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: City of Highland Park
2. MS4 Mailing Address: 1707 St Johns Ave

   City: Highland Park State: IL
3. Operator Type: City Other:
4. Operator Status: Local 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: 12
7. Latitude and Longitude at approximate geographical center of MS4 for which you are requesting authorization to discharge:

   Latitude: 42 Degrees 11 Minutes: 4 Seconds:

   Longitude: 87 Degrees: 47 Minutes: 13 Seconds:
8. Name(s) of known receiving waters

   Skokie River

   Middle Fork, North Branch Chicago River

   Lake Michigan, Bluff Watershed Area

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

Name: John M. Welch Title: City Engineer Phone: (847) 432-0807

Area of Responsibility:

Name: Ramesh Kanapareddy Title: Public Works Department Director Phone: 847) 432-0807

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)

The City of Highland Park intends to share responsibility for the implementation of its stormwater management program with a Qualifying Local Program (QLP), as outlined below.

Please note that the current version of the Illinois Environmental Protection Agency's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that the Illinois Environmental Protection Agency (IEPA) will make to the new version of the Permit, both the QLP and the MS4 remain committed to performing activities related to each of the six MCMs described in the current version of the Permit.

Qualifying Local Program:
The Lake County Stormwater Management Commission (SMC) serves as a QLP for Lake County MS4s. As a QLP, SMC performs activities related to each of the six MCMs described in the Permit, including activities related to Public Education and Outreach. Following the expiration of the current version of the Permit on March 31, 2014, SMC plans to continue to perform a variety of activities related to the Public Education and Outreach MCM, as described in Attachment A.

MS4 Stormwater Management Program:
As part of its stormwater management program, the City of Highland Park 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 Highland Park utilizes a variety of best management practices (BMPs) to educate and inform the public about these issues, including: distributing paper material containing information about stormwater management; sponsoring and/or attending community outreach events, including meetings, to provide information about stormwater management; publicizing household hazardous waste collection events sponsored by the Solid Waste Agency of Lake County (SWALCO) to encourage the public to participate in such events; upon request, providing classroom education on stormwater management to local students and teachers; upon request, providing training and information to local students and teachers interested in conducting storm drain stenciling; and, providing, on its website, information about stormwater management and its stormwater management program. Following the expiration of the current version of the Permit on March 31, 2014, the City of Highland Park plans to continue to perform a variety of activities related to the Public Education and Outreach MCM, as described in Attachment B.

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

B.Public Participation/Involvement

Measurable Goals (include shared responsibilities)

The City of Highland park intends to share responsibility for the implementation of its stormwater management program with a Qualifying Local Program (QLP), as outlined below.

Please note that the current version of the Illinois Environmental Protection Agency's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that the Illinois Environmental Protection Agency (IEPA) will make to the new version of the Permit, both the QLP and the MS4 remain committed to performing activities related to each of the six MCMs described in the current version of the Permit.

Qualifying Local Program:
The Lake County Stormwater Management Commission (SMC) serves as a QLP for Lake County MS4s. As a QLP, SMC performs activities related to each of the six MCMs described in the Permit, including activities related to Public Participation/Involvement. Following the expiration of the current version of the Permit on March 31, 2014, SMC plans to continue to perform a variety of activities related to the Public Participation/Involvement MCM, as described in Attachment A.

MS4 Stormwater Management Program:
As part of its stormwater management program, the City of Highland Park 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 Highland Park utilizes a variety of best management practices (BMPs) to involve and engage the public in these efforts, including: attending and encouraging public participation in stakeholder meetings; presenting information about stormwater management and its stormwater management program at public meetings; attending and participating in Municipal Advisory Committee (MAC) meetings to discuss and coordinate on the implementation of IEPA's NPDES Stormwater Program; and, providing a phone number and maintaining a process for receiving and processing information about stormwater-related problems and concerns from the public. Following the expiration of the current version of the Permit on March 31, 2014, the City of Highland Park plans to continue to perform a variety of activities related to the Public Participation/Involvement MCM, as described in Attachment B.

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)

The City of Highland Park intends to share responsibility for the implementation of its stormwater management program with a Qualifying Local Program (QLP), as outlined below. Note, however, that the primary responsibility for the implementation of the Illicit Discharge Detection and Elimination MCM lies with the City of Highland Park.

Please note that the current version of the Illinois Environmental Protection Agency's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that the Illinois Environmental Protection Agency (IEPA) will make to the new version of the Permit, both the QLP and the MS4 remain committed to performing activities related to each of the six MCMs described in the current version of the Permit.

Qualifying Local Program:
The Lake County Stormwater Management Commission (SMC) serves as a QLP for Lake County MS4s. As a QLP, SMC performs activities related to each of the six MCMs described in the Permit, including activities related to Illicit Discharge Detection and Elimination. Following the expiration of the current version of the Permit on March 31, 2014, SMC plans to continue to perform a variety of activities related to the Illicit Discharge Detection and Elimination MCM, as described in Attachment A.

MS4 Stormwater Management Program:
As part of its stormwater management program, the City of Highland Park conducts a number of activities related to Illicit Discharge Detection and Elimination. In accordance with the current version of the Permit, the City of Highland Park 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 (annual is recommended) inspection of storm sewer outfalls for detection of non-stormwater discharges and illegal dumping.

Following the expiration of the current version of the Permit on March 31, 2014, the City of Highland Park plans to continue to perform a variety of activities related to the Illicit Discharge Detection and Elimination MCM, as described in Attachment B.

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)

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 Highland Park by the City of Highland Park, establishes standards for Construction Site Runoff Control.

Although the City of Highland Park intends to share responsibility for the implementation of its stormwater management program with a Qualifying Local Program (QLP), as outlined below, the primary responsibility for the implementation of the Construction Site Runoff Control MCM lies with the the MS4, as the City of Highland Park is currently a Certified Community, as defined by the WDO.

Please note that the current version of the Illinois Environmental Protection Agency's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that the Illinois Environmental Protection Agency (IEPA) will make to the new version of the Permit, both the QLP and the MS4 remain committed to performing activities related to each of the six MCMs described in the current version of the Permit.

Qualifying Local Program:
The Lake County Stormwater Management Commission (SMC) serves as a QLP for Lake County MS4s. As a QLP, SMC performs activities related to each of the six MCMs described in the current version of the Permit, including activities related to Construction Site Runoff Control. Following the expiration of the current version of the Permit on March 31, 2014, SMC plans to continue to perform a variety of activities related to the Construction Site Runoff Control MCM, as described in Attachment A.

MS4 Stormwater Management Program:
In accordance with the current version of the Permit, the City of Highland Park has developed and implemented a Construction Site Runoff Control program to reduce the amount of pollution contained in construction stormwater runoff that enters the City of Highland Park's storm sewer system from development sites. The City of Highland Park has adopted the Lake County WDO and is currently certified by SMC to administer and enforce the provisions of the WDO. The City of Highland Park's designated Enforcement Officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within the City of Highland Park. Assistance in achieving compliance with the terms and conditions of the WDO is provided to SMC's Chief Engineer by the City of Highland Park. Following the expiration of the current version of the Permit on March 31, 2014, the City of Highland Park plans to continue to perform a variety of activities related to the Construction Site Runoff Control MCM, as described in Attachment B.

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)

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 Highland Park by the City of Highland Park, establishes standards for Post-Construction Runoff Control.

Although the City of Highland Park intends to share responsibility for the implementation of its stormwater management program with a Qualifying Local Program (QLP), as outlined below, the primary responsibility for the implementation of the Post-Construction Runoff Control MCM lies with the MS4, as the City of Highland Park is currently a Certified Community, as defined by the WDO.

Please note that the current version of the Illinois Environmental Protection Agency's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that the Illinois Environmental Protection Agency (IEPA) will make to the new version of the Permit, both the QLP and the MS4 remain committed to performing activities related to each of the six MCMs described in the current version of the Permit.

Qualifying Local Program:
The Lake County Stormwater Management Commission (SMC) serves as a QLP for Lake County MS4s. As a QLP, SMC performs activities related to each of the six MCMs described in the current version of the Permit, including activities related to Post-Construction Runoff Control. Following the expiration of the current version of the Permit on March 31, 2014, SMC plans to continue to perform a variety of activities related to the Post-Construction Runoff Control MCM, as described in Attachment A.

MS4 Stormwater Management Program:
In accordance with the current version of the Permit, the City of Highland Park has developed and implemented a Post-Construction Runoff Control program to reduce the amount of pollution contained in post-construction stormwater runoff that enters the City of Highland Park's storm sewer system from development sites. The City of HIghland Park has adopted the Lake County WDO and is currently certified by SMC to administer and enforce the provisions of the WDO. The City of Highland Park's designated Enforcement Officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within the City of Highland Park. Assistance in achieving compliance with the terms and conditions of the WDO is provided to SMC's Chief Engineer by the City of Highland Park. Following the expiration of the current version of the Permit on March 31, 2014, the City of Highland Park plans to continue to perform a variety of activities related to the Post-Construction Runoff Control MCM, as described in Attachment B.

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)

The City of Highland Park intends to share responsibility for the implementation of its stormwater management program with a Qualifying Local Program (QLP), as outlined below. Note, however, that the primary responsibility for the implementation of the Pollution Prevention/Good Housekeeping MCM lies with the City Of Highland Park.

Please note that the current version of the Illinois Environmental Protection Agency's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that the Illinois Environmental Protection Agency (IEPA) will make to the new version of the Permit, both the QLP and the MS4 remain committed to performing activities related to each of the six MCMs described in the current version of the Permit.

Qualifying Local Program:
The Lake County Stormwater Management Commission (SMC) serves as a QLP for Lake County MS4s. As a QLP, SMC performs activities related to each of the six MCMs described in the current version of the Permit, including activities related to Pollution Prevention/Good Housekeeping. Following the expiration of the current version of the Permit on March 31, 2014, SMC plans to continue to perform a variety of activities related to Pollution Prevention/Good Housekeeping, as described in Attachment A.

MS4 Stormwater Management Program:
In accordance with the current version of the Permit, the City of Highland Park 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 operation 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. Following the expiration of the current version of the Permit on March 31, 2014, the City of Highland Park plans to continue to perform a variety of activities related to the Pollution Prevention/Good Housekeeping MCM, as described in Attachment B.

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 an 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)).

Ghida S. Neukirch, CM	Deputy City Manager	30 Sept 14
Authorized Representative Name	Title	Date

Ghida S. Neukirch

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

APPROVED AS TO FORM ONLY
CORPORATION COUNSEL

Information required by this form must be provided to comply with 415 ILCS 5/39 (2000). Failure to do so may prevent this form from being processed and could result in your application being denied.

Additional Info - Page 1

A. Public Education and Outreach

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

Additional Info - Page 2

B. Public Participation/Involvement

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

Additional Info - Page 3

C. Illicit Discharge Detection and Elimination

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

Additional Info - Page 4

D. Construction Site Runoff Control

BMP Number _____

See Attachments A & B.

Add Another BMP

Delete Last Entry

Additional Info - Page 5

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

ATTACHMENT A
SUMMARY OF PROPOSED QLP STORMWATER MANAGEMENT ACTIVITIES

The Lake County Stormwater Management Commission (SMC) serves as a Qualifying Local Program (QLP) for Municipal Separate Storm Sewer Systems (MS4s) in Lake County. As a QLP, SMC has been working since the early 2000's, when the Illinois Environmental Protection Agency (IEPA) 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 IEPA's General NPDES Permit No. ILR40. Please note that the current version of IEPA's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that IEPA will make to the new version of the Permit, SMC remains committed to performing activities related to the six MCMs described in the current version of the Permit. Following the expiration of the current version of the Permit on March 31, 2014, SMC plans to continue to perform a variety of stormwater management activities, as described in more detail below.

A. Public Education and Outreach

SMC will continue to support Lake County MS4s in the development and implementation of their 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 IEPA's NPDES Stormwater Program on a regular basis at Municipal Advisory Committee (MAC) meetings. Upon request, SMC will provide educational presentations related to IEPA's NPDES Stormwater Program to Lake County MS4s.

Measurable Goal(s): *Provide educational presentations related to IEPA's NPDES Stormwater Program at MAC meetings.*
Upon request, provide educational presentations related to IEPA'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 IEPA's NPDES Stormwater Program will be included in SMC's quarterly newsletter, "Mainstream," at least once each year. SMC will coordinate with the Lake County Department of Transportation (LCDOT) to post watershed identification signage in watersheds where watershed planning or project implementation efforts have occurred or are occurring.

Measurable Goal(s): *Include public service announcement related to IEPA's NPDES Stormwater Program in its quarterly newsletter, "Mainstream," at least once each year. Post watershed identification signage in cooperation and collaboration with LCDOT.*

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 IEPA'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 IEPA'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 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 Stormwater Program," "Best Management Practices," "Projects," "Publications," "Watershed Management Plans," "Partnerships," and "Advisory Committees." These webpages provide information about IEPA'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 and ongoing projects, 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 IEPA'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 support Lake County MS4s in the development and implementation of their 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 IEPA's NPDES Stormwater Program. MAC will continue to meet quarterly or as needed to assist Lake County MS4s with the implementation of IEPA'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

Consistent with Lake County's comprehensive, countywide approach to stormwater management, 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, which include municipalities, townships, and drainage districts, to discuss, among other topics, the implementation of IEPA's NPDES Stormwater Program. SMC will continue to facilitate quarterly MAC meetings and will continue to provide general support to Lake County MS4s as they continue to develop and implement their stormwater management programs. 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 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 IEPA'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 IEPA'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 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 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.

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 IEPA'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 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.

SMC has also prepared a Technical Reference Manual (TRM) to accompany the WDO. The TRM is used to guide the creation of development plans that are in compliance with the provisions of the WDO and provides detailed information on the use of soil erosion and sediment control BMPs. It is currently being updated by the Technical Advisory Committee (TAC).

Measurable Goal(s): *Continue to administer and enforce the WDO.*
Continue to work on updates to the Technical Reference Manual (TRM) and toward publication of the updated document.

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 IV, Section B.1.j 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.

SMC has also prepared a Technical Reference Manual (TRM) to accompany the WDO. The TRM is used to guide the creation of development plans that are in compliance with the provisions of the WDO and provides additional guidance on the administration and enforcement of the ordinance. It is currently being updated by the Technical Advisory Committee (TAC).

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.
Continue to work on updates to the Technical Reference Manual (TRM) and toward publication of the updated document.

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 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.

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): *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 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 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.

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 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.

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 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.

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 chairmen, 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 support Lake County MS4s in the development and implementation of their 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 IEPA'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 IEPA'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 Highland Park conducts a number of activities related to each of the six minimum control measures (MCMs) described in IEPA's General NPDES Permit No. ILR40. Please note that the current version of IEPA's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that IEPA will make to the new version of the Permit, the City remains committed to performing activities related to each of the six MCMs described in the current version of the Permit. Following the expiration of the current version of the Permit on March 31, 2014, the City of Highland Park plans to continue to perform a variety of stormwater management activities, as described in more detail below.

Please note that the City of Highland Park has developed a Stormwater Management Program Plan (SMPP), which describes the City of Highland Park's stormwater activities in additional detail. The City of Highland Park's SMPP will be posted at City's website: www. cityhpil.com.

A. Public Education and Outreach

As part of its stormwater management program, the City 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 Highland Park 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 works to compile and distribute within the City of Highland Park 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.

Measurable Goal(s): *Distribute informational materials from "take away" rack at Public Services Building Lobby, 1150 Half Day Road Highland Park.*

Milestone(s): *The City of Highland Park 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 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.

Additionally, the City 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 Highland Park 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 Highland Park's website.

Milestone(s): *The City of Highland Park 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, who are described in more detail in Attachment A, upon request, the City will provide educational presentations on stormwater management-related topics to local students and teachers and/or other local stakeholders. Additionally, upon request, the City 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 Highland Park 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 will be maintaining 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 City of Highland Park's stormwater management program, including the proposed 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 City of Highland Park's website dedicated to its stormwater management program.*

Milestone(s): *The City of Highland Park 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 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 Highland Park 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 Highland Park 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 Highland Park 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 Highland Park's website.*

Milestone(s): *The City of Highland Park 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 Highland Park coordinates and conducts public meetings as well as committee meetings that are open to the public. City Council meetings are held on the 2nd and 4th Mondays of each month and are open to the public. These meetings involve the Highland Park City Council, which includes seven publicly elected representatives. Periodically, information about the City of Highland Park's stormwater management program is presented at such meetings.

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

Milestone(s): *The City of Highland Park 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 City of Highland Park 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 Highland Park 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 Highland Park provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The City 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 Highland Park 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 Highland Park conducts a number of activities related to Illicit Discharge Detection and Elimination. In accordance with the current version of the Permit, the City'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,
- Annual inspection of storm sewer outfalls for detection of non-stormwater discharges and illegal dumping.

In coordination and collaboration with the QLP, the City of Highland Park will continue to perform activities related to the Illicit Discharge Detection and Elimination MCM, as described below. Although the City 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 Highland Park.

C.1 Sewer Map Preparation

The City of Highland Park 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 Highland Park 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 Highland Park 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.*

Milestone(s): *The City of Highland Park 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 Highland Park 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 annual 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 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 City of Highland Park 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 Highland Park 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 Highland Park 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 Highland Park 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 Highland Park 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 Highland Park 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'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 Highland Park'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 Highland Park 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 City of Highland Park conducts annual 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 Highland Park 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 Highland Park provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The City 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 Highland Park 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 Highland Park 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 Public Services Building Lobby, 1150 Half day Rd., Highland Park and through the City of Highland Park's website.*

Milestone(s): *The City of Highland Park 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 Highland Park by the MS4, establishes standards for Construction Site Runoff Control. Although the City of Highland Park 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, as the City of Highland Park is currently a 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. As a Certified Community, the City of Highland Park is responsible for the administration and enforcement of the WDO within the City.

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

Milestone(s): *The City of Highland Park 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. As a Certified Community, the City of Highland park is responsible for the administration and enforcement of the WDO within the City.

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

Milestone(s): *The City of Highland Park 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. As a Certified Community, the City of Highland Park is responsible for the administration and enforcement of the WDO within the City.

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

Milestone(s): *The City of Highland Park 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 Highland Park is a Certified Community, the City's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within the City.

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

Milestone(s): *The City of Highland Park 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 Highland Park provides and publicizes a phone number that the public can use to submit information about stormwater-related problems and concerns. The City of Highland Park 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 Highland Park is a Certified Community, the City's designated enforcement officer is responsible for investigating reports of soil erosion and sediment control issues on development sites within the City.

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.

Milestone(s): *The City of Highland Park 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. Since the City of Highland Park is a Certified Community, the City's designated enforcement officer is responsible for conducting site inspections within the City.

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.*

Milestone(s): *The City of Highland Park 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 Highland Park by the

MS4, establishes standards for Post-Construction Runoff Control. Although the City 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 as the City of Highland Park is currently a 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 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 City of Highland Park is responsible for the administration and enforcement of the WDO within the City.

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

Milestone(s): *The City of Highland Park 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 Highland Park 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's storm sewer system. The procedures address both new and existing development.

The City'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 Certified Community, the City of Highland Park is responsible for the administration and enforcement of the WDO within the City.

The City of Highland Park's long-term operation and maintenance procedures address existing development via an inspection and maintenance program. The City 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.*
Conduct inspections of existing stormwater management facilities on a five year basis to identify the need for maintenance and/or repairs.

Milestone(s): *The City of Highland Park 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 Highland Park is a Certified Community, the City's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO within the City.

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

Milestone(s): *The City of Highland Park 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 the City of Highland Park is a Certified Community, the City's designated enforcement officer is responsible for conducting site inspections within the City.

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

Milestone(s): *The City of Highland Park 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 the City of Highland Park is a Certified Community, the City's designated enforcement officer is responsible for conducting site inspections within the City.

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

Milestone(s): *The City of Highland Park 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 current version of the Permit, the City of Highland Park 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 City will continue to perform activities related to the Pollution Prevention/Good Housekeeping minimum control measure, as described below. Note that although the City of Highland Park 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 Highland Park.

F.1 Employee Training Program

The City 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 Highland Park 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 Highland Park 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 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 City of Highland Park 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 Highland Park 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 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 Highland Park 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 Highland Park 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 Highland Park 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 Highland Park 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 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 Highland Park 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 Highland Park began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*