



Illinois Environmental Protection Agency

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

Notice of Intent for New or Renewal of General Permit for Discharges from Small Municipal Separate Storm Sewer Systems - MS4's

Part I. General Information

1. MS 4 Operator Name: _____

2. MS4 Mailing Address: _____

City: _____ State: IL _____

3. Operator Type: _____ Other: _____

4. Operator Status: _____ Other: _____

5. Name(s) of governmental entity(ies) in which MS4 is located:

State of Illinois _____

County of Lake _____

6. Area of land that drains to your MS4 in square miles: _____

7. Latitude and Longitude at approximate geographical center of MS4 for which you are requesting authorization to discharge:

Latitude: _____ Longitude: _____
Degrees Minutes Seconds Degrees Minutes Seconds

8. Name(s) of known receiving waters

9. Persons responsible for implementation or coordination of Stormwater Management Program:

Name: _____ Title: _____ Phone: _____

Area of Responsibility: _____

Name: _____ Title: _____ Phone: _____

Area of Responsibility: _____

Part II. Best Management Practices (include shared responsibilities) which have been implemented or are proposed to be implemented in the MS4 area:

A. Public Education and Outreach

Measurable Goals (include shared responsibilities)

QLP MS4

- A.1 Distributed Paper Material
- A.2 Speaking Engagement
- A.3 Public Service Announcement
- A.4 Community Event
- A.5 Classroom Education Material
- A.6 Other Public Education

Measurable Goals (include shared responsibilities)

QLP MS4

- B.2 Educational Volunteer
- B.3 Stakeholder Meeting
- B.4 Public Hearing
- B.5 Volunteer Monitoring
- B.6. Program Involvement
- B.7 Other Public Involvement

C. Illicit Discharge Detection and Elimination

Measurable Goals (include shared responsibilities)

QLP MS4

- C.1 Sewer Map Preparation
- C.2 Regulatory Control Program
- C.3 Detection/Elimination Prioritization Plan
- C.4 Illicit Discharge Tracing Procedures
- C.5 Illicit Source Removal Procedures
- C.6 Program Evaluation and Assessment
- C.7 Visual Dry Weather Screening
- C.8 Pollutant Field Testing
- C.9 Public Notification
- C.10 Other Illicit Discharge Controls

D. Construction Site Runoff Control

Measurable Goals (include shared responsibilities)

QLP MS4

- D.1 Regulatory Control Program
- D.2 Erosion and Sediment Control BMPs
- D.3 Other Waste Control Program
- D.4 Site Plan Review Procedures
- D.5 Public Information Handling Procedures
- D.6 Site Inspection/Enforcement Procedures
- D.7 Other Construction Site Runoff Controls

E. Post-Construction Runoff Control

Measurable Goals (include shared responsibilities)

QLP MS4

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

F. Pollution Prevention/Good Housekeeping

Measurable Goals (include shared responsibilities)

QLP MS4

- F.1 Employee Training Program
- F.2 Inspection and Maintenance Program
- F.3 Municipal Operations Storm Water Control
- F.4 Municipal Operations Waste Disposal
- F.5 Flood Management/Assess Guidelines
- F.6 Other Municipal Operations Controls

Part III. 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 gathered and evaluated 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 fines and imprisonment.

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

Authorized Representative Name

Title

Date

Authorized Representative Signature

You may complete this form online and save a copy locally before printing and signing the form. It should then be sent to:

Illinois Environmental Protection Agency
 Bureau of Water
 Division of Water Pollution Control
 Attn: Permit Section
 P.O. Box 19276
 1021 North Grand Avenue East
 Springfield, IL 62794-9276

A. Public Education and Outreach

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

B. Public Participation/Involvement

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

C. Illicit Discharge Detection and Elimination

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

D. Construction Site Runoff Control

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

E. Post-Construction Runoff Control

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

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F. Pollution Prevention/Good Housekeeping

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

ATTACHMENT A

SUMMARY OF PROPOSED QLP STORMWATER MANAGEMENT ACTIVITIES

SMC requires – through the Lake County Watershed Development Ordinance – local stormwater management programs to implement one or more of the minimum control measures specified in the Illinois Environmental Protection Agency’s (Illinois EPA’s) General NPDES Permit No. ILR40 (MS4 Permit), making it a Qualifying Local Program (QLP). Consistent with the County’s comprehensive, countywide approach to stormwater management, as a QLP, SMC has been working since the early 2000’s, when began the process of expanding its NPDES Stormwater Program to include small MS4s, to assist Lake County MS4s in developing and implementing efficient and effective stormwater management programs.

Although SMC is not itself an MS4, as it does not own or operate a separate storm sewer system, it does perform activities related to each of the six minimum control measures (MCMs) described in Illinois EPA’s General NPDES Permit No. ILR40.

Please note that the Illinois EPA has issued a new version of its MS4 Permit. The new version of the permit became effective on March 1, 2016. According to the new permit, MS4s have 180 days from the effective date of the permit to comply with any changes or new provisions contained in the permit.

SMC remains committed to performing a variety of stormwater management activities across the County – which are described in more detail below – to provide Lake County with a baseline Countywide stormwater management program that can be built upon by each of the individual MS4s. In addition to the stormwater management activities described below, SMC will work to update and enhance its stormwater management activities, as needed, over the coming months, to assist Lake County MS4s in meeting the requirements of the new MS4 Permit. Next year’s annual report due June 1, 2017, will contain information regarding the changes that have been made to SMC’s stormwater management activities to comply with and assist Lake County MS4s in meeting the requirements of the new MS4 Permit.

A. Public Education and Outreach

SMC will continue to provide a baseline Countywide stormwater management program and support Lake County MS4s in the development and implementation of their own stormwater management programs by performing activities related to the Public Education and Outreach MCM, as described below.

A.1 Distributed Paper Material

SMC compiles, develops, and distributes throughout Lake County a variety of materials related to stormwater management. SMC has produced a number of pamphlets and brochures related to stormwater management and prepares a quarterly newsletter, “Mainstream,” as well as an Annual Report, which highlight successful stormwater management activities conducted throughout Lake County. SMC also prepares project fact sheets that provide information about ongoing and recently completed stormwater management projects. In addition, SMC has developed or collaborated on a number of manuals related to stormwater management, such as “Riparian Areas Management: A Citizen’s Guide,” “A Citizen’s Guide to Maintaining Stormwater Best Management Practices,” and the “Streambank Stabilization Manual,” and will continue to develop or collaborate on such manuals or manual updates on an as-needed basis.

Measurable Goal(s): Distribute informational materials from “take away” rack at SMC. Upon request, distribute informational materials directly to Lake County MS4s for local distribution.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.2 Speaking Engagement

SMC provides educational presentations related to Illinois EPA’s NPDES Stormwater Program on a regular basis at Municipal Advisory Committee (MAC) meetings. Upon request, SMC will provide educational presentations related to Illinois EPA’s NPDES Stormwater Program to Lake County MS4s.

Measurable Goal(s): Provide educational presentations related to Illinois EPA’s NPDES Stormwater Program at MAC meetings. Upon request, provide educational presentations related to Illinois EPA’s NPDES Stormwater Program (e.g., “The Big Picture: Water Quality, Regulations & NPDES”) to Lake County MS4s.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.3 Public Service Announcement

A public service announcement related to Illinois EPA’s NPDES Stormwater Program will be included in SMC’s quarterly newsletter, “Mainstream,” at least once each year.

Measurable Goal(s): Include public service announcement related to Illinois EPA’s NPDES Stormwater Program in its quarterly newsletter, “Mainstream,” at least once each year.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.4 Community Event

SMC regularly sponsors and co-sponsors educational and technical training workshops on a variety of stormwater management-related topics. Each year, SMC will sponsor or co-sponsor at least one workshop on a topic related to Illinois EPA’s NPDES Stormwater Program, such as soil erosion and sediment control, illicit discharge detection and elimination, or stormwater best management practices (BMPs) that can be used to protect and improve water quality.

Measurable Goal(s): Sponsor or co-sponsor workshop on a topic related to Illinois EPA’s NPDES Stormwater Program.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.5 Classroom Education Material

Upon request, SMC will contribute to the development and compilation of materials for inclusion in a stormwater education kit that can be distributed to local students and teachers and/or other local

stakeholders. Additionally, upon request, SMC will provide information, materials, and training to local students and teachers and/or other local stakeholders interested in conducting storm drain stenciling.

Measurable Goal(s): Upon request, develop and compile materials for inclusion in a stormwater education kit.
Upon request, provide information, materials, and training to local students teachers and/or stakeholders interested in conducting storm drain stenciling.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.6 Other Public Education

SMC maintains a website that contains a variety of materials and resources related to stormwater management. The website includes webpages such as “National Pollutant Discharge Elimination System (NPDES) Phase II Stormwater Program,” “Stormwater Best Practices,” “Online Resources,” “Meeting Schedules,” “Watersheds,” “Partnerships,” and “Workshop Presentations.” These webpages provide information about Illinois EPA’s NPDES Stormwater Program, provide information about stormwater best management practices (BMPs), allow for download of stormwater management-related publications and documents, provide notices of upcoming meetings, provide links to completed watershed management plans, provide information on public involvement opportunities, and provide links to a number of other stormwater management-related resources.

Measurable Goal(s): Maintain and update the portion of the SMC website dedicated to Illinois EPA’s NPDES Stormwater Program with resources such as model ordinances, case studies, brochures, and links.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B. Public Participation/Involvement

SMC will continue to provide a baseline Countywide stormwater management program and support Lake County MS4s in the development and implementation of their own stormwater management programs by performing activities related to the Public Participation/Involvement MCM, as described below.

B.3 Stakeholder Meeting

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 the watershed stakeholders. Watershed stakeholders may include municipalities, townships, drainage districts, homeowner associations, lakes management associations, developers, landowners, and local, county, state, and federal agencies.

Measurable Goal(s): Provide notice of stakeholder meetings on SMC website.
Track number of watershed committee meetings conducted.
Establish watershed planning committees for each new watershed planning effort.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B.4 Public Hearing

SMC coordinates and conducts public meetings as well as committee meetings that are open to the public. A monthly Stormwater Management Commission meeting is open to the public and involves the SMC Board of Commissioners, which includes six municipal representatives and six county board members.

The Technical Advisory Committee (TAC) was created in 1992 to assist in the development, review, and revision of the Watershed Development Ordinance (WDO) and the associated administrative policies and procedures. TAC is made up of representatives from the development, environmental, municipal, and consulting 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 firm, and county representatives. MAC has worked to discuss, coordinate, and collaborate on the implementation of Illinois EPA's NPDES Stormwater Program. MAC will continue to meet quarterly or as needed to assist Lake County MS4s with the implementation of Illinois EPA's NPDES Stormwater Program.

The Watershed Management Board (WMB) meets annually to make recommendations on stormwater BMP project funding. WMB members include chief municipal elected officials, township supervisors, drainage district chairs, and county board members from each district within each of Lake County's four major watersheds.

*Measurable Goal(s): Provide notice of public meetings on SMC website.
Track number of meetings conducted.*

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B.6 Program Involvement

The Lake County Stormwater Management Commission (SMC) serves as a QLP for Lake County MS4s. Consistent with the County's comprehensive, countywide approach to stormwater management, as a QLP, SMC has been working since the early 2000's, when the Illinois EPA began the process of expanding its NPDES Stormwater Program to include small MS4s, to assist Lake County MS4s in developing and implementing efficient and effective stormwater management programs. In this role, in 2002, SMC proactively formed the Municipal Advisory Committee (MAC) to provide a forum for representatives of local MS4s, which include municipalities, townships, and drainage districts, to discuss, among other topics, the implementation of Illinois EPA's NPDES Stormwater Program. SMC will continue to facilitate quarterly MAC meetings and will continue to provide a baseline Countywide stormwater management program that can be built upon by each of the individual MS4s. In addition, SMC will continue to provide general support to Lake County MS4s as they continue to develop and implement their own stormwater management programs. On an annual basis, SMC will prepare an annual report on its stormwater management activities and will provide guidance to Lake County MS4s in preparing their own annual reports.

Measurable Goal(s): Track number of MAC meetings conducted.
Prepare annual report on Qualifying Local Program stormwater management activities.
Prepare template for use by Lake County MS4s in creating their own annual reports.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C. Illicit Discharge Detection and Elimination

SMC will continue to provide a baseline Countywide stormwater management program and support Lake County MS4s in the development and implementation of their stormwater management programs by performing activities related to the Illicit Discharge Detection and Elimination MCM, as described below. Note, however, that the primary responsibility for the implementation of the Illicit Discharge Detection and Elimination MCM lies with the MS4.

C.2 Regulatory Control Program

SMC provides local MS4s with model and example illicit discharge ordinances that prohibit all non-stormwater discharges, including illegal dumping, to the storm sewer system. Additionally, the WDO includes provisions that prohibit illicit discharges to the storm sewer system during construction (i.e., prior to final site stabilization) on development sites.

Measurable Goal(s): Provide model and example illicit discharge ordinances to Lake County MS4s. Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.10 Other Illicit Discharge Controls

SMC regularly sponsors and co-sponsors educational and technical training workshops on a variety of stormwater management-related topics. Each year, SMC will sponsor or co-sponsor an illicit discharge detection and elimination workshop or other training workshop related to Illinois EPA's NPDES Stormwater Program and track the number of attendees that attend the workshop.

Additionally, as part of its public education and outreach efforts, SMC distributes informational materials throughout Lake County about the hazards associated with illegal discharges and the improper disposal of waste.

Measurable Goal(s): Sponsor or co-sponsor and track the number of attendees at an Illicit Discharge Detection and Elimination workshop or other training workshop related to Illinois EPA's NPDES Stormwater Program.
Distribute informational materials about the hazards of illicit discharges and illegal dumping from "take away" rack at SMC and SMC website.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D. Construction Site Runoff Control

Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County, including requirements for construction site runoff control. SMC will continue to provide a baseline Countywide stormwater management program and support Lake County MS4s in the implementation of the Construction Site Runoff Control MCM by administering and enforcing the WDO and performing other stormwater management activities, as described below. Note, however, that the primary responsibility for the implementation of the Construction Site Runoff Control MCM in certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO) lies with the MS4.

D.1 Regulatory Control Program

The WDO is the regulatory mechanism that requires the use of soil erosion and sediment controls on development sites throughout Lake County. The soil erosion and sediment control provisions of the WDO are included in Article 6 of the ordinance. At a minimum, these standards apply to any development project that hydrologically disturbs 5,000 square feet of land or more.

SMC has also created a Designated Erosion Control Inspector (DECI) program. The purpose of the program is to facilitate positive communication between the permit issuing agency, whether such agency be SMC or a certified community, and the permit holder, by creating a single point of contact for the discussion and resolution of site soil erosion and sediment control issues and concerns. Furthermore, the program is intended to improve site conditions, minimize environmental impacts, and educate contractors, developers, and inspectors about the use of soil erosion and sediment control BMPs. It is worth noting that the DECI program was designed to closely mirror the inspection requirements of Illinois EPA's General NPDES Permit No. ILR10.

*Measurable Goal(s): Continue to administer and enforce the WDO.
Continue to administer the Designated Erosion Control Inspector (DECI) program outlined by the WDO.*

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.2 Erosion and Sediment Control BMPs

Article 6 of the WDO specifies the soil erosion and sediment control measures that must be used in conjunction with any land disturbing activities conducted on a development site. It specifies the use of a variety of soil erosion and sediment control BMPs 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 7 days of active disturbance; avoid disturbance of streams whenever possible; use controls that are appropriate for the size of the 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.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.3 Other Waste Control Program

Article 6 of the WDO includes provisions related to the control of waste and debris during construction on development sites.

Measurable Goal(s): Continue to administer and enforce the provisions of the WDO related to the control of waste and debris during construction on development sites.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.4 Site Plan Review Procedures

A community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO. Within certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO), responsibility for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO lies with the MS4; within non-certified communities, the designated enforcement officer is SMC's chief engineer. All designated enforcement officers must pass an exam in order to qualify to act as such. SMC administers this enforcement officer program, providing training on an as-needed basis to all enforcement officers to assist them in passing the exam, and maintains an up-to-date list identifying each community's designated enforcement officer. In addition to administering the enforcement officer program, SMC periodically reviews each community's WDO administration and enforcement records, using the results of such review to evaluate the performance of certified communities and designated enforcement officers.

Measurable Goal(s): Administer the Enforcement Officer (EO) program outlined by the WDO. Maintain an up-to-date list identifying each community's designated enforcement officer. Periodically review each community's WDO administration and enforcement records.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.5 Public Information Handling Procedures

SMC provides a number of opportunities for the receipt and consideration of information submitted by the public. SMC's Citizen Inquiry Response System (CIRS) documents and tracks the resolution of problems and complaints reported by the public. SMC's website provides information on "who to call" for various stormwater-related problems and concerns. An Interagency Coordination Agreement between SMC, the US Army Corps of Engineers, 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 relay such report to SMC. SMC will then investigate the report and prescribe appropriate corrective actions, sharing the results of such investigation with the property owner and any applicable local, state, or federal agencies. Within certified communities, such investigations are coordinated with the community's designated enforcement officer.

Measurable Goal(s): Document and track the number of soil erosion and sediment control-related complaints received and processed by SMC.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.6 Site Inspection/Enforcement Procedures

Article 11 of the WDO contains both recommended and minimum requirements for the inspection of development sites. Within certified communities, the community's designated enforcement officer is responsible for conducting these inspections; within non-certified communities, SMC's chief engineer is responsible for conducting these inspections. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls.

Article 12 of the WDO specifies the legal actions that may be taken and the penalties that may be imposed if the provisions of the WDO are violated. If development activities on a development site are not in compliance with the requirements of the WDO, the enforcement officer may issue a stop work order on all development activity on the development site or on the development activities that are in direct violation of the WDO. In addition, failure to comply with any of the requirements of the WDO constitutes a violation of the WDO, and any person convicted of violating the WDO may be fined.

Measurable Goal(s): Document and track the number of site inspections conducted by SMC.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E. Post-Construction Runoff Control

As described above, Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County, including requirements for post-construction runoff control. SMC will continue to provide a baseline Countywide stormwater management program and support Lake County MS4s in the implementation of the Post-Construction Runoff Control MCM by administering and enforcing the WDO and performing other stormwater management activities, as described below. Note, however, that the primary responsibility for the implementation of the Post-Construction Runoff Control MCM in certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO) lies with the MS4.

E.2 Regulatory Control Program

The WDO requires all permit applicants to adopt stormwater management strategies for controlling post-construction stormwater runoff on development sites. As outlined in Article 5, Section 503 of the WDO, all permit applicants must adopt stormwater management strategies that minimize increases in stormwater runoff rates, volumes, and pollutant loads from development sites. Proposed stormwater management strategies must address the runoff volume reduction requirements described in Article 5, Section 503 of the WDO and must include appropriate

stormwater BMPs to address the other applicable post-construction runoff control requirements of the WDO.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.3 Long Term O&M Procedures

The WDO requires that maintenance plans be developed for all stormwater management systems designed to serve major developments, as defined by the WDO. Such maintenance plans must include: a description of all maintenance tasks; an identification of the party or parties responsible for performing such maintenance tasks; a description of all permanent maintenance easements or access agreements, overland flow paths, and compensatory storage areas; and a description of dedicated sources of funding for the required maintenance. The WDO also requires that all stormwater management systems be located within a deed or plat restriction (e.g., easement) to ensure that the system remains in place in perpetuity and that access to the system is maintained in perpetuity for inspection and maintenance purposes.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.4 Pre-Construction Review of BMP Designs

As described above, a community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO. This includes a review of the stormwater BMPs that will be used to meet the post-construction runoff control requirements of the WDO.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.5 Site Inspections During Construction

As described above, Article 11 of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.6 Post-Construction Inspections

As described above, Article 11 of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process, including after final stabilization and landscaping, after the removal of soil erosion and sediment controls. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.7 Other Post-Construction Runoff Controls

Through the Watershed Management Board (WMB), SMC provides partial funding for flood damage reduction and surface water quality improvement projects. The WMB, which includes representatives from the Lake Michigan, North Branch of the Chicago River, Fox River, and Des Plaines River watersheds, meets annually to review potential projects and to make recommendations on stormwater BMP project funding. Members of the WMB include chief municipal elected officials, township supervisors, drainage district chairpersons, and county board members from each district found within each of Lake County's four major watersheds. The goal of the WMB program is to maximize opportunities for local units of government and other groups to have input and influence on the solutions used to address local stormwater management problems. Previous WMB-funded projects have reduced flooding, improved surface water quality, and enhanced existing stormwater management facilities throughout Lake County.

*Measurable Goal(s): Conduct annual WMB meeting.
Contribute funding to flood damage reduction and water quality improvement projects through the WMB.*

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

F. Pollution Prevention/Good Housekeeping

SMC will continue to provide a baseline Countywide stormwater management program and support Lake County MS4s in the development and implementation of their own stormwater management programs by performing activities related to the Pollution Prevention/Good Housekeeping MCM, as described below. Note, however, that the primary responsibility for the implementation of the Pollution Prevention/Good Housekeeping MCM lies with the MS4.

F.1 Employee Training Program

SMC will assist Lake County MS4s with the development and implementation of their employee training programs by maintaining a list of known employee training resources and opportunities, making available a software-based employee training program, and providing, upon request, technical assistance to local MS4s in developing and implementing their employee training

programs. In addition, each year, SMC will sponsor or co-sponsor a training workshop related to pollution prevention/good housekeeping or another workshop related to Illinois EPA's NPDES Stormwater Program.

Measurable Goal(s): *Maintain a list of known employee training resources and opportunities. Make available the Excal Visual Storm Watch: Municipal Storm Water Pollution Prevention software-based employee training program. Sponsor or co-sponsor a training workshop related to pollution prevention/good housekeeping or another training workshop related to Illinois EPA's NPDES Stormwater Program.*

Milestone(s): *SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*

F.5 Flood Management/Assess Guidelines

In working toward meeting its primary goals of flood damage reduction and surface water quality improvement, SMC follows a set of stormwater management policies that were created to define its roles and responsibilities for stormwater management in Lake County. One of these policies is to integrate multi-objective opportunities (e.g., flood damage reduction, surface water quality improvement, environmental enhancement) into SMC-sponsored projects. In accordance with this policy, SMC will evaluate all SMC-sponsored projects for multi-objective opportunities.

Measurable Goal(s): *Track number of SMC-sponsored projects that are reviewed for multi-objective opportunities.*

Milestone(s): *SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*

ATTACHMENT B
SUMMARY OF PROPOSED MS4 STORMWATER MANAGEMENT ACTIVITIES

As part of its stormwater management program, the City of Highwood conducts a number of activities related to each of the six minimum control measures (MCMs) described in Illinois EPA's General NPDES Permit No. ILR40.

Please note that the Illinois EPA has issued a new version of its General NPDES Permit No. ILR40 (MS4 Permit). The new version of the permit became effective on March 1, 2016. According to the new permit, MS4s have 180 days from the effective date of the permit to comply with any changes or new provisions contained in the permit.

The City of Highwood remains committed to maintaining its current stormwater management program, which is described in more detail below, and will work to update and enhance its program, as needed, over the coming months to comply with the requirements of the new permit. Next year's annual report due June 1, 2017, will contain information regarding the changes that have been made to the MS4's stormwater management activities to comply with the requirements of the new MS4 Permit.

Please note that the City of Highwood has developed a Stormwater Management Program Plan (SMPP), which describes the City of Highwood's stormwater management program in more detail. The City of Highwood's SMPP can be viewed at cityofhighwood.com.

A. Public Education and Outreach

As part of its stormwater management program, the City of Highwood conducts a number of Public Education and Outreach activities that educate and inform the public about the impacts of stormwater runoff on receiving water bodies and the steps that the public can take to reduce those impacts. In coordination and collaboration with the QLP, the City of Highwood will continue to perform activities related to the Public Education and Outreach MCM, as described below.

A.1 Distributed Paper Material

In addition to the QLP's efforts to distribute informational materials throughout Lake County, which are described in more detail in Attachment A, the City of Highwood works to compile and distribute within the City of Highwood a variety of materials related to stormwater management from a variety of sources, including the Lake County Stormwater Management Commission, Illinois EPA, US EPA, the Center for Watershed Protection, and other agencies and organizations. The City of Highwood maintains a list of the types of materials it has made available to the public and the methods through which such materials have been distributed.

Measurable Goal(s): *Distribute informational materials from "take away" rack at City Hall.*

Milestone(s): *The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*

A.4 Community Event

In addition to the QLP's efforts to sponsor or co-sponsor workshops and provide educational presentations, which are described in more detail in Attachment A, the City of Highwood sponsors and/or attends community outreach events, including meetings, to provide information on stormwater management-related topics. Audiences attending such events may include homeowners

associations, lake management associations, businesses, and neighborhood groups. The City of Highwood maintains a list of the stormwater management-related community outreach events, including meetings, that it has attended.

Additionally, the City of Highwood supports the efforts of the Solid Waste Agency of Lake County (SWALCO) to implement programs throughout Lake County that increase reuse, recycling, and composting and reduce reliance on landfills. As part of these waste management efforts, SWALCO conducts dozens of household hazardous waste collection events each year at various locations throughout the county. The City of Highwood publicizes these household hazardous waste collection events to encourage the public to participate in such events.

*Measurable Goal(s): Sponsor and/or attend stormwater management-related community outreach events, including meetings.
Provide notice of SWALCO household hazardous waste collection events on City of Highwood website.*

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.5 Classroom Education Material

In addition to the QLP's efforts to educate local students, teachers, and other local stakeholders, which are described in more detail in Attachment A, upon request, the City of Highwood will provide educational presentations on stormwater management-related topics to local students and teachers and/or other local stakeholders. The City of Highwood maintains a list of the stormwater management-related educational presentations that it has provided at local schools. Additionally, upon request, the City of Highwood will provide information and training to local students and teachers and/or other local stakeholders interested in conducting storm drain stenciling.

*Measurable Goal(s): Upon request, provide stormwater management-related educational presentation to local students and teachers and/or other local stakeholders.
Upon request, provide information and training to local students and teachers and/or other local stakeholders interested in conducting storm drain stenciling.*

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.6 Other Public Education

In addition to the QLP's efforts to distribute information via its website, which are described in more detail in Attachment A, the City of Highwood maintains a website that contains materials and resources related to stormwater management. The website includes a webpage that provides information about Illinois EPA's NPDES Stormwater Program, information about the City of Highwood's stormwater management program, including its SMPP, NOI, MS4 Permit, and Annual Reports, and links to a number of other stormwater management-related resources, including the Lake County Stormwater Management Commission's website.

Measurable Goal(s): Maintain and update the portion of the City of Highwood website dedicated to its stormwater management program.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B. Public Participation/Involvement

As part of its stormwater management program, the City of Highwood conducts a number of Public Participation/Involvement activities that involve and engage the public in the implementation of its stormwater management program. In coordination and collaboration with the QLP, the City of Highwood will continue to perform activities related to the Public Education and Outreach MCM, as described below.

B.3 Stakeholder Meeting

Watershed stakeholder meetings are regularly held throughout Lake County as part of new and/or ongoing watershed planning and/or project implementation efforts. When the City of Highwood is a stakeholder in a watershed planning and/or project implementation effort (i.e., any part of the MS4 is located within the boundaries of a watershed subject to a planning and/or project implementation effort), the City of Highwood participates in scheduled stakeholder meetings and publicizes the meetings to encourage other stakeholders (i.e., homeowner associations, lakes management associations, landowners) to participate.

Measurable Goal(s): As appropriate, attend and provide notice of stakeholder meetings on City of Highwood website.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B.4 Public Hearing

The City of Highwood coordinates and conducts public meetings as well as committee meetings that are open to the public. A bi-monthly City Council meeting is open to the public and involves the City Council, which includes seven publicly elected representatives. Periodically, information about the City of Highwood's stormwater management program is presented at such meetings.

Measurable Goal(s): Present information about the City of Highwood's stormwater management program at a public meeting at least once each year.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B.6 Program Involvement

SMC serves as a Qualifying Local Program (QLP) for all Lake County MS4s. In this role, in 2002, SMC proactively formed the Municipal Advisory Committee (MAC) to provide a forum for representatives of local MS4s to discuss, among other topics, the implementation of Illinois EPA's NPDES Stormwater Program. SMC plans to continue to facilitate quarterly MAC meetings to bring Lake County MS4s together to discuss the implementation of Illinois EPA's NPDES Stormwater Program. The City of Highwood will continue to attend and participate in the quarterly MAC meetings.

Measurable Goal(s): Continue to attend and participate in MAC meetings.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B.7 Other Public Involvement

The City of Highwood provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The City of Highwood documents and tracks the resolutions of problems and complaints reported by the public, including reports of illicit discharges and illegal dumping.

Measurable Goal(s): Provide phone number that the public can use to submit information about stormwater-related problems and concerns. As needed, follow up on reports of stormwater-related problems and concerns received from the public.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C. Illicit Discharge Detection and Elimination

As part of its stormwater management program, the City of Highwood conducts a number of activities related to Illicit Discharge Detection and Elimination. In accordance with the permit, the City of Highwood's Illicit Discharge Detection and Elimination program includes:

- A storm sewer system map showing the locations of all outfalls and the names and locations of all waters that receive discharges from those outfalls;
- An ordinance or other regulatory mechanism that prohibits all non-stormwater discharges into the storm sewer system and provides the authority for appropriate enforcement procedures and actions;
- A plan to detect and address all non-stormwater discharges, including illegal dumping, into the storm sewer system;
- A program to educate public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste; and,
- Periodic inspection of storm sewer outfalls for detection of non-stormwater discharges and illegal dumping.

In coordination and collaboration with the QLP, the City of Highwood will continue to perform activities related to the Illicit Discharge Detection and Elimination MCM, as described below. Note that although the City of Highwood intends to share responsibility for the implementation of the Illicit Discharge Detection and Elimination MCM with the QLP, as outlined in this NOI, the primary responsibility for the implementation of the Illicit Discharge Detection and Elimination MCM lies with the City of Highwood.

C.1 Sewer Map Preparation

The City of Highwood has prepared a storm sewer system map showing the locations of all outfalls and the names and locations of all waters that receive discharges from those outfalls. The storm

sewer system map is periodically maintained and updated to include outfalls associated with development projects and any previously unidentified outfalls.

Measurable Goal(s): Maintain and update storm sewer system map.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.2 Regulatory Control Program

The City of Highwood has adopted an illicit discharge ordinance that prohibits all non-stormwater discharges into the storm sewer system and provides the authority for appropriate enforcement procedures and actions. In addition, the Watershed Development Ordinance (WDO) includes provisions that prohibit illicit discharges to the storm sewer system during construction (i.e., prior to final site stabilization) on development sites.

Measurable Goal(s): Continue to administer and enforce the illicit discharge ordinance. Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.3 Detection/Elimination Prioritization Plan

The City of Highwood has developed and implemented a plan to detect and address all non-stormwater discharges, including illegal dumping, into the storm sewer system. Methods used to detect illicit discharges include periodic visual dry weather screening, employee reporting, and public reporting. Outfalls with suspicious discharges are assessed to determine whether or not flow is observed and whether or not any indicators of an illicit discharge are present. The results of each inspection are recorded on a form, and based on such results, appropriate follow-up actions are prescribed. Such follow-up actions may include additional inspections, additional water quality sampling and analysis, source tracking, and source removal. Follow-up activities are generally prioritized based on the scope and magnitude of the associated illicit discharge.

Measurable Goal(s): Conduct 5-year inspections of storm sewer outfalls for detection of illicit discharges, and annual inspections of all High Priority Outfalls. Continue to investigate potential illicit discharges identified by employees conducting day-to-day activities and operations (e.g., storm sewer cleaning and maintenance). Continue to investigate potential illicit discharges identified through public reporting.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.4 Illicit Discharge Tracing Procedures

The City of Highwood has developed procedures for tracking illicit discharges to their source. Methods that can be used to track illicit discharges to their source include drainage area investigations, storm sewer network investigations, and on-site investigations, which may involve

smoke testing, dye testing, and/or video inspection to pinpoint the exact source of an illicit discharge. When an illicit discharge is identified, appropriate source tracking procedures are selected and used to track the discharge to its source.

Measurable Goal(s): As needed, implement procedures for tracking illicit discharges to their source.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.5 Illicit Source Removal Procedures

The City of Highwood has developed procedures for removing illicit discharges from the storm drain system once they have been tracked to their source. These procedures generally include: using an independent third-party to confirm the presence of an illicit discharge; notifying the landowner of the presence of an illicit discharge; requesting and conducting a site inspection with the landowner to pinpoint the source of the illicit discharge and to identify potential remedial actions; notifying the landowner of the need to take corrective action; and, if necessary, enforcing the provisions of the illicit discharge ordinance to have the illicit discharge removed from the storm sewer system.

Measurable Goal(s): As needed, implement procedures for removing illicit discharges from the storm drain system.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.6 Program Evaluation and Assessment

The City of Highwood periodically evaluates and assesses the effectiveness of its Illicit Discharge Detection and Elimination program. This evaluation is generally based on the results of the City of Highwood's visual dry weather screening program and on the number of non-stormwater discharges and illegal dumping incidents identified through both employee and public reporting. If the City of Highwood's Illicit Discharge Detection and Elimination program is effective, it is logical to assume that, over time, the number of non-stormwater discharges and illegal dumping incidents identified through visual dry weather screening, employee reporting, and public reporting will decline.

Measurable Goal(s): Conduct annual evaluation and assessment of illicit discharge detection and elimination program.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.7 Visual Dry Weather Screening

In accordance with the permit, the City of Highwood conducts periodic inspections of storm sewer outfalls for detection of non-stormwater discharges and illegal dumping. During such inspections, outfalls are assessed to determine whether or not flow is observed and whether or not any indicators of an illicit discharge are present. The results of each inspection are recorded on a form, and based on such results, appropriate follow-up actions are prescribed. Such follow-up actions may include additional inspections, additional water quality sampling and analysis, source tracking, and

source removal. Follow-up activities are generally prioritized based on the scope and magnitude of the associated illicit discharge.

Measurable Goal(s): Conduct annual inspections of storm sewer outfalls for detection of illicit discharges.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.9 Public Notification

The City of Highwood provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The City of Highwood documents and tracks the resolutions of problems and complaints reported by the public, including reports of illicit discharges and illegal dumping.

Measurable Goal(s): Provide phone number that the public can use to submit information about stormwater-related problems and concerns, including illicit discharges. As needed, follow up on reports of illicit discharges and illegal dumping received from the public.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.10 Other Illicit Discharge Controls

As part of its Public Education and Outreach program, the City of Highwood distributes informational materials to businesses and the general public about the hazards associated with illegal discharges and the improper disposal of waste.

Measurable Goal(s): Distribute informational materials about the hazards of illicit discharges and illegal dumping from "take away" rack at City Hall and through the City of Highwood website.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D. Construction Site Runoff Control

Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County. The WDO, which is administered and enforced within the City of Highwood by SMC, establishes standards for Construction Site Runoff Control. Although the City of Highwood intends to share responsibility for the implementation of the Construction Site Runoff Control MCM with the QLP, as outlined in this NOI, the primary responsibility for the implementation of the Construction Site Runoff Control MCM lies with SMC, as the City of Highwood is currently a Non-Certified Community, as defined by the WDO.

D.1 Regulatory Control Program

The WDO is the regulatory mechanism that requires the use of soil erosion and sediment controls on development sites throughout Lake County. The soil erosion and sediment control provisions of

the WDO are included in Article 6. of the ordinance. At a minimum, these standards apply to any development project that hydrologically disturbs 5,000 square feet of land or more.

As a Non-Certified Community, SMC is responsible for the administration and enforcement of the WDO within the City of Highwood.

Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.2 Erosion and Sediment Control BMPs

Article 6 of the WDO specifies the soil erosion and sediment control measures that must be used in conjunction with any land disturbing activities conducted on a development site. It specifies the use of a variety of soil erosion and sediment control BMPs 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 7 days of active disturbance; avoid disturbance of streams whenever possible; use controls that are appropriate for the size of the 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. As a Non-Certified Community, SMC is responsible for the administration and enforcement of the WDO within the City of Highwood.

Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.3 Other Waste Control Program

Article 6 of the WDO includes provisions related to the control of waste and debris during construction on development sites. As a Non-Certified Community, SMC is responsible for the administration and enforcement of the WDO within the City of Highwood.

Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.4 Site Plan Review Procedures

A community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO. Within certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO), responsibility for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO lies with the MS4; within non-certified communities, the designated enforcement officer is SMC's chief engineer. Since the City of Highwood is a Non-

Certified Community, SMC's Chief Engineer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within the City of Highwood.

Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.5 Public Information Handling Procedures

The City of Highwood provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The City of Highwood documents and tracks the resolutions of problems and complaints reported by the public, including reports of soil erosion and sediment control issues on development sites. Since the City of Highwood is a Non-Certified Community, SMC's Chief Engineer is responsible for investigating reports of soil erosion and sediment control issues on development sites within the City of Highwood and, consequently, all such reports are referred to SMC.

*Measurable Goal(s): Provide phone number that the public can use to submit information about stormwater-related problems and concerns, including soil erosion and sediment control issues.
As needed, refer reports of soil erosion and sediment control issues received from the public to SMC.*

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.6 Site Inspection/Enforcement Procedures

Article 11 of the WDO contains both recommended and minimum requirements for the inspection of development sites. Within certified communities, the community's designated enforcement officer is responsible for conducting these inspections; within non-certified communities, SMC's chief engineer is responsible for conducting these inspections. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls. Since the City of Highwood is a Non-Certified Community, SMC's Chief Engineer is responsible for conducting site inspections within the City of Highwood.

Article 12 of the WDO specifies the legal actions that may be taken and the penalties that may be imposed if the provisions of the WDO are violated. If development activities on a development site are not in compliance with the requirements of the WDO, the enforcement officer may issue a stop work order on all development activity on the development site or on the development activities that are in direct violation of the WDO. In addition, failure to comply with any of the requirements of the WDO constitutes a violation of the WDO, and any person convicted of violating the WDO may be fined.

Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E. Post-Construction Runoff Control

As described above, Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County. The WDO, which is administered and enforced within the City of Highwood by the SMC, establishes standards for Post-Construction Runoff Control. Although the City of Highwood intends to share responsibility for the implementation of the Post-Construction Runoff Control MCM with the QLP, as outlined in this NOI, the primary responsibility for the implementation of the Post-Construction Runoff Control MCM lies with SMC, as the City of Highwood is currently Non-Certified Community, as defined by the WDO.

E.2 Regulatory Control Program

The WDO requires all applicants to adopt stormwater management strategies for controlling post-construction stormwater runoff on development sites. As outlined in Article 5, Section 503 of the WDO, all applicants must adopt stormwater management strategies that minimize increases in stormwater runoff rates, volumes, and pollutant loads from development sites. Proposed stormwater management strategies must address the runoff volume reduction requirements described in Article 5, Section 503 of the WDO and must include appropriate stormwater BMPs to address the other applicable post-construction runoff control requirements of the WDO. As a Non-Certified Community, SMC is responsible for the administration and enforcement of the WDO within the City of Highwood.

Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.3 Long Term O&M Procedures

The City of Highwood has developed long-term operation and maintenance procedures to help reduce the amount of pollution contained in post-construction stormwater runoff that enters the City of Highwood 's storm sewer system. The procedures address both new and existing development.

The City of Highwood's long-term operation and maintenance procedures address new development via the WDO. The WDO requires that maintenance plans be developed for all stormwater management systems designed to serve major developments, as defined by the WDO. Such maintenance plans must include: a description of all maintenance tasks; an identification of the party or parties responsible for performing such maintenance tasks; a description of all permanent maintenance easements or access agreements, overland flow paths, and compensatory storage areas; and a description of dedicated sources of funding for the required maintenance. The WDO also requires that all stormwater management systems be located within a deed or plat restriction (e.g., easement) to ensure that the system remains in place in perpetuity and that access to the

system is maintained in perpetuity for inspection and maintenance purposes. As a Non-Certified Community, SMC is responsible for the administration and enforcement of the WDO within the City of Highwood.

The City of Highwood's long-term operation and maintenance procedures address existing development via an inspection and maintenance program. The City of Highwood periodically inspects all existing post-construction stormwater management facilities (e.g., detention facilities), including those that have a maintenance plan (i.e., facilities located within developments regulated by the WDO) as well as those that do not (i.e., facilities located within developments pre-dating, and therefore not regulated by, the WDO), to identify any maintenance tasks and/or any repairs that need to be completed. Responsible parties are notified of the inspection results and of the need to complete any maintenance tasks or repairs.

*Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.
Conduct inspections of existing stormwater management facilities on a annual basis to identify the need for maintenance and/or repairs.*

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.4 Pre-Construction Review of BMP Designs

As described above, a community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO. This includes a review of the stormwater BMPs that will be used to meet the post-construction runoff control requirements of the WDO. Since the City of Highwood is a Non-Certified Community, SMC's Chief Engineer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within the City of Highwood.

Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.5 Site Inspections During Construction

As described above, Article 11 of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls. Since the City of Highwood is a Non-Certified Community, SMC's Chief Engineer is responsible for conducting site inspections within the City of Highwood.

Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.6 Post-Construction Inspections

As described above, Article 11 of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process, including after final stabilization and landscaping, after the removal of soil erosion and sediment controls. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls. Since the City of Highwood is a Non-Certified Community, SMC's Chief Engineer is responsible for conducting site inspections within the City of Highwood.

Measurable Goal(s): Assist SMC in ensuring that development projects are in compliance with the WDO.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

F. Pollution Prevention/Good Housekeeping

In accordance with the permit, the City of Highwood has developed and implemented a Pollution Prevention/Good Housekeeping program to reduce the amount of pollution generated by municipal activities and operations. The program includes: an employee training program; an inspection and maintenance program that incorporates pollution prevention and good housekeeping practices into day-to-day activities and operations; stormwater pollution control and non-stormwater discharge control procedures; waste management and disposal procedures; and, spill prevention, control, and cleanup procedures.

In coordination and collaboration with the QLP, the City of Highwood will continue to perform activities related to the Pollution Prevention/Good Housekeeping minimum control measure, as described below. Note that although the City of Highwood intends to share responsibility for the implementation of the Pollution Prevention/Good Housekeeping MCM with the QLP, as outlined in this NOI, the primary responsibility for the implementation of the Pollution Prevention/Good Housekeeping MCM lies with the City of Highwood.

F.1 Employee Training Program

The City of Highwood has developed and implemented an employee training program to help educate employees about the impacts of the pollution generated by municipal activities and operations and the steps that they can take to reduce those impacts. The employee training program teaches employees about the following: the impacts of stormwater runoff on receiving water bodies; the activities and operations that may be sources of stormwater pollution and/or non-stormwater discharges; the roles and responsibilities of each department and each individual employee in reducing the amount of pollution generated by municipal activities and operations; selecting and implementing stormwater best management practices; and, managing and maintaining green infrastructure practices.

Employees are subjected to a software-based employee training program, which provides baseline training on municipal pollution prevention/good housekeeping and are encouraged to attend relevant training opportunities that appear on the list of known employee training resources and opportunities provided by the QLP. Additionally, the City of Highwood works to identify and develop employee training resources and opportunities that contain educational materials tailored to those activities and operations conducted by specific departments and employees.

Measurable Goal(s): Continue to develop and implement employee training program.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

F.2 Inspection and Maintenance Program

The City of Highwood regularly inspects and maintains municipally owned or operated properties and infrastructure, including streets, parking lots, stormwater management facilities, storm sewers, landscaped areas, and maintenance facilities. A primary goal of the inspection and maintenance program is to address municipal infrastructure repair and maintenance needs in a way that reduces the amount of pollution that collects or that is generated on municipally owned or operated properties. Consequently, the City of Highwood works to incorporate pollution prevention and good housekeeping into its day-to-day activities and operations.

*Measurable Goal(s): Continue to implement inspection and maintenance program.
Continue to incorporate pollution prevention and good housekeeping practices into day-to-day activities and operations.*

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

F.3 Municipal Operations Stormwater Control

As part of its pollution prevention/good housekeeping efforts, the City of Highwood has identified municipal activities and operations with the potential to cause stormwater pollution or result in a non-stormwater discharge (e.g., vehicle maintenance, winter roadway maintenance). Through its employee training and operation and maintenance programs, the City of Highwood works to incorporate pollution prevention and good housekeeping practices into these activities and operations.

Measurable Goal(s): Continue to incorporate pollution prevention and good housekeeping practices into day-to-day activities and operations.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

F.4 Municipal Operations Waste Disposal

Waste management consists of implementing non-structural (i.e., procedural) and structural pollution prevention and good housekeeping practices for handling, storing, and disposing of wastes generated by municipal activities and operations. Through its employee training and operation and maintenance programs, the City of Highwood works to incorporate these waste management

practices into its day-to-day activities and operations to prevent the release of waste into the storm sewer system.

Measurable Goal(s): Continue to incorporate waste management practices into day-to-day activities and operations.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

F.6 Other Municipal Operations Controls

The City of Highwood has developed spill prevention, control, and cleanup procedures to prevent and respond to spills that result from municipal activities and operations. Through its employee training and operation and maintenance programs, the City of Highwood works to incorporate these spill prevention, control, and cleanup procedures into its day-to-day activities and operations to prevent the release of spills into the storm sewer system.

Measurable Goal(s): Continue to incorporate spill prevention, control, and cleanup procedures into day-to-day activities and operations.

Milestone(s): The City of Highwood began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.