



# 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

- MS 4 Operator Name: Cuba Township
- MS4 Mailing Address: 28000 West Cuba Road  
 City: Barrington, IL 60010 State: IL
- Operator Type: \_\_\_\_\_ Other: Township
- Operator Status: \_\_\_\_\_ Other: District
- Name(s) of governmental entity(ies) in which MS4 is located:

State of Illinois

County of Lake

Cuba Township

- Area of land that drains to your MS4 in square miles: 24.15 sq.mi. (34.5 miles roadway)
- Latitude and Longitude at approximate geographical center of MS4 for which you are requesting authorization to discharge:  
 Latitude: 42 10 34 Longitude: -88 10 37  
 Degrees Minutes Seconds: Degrees: Minutes: Seconds:

- Name(s) of known receiving waters  
Flint Creek

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

Name: Randy Marks Title: Highway Commissioner Phone: 847-381-1924  
 Area of Responsibility: Daily Operation

Name: Michael Shamsie, PE Title: Professional Engineer Phone: 309-755-3400  
 Area of Responsibility: Engineer Consultant

## 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

**A. Public Education and Outreach**

As part of its stormwater management program, the Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) will continue to perform activities related to the Public Education and Outreach MCM.

**A.1 Distributed Paper Material**

In addition to the QLP's efforts to distribute informational materials throughout Lake County, the Lake County Stormwater Management Commission (SMC) works to compile and distribute within Cuba Township a variety of materials related to stormwater management from a variety of sources, including the Lake County Stormwater Management Commission (i.e., QLP), IEPA, US EPA, the Center for Watershed Protection, and other agencies and organizations. The Lake County Stormwater Management Commission (SMC) 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 Village Hall.

*Milestone(s):* The Lake County Stormwater Management Commission (SMC) 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, the Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) maintains a list of the stormwater management-related community outreach events, including meetings, which it has attended.

Additionally, the Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) website.*

*Milestone(s): The Lake County Stormwater Management Commission (SMC) 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, upon request, the Lake County Stormwater Management Commission (SMC) will provide educational presentations on stormwater management-related topics to local students and teachers and/or other local stakeholders. The Lake County Stormwater Management Commission (SMC) maintains a list of the stormwater management-related educational presentations that it has provided at local schools. Additionally, upon request, the Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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, the Lake County Stormwater Management Commission (SMC) maintains a website that contains materials and resources related to stormwater management. The website includes a webpage that provides information about IEPA's NPDES Stormwater Program, information about the Lake County Stormwater Management Commission (SMC)'s stormwater management program, including its SMPP, NOI, Permit, and Annual Reports, and links to a number of other stormwater management-related resources, including the Lake County Stormwater Management Commission's (i.e., QLP's) website.

*Measurable Goal(s): Maintain and update the portion of the Lake County Stormwater Management Commission (SMC) website dedicated to its stormwater management program.*

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

## B. Public Participation/Involvement

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

#### B. Public Education and Outreach

As part of its stormwater management program, the Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) will continue to perform activities related to the Public Education and Outreach MCM.

#### 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) website.*

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

#### **B.4 Public Hearing**

The Lake County Stormwater Management Commission (SMC) coordinates and conducts public meetings as well as committee meetings that are open to the public. An annual Lake County Stormwater Management Commission Meeting is open to the public and involves the Lake County Stormwater Management Commission, which publicly elected representatives. Periodically, information about the Lake County Stormwater Management Commission (SMC)'s stormwater management program is presented at such meetings.

*Measurable Goal(s): Present information about the Lake County Stormwater Management Commission (SMC)'s stormwater management program at a public meeting at least once each year.*

*Milestone(s): The Lake County Stormwater Management Commission (SMC) 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 IEPA's NPDES Stormwater Program. SMC plans to continue to facilitate quarterly MAC meetings to bring Lake County MS4s together to discuss the implementation of IEPA's NPDES Stormwater Program. The Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*

#### **B.7 Other Public Involvement**

The Lake County Stormwater Management Commission (SMC) provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (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

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

### C. Illicit Discharge Detection and Elimination

As part of its stormwater management program, the Lake County Stormwater Management Commission (SMC) conducts a number of activities related to Illicit Discharge Detection and Elimination. In accordance with the current version of the Permit, the Lake County Stormwater Management Commission (SMC)'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 Lake County Stormwater Management Commission (SMC) will continue to perform activities related to the Illicit Discharge Detection and Elimination MCM, as described below. Note that although Cuba Township 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 Lake County Stormwater Management Commission (SMC).

### **C.1 Sewer Map Preparation**

The Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*

### **C.2 Regulatory Control Program**

The Lake County Stormwater Management Commission (SMC) 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. Continue to administer and enforce the WDO or Assist SMC in ensuring that development projects are in compliance with the WDO.*

*Milestone(s): The Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 [insert frequency of inspection (e.g., annual)] inspections of storm sewer outfalls for detection of illicit discharges. 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) periodically evaluates and assesses the effectiveness of its Illicit Discharge Detection and Elimination program. This evaluation is generally based on the results of the Lake County Stormwater Management Commission (SMC)'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 Lake County Stormwater Management Commission (SMC)'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 Lake County Stormwater Management Commission (SMC) 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 current version of the Permit, the Lake County Stormwater Management Commission (SMC) 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 [insert frequency of inspection (e.g., annual)] inspections of storm sewer outfalls for detection of illicit discharges.*

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

### **C.9 Public Notification**

The Lake County Stormwater Management Commission (SMC) provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (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**

As part of its Public Education and Outreach program, the Lake County Stormwater Management Commission (SMC) 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 Village Hall and through the Lake County Stormwater Management Commission (SMC) website.*

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

## D. Construction Site Runoff Control

Measurable Goals (include shared responsibilities)

- ✓  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

### 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 Lake County Stormwater Management Commission (SMC) by the MS4 of SMC, establishes standards for Construction Site Runoff Control. Although Cuba Township 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 the MS4 and SMC, as the Lake County Stormwater Management Commission (SMC) is currently a Certified Community or 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 IV, Section B.1.j. of the ordinance. At a minimum, these standards apply to any development project that hydrologically disturbs 5,000 square feet of land or more.

The Lake County Stormwater Management Commission (SMC) is responsible for the administration and enforcement of the WDO within Cuba Township.

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

*Milestone(s): The Lake County Stormwater Management Commission (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 IV, Section B.1.j 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. The Lake County Stormwater Management Commission (SMC) is responsible for the administration and enforcement of the WDO within Cuba Township.

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

*Milestone(s): The Lake County Stormwater Management Commission (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 IV, Section B.1.j of the WDO includes provisions related to the control of waste and debris during construction on development sites. The Lake County Stormwater Management Commission (SMC) is responsible for the administration and enforcement of the WDO within Cuba Township.

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

*Milestone(s): The Lake County Stormwater Management Commission (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.

SMC's Chief Engineer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within Cuba Township.

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

*Milestone(s): The Lake County Stormwater Management Commission (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**

The Lake County Stormwater Management Commission (SMC) provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The Lake County Stormwater Management Commission (SMC) 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. SMC's Chief Engineer is responsible for investigating reports of soil erosion and sediment control issues on development sites within Cuba Township 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, follow up on reports of soil erosion and sediment control issues received from the public or refer reports of soil erosion and sediment control issues received from the public to SMC.*

*Milestone(s): The Lake County Stormwater Management Commission (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 VI 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. SMC's Chief Engineer is responsible for conducting site inspections within Cuba Township.

Article VII 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): Continue to administer and enforce the WDO or Assist SMC in ensuring that development projects are in compliance with the WDO.*

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

## 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

#### E.1 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 Lake County Stormwater Management Commission (SMC) by the MS4 or SMC, establishes standards for Post-Construction Runoff Control. Although Cuba Township 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 the MS4 or SMC, as Cuba Township is currently Non-Certified 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 IV, Section B.1 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 IV, Section B.1.d of the WDO and must include appropriate stormwater BMPs to address the other applicable post-construction runoff control requirements of the WDO. As a Certified Community, the Lake County Stormwater Management Commission (SMC) is responsible for the administration and enforcement of the WDO within Non-Certified Cuba Township, SMC is responsible for the administration and enforcement of the WDO within Cuba Township.

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

*Milestone(s):* The Lake County Stormwater Management Commission (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 Lake County Stormwater Management Commission (SMC) has developed long-term operation and maintenance procedures to help reduce the amount of pollution contained in post-construction stormwater runoff that enters the Cuba Township's storm sewer and ditch system. The procedures address both new and existing development.

The Lake County Stormwater Management Commission (SMC)'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. The Lake County Stormwater Management Commission (SMC) is responsible for the administration and enforcement of the WDO within the Lake County Stormwater Management Commission (SMC).

The Lake County Stormwater Management Commission (SMC)'s long-term operation and maintenance procedures address existing development via an inspection and maintenance program. The Lake County Stormwater Management Commission (SMC) 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): Continue to administer and enforce the WDO or Assist SMC in ensuring that development projects are in compliance with the WDO. Conduct inspections of existing stormwater management facilities on a five year basis to identify the need for maintenance and/or repairs.*

*Milestone(s): The Lake County Stormwater Management Commission (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. Since the Lake County Stormwater Management Commission (SMC) is a Certified Community, the Lake County Stormwater Management Commission (SMC)'s designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within the Lake County Stormwater Management Commission SMC's Chief Engineer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within Cuba Township.

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

*Milestone(s): The Lake County Stormwater Management Commission (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 VI 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 Cuba Township is Non-Certified, SMC's Chief Engineer is responsible for conducting site inspections within Cuba Township.

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

*Milestone(s): The Lake County Stormwater Management Commission (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 VI 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 Cuba Township is Non-Certified, SMC's Chief Engineer is responsible for conducting site inspections within Cuba Township.

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

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

## F. Pollution Prevention/Good Housekeeping

Measurable Goals (include shared responsibilities)

- ✓  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

### F. Pollution Prevention/Good Housekeeping

In accordance with the current version of the Permit, the Lake County Stormwater Management Commission (SMC) 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 operation and maintenance program that incorporates pollution prevention and good housekeeping into day-to-day activities and operations; spill prevention and response procedures; and, an employee training program.

In coordination and collaboration with the QLP, the Lake County Stormwater Management Commission (SMC) will continue to perform activities related to the Pollution Prevention/Good Housekeeping minimum control measure, as described below. Note that although Cuba Township 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 Lake County Stormwater Management Commission (SMC).

#### F.1 Employee Training Program

The Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 operation 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*

## **F.3 Municipal/Township Operations Stormwater Control**

As part of its pollution prevention/good housekeeping efforts, the Lake County Stormwater Management Commission (SMC) has identified 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) 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 Lake County Stormwater Management Commission (SMC) began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*

## 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)).

RANDALL MARKS

Authorized Representative Name

COMMISSIONER

Title

4/28/14

Date

Randall Marks

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

Additional Info - Page 6

F. Pollution Prevention/Good Housekeeping

BMP Number \_\_\_\_\_

See Attachments A & B.

Add Another BMP

Delete Last Entry