



**Stormwater Management Program Plan for NPDES MS4  
General Permit ILR40**

**City of East Dubuque, IL**

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## **Introduction**

The U.S. Environmental Protection Agency and Illinois Environmental Protection Agency (Illinois EPA) administer a stormwater permit process under the National Pollutant Discharge Elimination System (NPDES) requirements for Small Municipal Separate Storm Sewer Systems, referred to as MS4 communities. These regulatory requirements involve addressing potential sources of stormwater pollutants within a community.

This report serves to summarize strategies and goals for the Stormwater Management Program for the City of East Dubuque (City) to meet requirements of the Illinois EPA's MS4 General NPDES Permit No. ILR40. This plan serves to document Best Management Practices (BMPs) already performed by the City of East Dubuque as well as identify future goals and BMPs to be implemented to strengthen the City's stormwater management program. The report is formatted to mirror the six minimum control measure areas identified by NPDES Permit ILR40 and subareas which are required to be addressed as part of the Notice of Intent (NOI) for coverage that is submitted to the Illinois EPA. For each section, key BMPs are identified, along with measurable goals and a schedule for adopting BMPs that are not already implemented. The Illinois EPA requires submittal of an annual report that reports on the progress on these goals.

The City of East Dubuque is within Dunleith Township in the northwest corner of Jo Daviess County, Illinois. The 2010 census population of East Dubuque was 1,704, and the 2020 census population was 1505. The east side of the City borders on the Mississippi River.

A representative of the Illinois EPA indicated in December 2021 that the City is required to meet requirements and obtain coverage under the MS4 program because Fentress Lake, within the limits of the City of East Dubuque, is designated as impaired. Fentress lake is listed on the Illinois EPA 2020/2022 303(d) list with total suspended solids runoff listed as a cause.

The Illinois EPA website (link below) contains information on the MS4 program including a copy of the current General NPDES Permit for MS4s which provides a complete set of requirements for coverage under General Permit ILR40. This general permit is periodically renewed by the Illinois EPA, and the renewal process typically includes updates to the standard permit conditions. The current version of ILR40 and guidance from the Illinois EPA should be reviewed regularly by users of this Stormwater Management Program documentation to ensure continued compliance.

Illinois EPA MS4 Permit Website:

<https://www2.illinois.gov/epa/topics/forms/water-permits/storm-water/Pages/ms4.aspx>

It is intended that the BMPs, goals, and strategies of this Stormwater Management Plan be regularly reviewed for possible updates as part of the annual report process or as necessitated by other changes.

### **A. Public Education and Outreach**

General NPDES Permit ILR40 requires the City of East Dubuque to distribute educational materials or conduct equivalent outreach activities to educate citizens on steps the public can take to reduce pollutants in stormwater runoff including topics such as effective pollution prevention and green infrastructure strategies.

#### A.1 Distributed Paper Material

1. BMP: Include information about the City's stormwater ordinances and references to the stormwater/pollution prevention section of the City website when building permits are issued. This information will pertain to best practices for preventing pollution due to construction activities and requirements for permitting.
  - a. Measurable goal: Develop and gather informational material to hand out alongside building permits and keep records of what information is provided to permittees.
  - b. Schedule:
    - i. Year 1: Develop/gather materials to hand out along with building permits, begin distributing this material as soon as possible but no later than the end of 2022.
    - ii. Year 2 and following: Continue to hand out information to the public in the manners described above.
2. BMP: Provide publicly available printed material pertaining to stormwater pollution prevention at City Hall for pickup by residents who visit. This will be in handout/brochure format and placed with other informational brochures currently available to residents.
  - a. Measurable goal: Identify relevant informational material available from the Illinois EPA and create physical copies to distribute at City Hall.
  - b. Schedule: Make printed materials available at City Hall by the end of the third quarter of 2022.
3. BMP: Utilize public notice space available on utility bills distributed to residents to include reminders about stormwater pollution prevention by referencing citizens to the City's website page with stormwater management and pollution reduction information once the page is developed.
  - a. Measurable goal: Use utility bills to issue information related to stormwater management at least once annually.
  - b. Schedule:
    - i. Year 1: Notify residents of public information posted on the City's stormwater and pollution prevention web pages after they are created via utility bills by the end of 2022.
    - ii. Year 2 and following: At least once annually, include stormwater and pollution prevention information to residents via utility bill.

#### A.2 Speaking Engagement

The City does not have an established speaking engagement program. The City would make a representative available at any request from community groups for public education presentations on stormwater management and pollution reduction efforts in the City.

#### A.3 Public Service Announcement

1. BMP: Develop an additional webpage or webpages on the City's existing website which will provide information to City residents and the public about the MS4 program and stormwater and pollution-prevention related items. This website will provide links and references to information related to stormwater pollution-prevention, including information specifically aimed at minimizing discharge of pollutant from private property

and activities which discharge into the storm sewer system, as well as "green infrastructure" strategies.

- a. Measurable goal: Develop the new City webpage or webpages with the information outlined above and track the number of visitors to the page(s). Report this information in the City's annual report.
  - b. Schedule:
    - i. Year 1: Create and post additional public information content by the end of the third quarter of 2022.
    - ii. Year 2 and following:
      - At a minimum, review the website page annually in March to determine if any additional public information should be updated or added. Additional reviews and updates may occur as needed at any time.
      - Track and report the number of visitors to stormwater webpages in the annual report.
2. BMP: Post copies of the City-specific MS4 NPDES documents on the newly created webpage. Documentation to be posted to include the Stormwater Management Plan, Notice of Intent (NOI) documents, and current and past annual reports. This website will be updated as these documents are created, updated, or revised.
- a. Schedule:
    - i. Year 1: Post the initial NPDES documentation and basic MS4 program information by the end of July 2022.
    - ii. Year 2 and following: Post the current NOIs and annual reports each year on the website as they are developed.

#### A.4 Community Event

1. BMP: The City will host an information table at an annual City event (such as during Memorial Day festivities that bring many residents and visitors to the downtown) to raise awareness of stormwater pollution issues. The specific event or events and method of distribution will be determined by City officials each year based on effectiveness.
  - a. Measurable goal: Distribute stormwater pollution prevention information at one City event annually and note this in the annual report.
  - b. Schedule:
    - i. Year 1 and following: Host a stormwater pollution prevention information table at a City event identified by City staff.

#### A.5 Classroom Education Material

The City does not provide specific educational material related to stormwater management to schools at this time. The City would make information available or make a representative available to participate in presentations to students about stormwater topics if requested.

#### A.6 Other Public Education

No additional specific BMPs or goals have been identified at this time.

## **B. Public Participation/Involvement**

Per the General NPDES Permit ILR40 requirements, the City shall provide a minimum of at least one annual public meeting for the public to provide input on the adequacy of the City's MS4 Program. This requirement can be met as part of a regular City council meeting or can be a separate meeting.

#### B.1 Public Panel

The City does not currently host a public panel on a stormwater requirements.

#### B.2 Educational Volunteer

The City does not have a dedicated Educational Volunteer at this time; however, an appropriate City representative will be made available as needed when educational outreach opportunities arise.

#### B.3 Stakeholder Meeting

The City does not currently hold any specific stakeholder meetings. However, the City's regular council meetings are open to the public and include a public comment period where residents can comment on items even if they are not on the agenda, which provide an opportunity for public comment at any time. City staff are also willing to meet with any groups/stakeholders which would like to request a meeting about stormwater related topics.

#### B.4 Public Hearing

1. BMP: Discuss the City's MS4 program, including progress towards measurable goals, necessary revisions, and summary of annual reporting, at a City council meeting at least once per year.
2. BMP: Continue to allow public attendance at City council meetings and to livestream City council meetings. Each council meeting throughout the year includes an opportunity for public comment where residents could choose to raise any stormwater concerns. Provide a specific opportunity for public comment on the MS4 program at the annual council meeting when the MS4 program is discussed.
  - a. Measurable goal: Include discussing progress, necessary updates, and annual reporting on the MS4 program with an opportunity for public comment on the agenda of a City council meeting at least once annually. Provide proper public notice of this meeting per standard state requirements, as well as posting about the agenda item and the intent to discuss the MS4 program on the City's Facebook page to raise additional public awareness.
  - b. Schedule:
    - i. Year 1 and following: Include discussion of the City's MS4 Program on the agenda for at least one City council meeting, typically expected to be in April or May each year.

#### B.5 Volunteer Monitoring

1. BMP: The City will include a note on their webpage informing residents that stormwater pollution issues they observe can be reported to the City to be formally addressed. This notice will remind residents that prompt reporting is important to preventing or minimizing pollution. Contact information for City Hall will be provided and reports received will be routed to the appropriate City official for a response.
  - a. Measurable goal: Keep a record of all comments/reports received as well as responses or actions taken and include them in the City's annual report.
  - b. Schedule:

- i. Year 1: Include the contact information and statement noted above on the web pages being created to host stormwater information by the end of July 2022.
- ii. Year 2 and following: Monitor and document all stormwater comments directed to the City.

#### B.6 Program Involvement

1. BMP: The City holds an annual "cleanup day" (typically in May on Mother's Day weekend) to collect non-hazardous household materials. The City works with local area waste disposal companies to handle the disposal of all collected items.
  - a. Measurable goal: Continue to hold the City Cleanup Day annually.
  - b. Schedule:
    - i. Year 1: Host the annual City Cleanup Day in May 2023.
    - ii. Year 2 and following: Host the annual City Cleanup Day in May.
2. BMP: The City will investigate the feasibility of creating a program for collection and disposal of selected hazardous household wastes (paint, oil, etc). This service would need to be arranged in conjunction with local commercial facilities that can appropriately handle the waste, and therefore the availability and feasibility of providing such an opportunity to the public will need to be evaluated.
  - a. Measurable goal: Before June of 2023, City personnel will investigate possible partnerships with commercial facilities, the associated costs, and therefore the resulting feasibility of creating a program for collection and disposal of hazardous household wastes.
  - b. Schedule:
    - i. Year 1: City personnel will investigate the items outlined above to determine the feasibility of creating a program.

#### B.7 Other Public Involvement

1. BMP: Work towards ensuring environmental justice by promoting events and information in ways accessible to all segments of the public.
  - a. Measurable goal: When providing information related to the MS4 program in a physical space, supplement distribution by also releasing the information through easily circulated, public methods – such as mailers, Facebook page posts, or utility bill messages.
  - b. Schedule:
    - i. Year 1 and following: Ongoing distribution of information through accessible means as noted.

### C. Illicit Discharge Detection and Elimination

The City utilizes various methods to detect and address potential illicit discharges into the stormwater system and waterways within East Dubuque. This includes appropriate record keeping and mapping of the storm sewer network using GIS tools, ordinances, and best practices for maintenance of City-maintained infrastructure.

#### C.1 Sewer Map Preparation

The City is currently implementing and updating a GIS program to document City utility infrastructure, including the storm sewer system, using technology provided by Subsurface

Solutions. The system provides an interactive map system for use by City employees to provide quick identification of infrastructure when required. The City has also previously produced overview maps of the City storm sewer network that are available for reference and are being updated by the GIS program implementation.

1. BMP: Continue to collect information including the location and condition of existing storm sewer and drainage infrastructure with a handheld field data collector and store the information on an accessible GIS server with Subsurface Solutions.
  - a. Measurable goal: Work towards mapping and storing existing City storm sewer location information in a GIS map and database format with Subsurface Solutions.
  - b. Schedule:
    - i. Year 1 and following: Data collection and updates to GIS and mapping to take place continuously until complete.
    - ii. Year 1 and following: Collect locations of newly constructed drainage infrastructure to be maintained by the City within 3 months of construction project completion.
2. BMP: Update the mapping for the storm sewer network on a continuous basis as construction projects involving drainage are completed and based on the results of field inspections of existing assets. Mapping should show the location of all outfalls as well as the names of all waters that receive discharges from those outfalls.
  - a. Measurable goal: Produce an updated map of the storm sewer system annually and include this map in the City's annual report and in other relevant locations.
  - b. Schedule:
    - i. Year 1: Include current copy of the City's sewer maps with this plan.
    - ii. Years 2 and following: Create updated copies of the City's sewer maps annually in the first quarter of the year (January-March) for use in annual reporting.

## C.2 Regulatory Control Program

The City prohibits polluting water and dumping of miscellaneous waste and declares them as unlawful nuisances in Title 5, Chapter 1, Section 5-1-1 of the City Code of Ordinances. The City has the right to institute proceedings as enforcement actions for nuisance violations.

The City also maintains requirements for new developments, including for construction of new storm and sanitary utilities, to avoid contamination of stormwater as part of Title 17 of the City Code of Ordinances

1. BMP: Review City ordinances related to illegal disposal of wastes and illicit discharges for possible updates.
  - c. Measurable Goal: The City will identify a work group as appropriate to review existing ordinances for possible modifications to strengthen prohibitions against non-stormwater discharges and enforcement actions.
  - a. Schedule:
    - i. Year 1: Identify a working group to review current ordinances to identify possible modifications related to stormwater and illicit discharge requirements.
    - ii. Year 2 and following: Work to implement any ordinance modifications identified.



### C.3 Detection/Elimination Prioritization Plan

The City conducts periodic inspections of storm sewer infrastructure and outfalls to ensure they are functioning properly and to note any potential issues with illicit discharges. At the time of the creation of this plan in 2022, the City is in the process of procuring a new jetter/vacuum truck which will assist the City with these inspections. The new truck includes a camera that will be used to view the condition of storm sewer infrastructure and which can be used for better identification of illegal hook-ups or illicit discharges.

1. BMP: Conduct periodic dry weather inspections of storm sewer outfalls to identify any signs of illicit discharges or illegal dumping. Priority should be given to major outfalls and those with the greatest potential for non-stormwater discharges, and these should be inspected on an annual basis.
2. BMP: Once received, the City will use the sewer jetter/vacuum truck to clean storm structures on a regular basis according to a maintenance plan to be established by the City's Public Works Department staff.
  - a. Measurable goal: Follow the City's maintenance plan to inspect storm structures for illicit discharges, clean storm structures, and complete all relevant documentation including records of inspections.
  - b. Schedule:
    - i. Year 1:
      - Conduct annual inspection of the high priority stormwater outfalls to review for any illicit discharges and determine any corrective measures which may be needed by November 2022.
      - Document the City's current practices as a plan for regular inspection, maintenance and cleaning of stormwater structures and review any updated procedures in conjunction with delivery of the new vacuum truck. Complete this plan by May 2023.
    - ii. Year 2 and following:
      - Implement the City's maintenance and cleaning plan for stormwater structures.
      - At a minimum, conduct annual inspection of the high priority stormwater outfalls to review for any illicit discharges and determine any corrective measures which may be needed. Inspect additional stormwater infrastructure as regularly as possible.

### C.4 Illicit Discharge Tracing Procedures

1. BMP: When illicit discharges or contamination are discovered, City forces will trace the source upstream and downstream through the drainage network to identify the source and contain the spread of the contaminant.
2. BMP: When necessary, camera storm sewer system to help trace illicit discharges.
  - a. Measurable goal: Document activities related to illicit discharge events, tracing activities, and resulting actions taken.
  - b. Schedule:
    - i. Year 1 and following: Track and trace illicit discharges identified and record the corrective actions taken on an ongoing basis.

### C.5 Illicit Source Removal Procedures

1. BMP: A sewer jetter/vacuum truck will be used to remove contaminants from the storm sewer system when identified.
  - a. Measurable goal: When illicit sources are identified in the storm sewer network, deploy City forces to outfall locations to contain and remove contamination. Take appropriate action to eliminate the source.
  - b. Schedule:
    - i. Year 1 and following: Take effective action to remove contaminants from the stormwater system as they are identified on an ongoing basis.

#### C.6 Program Evaluation and Assessment

1. BMP: The City will review the Stormwater Management Program at least once annually, as further described under section B.4.
  - a. Measurable goal: City staff should review the Stormwater Management Plan and associated documentation, including specific goals for elimination of illicit discharges, and discuss progress, necessary updates, and annual reporting on the MS4 program at a City council meeting at least once annually.
  - b. Schedule:
    - i. Year 1 and following: Discuss the MS4 program at an annual City council meeting in April or May.
2. BMP: Should revisions to the Stormwater Management Program be needed, the City will determine required changes following the annual plan review prior to the submission of their annual report.
  - a. Measurable goal: Make updates to the MS4 program as warranted throughout the year and resulting from the annual review and include these updates along with the City's annual report.
  - b. Schedule:
    - i. Year 1 and following: Update the City's Stormwater Management Program and include such updates in the submission of the City's annual report in May.

#### C.7 Visual Dry Weather Screening

1. The City will make annual dry weather inspections of outfalls, as further described in section C.3. All high priority outfalls will be reviewed annually, and as much of the remaining system as is feasible will be reviewed based on the City's plan for inspections.
  - a. Measurable goal: Document dry weather inspections of outfalls as described above in C.3.
  - b. Schedule:
    - i. Year 1 and following: Visually inspect outfalls and document the results of the inspections by November of each year.

#### C.8 Pollutant Field Testing

The City does not currently have a pollutant field testing program.

#### C.9 Public Notification

Refer to Sections A and B of this report for a summary of public notification and involvement strategies for the overall program that the City uses to inform residents of potential impacts of illicit discharges and methods for reporting illicit discharges and other stormwater concerns.

#### C.10 Other Illicit Discharge Controls

No other specific illicit discharge controls have been identified at this time.

### **D. Construction Site Runoff Control**

The City of East Dubuque follows State of Illinois requirements for construction project sites with respect to stormwater management and NPDES permit requirements. City Code of Ordinances Title 17, Chapter 2 contains detailed requirements for both during-construction and post-construction stormwater management, including structural controls, permitting, and inspections as further summarized below.

Building permits are required for certain construction activities within the City undertaken by private entities and therefore the requirements of the ordinances are administered through this permit program. The City and/or its designated engineering consultants plan for construction site runoff controls when developing plans for City improvement projects.

#### D.1 Regulatory Control Program

1. BMP: City Code of Ordinances Title 17 contains detailed requirements for the regulation of construction site stormwater controls within the City based upon project size. Construction projects within the City are required to follow Illinois EPA requirements for obtaining coverage under General NPDES Permit No. ILR10 if the disturbed area for construction is equal to or greater than 1 acre. Projects undertaken by private entities are required to file the appropriate notices for coverage under Permit No. IRL10. Copies of these same forms are required to be submitted to the City for review. The City files the appropriate notices to obtain coverage for its own projects when required based on the disturbed area for each project.
  - a. Measurable Goal: Continue to track and review projects as required by the current City Code regarding construction site stormwater activities to ensure that projects submit the appropriate documentation of coverage under ILR10 to the City when applicable.
  - b. Schedule:
    - i. Year 1 and following: Continue to require submittals in accordance with stormwater ordinances.

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

1. BMP: Distribute printed materials to applicants who request a building permit application to provide them additional guidance and information on construction site erosion control BMPs and the requirements of City Ordinances.
  - a. Measurable goal: The building permit forms and/or attachments to information provided to applicants will be reviewed and updated to include additional guidance information on required construction stormwater management and permitting requirements.
  - b. Schedule:
    - i. Year 1: Complete review and updates to building permit form or additional attached information by April 2023.
2. BMP: Require use of erosion and sediment controls on City construction projects to prevent erosion where anticipated, as required by City Ordinances. Include review of erosion and sediment control in standard procedure for plans being approved by the City.

- a. Measurable goal: City officials or qualified consultant staff hired by the City will review project plans for possible erosion concerns, and comment as necessary to ensure erosion and sediment control concerns are addressed through structural controls.
- b. Schedule:
  - i. Year 1 and following: Review plans as they are developed to ensure erosion and sediment control are not overlooked on City projects.

#### D.3 Other Waste Control Program

Currently the City does not have other specific programs beyond the noted City Ordinance requirements.

#### D.4 Site Plan Review Procedures

1. BMP: The City or designated representative reviews building permit applications. For projects of sufficient complexity (which typically includes anything disturbing over 1 acre and therefore requiring coverage under general permit ILR10) consultant staff from an engineering firm hired by the City to be its representative will review site plans and building permit applications.
  - a. Measurable goal: Track status of building permit reviews and site plan reviews for proposed construction projects within the City, including specifically noting whether construction site stormwater controls are included in the plan.
  - b. Schedule:
    - i. Year 1: Develop a checklist for plan review by City officials or other designated reviewers to be used during the review of building permit applications that require submittal of erosion and sediment control designs.
    - ii. Year 1 and following: Track the status of building permit reviews and site plan reviews for proposed construction projects within the City as needed.

#### D.5 Public Information Handling Procedures

1. BMP: The City website page to be developed for stormwater information will include information on how residents can contact City personnel to submit comments or report issues related to active construction site stormwater pollution.
  - a. Measurable goal: Update the website to provide contact information and provide an area for posting of NOIs to allow them to be added when received.
  - b. Schedule:
    - i. Year 1: Update the City website with the noted information by the end of the third quarter of 2022.
2. BMP: Post any copies of construction site stormwater NOIs submitted to the City on the City stormwater webpage for public information.
  - a. Measurable goal: Keep a record of any comments or reports received as well as any action taken to address the comments and report them annually as described in section B.5.
  - b. Schedule:
    - iii. Year 1 and following: Document records of public comments/reports with the City's annual report.

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

Existing City Ordinances (17-2-29) include provisions giving City representatives authority to inspect construction projects that are permitted through the City on a reasonable basis. City projects that disturb more than 1 acre and therefore require coverage for construction stormwater permitting under ILR10 typically result in the City retaining staff or hiring outside consultant staff who provide construction inspection and oversight including of stormwater structural controls.

1. BMP: Continue to comply with the requirements of City Ordinances regarding inspection and oversight of construction projects.
  - a. Measurable goal: Develop a centralized record keeping system for inspections performed and any resulting enforcement actions.
  - b. Schedule:
    - i. Year 1: Develop a system for centralized record keeping of inspections performed by the end of 2022.
    - ii. Year 2 and following: Continue to maintain records of inspections performed.

#### D.7 Other Construction Site Runoff Controls

No other specific site runoff controls have been identified at this time.

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

Post-construction runoff control practices are intended to address water quality and runoff volume after construction and full establishment of permanent erosion control measures has occurred. This process includes ensuring proper stormwater runoff controls are included in the project design as proposed projects are reviewed and approved by the City.

The City's current stormwater ordinances regarding post-construction stormwater management for projects that disturb greater than 1 acre are addressed within the City Code of Ordinances, Title 17. Building permits are required for certain construction activities within the City undertaken by private entities and therefore the requirements of the ordinances are administered through this permit program. The City and/or its designated engineering consultants plan for construction site runoff controls when developing plans for City improvement projects.

#### E.1 Community Control Strategy

At this time, the City does not have any specific community control strategies identified beyond the strategies discussed below under other sections of this control measure.

#### E.2 Regulatory Control Program

The City Code of Ordinances, Title 17 requires that for any development having one or more acres of land disturbance, a Stormwater Management Plan detailed in concept how runoff and associated water quality impacts resulting from the development will be controlled or managed. This plan must be prepared by a licensed professional engineer.

1. BMP: Continue to follow the requirements of the City Code of Ordinances, Title 17 requiring stormwater management plans for all developments with one or more acres of land to ensure control of stormwater volume and water quality of post-construction runoff is addressed.

- a. Measurable Goal: Continue to track and review projects as required by the current City Code regarding stormwater management plans for applicable size developments.
- b. Schedule:
  - i. Year 1 and following: Continue to require submittals in accordance with stormwater ordinances.

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

The City Code of Ordinances, Title 17-2-20 requires that projects greater than 1 acre have an enforceable operation and maintenance agreement for stormwater treatment practices to be implemented to ensure the systems installed functions as designed.

- 1. BMP: Continue to follow the requirements of the City of Ordinances, Title 17 requiring operation and maintenance agreements for all developments with one or more acres of land.
  - a. Measurable Goal: Continue to track and review projects as required by the current City Code regarding stormwater management plans and specifically O&M procedures for applicable size developments.
  - b. Schedule:
    - i. Year 1 and following: Continue to require submittals and appropriate O&M agreements in accordance with stormwater ordinances.

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

The City Code of Ordinances, Title 17 requires that for any development having one or more acres of land disturbance, a Stormwater Management Plan detailed in concept how runoff and associated water quality impacts resulting from the development will be controlled or managed. This plan must be prepared by a licensed professional engineer.

As the City does not currently have an engineer as part of the full-time staff, typically the services of a consulting engineer are retained to assist with reviews of projects that are large enough (over 1 acre of disturbance area) to trigger the requirements of the Title 17 ordinances.

- 1. BMP: Continue to follow the requirements of the City of Ordinances, Title 17 requiring stormwater management plans for all developments with one or more acres of land to ensure control of stormwater volume and water quality of post-construction runoff is addressed.
  - a. Measurable Goal: Continue to track and review projects as required by the current City Code regarding stormwater management plans for applicable size developments.
  - b. Schedule:
    - i. Year 1 and following: Continue to require submittals in accordance with stormwater ordinances.

### E.5 Site Inspections During Construction

Existing City Ordinances (17-2-29) include provisions giving City representatives authority to inspect construction projects that are permitted through the City on a reasonable basis. City projects that disturb more than 1 acre and therefore require coverage for construction stormwater permitting under ILR10 typically result in the City retaining staff or hiring outside consultant staff who provide construction inspection and oversight including of stormwater structural controls.

1. BMP: Continue to require compliance with the requirements of City Ordinances regarding inspection and oversight of construction projects.
  - a. Measurable goal: Develop a centralized record keeping system for inspections performed and any resulting enforcement actions.
  - b. Schedule:
    - i. Year 1: Develop a system for centralized record keeping of inspections performed by the end of 2022.
    - ii. Year 2 and following: Continue to maintain records of inspections performed.

#### E.6 Post-Construction Inspections

For projects that require coverage under construction site stormwater permit ILR10, completion of the notice of termination is required by the Illinois EPA. As part of the City Code of Ordinances Title 17, the City reserves the right to conduct a post-construction inspection as well to verify devices were installed and are functional. These inspections may include evaluating the conditions

1. BMP: Continue to require compliance with the requirements of City Ordinances regarding inspection and oversight of projects that involve stormwater best management practices.
  - a. Measurable goal: Develop a centralized record keeping system for inspections performed and any resulting enforcement actions.
  - b. Schedule:
    - i. Year 1: Develop a system for centralized record keeping of inspections performed by the end of 2022.
    - ii. Year 2 and following: Continue to maintain records of inspections performed.

#### E.7 Other Post-Construction Runoff Controls

1. BMP: Developing erosion control problems in the community will be documented by City crews during routine stormwater infrastructure inspections/maintenance. Appropriate action will be taken to correct these issues.
  - a. Measurable goal: Take photographs of erosion control problems observed in the field. Document these problems and pursue reparative action as applicable. If an erosion issue cannot be corrected immediately, document a plan to handle it in the future. Include a summary of erosion control problems encountered in the City's annual report.
  - b. Schedule
    - i. Year 1 and following: Document and address erosion control problems as they occur.

### **F. Pollution Prevention/Good Housekeeping**

#### F.1 Employee Training Program

1. BMP: Conduct an annual training meeting for relevant City employees to review the commitments made in this plan, how their daily operations can contribute to meeting the state goals, and why plan compliance is important to the community.
  - a. Measurable goal: Track attendance at this meeting and include this information in the City's annual report.
  - b. Schedule:
    - i. Years 1-5: Hold an annual training meeting each year.

#### F.2 Inspection and Maintenance Program

1. BMP: City vehicles are regularly assessed for maintenance needs and inspected for fluid leaks.
  - a. Measurable goal: Inspect and document condition and needed repairs for all City vehicles at least once annually.
  - b. Schedule
    - i. Year 1 and following: Document condition of all City vehicles in December.
2. BMP: When conducting inspections on drainage facilities, City forces will assess for erosion problems (as further described in E.7) and aging stenciling.
  - a. Measurable goal: Inspect and document condition of stenciling on City drainage structures on an annual basis, flag structures needing stenciling retouching in the GIS mapping metadata described previously in C.1.
  - b. Schedule:
    - i. Year 1 and following: Assess condition of storm drains in conjunction with other stormwater inspections performed annually.

#### F.3 Municipal Operations Stormwater Control

1. BMP: Salt purchased for winter road maintenance is stored in a salt shed.
  - a. Measurable goal: Continue to responsibly store salt in an enclosure.
  - b. Schedule:
    - i. Year 1 and following: Store road salt in a covered enclosure at all times.
2. BMP: The City does not use or maintain a store of pesticides or herbicides.
3. BMP: Street sweeping is performed twice a week in business areas and once a week in residential areas when there is not snow present to prevent suspended solids and salt from entering storm sewer network.
  - a. Measurable goal: Continue to perform street sweeping at the current rate.
  - b. Schedule:
    - i. Year 1 and following: Perform street sweeping during the appropriate seasons where such operations can occur.

#### F.4 Municipal Operations Waste Disposal

1. BMP: Vehicle maintenance and washing is done indoors, with waste collected in a triple basin that drains to sanitary. This basin is cleaned annually.
2. BMP: Oil-dri material is maintained at maintenance sites in case of vehicle spills
  - a. Measurable goal and Schedule: Develop a checklist for maintenance areas that helps ensure facility BMPs are in good working order for the coming year by the end of 2022.
  - b. Measurable goal: conduct annual inspection of maintenance facilities to ensure these BMPs are maintained.
    - i. Schedule for Year 1 and following: Each year in December, use the checklist noted above to conduct an audit of maintenance facility status.

#### F.5 Flood Management/Assess Guidelines

1. BMP: The City and the US Army Corp of Engineers conduct regular inspections of the Mississippi River flood levees.



- a. Measurable goal: Document findings that require action found during levee inspections and create an action plan for addressing them.
- b. Schedule:
  - i. Year 1 and following: Continue conducting inspections as recommended/required by the US Army Corp of Engineers.

#### F.6 Other Municipal Operations Controls

- 1. BMP: A barrier is constructed around fuel tanks located at the City's maintenance facility to provide secondary containment in case of a spill.
  - a. Measurable goal: Document any damage or leaks that occur at the fuel tanks so repairs can be made.
  - b. Schedule:
    - i. Year 1 and following: Perform continual visual monitoring of the fuel tank facilities throughout the year.

## **Appendix**

### **Stormwater Management Website Content**

Information to be posted on the City's stormwater management webpage or webpages to be developed in 2022 and maintained going forward will include:

- A. The current Notice of Intent for MS4 Permit Coverage
- B. A link to the current Illinois EPA Website with full MS4 NPDES General Permit information:  
<https://www2.illinois.gov/epa/topics/forms/water-permits/storm-water/Pages/ms4.aspx>
- C. This Stormwater Management Program Document.
- D. Annual Reports submitted to the Illinois EPA as they are developed.
- E. Contact information for a City official to allow for residents to ask questions about the stormwater management program or to call to report a problem or concerns.
- F. Copies of any educational fliers or other informational brochures developed by the EPA, Illinois EPA, and/or the City and provided to the public.
- G. Links to relevant educational materials.
- H. A method for tracking the number of visits to the specific City webpages related to stormwater management.
- I. Other items as identified.

## **Calendar of Activities to be Completed Annually**

### Annual Tasks with No Specific Timeframe

1. Refresh or install storm drain stenciling/markings based on determined needs through either City forces or with public participation.
2. Monitor and document all stormwater comments directed to the City via a log system.
3. Implement the City's maintenance and cleaning plan for stormwater structures. At a minimum, conduct annual inspection of the high priority stormwater outfalls to review for any illicit discharges and determine any corrective measures which may be needed. Inspect additional stormwater infrastructure as regularly as possible.
4. Keep records of any of the following as received to include in the annual report. Record the information received and any resolutions/actions taken:
  - i. Track and trace illicit discharges identified and record the corrective actions taken on an ongoing basis.
  - ii. Building Permits received and status of reviews for construction site stormwater management and post-construction stormwater management requirements.
  - iii. Site inspections performed by City or designated representative staff related to construction site stormwater management and post-construction stormwater management requirements.
5. Provide training on Stormwater Management/Pollution Prevention topics to City staff, especially items relevant to City operations (See Section F)
6. Annual inspection/maintenance of relevant components of municipal operation BMPs such as waste disposal items, visual monitoring of fuel tank facilities, spill response materials, etc. (See Section F)

### January

1. In the first quarter of the year, review and update if needed any copies of the City's sewer maps that are outside of the GIS system for use in annual reporting.

### February

1. If not completed within the prior 12 months, include in utility bill messaging a short notice directing residents in one of the first quarter utility bills reminding them of stormwater and pollution prevention information on the City website.
2. Identify a public event at which City staff or volunteers can host a stormwater pollution prevention information table (at least once annually). Anticipated that this would typically occur in May at Memorial Day events.

### March

1. Review the website to determine if any public information content should be updated or added if not already done within the last year.

### April

1. Prepare Annual Report. Report Content should summarize items from March of the previous year to March of the current year. Consider if any revisions to the Stormwater Management Program Plan are warranted at the same time.
2. Discuss MS4 Program and Annual report at City Council Meeting with an opportunity for public comment and discussion in either April or May.

### May

1. Submit Annual Report to Illinois EPA before June 1<sup>st</sup>.

2. Post the updated Annual Report (and updated NOIs, Stormwater Management Plan, or other documents if relevant) to the Stormwater Management webpage.
3. Host annual City Cleanup Day.

#### October

1. Verify that all annual inspections, such as visual dry-weather inspection of high priority outfalls (See C.7) or inspections of City operations and maintenance items, have occurred. If any remain, schedule for completion while the weather still allows and before the end of November.

### **Calendar or Items to be Completed in First 5 Years of Plan:**

This list is intended to summarize items noted within the plan above that are annual, ongoing tasks. Please refer to the additional task list for items that are to be performed on an annual basis.

#### Year 1 (Through June 1, 2023)

1. Website tasks:
  - a. Develop webpage(s) on City website to post basic MS4 NPDES documentation (copy of this report, NOI, etc.) in July 2022.
  - b. Include the contact information for a City official for reporting violations or issues on web pages being created (Refer to B.5) in July 2022.
  - c. Create and post additional public information content on the Stormwater Management webpage(s) by the end of the third quarter of 2022.
2. Make printed educational materials available at City Hall by the end of the third quarter of 2022.
3. Building Permit Related:
  - a. Review current City Building Permit application forms and update with additional information and/or handouts to be provided to applicants that with requirements for Construction Site Stormwater Management devices and permitting. (See A.1 and D.4)
  - b. Develop a checklist for plan review by City officials or other designated reviewers to be used during the review of building permit applications that require submittal of erosion and sediment control designs.
4. Notify residents of public information posted on the City's stormwater and pollution prevention web pages after they are created, no later than in October of 2022. This can occur through utility bill notices, social media posts, and other means.
5. Conduct field work to determine conditions of existing storm drain stenciling and determine what markings need to be refreshed or installed by the end of the first quarter of 2023.
6. Establish procedures for household waste collection and disposal and begin taking drop-offs from residents by the end of the first quarter of 2023 (See B.6).
7. Illicit Discharge Detection and Elimination tasks (See Section C).
  - a. Identify a working group to review current ordinances to identify possible modifications related to stormwater and illicit discharge requirements.
  - b. Conduct annual inspection of the high priority stormwater outfalls to review for any illicit discharges and determine any corrective measures which may be needed by November 2022.
  - c. Document the City's current practices as a plan for regular inspection, maintenance and cleaning of stormwater structures and review any updated procedures in conjunction with delivery of the new vacuum truck. Complete this plan by May 2023.

8. Record keeping; Develop or gather from available sources specific forms and systems to track and document the following items:
  - a. Inspection forms for:
    - i. Annual Dry Weather Visual Screening of Outfalls (See C.7)
    - ii. Site inspections of both construction site stormwater management and post-construction stormwater management (See Section D and E)
    - iii. Annual inspection/maintenance of relevant components of municipal operation BMPs such as waste disposal items, visual monitoring of fuel tank facilities, spill response materials, etc. (See Section F)
  - b. A system for logging records on an annual basis of any issues or complaints related to stormwater quality concerns and the follow-up or resolutions to those issues. (See B.5, D.5).
  - c. A log to track the status of any building permits/site plan reviews, specifically with regards to the completion of plan/permit reviews for construction site stormwater management and post-construction stormwater management requirements.
  - d. A log to track site inspections for construction site stormwater management and post-construction stormwater management.

Year 2 and following:

1. Work towards mapping and storing existing City storm sewer location information in map format with Subsurface Solutions, to take place continuously until complete, before the end of year 5. (See C.1)
2. Collect locations of newly constructed drainage infrastructure to be maintained by the City within 3 months of construction project completion.
3. Ensure appropriate Construction Site Erosion Control and Stormwater Management Plan requirements of City Ordinances are enforced, including reviewing these plans using checklists where applicable.