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Part A. Changes to Best Management Practices

Note: X indicates BMPs performed that were proposed in your NPDES permit
 ✓ indicates changes to BMPs proposed in your NPDES permit

Year 16	Year 17	Year 18	Year 189	Year 20	
MS4					
A. Public Education and Outreach					
X	X	X	X	X	A.1 Distributed Paper Material
					A.2 Speaking Engagement
X	X	X	X	X	A.3 Public Service Announcement
					A.4 Community Event
					A.5 Classroom Education Material
X	X	X	X	X	A.6 Other Public Education
B. Public Participation/Involvement					
					B.1 Public Panel
X	X	X	X	X	B.2 Educational Volunteer
					B.3 Stakeholder Meeting
					B.4 Public Hearing
X	X	X	X	X	B.5 Volunteer Monitoring
X	X	X	X	X	B.6 Program Coordination
X	X	X	X	X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination					
X	X	X	X	X	C.1 Storm Sewer Map Preparation
X	X	X	X	X	C.2 Regulatory Control Program
X	X	X	X	X	C.3 Detection/Elimination Prioritization Plan
X	X	X	X	X	C.4 Illicit Discharge Tracing Procedures
X	X	X	X	X	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

Year 16	Year 17	Year 18	Year 189	Year 20	
MS4					
D. Construction Site Runoff Control					
X	X	X	X	X	D.1 Regulatory Control Program
X	X	X	X	X	D.2 Erosion and Sediment Control BMPs
					D.3 Other Waste Control Program
X	X	X	X	X	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					
					E.1 Community Control Strategy
X	X	X	X	X	E.2 Regulatory Control Program
					E.3 Long Term O&M Procedures
X	X	X	X	X	E.4 Pre-Const Review of BMP Designs
					E.5 Site Inspections During Construction
					E.6 Post-Construction Inspections
					E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping					
X	X	X	X	X	F.1 Employee Training Program
X	X	X	X	X	F.2 Inspection and Maintenance Program
X	X	X	X	X	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 B. Status of Compliance with Permit Conditions

(Provide the status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable [MEP], and your identified measurable goals for each of the minimum control measures.)

The status of BMPs and measurable goals performed in Year 17 are described below.

1. Public Education and Outreach

The City of Palos Hills (City) committed to conduct Public Education and Outreach as part of its permit. Public Education and Outreach requires implementation of a program to distribute educational material to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants to stormwater runoff. The City committed to implementation of BMPs related to A.1, A.3, and A.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

A.1 Distributed Paper Material

Measurable Goals: *The City will continue to make the informational material and brochures available at the Public Works Department and City Hall.*

The City has obtained materials and brochures made available by the USEPA and has made the materials available at City Hall. The distributed materials include the brochure, “Make Your Home the Solution to Stormwater Pollution.” In addition, information related to stormwater and/or water quality was included on the City’s water bill delivered to all private properties.

A.3 Public Service Announcement

Measurable Goals: *The City will continue to include a stormwater and/or water quality related article once a year in the City newsletter.*

The City has prepared an article related to NPDES and published it in the City newsletter. The article, “Organic Lawn Care Guide: For a Vital, Healthy, Safe and Living Yard” has been included in the City newsletter.

A.6 Other Public Education

Measurable Goals: *The City will continue to monitor website links and update as new information becomes available.*

The City has created website links on the Public Works website to information on protecting water quality from urban runoff. The website links, “Make Your Home the Solution to Stormwater Pollution”, “Clean Water is Everybody’s Business”, “Storm Water Management for Small Businesses” and “Take the Stormwater Runoff Challenge” provide residents and businesses with information for preventing pollution and using water resources appropriately.

2. Public Participation/Involvement

The City committed to performing activities and services related to the Public Participation/Involvement minimum control measure under BMP numbers B.2, B.5, B.6 and B.7. The status or progress for each of the measurable goals related to these BMPs is presented below.

B.2 Educational Volunteer, B.5 Volunteer Monitoring and B.6 Program Coordination

Measurable Goals: The Public Works Department will continue to work with participants to identify programs and activities for each school or group.

The City participates in Community Days in conjunction with Moraine Valley Community College, with 40 participants including teachers and volunteers collected more than 2 tons of material. The City will continue to perform and participate with these activities.

B.7 Other Public Involvement

Measurable Goals: The Public Works Department will track reports by location and problem and will continue to address problems in a timely manner.

The City has created a link on the Public Works website to allow citizens to report illicit discharges and stormwater maintenance problems. The City will continue to monitor and utilize this tool. No reports have been received to date.

3. Illicit Discharge Detection and Elimination

The City committed to perform some activities related to the Illicit Discharge Detection and Elimination minimum control under BMP numbers C.1, C.2, C.3, C.4 and C.5. The status or progress for each of the measurable goals related to these BMPs is presented below.

C.1 Storm Sewer Map Preparation

Measurable Goals: The Public Works Department has completed the storm sewer map and will continue to update the map based on new and re-development.

The City has collected and entered data into their GIS database for the City storm sewer map and is approximately 100% complete. The collected data includes all receiving streams within the City and a majority of the existing storm sewer. The City's GIS based storm sewer map is extremely extensive, continually updated as appropriate and well beyond the minimum requirements of the IEPA.

C.2 Regulatory Control Program

Measurable Goals: The Public Works Department will enforce the Code revisions.

The City has drafted and adopted Ordinance revisions to prohibit non-stormwater discharges to any storm sewer under the jurisdiction of the City.

C.2 Regulatory Control Program, C.3 Detection/Elimination Prioritization Plan, C.4 Illicit Discharge Tracing Procedures and C.5 Illicit Source Removal Procedures

Measurable Goals: The City will enforce the proposed procedures for eliminating illicit discharges once they are reported and investigated.

The City has developed procedures for investigating and documenting reports of illicit discharges to the storm sewer system and began enforcing the new procedures in Year 4.

C.6 Program Evaluation and Assessment

Measurable Goals: The City will perform a yearly evaluation of its NPDES program and BMPs selected to for effectiveness in meeting the specified goals.

The City will perform yearly program compliance monitoring and evaluation to determine the effectiveness of the overall program and the BMPs selected.

C.10 Other Illicit Discharge Controls

Measurable Goals: The City perform annual monitoring of the receiving streams upstream and downstream of all MS4 discharge points.

The City continues to perform annual monitoring of the receiving streams upstream and downstream of the MS4 discharges.

4. Construction Site Runoff Control

The City committed to performing activities and services related to the Construction Site Runoff Control minimum control measure under BMP numbers D.1, D.2 and D.4. The status or progress for each of the measurable goals related to these BMPs is presented below.

D.1 Regulatory Control Program, D.2 Erosion and Sediment Control BMPs and D.4 Site Plan Review Procedures

Measurable Goal: The City will enforce the Ordinance revisions

The City has procedures that require that the sediment and erosion control measures for all developments over 1 acre within the City meet the requirements contained in the Illinois Urban Manual.

5. Post-Construction Runoff Control

The City committed to performing activities and services related to the Post-Construction Site Runoff Control minimum control measure under BMP numbers E.2 and E.4. The status or progress for each of the measurable goals related to these BMPs is presented below.

E.2 Regulatory Control Program

Measurable Goal: The City will enforce the Ordinance revisions.

The City has procedures to require the site design for development projects that disturb more than 1 acre have controls in place that would protect water quality and reduce the discharge of pollutants for the life of the development project.

E.4 Pre-Construction Review of BMP Designs

Measurable Goal: The City will continue to review stormwater BMPs within site development plans.

The City and their consultant have revised the site development plan review procedures to include the review of stormwater BMPs.

6. Pollution Prevention/Good Housekeeping

This minimum control measure involves the development and implementation of an operation and maintenance program to reduce the discharge of pollutants from municipal operations. This program must include a training program for municipal employees. The City committed to perform activities for BMP numbers F.1, F.2 and F.3. The status or progress for each of the measurable goals related to these BMPs is presented below.

F.1 Employee Training Program, F.3 Municipal Operations Storm Water Control

Measurable Goals: The Public Works Department will continue training and educational procedures that will curtail discharge of pollutants to storm sewer systems by Public Works employees.

The City conducts in-house training to educate employees on procedures to reduce the discharge of

pollutants to storm sewer systems by City employees. The City will continue the current training and procedures including daily briefing sessions prior to field execution of work orders. The City has modified procedures regarding the storage of spoil piles, sediment removal and stores salt in a covered facility.

F.2 Inspection and Maintenance Program

Measurable Goals: The City has developed a work order form and log tracking system and will continue the inspection program.

The Public Works Department has revised inspection policies and created inspection forms. The Public Works Department currently performs cleaning and maintenance activity within the creeks under the jurisdiction of the City during the winter months and will continue to perform the activities. The City has estimated that approximately two-thirds of the City has been inspected to date.

Part C. Information and Data Collection Results

(Provide information and water quality sampling/monitoring data related to illicit discharge detection and elimination collected during the reporting period.)

Year 17 activities related to illicit discharge detection and elimination consisted primarily of program planning efforts. Therefore, no information or data was collected during this period.

Part D. Summary of Year 18 Stormwater Activities

(Present a summary of the storm water activities you plan to undertake during the next reporting cycle, including an implementation schedule in the sections following the table.)

The table shown below summarizes the BMPs committed to for Year 18. Specific BMPs and measurable goals for Year 18 program development activities are presented in the sections following the table.

Note: X indicates BMPs committed to for Year 18.

Year 18	
MS4	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
X	A.3 Public Service Announcement
	A.4 Community Event
	A.5 Classroom Education Material
X	A.6 Other Public Education
B. Public Participation/Involvement	
	B.1 Public Panel
X	B.2 Educational Volunteer
	B.3 Stakeholder Meeting
	B.4 Public Hearing
X	B.5 Volunteer Monitoring
X	B.6 Program Coordination
X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination	
X	C.1 Storm Sewer Map Preparation
X	C.2 Regulatory Control Program
X	C.3 Detection/Elimination Prioritization Plan
X	C.4 Illicit Discharge Tracing Procedures
X	C.5 Illicit Source Removal Procedures
X	C.6 Program Evaluation and Assessment
	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
	C.9 Public Notification
X	C.10 Other Illicit Discharge Controls

Year 18	
MS4	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
	D.3 Other Waste Control Program
X	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	
	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
	E.3 Long Term O&M Procedures
X	E.4 Pre-Const Review of BMP Designs
	E.5 Site Inspections During Construction
	E.6 Post-Construction Inspections
	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
X	F.2 Inspection and Maintenance Program
X	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

1. Public Education and Outreach

The City is committing to conduct Public Education and Outreach as part of its permit. Public Education and Outreach requires implementation of a program to distribute educational material to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants to stormwater runoff. The City commits to implementation of BMPs related to A.1, A.3, and A.6 as described below.

A.1 Distributed Paper Material

The City will make available informational brochures to the public to increase awareness of impacts of stormwater discharges on water bodies and steps the public can take to reduce pollutants in stormwater runoff.

Measurable Goals: The City will continue to make the informational material and brochures available at the Public Works Department and City Hall.

A.3 Public Service Announcement

The City will include a stormwater and/or water quality related article once a year in the City's newsletter.

Measurable Goals: The City will continue to include a stormwater and/or water quality related article once a year in the City newsletter.

A.6 Other Public Education

The City will create a link on the City website to increase the public awareness of impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff. The City will also post their NOI on the City website.

Measurable Goals: The City will continue to monitor website links and update as new information becomes available.

2. Public Participation/Involvement

The City will perform activities and services related to the Public Participation/Involvement minimum control measure. BMPs will be implemented under BMP numbers B.2, B.5, B.6 and B.7 as described below.

B.2 Educational Volunteer, B.5 Volunteer Monitoring and B.6 Program Coordination

The City will provide organization, supplies and/or training to local schools, businesses or civic groups for water quality and stream enhancement activities.

Measurable Goals: The Public Works Department will continue to work with participants to identify programs and activities for each school or group.

B.7 Other Public Involvement

The City will create a link on the Public Works Department website that includes reporting illicit discharges to the storm sewer system and maintenance problems associated with ponds, streams, or outfalls.

Measurable Goals: The Public Works Department will track reports by location and problem and will continue to address problems in a timely manner. The City will continue to actively participate and support the Roberts Road Area Stormwater Master Plan Pilot Study.

3. Illicit Discharge Detection and Elimination

The City commits to performing some activities related to the Illicit Discharge Detection and Elimination minimum control. BMPs will be implemented under BMP numbers C.1, C.2, C.3, C.4 and C.5 as described below.

C.1 Storm Sewer Map Preparation

The City will prepare a storm sewer map of the entire City including the names of all outfalls and receiving streams.

Measurable Goals: The Public Works Department has completed the storm sewer map and will continue to update the map based on new and re-development.

C.2 Regulatory Control Program

The City will develop Ordinance revisions to prohibit non-stormwater discharges to any storm sewer within the City or under the jurisdiction of the City.

Measurable Goals: The Public Works Department will enforce the Code revisions.

C.2 Regulatory Control Program, C.3 Detection/Elimination Prioritization Plan, C.4 Illicit Discharge Tracing Procedures, and C.5 Illicit Source Removal Procedures

The City will put in place procedures for handling the report of a possible illicit discharge to storm sewer systems. The City will develop a procedure for tracking reports of illicit discharges and the enforcement guidelines in proposed Ordinance will be reviewed to facilitate the elimination of illicit discharges once they are discovered, tracked and investigated.

Measurable Goals: The City will enforce the proposed procedures for eliminating illicit discharges once they are reported and investigated.

C.6 Program Evaluation and Assessment

The City will perform yearly program compliance monitoring and evaluation to determine the effectiveness of the overall program and the BMPs selected.

Measurable Goals: The City will perform a yearly evaluation of its NPDES program and BMPs selected to for effectiveness in meeting the specified goals.

C.10 Other Illicit Discharge Controls

The City will perform annual monitoring of the receiving streams upstream and downstream of the MS4 discharges.

Measurable Goals: The City perform annual monitoring of the receiving streams upstream and downstream of all MS4 discharge points.

4. Construction Site Runoff Control

The City will perform activities and services related to the Construction Site Runoff Control minimum control measure. BMPs will be implemented under BMP numbers D.1, D.2, and D.4 as described below.

D.1 Regulatory Control Program, D.2 Erosion and Sedimentation Control BMPs and D.4 Site Plan Review Procedures

Measurable Goal: The City will enforce the Ordinance revisions.

5. Post-Construction Runoff Control

The City will perform activities and services related to the Post-Construction Site Runoff Control minimum control measure. BMPs will be implemented under BMP numbers E.2 and E.4 as described below.

E.2 Regulatory Control Program

The City will amend the Ordinance to require that the site design for development projects that disturb greater than one acre must have in place controls that would protect water quality and reduce the discharge of pollutants

for the life of the development project. The goal of this BMP will be to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre.

Measurable Goals: The City will enforce the Ordinance revisions.

E.4 Pre-Construction Review of BMP Designs

The City will revise the site development plan review procedures to specifically include review of structural and nonstructural stormwater BMPs.

Measurable Goals: The City will continue to review stormwater BMPs within site development plans.

6. Pollution Prevention/Good Housekeeping

This minimum control measure involves the development and implementation of an operation and maintenance program to reduce the discharge of pollutants from municipal operations. This program must include a training program for municipal employees. The City will perform BMPs under BMP numbers F.1, F.2 and F.3 as described below.

F.1 Employee Training Program and F.3 Municipal Operations Storm Water Control

The City will hand out literature and/or provide in-house presentations that provide guidance and procedures for employees to reduce or eliminate the discharge of pollutants from City owned facilities to the storm sewer system. The goal of this BMP will be to educate City employees of current practices that contribute to stormwater pollution and/or to develop new procedures and make revisions to existing procedures that will curtail the discharge of pollutants to storm sewer systems by City employees.

Measurable Goals: The Public Works Department will continue training and educational procedures that will curtail discharge of pollutants to storm sewer systems by Public Works employees.

F.2 Inspection and Maintenance Program

The City Public Works Department will revise the Public Works procedures to require routine inspections of ponds, stream channels and storm sewer outfalls once every three years by Public Works staff. Non-routine inspection visits should be required to address comments from residents and the Fire Department Hazardous Materials Unit reports. Inspection forms will be used for each inspection and a procedure will be developed for tracking inspections.

Measurable Goals: The City has developed a work order form and log tracking system and will continue the inspection program.

Part E. Notice of Qualifying Local Program

The City of Palos Hills Municipal Code (Code), Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) Ordinances and City of Palos Hills Public Works Department are considered Qualifying Local Programs (QLPs) that count towards satisfying the requirements of the six minimum control measures. Listed below is a summary of the activities performed by the QLPs during Year 17. In general, all activities performed by the QLPs during Year 17 will be continued in subsequent years.

1. Public Education and Outreach:

The City has hosted household hazardous waste collections in cooperation with the IEPA. The City will continue to be an active participant in this activity and will provide notification to its residents through mailings or the City website. This program relates to BMP number A.4.

2. Public Participation/Involvement:

The City does not have a QLP for this control measure.

3. Illicit Discharge Detection and Elimination:

The City is in the early stages of developing a comprehensive storm sewer atlas in GIS and will complete the map within 5 years. This program relates to BMP C.1. The Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) Sewage and Waste Control Ordinance prohibits the discharge of wastes of any kind to the waters of the state under the jurisdiction of the MWRD. The City's Code also prohibits the discharge of any sewage, industrial wastes or other polluted waters to any natural outlet within the City. This program relates to BMP C.2.

4. Construction Site Runoff Control:

The City's Code requires submittal of a sediment and erosion control plan for any disturbed area in a Special Flood Hazard Area (SFHA) and also requires any developer to prevent earth from washing off the construction site. This program relates to BMP number D.1. The City Engineer reviews the sediment and erosion control plans. This program relates to BMP number D.4. The Code also requires inspections of construction sites to ensure compliance with the Code. This program relates to BMP number D.6.

5. Post-Construction Runoff Control:

The City's Code provides permit and design requirements for stormwater detention facilities and requires owners to maintain stormwater facilities to prevent the degradation of local water quality. This relates to BMP numbers E.2 and E.3. The Code also requires construction site inspections during and after construction. This program relates to BMP numbers E.5 and E.6.

6. Pollution Prevention/Good Housekeeping:

The Public Works Department has a salt storage structure and an oil separator in the truck maintenance area of the Public Works facility. This program relates to BMP F.3.

Part F. Construction Projects Conducted During Year 17

(Provide a list of construction projects your entity has paid for during the reporting period.)

Project Name	Project Size (acres)	Construction Start Date	Construction End Date
New Public Works Facility	5.0	March 2019	Ongoing