the City's website.

BMP B.3 – Stakeholder Meeting

The City meets with area districts and organizations including the Prospect Heights Park District, River Trails Park District, Prospect Heights Library District, Prospect Heights Fire District, local school districts and residents to discuss NPDES and BMPs.

BMP B.4 – Public Hearing

The NPDES Annual Report is presented to the City Council and aired on the PAC.

BMP B.5 – Volunteer Meeting

The City regular meets with volunteers to discuss the NPDES program and BMPs

BMP B.6 – Program Coordination

The City continues to work with other local units of government as well as stakeholders and residents to coordinate efforts as they pertain to the NPDES program and BMPs.

BMP B.7 – Other Public Involvement

The City is working with a college student on a master's thesis pertaining to water quality on the McDonald Creek.

C. Illicit Discharge Detection and Elimination

Prospect Heights implements activities related to IDDE including the following:

- I. Maintain a stormwater/sewer system map that shows the location of outfalls and the names and locations of all Waters of the US that receive discharges from these outfalls.
2. Prohibit non-stormwater discharges into the stormwater sewer system and implement appropriate enforcement procedures and actions.
3. Educate public employees, business and the general public of hazards associated with illegal discharges and improper disposal of waste.

BMP C.1 – Sewer Map

Prospect Heights continues to update the sewer maps and the information is distributed to the Prospect Heights Fire District and the MWRDGC. The City also uses the Cook County GIS as a database back-up.

BMP C.2 – Regulatory Control Program

Prospect Heights adopted the Illicit Discharge and Connection Ordinance prohibiting non-stormwater discharges to the storm sewer or drainage system. The Ordinance includes provisions for construction site regulations (e.g., silt fencing, dumping prohibition). The City follows the MWRDGC Stormwater Management Plan, and WDO regulating development and redevelopment projects in Cook County.

BMP C.3 - Detection/Elimination Prioritization Plan

As part of this plan, Prospect Heights will continue to incorporate detection methods that will include dry weather screening, a regular storm sewer maintenance program, and public reporting. Outfalls observed to have dry weather flow are investigated. Leak detection of water mains, sewer jetting and televising and street cleaning are conducted throughout the year.

BMP C.4- Illicit Discharge Tracing Procedures

Several years ago, Prospect Heights established a "Task Force" consisting of City staff and the Old Town Sanitary District to establish a program. They continue to work on procedures and funding mechanisms to identify and trace illicit discharges.

BMP C.5- Illicit Source Removal Procedures

Prospect Heights implemented procedures to trace illicit discharges to their origin and remove identified connections. The City contracts jetting, cleaning and televising sewers to assist in identifying sources of illicit discharges. City staff conducts quarterly inspections, which includes flushing/jetting, dye testing and televising to identify and clear blockages and identify illicit discharges. The City advertises an illicit discharge/illegal dumping hotline in the City's newsletter and on the City's website. Prospect Heights tracks the calls to ensure correction of the issue.

BMP C.6 – Program Evaluation and Assessment

As this is the second year of the program, the City continues to assess the procedures and results and will modify the program as necessary. To date, the program has been effective, and has helped identify and eliminate three illicit discharges.

BMP C.7 – Visual Dry Weather Screening

Prospect Heights' Public Works Department performs quarterly inspection concurrent with debris and obstruction removal. Dry weather inspections include, but are not limited to, testing, removing obstructions, flushing, televising and dye testing to ensure no blockages and illicit discharges exist.

BMP C.8- Pollution Field Testing

Prospect Heights has started to periodically sample streams and watersheds to establish benchmarks. There have been no identifiable problems.

BMP C.9- Public Notification

Prospect Heights notifies the City Council, which is aired on the PAC, regarding illicit discharges.

D. Construction Site Runoff Control

Prospect Heights implemented strict requirements for soil, erosion and sediment controls based on the draft Cook County WDO. The City plans to adopt this ordinance upon Cook County's adoption. In the meantime, the City continues to use its Code, Illicit Discharge Ordinance and permit requirements for controls, plan reviews, inspections and enforcement,

BMP D.1 –Regulatory Control Program

The City continues to enforce, review and modify codes and permitting requirements to ensure that applicable developments are in compliance with the NPDES program.

BMP D.2 -Erosion and Sediment Control

The City continues to enforce all codes and permitting requirements to ensure that applicable developments are in compliance with the City Code and permitting requirements. Prospect Heights will continue to conduct pre-construction meetings to review the City Code, Illicit Discharge Ordinance and WDO with builders and developers.

BMP D.3 –Other Waste Control Program

The City Code includes provisions regarding site waste control that includes construction debris. During inspections related to erosion control, the City ensures that the site complies with controlling other waste.

BMP D.4 -Site Plan Review Procedures

Prospect Heights Building/Zoning/Engineering Department reviews site plans and enforces City codes, ordinances and regulations regarding silt fencing and illicit discharges during construction and post-construction. The review occurs prior to permitting and post- construction inspections occur prior to occupancy or permit close-out.

BMP D.5 –Public Information Handling Procedures

During the development review process, impacted residents are notified of the project and ways to contact the City if they suspect illicit discharges. Furthermore, announcements as part of Council meeting and information in City newsletters include contact information for reporting. The City reviews each call and takes action as necessary.

BMP D.6 -Site Inspection Enforcement

The City conducts multiple inspections during a construction process. Whenever a City representative is site, they conduct and inspection of BMPs and note compliance with the City's Codes.

E. Post-Construction Runoff Control

The City's control strategy is to continue post-construction run-off control practices, regulatory control programs and long term O&M procedures.

BMP E.2 -Regulatory Control Program

The City continues to regulate its program using City and MWRDGC ordinances, and state and federal regulations pending adoption of the MWRDGC WDO.

BMP E.3 -Long Term O&M Procedures

The City has not formalized long-term O&M procedures but continues to identify and program long-term O&M procedures.

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

The City initiates pre-permitting and pre-construction meetings regarding applicable developments and the use of BMPs.

BMP E.5 - Site Inspection During Construction

The City continues to conduct pre-construction, progress and post-construction inspections to monitor implementation and compliance with regulations and evaluate effectiveness.

BMP E.6 - Post Construction Inspection

Prior to issuing a Certificate of Occupancy or closing the City issued permit, the City conducts a post-construction inspection. All shortcomings and violations must be corrected.

F. Pollution Prevention/Good Housekeeping

BMP F.1-Employment Training Program

Due to the small number of employees, the City's training is limited to the review of newsletters, websites and other sources to monitor the NPDES program and BMPs.

BMP F.2 -Inspection and Maintenance Program

The City continues to evaluate stormwater discharges and drainage areas. Discharges of concern are sent for analysis.

BMP F.3-Municipal Operations Storm Water Control

The City continues its operation of monitoring and implanting the Creek Maintenance, Storm Sewer Inspection, and Leak Detection Programs.

BMP F.4-Municipal Operations Waste Disposal

The City contracts waste disposal and recycling programs.

BMP F.5-Flood Management/Assess Guidelines

The City actively manages its responsibilities under the NFIP and CRS programs.

Stormwater Management Program Assessment, Year 10

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

The MS4 collected water quality sampling data during Year 10, and reviewed the data to determine whether or not it provides any evidence of reduced pollutant loads or improved water quality. The data collected from water quality sampling locations upstream and downstream of the MS4's stormwater discharges show either no change or a decrease in a number of water quality parameters between the upstream and downstream sampling locations. These findings may be attributable to the MS4's stormwater management activities and indicate that the MS4's stormwater management program and BMPs are appropriate.

Part C. MS4 Information and Data Collection Results, Year 10

Annual Monitoring and Data Collection, Year 10

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

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

IDDE Monitoring and Data Collection, Year 10

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

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

Part D. MS4 Summary of Year 11 Stormwater Activities

The table below indicates the stormwater management activities that the MS4 plans to undertake during Year 11. Additional information about the BMPs and measurable goals that the MS4 will implement during Year 11 is provided in the section following the table.

Note: x indicates BMPs that will be implemented during Year 11

Year 11	
MS4	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
X	A.2 Speaking Engagement
X	A.3 Public Service Announcement
X	A.4 Community Event
	A.5 Classroom Education Material
	A.6 Other Public Education
B. Public Participation/Involvement	
X	B.1 Public Panel
X	B.2 Educational Volunteer
X	B.3 Stakeholder Meeting
X	B.4 Public Hearing
X	B.5 Volunteer Monitoring
X	B.6 Program Coordination
	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination	
X	C.1 Storm Sewer Map Preparation
X	C.2 Regulatory Control Program
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
X	C.8 Pollutant Field Testing
X	C.9 Public Notification
	C.10 Other Illicit Discharge Controls

Year 11	
MS4	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
X	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
X	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
X	F.2 Inspection and Maintenance Program
X	F.3 Municipal Operations Storm Water Control
X	F.4 Municipal Operations Waste Disposal
	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls

A. Public Education and Outreach

Prospect Heights continues to implement the BMPs described in its SMPP and to track progress in implementing its stormwater management program. Prospect Heights is committed to implementing this component of the program by distributing educational material to the community and conducting outreach activities regarding the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants from stormwater runoff.

BMP A.1 – Distributed Paper Material

Prospect Heights currently distributes information and pamphlets at public events as well as having BMP brochures at City Hall. This information includes water quality/stormwater articles. Prospect Heights also includes pertinent stormwater management articles in its quarterly newsletter and works with MWRDGC in distributing pamphlets promoting the Rain Barrel Program.

Measurable Goals:-Continue to distribute pamphlets and brochures at public events and at City facilities.

-Include water quality/stormwater management Implement, and track progress, of BMPs as described in the SMPP.

BMP A.3 – Public Service Announcement

Prospect Heights continues to broadcast on its public access channel (PAC) information regarding water quality/stormwater management and procedures to report illicit discharges.

Measurable Goals:-Continue to monitor the information placed on the PAC and on the website.

BMP A.4 – Community Event

Prospect Heights co-sponsors events with the Prospect Heights Park District, Prospect Heights Garden Club, and Friends of McDonald Creek. Events may include environmental and creek cleaning, and illicit discharge detection.

Measurable Goals:-Continue to work with stakeholders to promote BMP's through events, the PAC and the City website.

BMP A.6 – Other Public Education

Prospect Heights co-sponsors events with the SWANCC for the collection and proper disposal of hazardous materials. Also, Prospect Heights established and publicized e-waste disposal at the Public Works facility.

Measurable Goals:-Continue to work with other agencies to educate the public on illicit discharges and the NPDES program

-Publicize the events on the PAC, the City website and newsletters

B. Public Participation/Involvement

BMP B.1 – Public Panel

The City's Ad Hoc Flooding and Street Committee continues to meet on a regular basis to address storm water runoff, monitor flooding and drainage issues, and evaluate BMPs to resolve the issues. The City's Water Committee regularly meets to address NPDES, illicit discharges, IEPA issues, drainage and water quality. The Water Committee also updates the City's Surface Water Protection Program, as needed. The activities of both committees are regularly updated on the City's website.

Measurable Goals:

- Implement and track progress of BMP's
- Continue to use the Committees to encourage public participation and involvement in the City's NPDES and environmental program
- Promote awareness of stormwater issues and track the processes

BMP B.3 – Stakeholder Meeting

The City meets with area districts and organizations including the Prospect Heights Park District, River Trails Park District, Prospect Heights Library District, Prospect Heights Fire District, local school districts and residents to discuss NPDES and BMPs.

Measurable Goals:

- Implement and track progress of BMP's
- Continue to meet with stakeholders

BMP B.4 – Public Hearing

The NPDES Annual Report is presented to the City Council and aired on the PAC.

Measurable Goals:

- Present the Annual Report to the City Council

BMP B.5 – Volunteer Meeting

The City regular meets with volunteers to discuss the NPDES program and BMPs

Measurable Goals:

- Continue to meet with volunteers as requested

BMP B.6 – Program Coordination

The City continues to work with other local units of government as well as stakeholders and residents to coordinate efforts as they pertain to the NPDES program and BMPs.

Measurable Goals:

- Continue to coordinate activities with other agencies, stakeholders and residents.

BMP B.7 – Other Public Involvement

The City is working with a college student on a master's thesis pertaining to water quality on the McDonald Creek.

Measurable Goals:

- Continue to work with the graduate student

C. Illicit Discharge Detection and Elimination

Prospect Heights implements activities related to IDDE including the following:

1. Maintain a storm water/sewer system map that shows the location of outfalls and the names and locations of all Waters of the US that receive discharges from these outfalls.
2. Prohibit non-storm water discharges into the stormwater sewer system and implement appropriate enforcement procedures and actions.
3. Educate public employees, business and the general public of hazards associated with illegal discharges and improper disposal of waste.

BMP C.1 – Sewer Map

Prospect Heights continues to update the sewer maps and the information is distributed to the Prospect Heights Fire District and the MWRDGC. The City also uses the Cook County GIS as a database back-up.

*Measurable Goals: -Implement and track progress of BMPs
-Continue to update maps
-Implement GIS programs to enhance planning*

BMP C.2 – Regulatory Control Program

Prospect Heights adopted the Illicit Discharge and Connection Ordinance prohibiting non-stormwater discharges to the storm sewer or drainage system. The Ordinance includes provisions for construction site regulations (e.g., silt fencing, dumping prohibition). The City follows the MWRDGC Stormwater Management Plan, and WDO regulating development and redevelopment projects in Cook County.

*Measurable Goals: -Implement and track progress of BMPs
-Enforce Prospect Heights and MWRDGC ordinances, codes and policies*

BMP C.3 - Detection/Elimination Prioritization Plan

As part of this plan, Prospect Heights will continue to incorporate detection methods that will include dry weather screening, a regular storm sewer maintenance program, and public reporting. Outfalls observed to have dry weather flow are investigated. Leak detection of water mains, sewer jetting and televising and street cleaning are conducted throughout the year.

*Measurable Goals: -Implement and track progress of BMPs
-Monitor implementation programs*

BMP C.4- Illicit Discharge Tracing Procedures

Several years ago, Prospect Heights established a "Task Force" consisting of City staff and the Old Town Sanitary District to establish a program. They continue to work on procedures and funding mechanisms to identify and trace illicit discharges.

Measurable Goals: -Implement and track progress of BMPs

- Establish procedures*
- Identify and implement funding mechanism*

BMP C.5- Illicit Source Removal Procedures

Prospect Heights implemented procedures to trace illicit discharges to their origin and remove identified connections. The City contracts jetting, cleaning and televising sewers to assist in identifying sources of illicit discharges. City staff conducts quarterly inspections, which includes flushing/jetting, dye testing and televising to identify and clear blockages and identify illicit discharges. The City advertises an illicit discharge/illegal dumping hotline in the City's newsletter and on the City's website. Prospect Heights tracks the calls to ensure correction of the issue.

- Measurable Goals:*
- Implement and track progress of BMPs*
 - Inspect, monitor, report and enforce illegal discharges as outlined in the City's Illicit Discharge Ordinance and the City Code.*

BMP C.6 – Program Evaluation and Assessment

As this is the second year of the program, the City continues to assess the procedures and results and will modify the program as necessary. To date, the program has been effective, and has helped identify and eliminate three illicit discharges.

- Measurable Goals:*
- Continue to evaluate the efficacy of the program*

BMP C.7 – Visual Dry Weather Screening

Prospect Heights' Public Works Department performs quarterly inspection concurrent with debris and obstruction removal. Dry weather inspections include, but are not limited to, testing, removing obstructions, flushing, televising and dye testing to ensure no blockages and illicit discharges exist.

- Measurable Goals:*
- Implement and track progress of BMPs*
 - Continue to perform dry weather inspections*

BMP C.8- Pollution Field Testing

Prospect Heights has started to periodically sample streams and watersheds to establish benchmarks. There have been no identifiable problems.

- Measurable Goal:*
- Implement and track progress of BMPs*
 - Continue sampling*

BMP C.9- Public Notification

Prospect Heights notifies the City Council, which is aired on the PAC, regarding illicit discharges.

- Measurable Goals:*
- Implement and track progress of BMPs*
 - Notify the City Council of irregular findings*

D. Construction Site Runoff Control

Prospect Heights implemented strict requirements for soil, erosion and sediment controls based on the draft Cook County WDO. The City plans to adopt this ordinance upon Cook County's adoption. In the meantime, the City continues to use its Code, Illicit Discharge Ordinance and permit requirements for controls, plan reviews, inspections and enforcement,

BMP D.1 –Regulatory Control Program

The City continues to enforce, review and modify codes and permitting requirements to ensure that applicable developments are in compliance with the NPDES program.

*Measurable Goals -Implement and track progress of BMPs
-Enforce, review and modify the City Code and Illicit Discharge Ordinance*

BMP D.2 -Erosion and Sediment Control

The City continues to enforce all codes and permitting requirements to ensure that applicable developments are in compliance with the City Code and permitting requirements. Prospect Heights will continue to conduct pre-construction meetings to review the City Code, Illicit Discharge Ordinance and WDO with builders and developers.

*Measurable Goals: -Implement and track progress of BMPs
-Enforce the City Code and Illicit Discharge Ordinance
-Follow City guidelines for permits, reviews, inspections and enforcement actions*

BMP D.3 –Other Waste Control Program

The City Code includes provisions regarding site waste control that includes construction debris. During inspections related to erosion control, the City ensures that the site complies with controlling other waste.

*Measurable Goals: -Implement and track progress of BMPs
-Enforce the City Code and Illicit Discharge Ordinance
-Follow City guidelines for permits, reviews, inspections and enforcement actions*

BMP D.4 -Site Plan Review Procedures

Prospect Heights Building/Zoning/Engineering Department reviews site plans and enforces City codes, ordinances and regulations regarding silt fencing and illicit discharges during construction and post-construction. The review occurs prior to permitting and post-construction inspections occur prior to occupancy or permit close-out.

*Measurable Goals: -Implement and track progress of BMPs
-Enforce the City Code and Illicit Discharge Ordinance
-Follow City guidelines for permits, reviews, inspections and enforcement actions*

BMP D.5 –Public Information Handling Procedures

During the development review process, impacted residents are notified of the project and ways to contact the City if they suspect illicit discharges. Furthermore, announcements as part of Council meeting and information in City newsletters include contact information for reporting. The City reviews each call and takes action as necessary.

*Measurable Goals: -Implement and track progress of BMPs
-Enforce the City Code and Illicit Discharge Ordinance
-Follow City guidelines for permits, reviews, inspections and enforcement actions*

BMP D.6 -Site Inspection Enforcement

The City conducts multiple inspections during a construction process. Whenever a City representative is site, they conduct an inspection of BMPs and note compliance with the City's Codes.

*Measurable Goals: -Implement and track progress of BMPs
-Enforce the City Code and Illicit Discharge Ordinance
-Follow City guidelines for permits, reviews, inspections and enforcement actions*

E. Post-Construction Runoff Control

The City's control strategy is to continue post-construction run-off control practices, regulatory control programs and long term O&M procedures.

BMP E.2 -Regulatory Control Program

The City continues to regulate its program using City and MWRDGC ordinances, and state and federal regulations pending adoption of the MWRDGC WDO.

BMP E.3 -Long Term O&M Procedures

The City has not formalized long-term O&M procedures but continues to identify and program long-term O&M procedures.

*Measurable Goals: -Establish long-term O&M procedures
-Continue to implement and evaluate BMPs*

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

The City initiates pre-permitting and pre-construction meetings regarding applicable developments and the use of BMPs.

*Measurable Goals: -Implement and track progress of BMPs
-Enforce the codes for applicable development
-Updates codes and regulations as conditions dictate
-Continue pre-permitting and pre-construction meetings*

BMP E.5 - Site Inspection During Construction

The City continues to conduct pre-construction, progress and post-construction inspections to monitor implementation and compliance with regulations and evaluate effectiveness.

*Measurable Goals: -Implement and track progress of BMPs
-Enforce the codes for applicable development*

BMP E.6 - Post Construction Inspection

Prior to issuing a Certificate of Occupancy or closing the City issued permit, the City conducts a post-construction inspection. All shortcomings and violations must be corrected.

*Measurable Goals: -Implement and track progress of BMPs
-Enforce the codes for applicable development*

F. Pollution Prevention/Good Housekeeping

BMP F.1-Employment Training Program

Due to the small number of employees, the City's training is limited to the review of newsletters, websites and other sources to monitor the NPDES program and BMPs.

Measurable Goals: -Establish formal training program

BMP F.2 -Inspection and Maintenance Program

The City continues to evaluate stormwater discharges and drainage areas. Discharges of concern are sent for analysis.

Measurable Goals: -Budget permitting, actively test stormwater discharges

BMP F.3-Municipal Operations Storm Water Control

The City continues its operation of monitoring and implanting the Creek Maintenance, Storm Sewer Inspection, and Leak Detection Programs.

BMP F.4-Municipal Operations Waste Disposal

The City contracts waste disposal and recycling programs.

BMP F.5-Flood Management/Assess Guidelines

The City actively manages its responsibilities under the NFIP and CRS programs.

Part F. MS4 Construction Projects Conducted During Year 10

Project Name	Project Size (acres)	Construction Start Date	Construction End Date
Roads 2012 (City-wide street repair program)		May 2012	November 2012

