

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

Complete each section of this report.

REPORT PERIOD:	FROM: MARCH 2015	TO: MARCH 2016
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**MS4 OPERATOR INFORMATION: (As it appears on the current permit)**

NAME: Will County		TELEPHONE NUMBER: (815) 774-3321
MAILING ADDRESS: 58 East Clinton Street, Suite 100		
CITY: Joliet	STATE: IL	ZIP: 60432
CONTACT PERSON: Curt Paddock (Person responsible for Annual Report)		

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

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

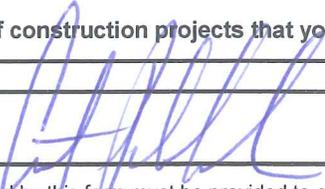
**B.**  
Attach the status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, and your identified measurable goals for each of the 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, 2016
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Information required by this form must be provided to comply with 415 ILCS 5/39 (1996). Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

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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 11	Year 12	Year 13	Year 14	Year 15	
<b>MS4</b>					
<b>A. Public Education and Outreach</b>					
X	✓	✓	✓	✓	A.1 Distributed Paper Material
					A.2 Speaking Engagement
✓	✓	✓	✓	✓	A.3 Public Service Announcement
X	X	X	X	X	A.4 Community Event
X	X	X	X	X	A.5 Classroom Education Material
X	X	X	X	X	A.6 Other Public Education
<b>B. Public Participation/Involvement</b>					
					B.1 Public Panel
X	✓	✓	✓	✓	B.2 Educational Volunteer
X	X	X	X	X	B.3 Stakeholder Meeting
X	X	X	X	X	B.4 Public Hearing
X	X	X	X	X	B.5 Volunteer Monitoring
X	✓	✓	✓	✓	B.6 Program Coordination
X	X	X	X	X	B.7 Other Public Involvement
<b>C. Illicit Discharge Detection and Elimination</b>					
X	X	X	X	X	C.1 Storm Sewer Map Preparation
X	X	X	X	X	C.2 Regulatory Control Program
X	X	X	X	X	C.3 Detection/Elimination Prioritization Plan
X	X	X	X	X	C.4 Illicit Discharge Tracing Procedures
X	X	X	X	X	C.5 Illicit Source Removal Procedures
X	X	X	X	X	C.6 Program Evaluation and Assessment
					C.7 Visual Dry Weather Screening
					C.8 Pollutant Field Testing
					C.9 Public Notification
X	X	X	X	X	C.10 Other Illicit Discharge Controls

Year 11	Year 12	Year 13	Year 14	Year 15	
<b>MS4</b>					
<b>D. Construction Site Runoff Control</b>					
X	X	X	X	X	D.1 Regulatory Control Program
X	X	X	X	X	D.2 Erosion and Sediment Control BMPs
					D.3 Other Waste Control Program
X	X	X	X	X	D.4 Site Plan Review Procedures
X	X	X	X	X	D.5 Public Information Handling Procedures
X	X	X	X	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	X	X	X	X	E.2 Regulatory Control Program
					E.3 Long Term O&M Procedures
X	X	X	X	X	E.4 Pre-Const Review of BMP Designs
X	X	X	X	X	E.5 Site Inspections During Construction
X	X	X	X	X	E.6 Post-Construction Inspections
					E.7 Other Post-Const Runoff Controls
<b>F. Pollution Prevention/Good Housekeeping</b>					
X	X	X	X	X	F.1 Employee Training Program
X	X	X	X	X	F.2 Inspection and Maintenance Program
X	X	X	X	X	F.3 Municipal Operations Storm Water Control
X	X	X	X	X	F.4 Municipal Operations Waste Disposal
X	X	X	X	X	F.5 Flood Management/Assess Guidelines
X	X	X	X	X	F.6 Other Municipal Operations Controls

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

*(Provide 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 maximum extent practicable [MEP], and your identified measurable goals for each of the minimum control measures.)*

The status of BMPs and measurable goals performed in Year 13 are described below.

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

Will County (County) 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 stormwater runoff. The County committed to implementation of BMPs related to A.1, A.4, A.5 and A.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

#### **BMP No. A1 – Distributed Educational Material**

**Brief Description of BMP:** The County makes a variety of stormwater quality or related materials available on the Will County Green website. This information includes recycling events, rain barrel information, Household Hazardous Waste events, and many other examples of educational materials. The WillCountyGreen.com website had 36,157 visitors in 2015, which is 11.81% more than in 2014. Of that number, 25% were repeat visitors and 75% were first time visitors. WillCountyGreen.com is a comprehensive environmental website with over 250 pages of information. It offers a database search filled with businesses, a newspaper article section and a calendar of upcoming events, along with a FAQ section that many people use to contact us. Due to these features, the website requires weekly updating.

The County also utilizes other electronic formats such as their E-Blast program to distribute stormwater quality or related information to residents and other interested parties. A newsletter is sent through Constant Contact to political leaders, citizens, teachers and to all employees throughout the County - this is estimated to reach over 3,000 people each month. It features a variety of brief articles, links to many of the willcountygreen.com pages and invitations to follow us on Facebook, Twitter, YouTube.

#### **BMP No. A4 – Community Event**

**Brief Description of BMP:** The County annually hosts an informational booth at the County Fair to provide residents with the opportunity to obtain a variety of information including topics related to stormwater quality and similar issues. The County estimates that they distributed approximately 100 pamphlets at the County Fair Informational booth to residents interested in stormwater quality and related issues during Permit Year 13.

#### **BMP No. A5 – Classroom Education Material**

**Brief Description of BMP:** The County has an educational classroom program where County staff visits schools to provide education on a variety of topics including those relating to stormwater quality or related issues. The County estimates that during Permit Year 13 approximately 50 schools were visited reaching an estimated student population around 5000.

### **BMP No. A6 – Other Public Education**

**Brief Description of BMP:** The County is actively involved in the use of social media as a means of distributing information and materials. The County operates a Facebook page as well as a Twitter Handle and uses both outlets to disseminate stormwater quality or related materials and/or information.

The Facebook page is updated daily and has over 830 followers. Many environmental messages are created for the site, including plenty on storm water, proper disposal of hazardous waste, cleaning with less harmful products, recycling and waste reduction.

The Twitter page is also updated daily, carrying the same messages (but without photos) as Facebook.

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

The County committed to performing activities and services related to the Public Participation/Involvement minimum control measure under BMP numbers B.3, B.4, B.5, and B.7. The status or progress for each of the measurable goals related to these BMPs is presented below.

### **BMP No. B.3 – Stakeholder Meeting**

**Brief Description of BMP:** The County has an active and progressive Stormwater Committee that is responsible for a multitude of stormwater management and water quality activities. The Stormwater Committee publicly met bi-monthly providing the opportunity for interested individuals to learn, inquire or be involved in the County' stormwater management issues. The County continued to host and support the Stormwater Management Committee and funded three stormwater projects during Permit Year 13 totaling approximately \$120,000.

### **BMP No. B.4 – Public Hearing**

**Brief Description of BMP:** The County partners with the Will/South Cook Soil Water Conservation District to provide input and analysis for development sites throughout the County. Public Hearings are required as a part of the zoning process and occur at least 12 times per year. These hearings provide a dedicated opportunity for interested residents and individuals give input on stormwater management and related water quality issues. The County continued this partnership during Year 13 and heard approximately 87 cases.

### **BMP No. B.5 – Volunteer Monitoring**

**Brief Description of BMP:** The County participates in planning groups for specific watersheds within Will County. These groups meet to discuss issues affecting the watershed including preserving, protecting and restoring water quality and other issues relating to stormwater management. The County participates in the Hickory Creek Watershed Planning Group, the Lower DuPage River Watershed Coalition and USGS management Will County Rain Gage Network. A total of \$37,121 was paid to those groups during Permit Year 13.

### **BMP No. B.7 – Other Public Involvement**

**Brief Description of BMP:** The County organizes specialized collection events that allow citizens to properly dispose of wastes that could potentially be dumped or otherwise disposed of illegally and end up in the municipal separate storm sewer system. These events are held throughout the year and at various locations in the County to provide opportunities for as many residents as possible. During Permit Year 13, the County hosted 5 events and collected approximately 250,000 pounds of waste. Additionally, the County collected over 1,200 pounds of pharmaceutical/medical waste during the current permit year. The collection of these wastes prevented them from being dumped or otherwise introduced to the MS4 system.

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

The County committed to perform some activities related to the Illicit Discharge Detection and Elimination minimum control under BMP numbers C.1, C.2, C.3, C.4, C.5, C.6 and C.10. The status or progress for each of the measurable goals related to these BMPs is presented below.

#### **BMP No. C1 – Storm Sewer Map Preparation**

**Brief Description of BMP:** The County has developed a comprehensive stormwater atlas showing the location of all County-owned outfalls and receiving streams in the County.

#### **BMP No. C2 – Regulatory Control Program**

**Brief Description of BMP:** The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to detect, investigate and eliminate potential illicit. The County will continue to review the Ordinances and update its program as necessary to effectively detect and eliminate illicit discharges in compliance with NPDES requirements.

#### **BMP No. C3 – Detection/Elimination Prioritization Plan**

**Brief Description of BMP:** The County has policies and procedures in place to detect and eliminate illicit discharges. Procedures may involve multiple departments and procedures such as tracing can be employed as necessary to identify and eliminate the discharge. Enforcement procedures are utilized on an as-needed basis to obtain compliance. Additionally, the Will County Land Use Department Resource Recovery & Energy Division performed open dumping and burning related enforcement program and conducted a minimum of 171 inspections during the permit year. During this time frame 70 sites or cases with open dumping or burning were cleaned up and closed. A total 5,192 cubic yards of waste was removed and 1,526 tires were removed from the sites or properties. The County also has approximately 3,300 individual discharging mechanical systems that are regulated by the County Health Department and 3 active discharge mechanical systems that are regulated by the US Environmental Protection Agency.

#### **BMP No. C4 – Illicit Discharge Tracing Procedures**

**Brief Description of BMP:** The County conducts the screening of outfalls on an annual basis or as funding allows to evaluate the potential for illicit discharges. The County employed established procedures to inspect storm sewer outfalls, identify potential problems and investigate potential illicit discharges during Year 13.

#### **BMP No. C5 – Illicit Source Removal Procedures**

**Brief Description of BMP:** The County continued the existing program and review the procedures as needed to authorize the removal of illicit discharges from the storm sewer system. This program requires the disconnection of any illicit discharge source that can be identified through the tracing program.

#### **BMP No. C.6 – Program Evaluation and Assessment**

**Brief Description of BMP:**

The County regularly assesses their NPDES program on an annual basis to determine the effectiveness of the BMPs selected to meet the specified goals for overall compliance. The goal of this program is to evaluate the appropriateness of the BMPs selected for the NPDES program in

meeting the goals necessary to maintain compliance. The County continued the assessment during Year 13.

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

##### **Brief Description of BMP:**

The County performs regular monitoring activities of the receiving waters that receive discharges from MS4 outfalls. The goal of this program is to monitor the receiving waters for potential illicit discharges from the MS4. The County continued to monitor the receiving waters upstream and downstream of the MS4 discharge points during Permit Year 13.

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

The County committed to performing activities and services related to the Construction Site Runoff Control minimum control measure under BMP numbers D.1, D.2, D.4, D.5 and D.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

#### **BMP No. D1 – Regulatory Control Program**

**Brief Description of BMP:** The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

#### **BMP No. D2 – Erosion and Sediment Control BMPs**

**Brief Description of BMP:** The County has procedures in place that require the review of Best Management Practices for proposed developments prior to construction. The intent of these procedures is to reduce or prevent the discharge of pollutants from construction sites through the use of effective BMPs. The County continued to review, inspect and enforce the ordinance regulations during Year 13 to prevent or reduce the discharge of sediment or other pollutants from construction sites as it relates to BMP's.

#### **BMP No. D4 –Site Plan Review Procedures**

**Brief Description of BMP:** The County has procedures and policies in place that require the review of site plans for compliance with all applicable State and County Ordinances specifically as they relate to soil erosion and sediment control measures and other potential construction related pollutants.

#### **BMP No. D5 – Public Information Handling Procedures**

**Brief Description of BMP:** The County has procedures in place for receiving, logging and addressing reports from residents or other individual regarding the potential release of pollutants or sediment from construction sites. The County continued the program to receive, investigate and address publicly reported issues.

#### **BMP No. D6 – Site Inspection/Enforcement Procedures**

**Brief Description of BMP:** The County has procedures and policies in place for the inspection and enforcement of applicable ordinances for construction sites in the County. These procedures specifically apply to soil erosion and sediment control measures and other potential construction related pollutants. Forms, checklists and other enforcement measures utilized by the County are available upon request. During permit Year 13, approximately 328 compliance inspections were performed and documented by the County. Currently there are approximately 137 open permits within the County.

## 5. Post-Construction Runoff Control

The County committed to performing activities and services related to the Post-Construction Site Runoff Control minimum control measure under BMP numbers E.2, E.4, E.5 and E.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

### **BMP No. E2 – Regulatory Control Program**

**Brief Description of BMP:** The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce post-construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate post-construction site runoff controls in compliance with NPDES requirements.

### **BMP No. E4 – Pre-Construction Review of BMP Designs**

**Brief Description of BMP:** The County has procedures and policies in place that require the review of site plans for compliance with all applicable State and County Ordinances specifically as they relate to soil erosion and sediment control measures and other potential construction related pollutants.

### **BMP No. E.5, E.6 – Site Inspections During Construction, Post Construction Inspections**

**Brief Description of BMP:** The County has site inspection procedures in place during and prior to releasing the site after construction to verify that proposed developments are in compliance with the County Ordinances and regulations related to construction site runoff controls and potential discharge of pollutants. The County has a soil erosion and sediment control checklist that is employed during site inspections to verify compliance and consistency in the inspection process. The County continued the site inspection and enforcement policies and procedures for all developments during and after construction and will update or modify as needed to maintain compliance with their NPDES permit conditions. During permit Year 13, approximately 328 compliance inspections were performed and documented by the County. Currently there are approximately 137 open permits within the County.

## 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 County committed to perform activities for BMP numbers F.1, F.2, F.3, F.4, F.5 and F.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

### **BMP No. F1 – Employee Training Program**

**Brief Description of BMP:** The County conducts regular employee training for ways to reduce or prevent the discharge of potential pollutants from municipal operations including proper maintenance of municipal facilities and property, the inspection of stormwater management systems and other areas that may impact stormwater runoff. The County will continue the current employee training and will modify it as needed to meet the requirements of the NPDES program. Current staff includes four Certified Floodplain Managers and one Certified Stormwater Inspector.

### **BMP No. F2 – Inspection and Maintenance Program**

**Brief Description of BMP:** The County has an inspection and maintenance program that is designed to reduce pollutant runoff from municipal operations by maintaining properly

functioning facilities. This maintenance program will be continued and evaluated on an annual basis to determine its effectiveness in reducing pollutant runoff.

**BMP No. F3/F4 – Municipal Operations Stormwater Control, Municipal Operation Waste Disposal**

**Brief Description of BMP:** The County currently has many operational policies designed to prevent storm water pollution associated with municipal operations. Road salt is stored on a paved surface and covered to protect it from precipitation. The County stores diesel fuel and gasoline for its vehicles in appropriate tanks with containment measures. Used vehicle oil is stored in a holding tank and periodically hauled away by a waste disposal service. Maintenance and washing of the County vehicles is performed in the County maintenance garage or similar facility. These programs will be evaluated on a regular basis to determine its effectiveness and modified as necessary to meet the requirements of the NPDES program. The County continued the current program and review these policies and revise as necessary to maintain compliance with the permit conditions.

**BMP No. F5 – Flood Management/Assess Guidelines**

**Brief Description of BMP:** The County and State have strict development regulations related to floodplain management and the evaluation of potential development in these areas. The County also has Certified Floodplain Managers on staff to assist with development issues and other floodplain management concerns. The County continued to enforce the requirements for potential development in special flood hazard areas.

**BMP No. F6 – Other Municipal Operations Controls**

**Brief Description of BMP:** The County regularly evaluates their policies and programs for effectiveness and compliance. Currently the program is evaluated and/or updated at least annually or as needed to maintain compliance with permit conditions. The County continued the current evaluation program and review these policies and revise as necessary to maintain compliance with the permit conditions.

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

*(Provide information and water quality sampling/monitoring data related to illicit discharge detection and elimination collected during the reporting period.)*

No information or data was collected during Year 13.

## Part D. Summary of Year 14 Stormwater Activities

*(Present a summary of the storm water activities you plan to undertake during the next reporting cycle, including an implementation schedule in the sections following the table.)*

Will County is aware that the General NPDES Permit No. ILR 40 effective March 1, 2016 has modified some of the requirements, including (but not limited to) the monitoring program, public hearings and environmental justice. Will County is currently researching and evaluating what will be required in order to remain in compliance in year 14.

The table shown below summarizes the BMPs committed to for the next NPDES permitting cycle. Specific BMPs and measurable goals for future development activities are presented in the sections following the table.

**Note: X indicates BMPs committed to for Year 14.**

Year 14	
MS4	
<b>A. Public Education and Outreach</b>	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
	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>	
	B.1 Public Panel
	B.2 Educational Volunteer
X	B.3 Stakeholder Meeting
X	B.4 Public Hearing
X	B.5 Volunteer Monitoring
	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
	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
	C.9 Public Notification
X	C.10 Other Illicit Discharge Controls

Year 14	
MS4	
<b>D. Construction Site Runoff Control</b>	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
	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
	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>	
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

## 1. Public Education and Outreach

The County is committing 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 stormwater runoff. The County commits to implementation of BMPs related to A.1, A.4, A.5 and A.6 as described below.

### **BMP No. A1 – Distributed Educational Materials**

**Brief Description of BMP:** The County makes a variety of stormwater quality or related materials available on the Will County Green website. This information includes recycling events, rain barrel information, Household Hazardous Waste events, and many other examples of educational materials. The County also utilizes other electronic formats such as their E-Blast program to distribute stormwater quality or related information to residents and other interested parties.

**Measurable Goal(s), including frequencies:** The County will continue to provide the residents with stormwater articles or related materials on the County websites and update or add new material at least twice a year or as needed to maintain compliance with the permit conditions.

**Milestones: Years 11-15:** Continue to include stormwater information on County websites and update as new material and/or information becomes available.

### **BMP No. A4 – Community Event**

**Brief Description of BMP:** The County annually hosts an informational booth at the County Fair to provide residents with the opportunity to obtain a variety of information including topics related to stormwater quality and similar issues.

**Measurable Goal(s), including frequencies:** Annually distribute at least 100 pamphlets at the County Fair Informational booth to residents interested in stormwater quality and related issues.

**Milestones: Years 11-15:** Distribute informational pamphlets annually at the County Fair and work to increase distribution by 10% each year.

### **BMP No. A5 – Classroom Education Material**

**Brief Description of BMP:** The County has an educational classroom program where County staff visits schools to provide education on a variety of topics including those relating to stormwater quality or related issues. The County anticipates visiting approximately 50 schools during this permit year with a student population around 5000.

**Measurable Goal(s), including frequencies:** Continue to visit local schools to present stormwater quality and similar issues at least once a month.

**Milestones: Years 11-15:** Continue to perform the classroom educational program and increase the number of schools by 2.5-5% each year or as funding allows.

### **BMP No. A6 – Other Public Education**

**Brief Description of BMP:** The County is actively involved in the use of social media as a means of distributing information and materials. The County operates a Facebook page as well as a Twitter Handle and uses both outlets to disseminate stormwater quality or related materials and/or information.

**Measurable Goal(s), including frequencies:** Continue to operate and maintain the social media sites as a means of disseminating educational materials.

**Milestones: Years 11-15:** Work to increase the number of active users on the social media sites by 5% each year.

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

The County will perform activities and services related to the Public Participation/Involvement minimum control measure. BMPs will be implemented under BMP number B.3, B.4, B.5, and B.7 as described below.

### **BMP No. B.3 – Stakeholder Meeting**

**Brief Description of BMP:** The County has an active and progressive Stormwater Committee that is responsible for a multitude of stormwater management and water quality activities. The Stormwater Committee publicly meets bi-monthly providing the opportunity for interested individuals to learn, inquire or be involved in the County's stormwater management issues. The Stormwater Committee has also funded stormwater quality or related projects in the County.

**Measurable Goal(s), including frequencies:** The County will continue to host and support the Stormwater Management Committee.

**Milestones: Years 11-15:** The County will work to increase the attendance at the Stormwater Management Committee meetings by 5% per year and fund at least one additional project as funding allows.

### **BMP No. B.4 – Public Hearing**

**Brief Description of BMP:** The County partners with the Will/South Cook Soil Water Conservation District to provide input and analysis for development sites throughout the County. Public Hearings are required as a part of the zoning process and occur at least 12 times per year.

**Measurable Goal(s), including frequencies:** Provide a dedicated opportunity for interested residents and individuals give input on stormwater management and related water quality issues.

**Milestones: Years 11-15:** The County will continue to partner with the Will/South Cook Soil and Water Conservation District and provide these public hearings at least 12 times per year.

### **BMP No. B.5 – Volunteer Monitoring**

**Brief Description of BMP:** The County participates in planning groups for specific watersheds within Will County. These groups meet to discuss issues affecting the watershed including preserving, protecting and restoring water quality and other issues relating to stormwater management.

**Measurable Goal(s), including frequencies:** Continue to provide the volunteer monitoring opportunities for protecting, preserving and restoring Will County watersheds.

**Milestones: Years 11-15:** The County will work to increase the participation in the planning groups by 5% each permit year.

### **BMP No. B.7 – Other Public Involvement**

**Brief Description of BMP:** The County organizes specialized collection events that allow citizens to properly dispose of wastes that could potentially be dumped or otherwise disposed of illegally and end up in the municipal separate storm sewer system. These events are held throughout the year and at various locations in the County to provide opportunities for as many residents as possible.

**Measurable Goal(s), including frequencies:** Continue to organize, fund and provide the collection events to reduce or prevent the discharge of illicit material into the municipal separate storm sewer system.

**Milestones: Years 11-15:** The County will work to increase the number of participants/materials collected by 5% each year.

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

The County commits to performing some activities related to the Illicit Discharge Detection and Elimination minimum control. BMPs will be implemented under BMP numbers C.1, C.2, C.3, C.4, C.5, C.6 and C.10 as described below.

**BMP No. C1 – Storm Sewer Map Preparation**

**Brief Description of BMP:** The County has developed a comprehensive stormwater atlas showing the location of all County-owned outfalls and receiving streams in the County.

**Measurable Goal(s), including frequencies:** The County will update the storm sewer atlas to reflect the latest development and any changes in the Urbanized area based on the permit conditions.

**Milestones: Years 11-15:** Update the storm sewer atlas to reflect new development and permit modifications.

**BMP No. C2 – Regulatory Control Program**

**Brief Description of BMP:** The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to detect, investigate and eliminate potential illicit The County will continue to review the Ordinances and update its program as necessary to effectively detect and eliminate illicit discharges in compliance with NPDES requirements.

**Measurable Goal(s), including frequencies:** The County will continue to review the illicit discharge detection and elimination program and the associated Ordinances for compliance with NPDES requirements.

**Milestones: Years 11-15:** The County will review its program and associated Ordinances and revise as needed.

**BMP No. C3 – Detection/Elimination Prioritization Program**

**Brief Description of BMP:** The County has policies and procedures in place to detect and eliminate illicit discharges. Procedures may involve multiple departments and procedures such as tracing can be employed as necessary to identify and eliminate the discharge. Enforcement procedures are utilized on an as-needed basis to obtain compliance.

**Measurable Goal(s), including frequencies:** Inspect storm sewer outfalls, reported complaints and other issues to determine high priority sites or other potential issue and perform investigations as needed to locate and eliminate illicit discharges.

**Milestones: Years 11-15:** Continue inspections and enforce policies and procedures to identify, enforce and eliminate illicit discharge.

**BMP No. C4 – Illicit Discharge Tracing Procedures**

**Brief Description of BMP:** The County conducts the screening of outfalls on an annual basis or as funding allows to evaluate the potential for illicit discharges.

**Measurable Goal(s), including frequencies:** Employ established procedures to inspect storm sewer outfalls, identify potential problems and investigate potential illicit discharges.

**Milestones: Years 11-15:** Continue inspections to identify, trace and enforce illicit discharge regulations to eliminate potential pollution.

**BMP No. C5 – Illicit Source Removal Procedures**

**Brief Description of BMP:** The County will continue the existing program and review the procedures as needed to authorize the removal of illicit discharges from the storm sewer system.

**Measurable Goal(s), including frequencies:** Require disconnection of any illicit discharge source that can be identified through the tracing program.

**Milestones: Years 11-15:** Continue current program and review procedures as needed for updates to authorize the removal of illicit discharges.

## **BMP No. C.6 – Program Evaluation and Assessment**

### **Brief Description of BMP:**

The County regularly assesses their NPDES program on an annual basis to determine the effectiveness of the BMPs selected to meet the specified goals for overall compliance.

### **Measurable Goal(s), including frequencies:**

The goal of this program is to evaluate the appropriateness of the BMPs selected for the NPDES program in meeting the goals necessary to maintain compliance.

**Milestones:**     **Years 11-15:** The County will continue the yearly evaluation of its NPDES program and BMPs selected for effectiveness in meeting the specific measurable goals.

## **BMP No. C.10**

### **Brief Description of BMP:**

The County performs regular monitoring activities of the receiving waters that receive discharges from MS4 outfalls.

### **Measurable Goal(s), including frequencies:**

The goal of this program is to monitor the receiving waters for potential illicit discharges from the MS4.

**Milestones:**     **Years 11-15:** The County will continue to monitor the receiving waters upstream and downstream of the MS4 discharge points.

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

The County will perform activities and services related to the Construction Site Runoff Control minimum control measure. BMPs will be implemented under BMP numbers D.1, D.2, D.4, D.5, and D.6 as described below.

### **BMP No. D1 – Regulatory Control Program**

**Brief Description of BMP:** The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

**Measurable Goal(s), including frequencies:** The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

**Milestones: Year 11-15:** The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

### **BMP No. D2 – Erosion and Sediment Control BMPs**

**Brief Description of BMP:** The County has procedures in place that require the review of Best Management Practices for proposed developments prior to construction. The intent of these procedures is to reduce or prevent the discharge of pollutants from construction sites through the use of effective BMPs.

**Measurable Goal(s), including frequencies:** The County will continue to review, inspect and enforce the ordinance regulations to prevent or reduce the discharge of sediment or other pollutants from construction sites as it relates to BMP's.

**Milestones: Year 11-15:** The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

**BMP No. D4 – Site Plan Review Procedures**

**Brief Description of BMP:** The County has site plan review procedures in place to verify that proposed developments are in compliance with the County Ordinances and regulations related to construction site runoff controls and potential discharge of pollutants. The County has a soil erosion and sediment control checklist that is employed during reviews to verify compliance and consistency in the review process.

**Measurable Goal(s), including frequencies:** The County will continue the site plan review procedures for all developments and will update or modify as needed to maintain compliance with their NPDES permit conditions.

**Milestones: Year 11-15:** The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

**BMP No. D5 – Public Information Handling Procedures**

**Brief Description of BMP:** The County has procedures in place for receiving, logging and addressing reports from residents or other individual regarding the potential release of pollutants or sediment from construction sites.

**Measurable Goal(s), including frequencies:** The County will continue the program to receive, investigate and address publicly reported issues.

**Milestones: Year 11-15:** The County will continue the public reporting program to reduce or eliminate the potential for discharge of pollutants from construction site runoff related issues.

**BMP No. D6 – Site Enforcement/Inspection Procedures**

**Brief Description of BMP:** The County has site inspection and enforcement procedures in place to verify that proposed developments are in compliance with the County Ordinances and regulations related to construction site runoff controls and potential discharge of pollutants. The County has a soil erosion and sediment control checklist that is employed during site inspections to verify compliance and consistency in the inspection process.

**Measurable Goal(s), including frequencies:** The County will continue the site inspection and enforcement policies and procedures for all developments and will update or modify as needed to maintain compliance with their NPDES permit conditions.

**Milestones: Year 11-15:** The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

**5. Post-Construction Runoff Control**

The County will perform activities and services related to the Post-Construction Site Runoff Control minimum control measure. BMPs will be implemented under BMP numbers E.2, E.4, E.5 and E.6 as described below.

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

**Brief Description of BMP:** The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce post construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

**Measurable Goal(s), including frequencies:** The County will continue to review the Ordinances and update its program as necessary to effectively regulate post construction site runoff controls in compliance with NPDES requirements.

**Milestones: Year 11-15:** The County will continue to review the Ordinances and update its program as necessary to effectively regulate post construction site runoff controls in compliance with NPDES requirements.

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

**Brief Description of BMP:** The County has procedures in place that require the review of Best Management Practices for proposed developments prior to construction. The intent of these procedures is to reduce or prevent the discharge of pollutants from construction sites through the use of effective BMPs.

**Measurable Goal(s), including frequencies:** The County will continue to review, inspect and enforce the ordinance regulations to prevent or reduce the discharge of sediment or other pollutants from construction sites as it relates to BMP's.

**Milestones: Year 11-15:** The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

**BMP No. E.5, E.6 – Site Inspections During Construction, Post Construction Inspections**

**Brief Description of BMP:** The County has site inspection procedures in place during and prior to releasing the site after construction to verify that proposed developments are in compliance with the County Ordinances and regulations related to construction site runoff controls and potential discharge of pollutants. The County has a soil erosion and sediment control checklist that is employed during site inspections to verify compliance and consistency in the inspection process.

**Measurable Goal(s), including frequencies:** The County will continue the site inspection and enforcement policies and procedures for all developments during and after construction and will update or modify as needed to maintain compliance with their NPDES permit conditions.

**Milestones: Year 11-15:** The County will continue the current program to review, inspect and enforce existing procedures and ordinances. These will be revised as needed to make sure that the County procedures for review, inspection, and enforcement of stormwater pollution control measures are in continual conformance with the NPDES requirements.

**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 County will perform BMPs under BMP numbers F.1, F.2, F.3, F.4, F.5 and F.6 as described below.

**BMP No. F1 – Employee Training Program**

**Brief Description of BMP:** The County regularly provides training to staff regarding a variety of topics aimed at reducing or preventing the discharge of contaminants from municipal operations. County staff currently includes four Certified Floodplain Managers and one Certified Stormwater Inspector. Both certifications require extensive training and continued educational credits to maintain certification.

**Measurable Goal(s), including frequencies:** Conduct annual employee training to educate staff on prevention and reduction of storm water pollution from municipal activities.

**Milestones: Years 11-15:** The County will continue to review and revise the existing employee training and educational programs as needed.

**BMP No. F2 – Inspection and Maintenance Program**

**Brief Description of BMP:** The County has an inspection and maintenance program that is designed to reduce pollutant runoff from municipal operations through proper maintenance and functionality. The County currently performs cleaning and routine maintenance as needed or based on reports of problem or concerns. This maintenance program will be continued and evaluated on an annual basis to determine its effectiveness in reducing pollutant runoff.

**Measurable Goal(s), including frequencies:** The County will continue the current program and continually review the inspection and maintenance program to determine effectiveness or update as needed based on the permit requirements.

**Milestones: Years 11-15:** The County will continue the current program and continually review the inspection and maintenance program to determine effectiveness.

**BMP No. F3/F4 – Municipal Operations Stormwater Control, Municipal Operation Waste Disposal**

**Brief Description of BMP:** The County currently has many operational policies designed to prevent storm water pollution associated with municipal operations. Road salt is stored on a paved surface and covered to protect it from precipitation. The County stores diesel fuel and gasoline for its vehicles in appropriate tanks with containment measures. Used vehicle oil is stored in a holding tank and periodically hauled away by a waste disposal service. Maintenance and washing of the County vehicles is performed in the County maintenance garage or similar facility. These programs will be evaluated on a regular basis to determine its effectiveness and modified as necessary to meet the requirements of the NPDES program.

**Measurable Goal(s), including frequencies:** The County will continue the current program and review these policies and revise as necessary to maintain compliance with the permit conditions.

**Milestones: Years 11-15:** The County will continue the programs in place and review and revise as necessary.

**BMP No. F5 – Flood Management/Assess Guidelines**

**Brief Description of BMP:** The County and State have strict development regulations related to floodplain management and the evaluation of potential development in these areas. The County also has Certified Floodplain Managers on staff to assist with development issues and other floodplain management concerns.

**Measurable Goal(s), including frequencies:** The County will continue to enforce the requirements for potential development in special flood hazard areas.

**Milestones: Years 11-15:** The County will continue to enforce the ordinances as needed for compliance with development in special flood hazard areas.

**BMP No. F6 – Other Municipal Operations Controls**

**Brief Description of BMP:** The County regularly evaluates their policies and programs for effectiveness and compliance. Currently the program is evaluated and/or updated at least annually or as needed to maintain compliance with permit conditions.

**Measurable Goal(s), including frequencies:** The County will continue the current evaluation program and review these policies and revise as necessary to maintain compliance with the permit conditions.

**Milestones: Years 11-15:** The County will continue the programs in place and review and revise as necessary.

## Part E. Notice of Qualifying Local Program

The Will County Water Resources and Stormwater Management Ordinances and current programs and activities by County staff are considered Qualifying Local Programs (QLPs) that count towards satisfying the requirements of the six minimum control measures. Listed below is a summary of the activities performed by the QLPs during Year 13. In general, all activities performed by the QLPs during Year 13 will be continued in subsequent years.

### 1. Public Education and Outreach

#### **BMP No. A1 – Distributed Educational Material**

**Brief Description of BMP:** The County makes a variety of stormwater quality or related materials available on the Will County Green website. This information includes recycling events, rain barrel information, Household Hazardous Waste events, and many other examples of educational materials. The County also utilizes other electronic formats such as their E-Blast program to distribute stormwater quality or related information to residents and other interested parties.

#### **BMP No. A.3 – Public Service Announcement**

**Brief Description of BMP:** The County unintentionally committed to this BMP in their Notice of Intent. BMP A.2 should have been selected and the correct description and milestones are provided in Part D of this report.

#### **BMP No. A6 – Other Public Education**

**Brief Description of BMP:** The County is actively involved in the use of social media as a means of distributing information and materials. The County operates a Facebook page as well as a Twitter Handle and uses both outlets to disseminate stormwater quality or related materials and/or information.

### 2. Public Participation/Involvement:

#### **BMP No. B.5 – Volunteer Monitoring**

**Brief Description of BMP:** The County organizes planning groups for specific watersheds within Will County. These groups meet to discuss issues affecting the watershed including preserving, protecting and restoring water quality and other issues relating to stormwater management.

#### **BMP No. B7 – Other Public Involvement**

**Brief Description of BMP:** The County organizes specialized collection events that allow citizens to properly dispose of wastes that could potentially be dumped or otherwise disposed of illegally and end up in the municipal separate storm sewer system. These events are held throughout the year and at various locations in the County to provide opportunities for as many residents as possible.

### 3. Illicit Discharge Detection and Elimination:

#### **BMP No. C1 – Storm Sewer Map Preparation**

**Brief Description of BMP:** The County has developed a comprehensive stormwater atlas showing the location of all County-owned outfalls and receiving streams in the County.

#### **BMP No. C2 – Regulatory Control Program**

**Brief Description of BMP:** The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to detect, investigate and eliminate potential illicit discharges. The County will continue to review the Ordinances and update its program as necessary to effectively detect and eliminate illicit discharges in compliance with NPDES requirements.

#### **BMP No. C3 – Detection/Elimination Prioritization Plan**

**Brief Description of BMP:** The County has policies and procedures in place to detect and eliminate illicit discharges. Procedures may involve multiple departments and procedures such as tracing can be employed as

necessary to identify and eliminate the discharge. Enforcement procedures are utilized on an as-needed basis to obtain compliance.

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

##### **BMP No. D1 – Regulatory Control Program**

**Brief Description of BMP:** The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate construction site runoff controls in compliance with NPDES requirements.

##### **BMP No. D4 –Site Plan Review Procedures**

**Brief Description of BMP:** The County has procedures and policies in place that require the review of site plans for compliance with all applicable State and County Ordinances specifically as they relate to soil erosion and sediment control measures and other potential construction related pollutants.

##### **BMP No. D6 – Site Inspection/Enforcement Procedures**

**Brief Description of BMP:** The County has procedures and policies in place for the inspection and enforcement of applicable ordinances for construction sites in the County. These procedures specifically apply to soil erosion and sediment control measures and other potential construction related pollutants. Forms, checklists and other enforcement measures utilized by the County are available upon request.

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

##### **BMP No. E2 – Regulatory Control Program**

**Brief Description of BMP:** The County has prepared, adopted and enforces the Will County Stormwater Management and Water Resources Ordinances. These ordinances provide the regulatory authority for the County to inspect, evaluate and enforce post-construction site runoff control measures. The County will continue to review the Ordinances and update its program as necessary to effectively regulate post-construction site runoff controls in compliance with NPDES requirements.

##### **BMP No. E4 – Pre-Construction Review of BMP Designs**

**Brief Description of BMP:** The County has procedures and policies in place that require the review of site plans for compliance with all applicable State and County Ordinances specifically as they relate to soil erosion and sediment control measures and other potential construction related pollutants.

#### **6. Pollution Prevention/Good Housekeeping:**

##### **BMP No. F1 – Employee Training Program**

**Brief Description of BMP:** The County conducts regular employee training for ways to reduce or prevent the discharge of potential pollutants from municipal operations including proper maintenance of municipal facilities and property, the inspection of stormwater management systems and other areas that may impact stormwater runoff. The County will continue the current employee training and will modify it as needed to meet the requirements of the NPDES program.

##### **BMP No. F2 – Inspection and Maintenance Program**

**Brief Description of BMP:** The County has an inspection and maintenance program that is designed to reduce pollutant runoff from municipal operations by maintaining properly functioning facilities. This maintenance program will be continued and evaluated on an annual basis to determine its effectiveness in reducing pollutant runoff.

