

**Preamble to Notice of Intent for Renewal of General Permit
Lake County, Illinois
Countywide Approach and Drainage Overview:
SMC as a Qualifying Local Program**

Countywide Approach

The Lake County Stormwater Management Commission (SMC) is a countywide governmental agency created by county ordinance under the authority of Illinois Revised Statute 55/5-1062. SMC's goals include the reduction of flood damage and water quality degradation and assurance that new development addresses nonpoint source pollution, does not increase flood and drainage hazards to others or create unstable conditions susceptible to erosion. To accomplish this, the SMC works cooperatively with individuals, groups, and units of government as well as serving as the corporate enforcement authority for the Lake County Watershed Development Ordinance. Certified communities are also required participants in the enforcement of the Watershed Development Ordinance. SMC utilizes technical assistance, educational programs and watershed planning to increase public awareness of natural resources and the impacts of urbanization on stormwater quality. In addition, SMC provides solutions to problems related to stormwater and identifies better ways of managing natural resources.

SMC assisted small MS4s in the development and establishment of an efficient and effective program to meet the requirements of the Illinois NPDES Phase II program via a countywide approach under the original 5-year NOI period. SMC has been implementing a comprehensive, countywide stormwater program for 11 years, which provided services under four of the six Minimum Control Measures at the issuance of the original NOI. In 2002, SMC formed an Ad Hoc Municipal Advisory Committee (MAC) specifically to advise MS4s on the NPDES Phase II Permit program. The MAC is comprised of municipal, township, drainage district, consultant and county representatives. SMC is advising and assisting the MS4s in preparing their NOIs, but will not be a permittee as it does not own or operate any sewer systems.

SMC has sponsored informational workshops and roundtable discussions and formed the Municipal Advisory Committee (MAC) to receive input on how SMC can best assist local governments during the permit application process and implementation period. Through these discussions, it was decided that each municipality (or small MS4) will submit its own "Notice of Intent" (NOI) to be covered under IEPA's statewide general permit; however, using the countywide approach municipalities may take credit for the programs and ordinances developed by SMC as well as tailor specific local BMP programs for compliance with the Phase II rules.

As part of the countywide approach to comply with the NPDES Phase II program, SMC has already provided the following assistance to municipalities at no additional cost:

- Supported NPDES II presentations to local boards,
- Developed model Notice of Intent (NOI),
- Provided countywide receiving streams map,
- Developed specific BMP Measurable Goals and program development tasks for Years 1 through 5,
- Served as clearinghouse for all support information and acts as a liaison to IEPA and USEPA,
- Supported the Municipal Advisory Committee (MAC),
- Drafted models of the Annual Performance Reports and specific BMP Measurable Goals for Years 1 through 5,
- Provided model Illicit Discharge Ordinance language and a Lake County Guidance Manual for Illicit Discharge Detection and Elimination (IDDE),
- Developed training workshops for municipal employees regarding IDDE program development, good house keeping, Managing Snow and Ice Operations to Protect Water Quality, and
- Continued to enforce and amend the Lake County Watershed Development Ordinance (WDO).

The original NOI identified various existing SMC countywide services that qualify for credit under four of the six Minimum Control Measures. These services include:

- A. **Public Education and Outreach:** SMC provides, through its Public Information Coordinator, various training workshops, homeowners workshops, brochures, training manuals, videos, etc., which qualify for credit.
- B. **Public Participation and Involvement:** SMC coordinates and participates in public meetings and committees, including the Municipal Advisory Committee (MAC), SMC Board of Commissioners, Technical Advisory Committee (TAC), citizen watershed planning committees, Watershed Management Board (WMB), and volunteer support.
- D. **Construction Site Runoff Control:** SMC adopted the countywide Watershed Development Ordinance in 1992, which establishes the minimum stormwater management requirements for development in Lake County. The WDO, which is enforced by SMC as well as by certified communities in the county, establishes standards for construction site runoff control.
- E. **Post-Construction Runoff Control:** The Watershed Development Ordinance also establishes standards for post-construction runoff control.

The MAC approach left the bulk of the remaining two Minimum Control Measures to the MS4.

- C. **Illicit Discharge Detection and Elimination:** The MS4 was responsible for creating an Illicit Discharge Detection and Elimination (IDDE) program, development of a map identifying outfalls to the drainage system, and the development of a local IDDE ordinance.
- F. **Pollution Prevention/Good House Keeping:** The MS4 was responsible for creating a Pollution Prevention/Good Housekeeping plan for municipal activities, and creating an employee training program

The MS4's have completed a Stormwater Management Program (SMP) per the first five (5) year program, as demonstrated by their individual NOI. Several communities have developed a single detailed Plan that describes their entire SMP, including each of the six (6) minimum control measures. The use of this type of document will likely enhance the efficiency of the MS4 programs and ease in reporting, training and tracking.

SMC is proposing to create a Stormwater Management Program Plan (SMPP) template that can be reviewed, revised and implemented by each MS4. With the SMPP template, MS4's can create a SMPP using the framework provided by SMC. This can be accomplished by reviewing and revising the SMC recommended Best Management Practices for Minimum Control categories into a community specific SMPP. This information would be combined with the MS4's specific approach to meeting the last two Minimum Control Measures. Toward the end result, each MS4 would have a formal SMPP, which would address each of the six Minimum Control Measures of the General Permit. Additionally, SMC will continue to foster the success of a countywide NPDES Phase II approach by continuing to provide support to local municipalities throughout the permit process and implementation phase by developing draft annual progress reports and sponsoring MAC meetings.

NOTE FOR MS4:

- **Items highlighted in yellow should be specifically reviewed and revised as appropriate for each MS4.**
- **Red font text should be removed from the final NOI.**
- **Items highlighted in blue should have been completed during the original NOI (per the original permit requirements), and the text should be revised accordingly if these tasks have not yet been completed.**

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 NOTICE OF INTENT FOR NEW OR RENEWAL OF
 GENERAL PERMIT FOR DISCHARGES FROM
 SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS
 (MS4s)**

Input forms in Word format are available via email.
terri.lemasters@illinois.gov
 or by calling the Permit Section at 217/782-0610
 See address for mailing on page 4

For Office Use Only – Permit No. ILR40_____

Part I. General Information

1. MS4 Operator Name: Vernon Township
2. MS4 Operator Mailing Address:
 Street- 3050 N. Main St City- Buffalo Grove
 State- Illinois Zip Code- 60089
3. Operator Type: Township Road District
4. Operator Status: Local
5. Name(s) of Governmental Entity (ies) in which MS4 is located: Vernon Township
6. Area of land that drains to your MS4 (in square miles): 36
7. Latitude/Longitude at approximate geographical center of MS4 for which you are requesting authorization to discharge:
 Latitude: 42 12 15 Longitude: 087 57 20
 DEG. MIN. SEC. DEG. MIN SEC.
8. Name(s) of known receiving waters: *Attach additional sheets (Attachment 1) as necessary:*

1. <u>Indian Creek</u>	2. <u>Lower Des Plaines River</u>
3. <u>Aptakisic Creek</u>	4. _____
5. _____	6. _____
7. _____	8. _____
9. _____	10. _____

9. Persons Responsible for Implementation/Coordination of Storm Water Management Program:

<u>Name</u>	<u>Title</u>	<u>Telephone No.</u>	<u>Area of Responsibility</u>
<u>Bryant Schroeder</u>	<u>Hwy Comm</u>	<u>847-634-4600</u>	<u>Township Roads</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Part II. Best Management Practices (include shared responsibilities) Proposed to be

Implemented in the MS4 Area

(Details of BMP implementation for each checked BMP number, e.g., A.1, E.2, is required in Part IV of NOI.)

		“X” commitment	
QLP	MS4	“.” QLP commitment related only to language in SMPP template	
		A. Public Education and Outreach	
X	X	A.1	Distributed Paper Material
		A.2	Speaking Engagement
X		A.3	Public Service Announcement
X	X	A.4	Community Event
X		A.5	Classroom Education Material
X	X	A.6	Other Public Education
		B. Public Participation/Involvement	
X		B.1	Public Panel
		B.2	Educational Volunteer
X		B.3	Stakeholder Meeting
	X	B.4	Public Hearing
		B.5	Volunteer Monitoring
X		B.6	Program Coordination
-		B.7	Other Public Involvement
		C. Illicit Discharge Detection and Elimination	
-	X	C.1	Storm Sewer Map Preparation
X	X	C.2	Regulatory Control Program
-	X	C.3	Detection/Elimination Prioritization Plan
-	X	C.4	Illicit Discharge Tracing Procedures
-	X	C.5	Illicit Source Removal Procedures
-	X	C.6	Program Evaluation and Assessment
-	X	C.7	Visual Dry Weather Screening
		C.8	Pollutant Field Testing
-	X	C.9	Public Notification

		“X” commitment	
QLP	MS4	“.” QLP commitment related only to language in SMPP template	
		C.10 Other Illicit Discharge Controls	
		D. Construction Site Runoff Control	
X	X	D.1	Regulatory Control Program
X	X	D.2	Erosion and Sediment Control BMPs
X	X	D.3	Other Waste Control Program
X	X	D.4	Site Plan Review Procedures
X	X	D.5	Public Information Handling Procedures
X	X	D.6	Site Inspection/Enforcement Procedures
		D.7 Other Construction Site Runoff Controls	
		E. Post-Construction Runoff Control	
		E.1	Community Control Strategy
X	X	E.2	Regulatory Control Program
X	X	E.3	Long Term O&M Procedures
X	X	E.4	Pre-Const Review of BMP Designs
X	X	E.5	Site Inspections During Construction
X	X	E.6	Post-Construction Inspections
X		E.7	Other Post-Const Runoff Controls
		F. Pollution Prevention/Good Housekeeping	
X	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

Note: Certified communities have shared responsibility with SMC, the QLP, under BMPs D.1, D.2, D.3, D.4, D.5, D.6, E.2, E.3, E.4, E.5, E.6, and E.7.

Part III. Qualifying Local Programs

The Lake County Stormwater Management Commission (SMC) will serve as a Qualifying Local Program for MS4s in Lake County. As part of ongoing services, SMC will perform some functions related to each of the six minimum control measures, however, the MS4s will be providing additional services in their local programs, especially for Illicit Discharge Detection and Elimination and Pollution Prevention/Good Housekeeping BMPs. BMPs and measurable goals that will be performed by the QLP are described in Attachment 2.

Six Minimum Control Measures:

1. Public Education and Outreach.
2. Public Participation/Involvement.
3. Illicit Discharge Detection and Elimination.
4. Construction Site Runoff Control.
5. Post-Construction Runoff Control.
6. Pollution Prevention/Good Housekeeping.

Part IV. Measurable Goals (include shared responsibilities) Proposed to be Implemented by the MS4

Proposed BMPs are described on Attachment 3.

Part V. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment.

Authorized Representative Name and Title

Signature

Date

Bryant Schroeder, Highway
Commissioner

Mail completed form to:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
ATTN: PERMIT SECTION
POST OFFICE BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

Copy and complete this page if additional pages are necessary:

Attachment 1
Receiving Streams (Continued)

11. **Not Applicable** (Based on the 26 Receiving Streams in Lake County, it is unlikely that municipal MS4s will need this attachment, however, some entities such as LCDOT may need to list all 26)

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Attachment 2

Part III (Continued) Qualifying Local Programs

The Lake County Stormwater Management Commission (SMC) will serve as a Qualifying Local Program for MS4s in Lake County.

SMC is proposing to create a SMPP template that can be reviewed and revised by each MS4, to enhance their existing program. Additionally, SMC will continue to foster the success of a countywide NPDES Phase II approach by continuing to provide support to local municipalities throughout the permit process and implementation phase.

1. Public Education and Outreach.

The SMC will conduct Public Education and Outreach as part of its ongoing countywide services. 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.

BMP No. A.1: Distributed Paper Material

The SMC develops and distributes a variety of materials related to stormwater management in Lake County. A number of pamphlets and brochures related to BMPs and stormwater management have been produced. SMC prepares a quarterly newsletter, "Mainstream" as well as an Annual Report that highlights the stormwater management activities in Lake County. SMC also prepares Project Fact Sheets that provide information on ongoing and recently completed stormwater management projects. SMC has developed or collaborated on a number of manuals such as the "Riparian Areas Management: A Citizen's Guide", "A Citizen's Guide to Maintaining Stormwater Best Management Practices", and the "Streambank Stabilization Manual."

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

BMP No. A.3: Public Service Announcement

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

Measurable Goals: Include public service announcement highlighting community accomplishments related to the NPDES Phase II process in "Mainstream" once annually.

Post watershed identification signage with LCDOT.

BMP No. A.4: Community Event

The SMC sponsors and co-sponsors technical training and public awareness workshops. Workshop topics include watershed tours for the public, soil erosion and sediment control technical training module, management practices to protect water quality, etc.

Measurable Goals: Conduct workshop(s) annually.

Recommend measures to address this BMP in SMPP template

BMP No. A.5: Classroom Education

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

Measurable Goals: Develop and compile information for stormwater educational kit for distribution upon request.

Provide materials and training on storm sewer inlet stenciling kits to teachers upon request.

BMP No. A.6: Other Public Education

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

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

Recommend measures to address this BMP in SMPP template.

2. Public Participation/Involvement.

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

BMP No. B.1: Public Panel

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

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

The Municipal Advisory Committee (MAC) is made up of municipal, township, drainage district, consulting and county representatives. MAC has worked to coordinate and review the Notice of Intent (NOI) and other NPDES Phase II program components. The MAC will continue to meet as needed during the implementation of the NPDES Phase II stormwater management program.

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

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

BMP No. B.3: Stakeholder Meeting

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

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

BMP No. B.6: Program Coordination

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

*Measurable Goals: Track number of MAC meetings conducted during program implementation.
Prepare draft report on Qualifying Local Program activities at the end of each permit year, if required.*

BMP No. B.7: Other Public Involvement

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

3. Illicit Discharge Detection and Elimination.

MS4s are required to perform activities related to the Illicit Discharge Detection and Elimination (IDDE) minimum control. The requirements of an IDDE program include the following:

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

The SMC will provide a SMPP template that includes recommended measures to be implemented by the MS4s. Additionally, SMC is committed to providing some supporting additional functions to MS4s for meeting the Illicit Discharge Detection and Elimination minimum control.

BMP No. C.1: Storm Sewer Map Preparation

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

BMP No. C.2: Regulatory Control Program

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

Measurable Goal: Continue to enforce the countywide WDO.

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

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

BMP No. C.4: Illicit Discharge Tracing Procedures

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

BMP No. C.5: Illicit Source Removal Procedures

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

BMP No. C.6: Program Evaluation and Assessment

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

BMP No. C.7: Visual Dry Weather Screening

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

BMP No. C.9: Public Notification

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

4. Construction Site Runoff Control.

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

BMP No. D.1: Regulatory Control Program

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

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

*Measurable Goal: Continue to enforce the countywide WDO.
Administer the DECI as outlined by the WDO.
Recommend measures to address this BMP in SMPP template.*

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

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

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

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

BMP No. D.3: Other Waste Control Program

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

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

BMP No. D.4: Site Plan Review Procedures

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

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

Recommend measures to address this BMP in SMPP template.

BMP No. D.5: Public Information Handling Procedures

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

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

Recommend measures to address this BMP in SMPP template.

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

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

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

Recommend measures to address this BMP in SMPP template.

5. Post-Construction Runoff Control.

As described above, the Lake County Watershed Development Ordinance (WDO) establishes the minimum stormwater management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or re-development, which result in over 0.5 acres of new impervious area.

BMP No. E.2: Regulatory Control Program

The WDO requires that all applicants adopt a stormwater management strategy for controlling post-construction runoff. The applicant must develop a stormwater management strategy that minimizes the increase in runoff volumes and rates and addresses the water quality treatment requirements of the WDO. The proposed drainage plan must use the runoff

reduction hierarchy in the WDO and implement BMPs as presented in the TRM. The WDO also requires the use of buffers when adjacent to existing water bodies.

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

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

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

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

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

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

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

BMP No. E.5: Site Inspections During Construction

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

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

BMP No. E.6: Post-Construction Inspections

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

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

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

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

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

6. Pollution Prevention/Good Housekeeping.

This minimum control measure involves the development and implementation of an operation and maintenance program to reduce the discharge of pollutants from municipal operations. This program must include a training program for municipal employees.

BMP No. F.1: Employee Training Program

The SMC will assist MS4s in developing programs for F.1 by incorporating recommended actions into the SMPP template. Additionally, SMC will serve as technical advisors and as a clearinghouse of information related to employee training BMPs and periodically offer training programs.

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

BMP No. F.2: Inspection and Maintenance Program

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

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

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

BMP No. F.4: Municipal Operations Waste Disposal

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

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

By adopted policy in the Lake County Stormwater Management Plan, SMC's standard

operating procedure is to assess the feasibility of implementing water quality functions in all flood control designs. SMC will evaluate all SMC-sponsored projects for multi-objective opportunities.

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

BMP No. F.6: Other Municipal Operations Control

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

Attachment 3

Part IV. (Continued) Measurable Goals (include shared responsibilities) Proposed to be Implemented by the MS4

All Measurable Goals will be achieved on an annual basis, at a minimum. The current SMPP has established performance milestones for BMP activities under the Illicit Discharge Detection and Elimination minimum control section.

The QLP has committed to providing a SMPP template; refer to preamble and QLP sections of this NOI for additional information. The use of this type document will likely enhance the efficiency of the MS4 program and ease in reporting, training and tracking. Therefore, it is anticipated that the enhanced SMPP template will be received from SMC by mid Year 6. The MS4 will review, revise and accept the SMPP by the end of Year 6.

1. Public Education and Outreach

Vernon Township 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.

BMP No. A.1: Distributed Paper Material

The SMC develops and distributes a variety of materials related to stormwater management in Lake County. A number of pamphlets and brochures related to BMPs and stormwater management have been produced. Vernon Township made these publications available.

*Measurable Goal(s): Implement current MS4 SMPP.
Review and revise enhanced SMPP template, provided by QLP,
language related to this provision by end of Year 6.*

BMP No. A.4: Community Event

Vernon Township provides information regarding the location where the general public can dispose of common household pollutants. Solid Waste Agency of Lake County (SWALCO) holds household waste collection events in various communities throughout Lake County, which assist in collecting waste before it enters the storm sewer system. Vernon Township publicizes these SWALCO events.

*Measurable Goal(s): Implement current MS4 SMPP.
Review and revise enhanced SMPP template, provided by QLP,
language related to this provision by end of Year 6.*

BMP No. A.6: Other Public Education

Vernon Township provides additional educational materials to the general public. This is accomplished by periodically including a water quality/ storm water section in township newsletter and maintaining links to NPDES II and BMP resources.

*Measurable Goal(s): Implement current MS4 SMPP.
Review and revise enhanced SMPP template, provided by QLP,
language related to this provision by end of Year 6.*

2. Public Participation/Involvement

The MS4 will perform activities and services related to the Public Participation/Involvement minimum control measure.

BMP No. B.3: Stakeholder Meeting

Stakeholder meetings are conducted throughout the county for ongoing planning and project implementation efforts. When stakeholder groups (such as watershed planning committees) include the jurisdictional area of the MS4, the MS4 will publicize stakeholder meetings locally and participate by being represented at the stakeholder meetings.

Measurable Goal(s): Implement current MS4 SMPP.

BMP No. B.4: Public Hearing

Vernon Township will conduct a public meeting to present each annual report and on its proposed SMPP.

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

BMP No. B.7: Other Public Involvement

MS4 will maintain and publicize illicit discharge/illegal dumping contact numbers for citizens to report illegal dumping and suspicious discharges.

*Measurable Goal(s): Implement current MS4 SMPP.
Review and revise enhanced SMPP template, provided by QLP,
language related to this provision by end of Year 7*

3. Illicit Discharge Detection and Elimination

The Village will perform activities related to the Illicit Discharge Detection and Elimination (IDDE) minimum control. The majority of these activities will be related to IDDE program design. .

BMP No. C.1: Storm Sewer Map Preparation

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

*Measurable Goal(s): Maintain and update outfall map.
Review, revise and accept SMPP template language related to this
provision by end of Year 6.*

BMP No. C.2: Regulatory Control Program

The MS4 adopted ordinance language to prohibit non-storm water discharges to the storm sewer or drainage system, under the original NOI. Additionally, the WDO includes provisions, which prohibit illegal dumping to the storm sewer or drainage system.

Measurable Goal(s): This falls under Lake County.

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

Implement plan established during original NOI to detect and address illicit discharges. Detection methods include dry-weather screening, regular storm sewer maintenance, and public reporting. Plan will be implemented in accordance with performance milestones established in current SMPP. All outfalls observed to have dry weather flow during pre-screening (pre-screening activities completed during original NOI), to be investigated by the end of Year 8. Complete dry weather screening of all outfalls on a rotating basis with each outfall being inspected at least once every 5-years. Enhance current plan based on SMPP template and implement plan enhancements.

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 7.*

BMP No. C.4: Illicit Discharge Tracing Procedures

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

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 7.*

BMP No. C.5: Illicit Source Removal Procedures

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

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 7.*

BMP No. C.6 Program Evaluation and Assessment

Periodically evaluate and assess the IDDE portion of the SMPP. Collaborate and share information about IDDE program and results through MAC.

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 7.*

BMP No. C.7: Visual Dry Weather Screening

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

Measurable Goal(s): *Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

BMP No. C.9: Public Notification

It is anticipated that the enhanced SMPP template may include measures beyond the current program scope.

Measurable Goal(s): *Consider additional language in SMPP template language, and incorporate into program by end of Year 8.*

4. Construction Site Runoff Control

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

BMP No. D.1: Regulatory Control Program

See QLP description

Measurable Goal(s): *Enforce WDO.
Administer the Designated Erosion Control Inspector Program as outlined by the WDO.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

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

See QLP description.

Measurable Goal(s): *Enforce WDO.
Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 6.*

BMP No. D.3: Other Waste Control Program

See QLP description. *Continue Leaf Collection Program.*

Measurable Goal(s): *Enforce WDO.*

*Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

BMP No. D.4: Site Plan Review Procedures

See QLP description. Continue to stay in good standing with SMC. Continue to review TAC meeting minutes and provide input as applicable.

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

BMP No. D.5: Public Information Handling Procedures

See QLP description. Continue tracking number of complaints received and processed related to soil erosion and sediment control.

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

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

See QLP description. Continue current inspection and enforcement efforts.

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

5. Post-Construction Runoff Control

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

BMP No. E.2: Regulatory Control Program

See QLP description.

*Measurable Goal(s): Enforce WDO.
Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

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

See QLP description. Continue existing village inspection program of detention facilities.

*Measurable Goal(s): Enforce WDO.
Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

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

See QLP description.

*Measurable Goal(s): Enforce WDO.
Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

BMP No. E.5: Site Inspections During Construction

See QLP description.

*Measurable Goal(s): Enforce WDO.
Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

BMP No. E.6: Post-Construction Inspections

See QLP description.

*Measurable Goal(s): Enforce WDO.
Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 8.*

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 includes a training program for municipal employees.

BMP No. F.1: Employee Training Program

Implement training program, established under original NOI, for municipal employees. SMC, the Qualifying Local Program, will serve as a clearinghouse of these materials.

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 7.*

BMP No. F.2: Inspection and Maintenance Program

The Pollution Prevention/Good Housekeeping program completed under the original NOI includes measures to reduce the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems. Clean, correct, or otherwise address identified storm and sanitary sewer trouble areas.

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 7.*

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

The program completed under the original NOI identifies where maintenance and washing of MS4 fleet is done, how lubricant and oil spills are handled, how/where road salt and chemicals are stored, etc.

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 7.*

BMP No. F.4: Municipal Operations Waste Disposal

The program completed during the original NOI helps ensure a reduction in the amount and type of pollution that results from waste disposal operations, such as separate storm sewer systems, roads and parking lots, maintenance and storage yards (including salt/sand storage and snow disposal areas), and waste transfer stations.

*Measurable Goal(s): Implement current MS4 SMPP.
Review, revise and accept SMPP template language related to this provision by end of Year 7.*

F.6 Other Municipal Operations Control

It is anticipated that the enhanced SMPP template may include measures beyond the current program scope.

Measurable Goal(s): Consider additional language in SMPP template language, and incorporate into program by end of Year 7.