



May 26, 2020

Illinois Environmental Protection Agency
Bureau of Water
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Re: NPDES Phase II – Year 17 Annual Report
Prospect Heights MS4 Permit No. ILR40-0427

To Whom It May Concern:

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

If you should have any questions or require additional information, please contact Pat Glenn at (847) 478-9700 or at pglenn@gha-engineers.com.

Sincerely,

City of Prospect Heights



Joe Wade
City Administrator

cc: Pat Glenn, Gewalt Hamilton Associates, Inc.



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, 2019 To March, 2020

Permit No. ILR40 4027

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: Joe Wade Email Address: jwade@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)

Cook County
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))

Joseph A. Wade

Owner Signature:

5-26-2020

Date:

Joseph F. Wade

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

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

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

**City of Prospect Heights
Permit No. ILR40 0427**

Permit Year 17: March 1, 2019 to March 1, 2020

Table of Contents

<u>Part A. Changes to Best Management Practices.....</u>	<u>A-1</u>
<u>Part B. Status of Compliance with Permit Conditions.....</u>	<u>B-1</u>
<u>Part C. Information and Data Collection Results.....</u>	<u>C-1</u>
<u>Part D. Summary of Year 18 Stormwater Activities.....</u>	<u>D-1</u>
<u>Part E. Notice of Qualifying Local Program.....</u>	<u>E-1</u>
N/A	
<u>Part F. Construction Projects Conducted During Year 17.....</u>	<u>F-1</u>

Part A. MS4 Changes to Best Management Practices, Year 17

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 17

Year 17	
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
	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
	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 17	
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 17

Stormwater Management Activities, Year 17

Please note that IEPA issued a new version of its General NPDES Permit No. ILR40 (Permit), effective on March 1, 2016. On behalf of all MS4s within the county, SMC performs activities related to each of the six minimum control measures which are described in detail in the SMPP. These BMPs, implemented at the county level, make significant strides in achieving the statutory goal of reducing the discharge of pollutants to the MEP as watershed boundaries are not constrained by municipal borders.

- The SMPP for this MS4 Program can be viewed at the following link: http://www.gha-engineers.com/ms4/wp-content/uploads/2017/07/City-of-Prospect-Heights_SMPP-No-appendices.pdf
- The previous five years of Annual Reports for this MS4 Program can be viewed at the following link: <https://www.gha-engineers.com/ms4/documentation/>

In response to the new ILR40 permit, effective March 1, 2016, Lake County SMC issued a revised SMPP template in November of 2016 (near the end of Year 14). During Year 17, the MS4 reviewed and revised its SMPP. The stormwater management activities that the MS4 performed during Year 17, including your MS4 program BMPs and measurable goals, are described in detail in the revised SMPP. A copy of the annual tracking form is included at the end of Part B of this report.

Public Education and Outreach

Measurable Goal(s):

- Implement BMPs and track progress of BMP implementation, as described in the SMPP, including: distribute materials at City Hall / in City Newsletter, ensure MS4 documents are posted to website, support MWRD outreach efforts, publicize recycling events, and promote BMPs to residents.

Year 17 MS4 activities:

- The MS4 has developed a flyer to distribute to educate homeowners about ways to improve the quality of storm water runoff. This flyer is available at the City office.
- The MS4 continues to implement the BMPs described in its SMPP and to track progress in implementing its stormwater management program.

B. Public Participation/Involvement

Measurable Goal(s):

- Implement BMPs and track progress of BMP implementation, as described in the SMPP, including: participate in stakeholder meetings (watershed groups, Municipal Advisory Council), present the Annual Report to the Board at a public meeting, identify/reach out to Environmental Justice areas, publicize City contact information, log and investigate illicit discharges reported by residents.

Year 17 MS4 activities:

- The MS4 continues to implement the BMPs described in its SMPP and to track progress in implementing its stormwater management program.

C. Illicit Discharge Detection and Elimination

Measurable Goal(s):

- Implement BMPs and track progress of BMP implementation, as described in the SMPP, including: comply with the WMO, enforce the City's Sewer Ordinance (8-5-12) and

Stormwater Runoff Ordinance (8-1-3), perform annual dry-weather inspections of the City's outfalls, follow illicit discharge reporting and removal procedures (listed in the SMPP), and track all illicit discharges.

Year 17 MS4 activities:

- The MS4 continues to implement the BMPs described in its SMPP and to track progress in implementing its stormwater management program.

D. Construction Site Runoff Control

Measurable Goal(s):

- Implement BMPs and track progress of BMP implementation, as described in the SMPP.
- Continue to comply with MWRD's enforcement of the WMO.

Year 17 MS4 activities:

- The MS4 continues to implement the BMPs described in its SMPP and to track progress in implementing its stormwater management program.
- The MS4 continues to comply with the MWRD's enforcement of the WMO.

E. Post-Construction Runoff Control

Measurable Goal(s):

- Implement BMPs and track progress of BMP implementation, as described in the SMPP, including: allowing for public submissions of concerns/follow-up with concerns as appropriate, encouraging residents to implement watershed plan recommendations and evaluating the feasibility of implementing watershed plan recommendations (including stream and/or detention basin retrofits) as part of the City's budgeting process, and periodic inspection of streambanks and detention pond shorelines for erosion.
- Continue to comply with MWRD's enforcement of the WMO.

Year 17 MS4 activities:

- The MS4 continues to implement the BMPs described in its SMPP and to track progress in implementing its stormwater management program.
- The MS4 continues to comply with MWRD's enforcement of the WMO.

F. Pollution Prevention/Good Housekeeping

Measurable Goal(s):

- Implement BMPs and track progress of BMP implementation, as described in the SMPP, including: promoting training opportunities by the MWRD and Lake County SMC, and ensuring the relevant staff are trained in Best Management Practices, including snow and ice removal.

Year 17 MS4 activities:

- The MS4 continues to implement the BMPs described in its SMPP and to track progress in implementing its stormwater management program.
- The MS4 continues to comply with MWRD's enforcement of the WMO.

Stormwater Management Program Assessment, Year 17

The MS4 revised their SMPP to coincide with the March 2016 ILR40 permit. As described in the revised SMPP there are extensive monitoring efforts already underway across the County, refer to Part C of this report for additional information. Additionally, the SMPP identified impaired waters based on the July 2016 303(d) list. The inclusion or exclusion of water bodies on the IEPAs 303(d) list, published bi-annually, is a direct reflection of the program's effectiveness.

Annual SMPP Tasks				
BMP	Task	Resp. Party	Date Compl'd	SMPP Section
A.6	Post NOI, SMPP and Annual Report on website	GHA	6/1/2019	3.2.B
B.4	Present Annual Report to Board during open meeting	GHA	5/28/2019	3.3.B
C.1	Update outfall map (new permits, outfall inventory updates)	GHA	N/A	1.4.B, 3.4.D.3.c
C.1	Inspect for "new" outfalls every 5 years	Public Works	N/A	1.4.B
C.3, C.7	Pre-screen 100% of outfalls (20% per year or 100% within every 5-yrs)	Public Works	Summer 2019	3.4.D.2.a
C.3, C.8	Complete outfall inspection procedure for all outfalls with observed dry weather flow (20% per year or 100% within every 5-yrs). Document.	Public Works	Summer 2019	3.4.D.2.b-c
C.3, C.8	Inspect all high priority outfalls	Public Works	Summer 2019	3.4.D.2.b
C.6	Review the results of the screening program. Include assessment in Part B of the Annual Report.	GHA	5/31/2019	4.2
C.7	Inspect and clean catch basins (approximately 20% per year or 100% within every 5-yrs). Document.	Public Works	Ongoing	3.7.A.2.b
E.6, E.7	Consider public implementation of watershed plan recommendations as part of fiscal planning/budgeting	City	Ongoing	3.6.D, 3.6.E
F.2	Inspect and recondition spreaders and spinners. Install these items onto snow removal vehicles, performing test operations, calibrating distribution rates per National Salt Institution Application Guidelines, and conducting better driver training.	Public Works	Ongoing	3.7.A.4.a
A-F	Review Program, include finding in annual report	GHA	5/31/2020	4.2
B.6	Evaluate SWPP. Major highlights and deficiencies should be noted annually and the plan revised accordingly on a minimum 5-yr basis, or as necessary.	GHA	Revised in 2017	4.2.C
	Comply with monitoring program commitments, describe in Annual Report	GHA	9/5/2019	4.1

Part C. MS4 Information and Data Collection Results, Year 17

Annual Monitoring and Data Collection, Year 17

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

The MS4 revised their SMPP to coincide with the March 2016 ILR40 permit. As described in the revised SMPP there are extensive monitoring efforts already underway across the County. The MS4 is located in the North Branch Chicago River Watershed in Cook County and supposed the efforts of the North Branch Chicago River Watershed Workgroup (NBWW), but is not currently a dues-paying member. The following is a brief summary of the efforts described in more detail in the SMPP.

- The North Branch Watershed Workgroup (NBWW) monitors water quality in the North Branch Chicago River and tributaries to accurately identify the quality of the river ecosystems as well as stressors associated with non-attainment of water quality standards and designated uses. Monitoring data will allow for a greater understanding of the water quality impairments, identify priority restoration activities, and track water quality improvements. The Workgroup is committed to an approach for attaining water quality standards that focuses on stakeholder involvement, monitoring, and locally led decision-making based on sound science. Comprehensive baseline monitoring has been completed at all 25 sites for water column chemistry and sampled 14 sites for fish, habitat, macroinvertebrate, and sediment chemistry. Data sondes were deployed at 7 sites in the Middle and West Forks for collection of dissolved oxygen (D.O), pH, temperature, and specific conductance. The NBWW will continue to support the North Branch Watershed Planning Committee and the North Branch Watershed Consortium through regular discussion at general meetings. MS4 communities that are currently NBWW members for the reporting year are located at (URL: www.nbwwil.org).
- A portion of the community is located outside of these monitoring efforts. A total of 2 locations were selected to perform supplemental water quality monitoring. The data collected from these water quality sampling locations will be compared with subsequent years sampling to assist in determining if the BMPs and stormwater management program are appropriate.

Part D. MS4 Summary of Year 18 Stormwater Activities

The table below indicates the stormwater management activities that the MS4 plans to undertake during Year 18. Additional information about the stormwater management activities that the MS4 will perform is provided in the section following the table.

Note: “X” indicates BMPs that will be implemented during Year 18
✓ indicates BMPs that were changed during Year 18

Year 18	
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
	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 18	
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
X	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
	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
X	F.6 Other Municipal Operations Controls

Stormwater Management Activities, Year 18

The MS4's NPDES Program can be viewed at http://www.gha-engineers.com/ms4/wp-content/uploads/2017/07/City-of-Prospect-Heights_SMPP-No-appendices.pdf

A. Public Education and Outreach

The MS4 utilizes a variety of methods to educate and provide outreach to the public about the importance of managing pollutants that potentially could enter the stormwater system. The MS4's Public Education and Outreach program includes: the distribution of educational material via take-away racks, municipal newsletters, website, at outreach events and by supporting efforts of the Solid Waste Agency of Northern Cook County (SWANCC).

Measurable Goal(s):

- Support MWRD efforts.
- Implement BMPs and track progress of BMP implementation, as described in the SMPP.

B. Public Participation/Involvement

The MS4 utilizes a variety of methods to allow input from citizens during the development and implementation of the SMPP. The MS4's Public Participation/Involvement program includes the following: maintaining a process for receiving and processing citizen input/complaints; attending and publicizing stakeholder meetings, identification of environmental justice areas, and presenting program information at a public meeting at least once annually.

Measurable Goal(s):

- Support MWRD efforts.
- Implement BMPs and track progress of BMP implementation, as described in the SMPP.

C. Illicit Discharge Detection and Elimination

The MS4 will conduct activities toward the identification and removal of direct connections of pollutants into the storm water management systems (including wetlands and receiving waters). The program includes the following primary components.

- An outfall map showing the locations of outfalls and the names and locations of all waters that receive discharges from those outfalls;
- An ordinance that prohibits all non-storm water discharges into the storm sewer system and provides the authority for appropriate enforcement procedures and actions;
- A plan to detect and address all non-stormwater discharges, into the storm sewer system;
- Periodic inspection of outfalls for detection of non-stormwater discharges and illegal dumping (5-yr rescreening schedule).
- Annual inspection of all High Priority Outfalls.

Measurable Goal(s):

- Support MWRD Efforts.
- Implement BMPs and track progress of BMP implementation, as described in the SMPP.

D. Construction Site Runoff Control

Cook County has adopted a countywide Watershed Management Ordinance (WMO) that establishes the minimum stormwater management requirements for development in Cook County. The WMO establishes countywide standards for runoff maintenance, detention sites, soil erosion and sediment control, inspections, water quality, wetlands and floodplains. The WMO, which is

administered and enforced within the community by the MWRD, establishes standards for construction site runoff control.

Measurable Goal(s):

- Implement BMPs and track progress of BMP implementation, as described in the SMPP.
- Assist MWRD in ensuring that all applicable developments are in compliance with the WMO.

E. Post-Construction Runoff Control

As described above, the countywide WMO establishes the minimum stormwater management requirements for development in Cook County. BMP standards are incorporated into the WMO to implement stormwater management strategies that minimize increases in stormwater runoff rates, volumes, and pollutant loads from development sites. The SMPP also includes support of Watershed Plan recommendations and inspection procedures for streambanks and shorelines, streambeds, and detention/retention ponds.

Measurable Goal(s):

- Implement BMPs and track progress of BMP implementation, as described in the SMPP.
- Assist MWRD in ensuring that all applicable developments are in compliance with the WMO.

F. Pollution Prevention/Good Housekeeping

The MS4 is committed to implementing the Pollution Prevention/Good Housekeeping component of its SMPP. The MS4 is responsible for the care and upkeep of the general facilities, municipal roads, its general facilities and associated maintenance yards. The MS4's Pollution Prevention/Good Housekeeping program includes: the evaluation and improvement of municipal policies and procedures to reduce the discharge of pollutants from municipal activities and operations.

Measurable Goal(s):

- Implement BMPs and track progress of BMP implementation, as described in the SMPP.

Part E. Notice of Qualifying Local Program

N/A

