



# Illinois Environmental Protection Agency

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

## Division of Water Pollution Control ANNUAL FACILITY INSPECTION REPORT

### for NPDES Permit for Storm Water Discharges from Separate Storm Sewer Systems (MS4)

*This fillable form may be completed online, a copy saved locally, printed and signed before it is submitted to the Compliance Assurance Section at the above address. Complete each section of this report.*

Report Period: From March, 2019 To March, 2020

Permit No. ILR40 0283

#### MS4 OPERATOR INFORMATION: (As it appears on the current permit)

Name: City of Aurora Mailing Address 1: 44 East Downer Place

Mailing Address 2: \_\_\_\_\_ County: Kane

City: Aurora State: IL Zip: 60505-3302 Telephone: 630-256-3231

Contact Person: Mark Phipps, P.E., CFM, CPESC Email Address: mhipps@aurora-il.org  
(Person responsible for Annual Report)

#### Name(s) of governmental entity(ies) in which MS4 is located: (As it appears on the current permit)

Kane Co, Aurora Twp, Sugar Grove Twp, Batavia Twp DuPage Co, Naperville Twp, Winfield Twp  
Will Co, Wheatland Twp Kendall Co, Oswego Twp

#### THE FOLLOWING ITEMS MUST BE ADDRESSED.

A. Changes to best management practices (check appropriate BMP change(s) and attach information regarding change(s) to BMP and measurable goals.)

- |  |                          |   |                          |
|--|--------------------------|---|--------------------------|
| 1. Public Education and Outreach             | <input type="checkbox"/> | 4. Construction Site Runoff Control       | <input type="checkbox"/> |
| 2. Public Participation/Involvement          | <input type="checkbox"/> | 5. Post-Construction Runoff Control       | <input type="checkbox"/> |
| 3. Illicit Discharge Detection & Elimination | <input type="checkbox"/> | 6. Pollution Prevention/Good Housekeeping | <input type="checkbox"/> |

B. Attach 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 MEP, and your identified measurable goals for each of the minimum control measures.

C. Attach results of information collected and analyzed, including monitoring data, if any during the reporting period.

D. Attach a summary of the storm water activities you plan to undertake during the next reporting cycle ( including an implementation schedule.)

E. Attach notice that you are relying on another government entity to satisfy some of your permit obligations (if applicable).

F. Attach a list of construction projects that your entity has paid for during the reporting period.

**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))**

Owner Signature:

Mark Phipps, P.E., CFM, CPESC

Printed Name:

6/1/20

Date:

Engineering Coordinator

Title:

EMAIL COMPLETED FORM TO: [epa.ms4annualinsp@illinois.gov](mailto:epa.ms4annualinsp@illinois.gov)

or Mail to: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
WATER POLLUTION CONTROL  
COMPLIANCE ASSURANCE SECTION #19  
1021 NORTH GRAND AVENUE EAST  
POST OFFICE BOX 19276  
SPRINGFIELD, ILLINOIS 62794-9276

**ANNUAL FACILITY INSPECTION REPORT**  
**FOR DISCHARGES FROM MUNICIPAL SEPARATE STORM SEWER SYSTEMS**  
REPORTING PERIOD: MARCH 1, 2019 – FEBRUARY 29, 2020  
CITY OF AURORA, ILLINOIS  
(NPDES Permit No. ILR400283)

**I. CHANGES TO BEST MANAGEMENT PRACTICES**

During this reporting period, the City has not made any changes to the Best Management Practices and measurable goals of its stormwater management program.

**II. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS**

The City has committed to specific stormwater Best Management Practices (BMPs) in order to meet the requirements of General NPDES Permit No. ILR40. The selected BMPs are designed to reduce the discharge of pollutants from the City's municipal separate storm sewer system to the maximum extent practicable, with consideration of the City's staff and budget. Each of the selected BMPs has been effective during the reporting period. The following is a status report for each BMP describing the activities undertaken during this reporting period.

- **PUBLIC EDUCATION AND OUTREACH**

- **BMP A.1 – Distributed Paper Material**

<b>MEASURABLE GOAL</b>	Annually distribute one educational flyer through an Aurora school. Priority will be placed on schools located within environmental justice areas. Document the number of students that received the flyer each year.
<b>STATUS</b>	City staff created a bookmark listing ways the public can help keep Aurora's waterways clean. The text is printed in English on one side and Spanish on the other. During October and November 2019, over 2,000 bookmarks were printed and distributed to the 5 <sup>th</sup> Grade students at every elementary school in Aurora.

- **BMP A.2 – Speaking Engagement**

<b>MEASURABLE GOAL</b>	<p>Annually make one public presentation in Aurora about the impacts of stormwater discharges on water bodies and steps the public can take to reduce pollutants in stormwater runoff. The presentations will cover the following range of topics.</p> <ul style="list-style-type: none"><li>• Proper use and management of household chemicals such as: fluids for vehicles and other equipment; soaps, solvents, and detergents for outdoor washing; paint; chemicals for lawn and garden care; and winter de-icing materials</li><li>• The hazards associated with illegal discharges and improper disposal of waste, along with a telephone number for reporting potential incidents</li><li>• Green infrastructure strategies for stormwater pollution prevention and information about the costs of these</li></ul>
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	<p>strategies</p> <ul style="list-style-type: none"> <li>• Climate change and its potential impact on stormwater pollution</li> </ul>
<b>STATUS</b>	<p>During this reporting period, the City's Engineering Division made two presentations about the impacts of stormwater discharges on water bodies and steps the public can take to reduce pollutants in stormwater runoff. Details about these presentations are listed below.</p> <ul style="list-style-type: none"> <li>• December 2, 2019 – Presentation to 6<sup>th</sup> grade students at John C. Dunham STEM Partnership School</li> <li>• December 4, 2019 – Presentation to 5<sup>th</sup> grade students at Nancy Hill Elementary School</li> </ul> <p>In addition to these presentations, a City representative attended the events listed below and distributed information about the City's sustainable initiatives.</p> <ul style="list-style-type: none"> <li>• September 28, 2019 - Greenfest</li> <li>• November 14, 2019 - Waubonsie Valley High School career day</li> <li>• January 17, 2020 - West Aurora High School career fair.</li> </ul> <p>The City also supported Kane County's event "When it Rains...Backyard Stormwater Management and Flood Preparedness" on May 17, 2019. This event featured a presentation by Jim Kleinwachter of The Conservation Foundation.</p>

• **BMP A.6 – Other Public Education**

<b>MEASURABLE GOAL</b>	<p>Continually provide links to educational resources on the City's web site about the impacts of stormwater discharges on water bodies and steps the public can take to reduce pollutants in stormwater runoff. The educational resources will cover the following range of topics.</p> <ul style="list-style-type: none"> <li>• Proper use and management of household chemicals such as: fluids for vehicles and other equipment; soaps, solvents, and detergents for outdoor washing; paint; chemicals for lawn and garden care; and winter de-icing materials</li> <li>• The hazards associated with illegal discharges and improper disposal of waste, along with a telephone number for reporting potential incidents</li> <li>• Green infrastructure strategies for stormwater pollution prevention and information about the costs of these strategies</li> <li>• Climate change and its potential impact on stormwater pollution</li> </ul>
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<b>STATUS</b>	<p>The City's web site includes a page titled "Protecting Aurora's Waterways" (<a href="https://www.aurora-il.org/1787/Protecting-Auroras-Waterways">https://www.aurora-il.org/1787/Protecting-Auroras-Waterways</a>) with information about the City's sewer system, what the City is doing to protect water quality, and what residents can do. This web page includes links to a wealth of educational resources.</p> <p>Rain barrels are on display with educational material at the Phillips Park Zoo and the Phillips Park Visitor Center.</p>
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- **PUBLIC INVOLVEMENT/PARTICIPATION**

- **BMP B.3 – Stakeholder Meeting**

<b>MEASURABLE GOAL</b>	Participate in the Fox River Study Group (FRSG), which is a diverse group of stakeholders interested in improving and protecting the Fox River.
<b>STATUS</b>	<p>City staff attended the monthly FRSG meetings, participated in various committees, continued tracking the City's annual phosphorus load reduction, and provided FRSG with \$99,000 of financial support.</p> <p>The City also maintained its membership in the Fox River Ecosystem Partnership and the DuPage River Salt Creek Workgroup.</p>

- **BMP B.4 – Public Hearing**

<b>MEASURABLE GOAL</b>	Annually present the City's stormwater management program at a publicly noticed City Council or Committee meeting to seek public input on the program.
<b>STATUS</b>	The City's stormwater management program was presented at the February 24, 2020 meeting of the Infrastructure & Technology Committee.

- **BMP B.5 – Volunteer Monitoring**

<b>MEASURABLE GOAL</b>	Annually inform residents of a telephone number for reporting stormwater related issues including: ordinance violations, construction site soil erosion and sediment control violations, maintenance issues, and illicit discharges. Publicize the telephone number using the City's newsletters and the City's web site.
<b>STATUS</b>	The City's web site includes a page titled "Protecting Aurora's Waterways" with a telephone number residents can call to report stormwater related issues. The City also has an InfoAurora app available for mobile devices that allows residents to report stormwater related issues, such as illegal dumping.

- **BMP B.6 – Program Involvement**

<b>MEASURABLE GOAL</b>	Annually coordinate an event with an Aurora school to educate children about water quality and collect water quality data. Priority will be placed on schools located within environmental justice areas.
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<p><b>STATUS</b></p>	<p>The City is partnering with Friends of the Fox River (FOFR) to implement the Aurora Watershed Watchdogs program, which teaches students about water quality. They also collect water quality data at the in-stream events.</p> <ul style="list-style-type: none"> <li>• March 18, 2019 – 118 students from Nancy Hill Elementary School (in-school)</li> <li>• March 28, 2019 – 87 students from Nicholson Elementary School (in-school)</li> <li>• October 9, 2019 – 42 students from John C. Dunham STEM Partnership School (in-stream)</li> <li>• November 15, 2019 – 30 students at SciTech Lab Night (museum expo)</li> <li>• November 25, 2019 – 156 students from Cowherd Middle School (in-school)</li> <li>• November 26, 2019 – 156 students from Cowherd Middle School (in-school)</li> <li>• January 14, 2019 – 50 students from Krug Elementary School (in-school)</li> </ul> <p>The City partners with Kiwanis International and other agencies on a community-wide service day that included cleaning-up along the Fox River and Indian Creek on April 13, 2019. Beyond promoting the event to its staff, the City provides banners, dumpsters, tents, and a grill.</p> <p>Mayor Richard Irvin made a proclamation on September 21, 2019 that each year the third Saturday in September would be Fox River Day in Aurora, on which the City will support events, public and private, that honor and celebrate the wellbeing of the Fox River.</p> <p>The City sponsors a rain barrel program with The Conservation Foundation. Rain barrels can be purchased online at a reduced price. Arrangements can be made for home delivery or pick-up at Aurora's Farmer's Market. 49 rain barrels were purchased through the program in 2019.</p> <p>The cities of Aurora and Naperville work together to sponsor and promote the collection of a wide range of household hazardous waste items. These items are collected at the Naperville Public Works Building at no cost to residents and then are disposed of properly.</p>
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- **ILLICIT DISCHARGE DETECTION AND ELIMINATION**

- **BMP C.1 – Sewer Map Preparation**

<b>MEASURABLE GOAL</b>	Continually maintain and improve the City's GIS-based sewer atlas.
<b>STATUS</b>	As construction projects are completed (public and private), the City's sewer atlas is consistently updated according to as-built engineering plans and/or field located infrastructure. As sewer lines are cleaned and televised, the City links the inspection videos to the sewer atlas.

- **BMP C.2 and C.5 – Regulatory Control Program and Illicit Source Removal Procedures**

<b>MEASURABLE GOAL</b>	Document all reports of suspicious discharges, along with the investigative measures taken and any enforcement actions.
<b>STATUS</b>	<p>One suspicious discharge was identified during the reporting period.</p> <ul style="list-style-type: none"> <li>• November 5, 2019 – silty water discharging from the Butterfield East Unit 3 detention basin</li> </ul> <p>This matter was investigated and the source was determined to be a drain tile. The silty discharge was intermittent at the time of inspection and no sinkhole or other spot repair was identified that might be responsible for the silty discharge.</p>

- **BMP C.3 – Detection/Elimination Prioritization Plan**

<b>MEASURABLE GOAL</b>	Prioritize outfalls with the greatest potential for non-stormwater discharges for annual inspection and establish an inspection schedule for the remaining outfalls.
<b>STATUS</b>	Outfalls are designated as priority outfalls for dry weather inspection if they have a dimension larger than 48 inches (diameter, width, or height); or, if they were previously found with a suspicious odor or a suspicious visual characteristic. Each year, the City plans to inspect all priority outfalls and at least 20% of its other outfalls.

- **BMP C.7 – Visual Dry Weather Screening**

<b>MEASURABLE GOAL</b>	Perform dry weather screening of City outfalls according to the Prioritization Plan.
<b>STATUS</b>	The City screened its 57 priority outfalls and 164 of its 707 (23%) total outfalls during August 2019. The 164 outfalls inspected this reporting year were those along Waubonsie Creek and Blackberry Creek.

- **BMP C.9 – Public Notification**

<b>MEASURABLE GOAL</b>	Require the installation of grates cast with “Dump No Waste, Drains to River” for all new inlets and catch basins installed with road maintenance projects or new development.
<b>STATUS</b>	The City’s standard specifications for road maintenance projects and new development projects were revised in December 2017 and January 2019, respectively. When new grates are installed for inlets and catch basins, the grates will be cast with the statement “Dump No Waste, Drains to River.”

- **BMP C.10 – Other Illicit Discharge Controls**

<b>MEASURABLE GOAL</b>	Maintain and service pet waste receptacles weekly at McCarty Park, the Phillips Park dog park, and Millennium Plaza.
<b>STATUS</b>	City staff services the pet waste receptacles at McCarty Park and the Phillips Park dog park 2-3 times per week Spring-Fall and 1 time per week during the Winter. The receptacles at Millennium Plaza are serviced 3-4 times per week.

- **CONSTRUCTION SITE RUNOFF CONTROL**

- **BMP D.1 and D.4 – Regulatory Control Program and Site Plan Review Procedures**

<b>MEASURABLE GOAL</b>	Review site plans for effective soil erosion and sediment controls, controls for non-stormwater discharges from the construction site, and compliance with General NPDES Permit No. ILR10.
<b>STATUS</b>	<p>The City has adopted a more restrictive version of the Kane County Stormwater Ordinance. This Ordinance requires soil erosion and sediment controls for regulated development and it includes sanctions the City can use to ensure compliance. The City (or its erosion control consultant) reviews proposed site plans prior to issuing permits for development and re-development.</p> <p>Files are maintained for every regulated development. The file includes an approved site plan specifying appropriate soil erosion and sediment controls. For construction sites over 1 acre in size, the file also includes erosion control inspection reports documenting the condition of control measures and any necessary corrective action.</p>

- **BMP D.5 – Public Information Handling Procedures**

<b>MEASURABLE GOAL</b>	Provide the public with opportunities for input on proposed development and re-development at publicly noticed meetings.
<b>STATUS</b>	Meetings of the Plan Commission, the Planning and Development Committee, the Committee of the Whole, and the City Council are publicly noticed and typically provide public with the opportunity to comment on agenda items, including proposed development projects.

- **BMP D.6 – Site Inspection/Enforcement Procedures**

<b>MEASURABLE GOAL</b>	All permitted development sites will be inspected throughout construction to ensure appropriate erosion and sediment control measures have been installed and are being maintained.
<b>STATUS</b>	Ongoing projects are inspected regularly and in response to complaints received from the public. Insufficient erosion control measures are addressed promptly.

- **POST-CONSTRUCTION RUNOFF CONTROL**

- **BMP E.2 and E.4 – Regulatory Control Program and Pre-Construction Review of BMP Designs**

<b>MEASURABLE GOAL</b>	Review site plans for appropriate structural and non-structural BMPs, including green infrastructure, as well as compliance with General NPDES Permit No. ILR10.
<b>STATUS</b>	<p>The City has adopted a more restrictive version of the Kane County Stormwater Ordinance, which is the regulatory mechanism used to minimize the volume of stormwater runoff and reduce the discharge of pollutants from new development, re-development, and public surfaces to the maximum extent practicable. The City reviews the design of stormwater infrastructure prior to issuing permits for development and re-development.</p> <p>Files are maintained for every regulated development. The file includes an approved site plan and design calculations for any structural BMPs and green infrastructure. The file may also include a plat.</p>

- **BMP E.3 – Long Term O&M Procedures**

<b>MEASURABLE GOAL</b>	Require Long-Term O&M Plans for stormwater management facilities in accordance with the Kane County Stormwater Ordinance. Inspect priority detention basins.
<b>STATUS</b>	The City requires long-term operation and maintenance plans for stormwater infrastructure in accordance with the Kane County Stormwater Ordinance. Prior to significant storm events, detention basins that are prone to clogging are typically inspected and, if necessary, maintained by the City's Water & Sewer Maintenance Division.

- **BMP E.5 and E.6 - Site Inspections During Construction and Post-Construction Inspections**

<b>MEASURABLE GOAL</b>	All permitted development sites will be inspected throughout construction and at the completion of construction to ensure consistency with the approved construction plans.
<b>STATUS</b>	The City inspects new development and re-development sites during and at the completion of construction. As-built plans are prepared



	for required BMPs. If the constructed BMP is deficient in any way, the deficiency must be addressed before the letter of credit or subdivision bond is released.
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- **BMP E.7 – Other Post-Construction Runoff Controls**

<b>MEASURABLE GOAL</b>	Develop and implement standards to incorporate permanent erosion control measures and native plantings, where appropriate, in the design of new and retrofit flood management projects.
<b>STATUS</b>	New and retrofit flood management projects are designed with permanent erosion control measures and native plantings, where appropriate. Rip-rap and permanent turf reinforcement matting are typically specified in locations where overland flow or wave action may be too erosive for turf grass. And, the City has developed a list of native plants that have performed well in rain gardens and bio-swales. Plants will be selected from this list whenever additional native plantings are desirable.

- **POLLUTION PREVENTION/GOOD HOUSEKEEPING**

- **BMP F.1 – Employee Training Program**

<b>MEASURABLE GOAL</b>	Provide annual staff training and a written exam on stormwater pollution prevention for municipal operations, illicit discharge detection and elimination, and maintenance of green infrastructure. When contractors are hired for maintenance, repair, or replacement of stormwater BMPs, only hire contractors that have been trained and are experienced in this type of work.
<b>STATUS</b>	The City hosted training on Sensible Salting for a total of 80 employees on October 14, 2019. Attendees included snow plow drivers and supervisors from multiple City departments.  Qualifications are considered whenever the City hires contractors to maintain, repair, or replace BMPs.

- **BMP F.3 – Municipal Operations Stormwater Control**

<b>MEASURABLE GOAL</b>	Document City procedures and control measures designed to reduce the discharge of pollutants from municipal operations in a Stormwater Pollution Prevention Plan for the City.
<b>STATUS</b>	Design of a new Public Works Facility is underway and construction is expected to begin in 2021. A Stormwater Pollution Prevention Plan will be prepared for the Public Works Facility during the next reporting period.

### **III. RESULTS OF INFORMATION COLLECTED AND ANALYZED**

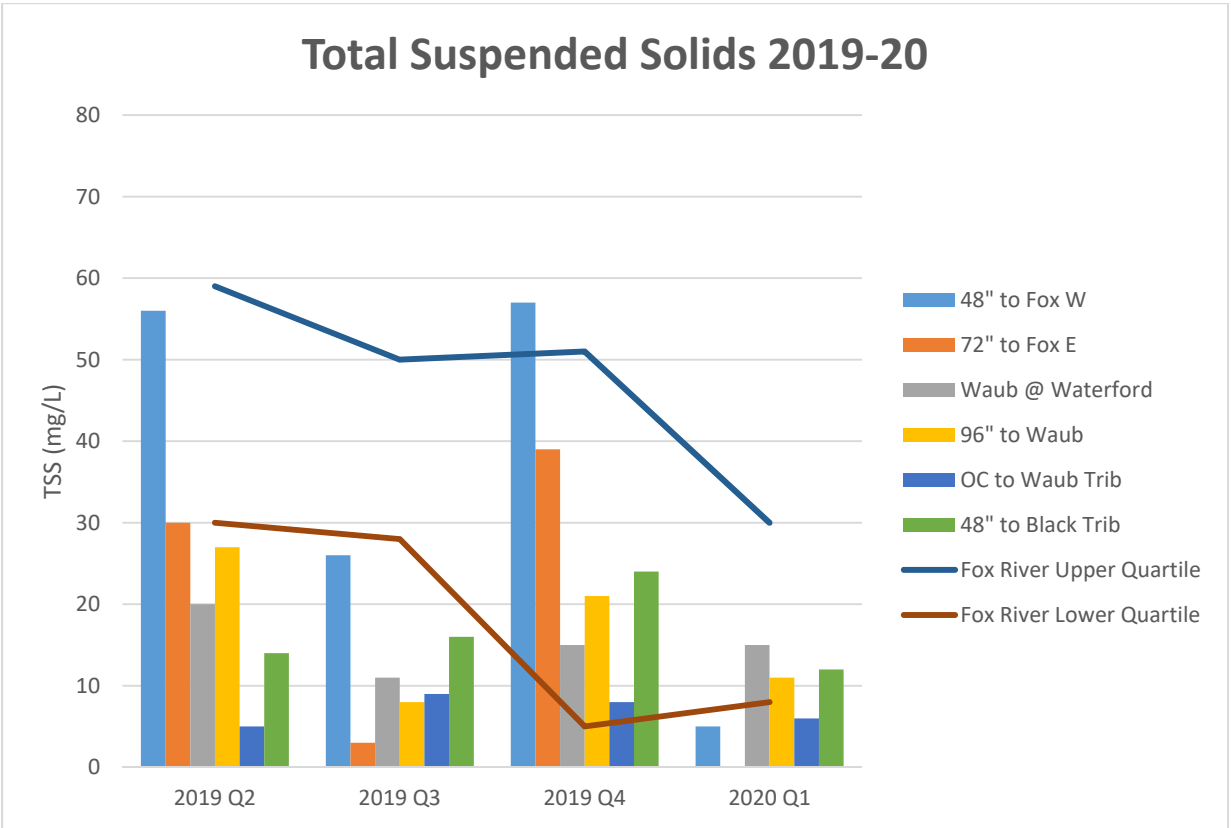
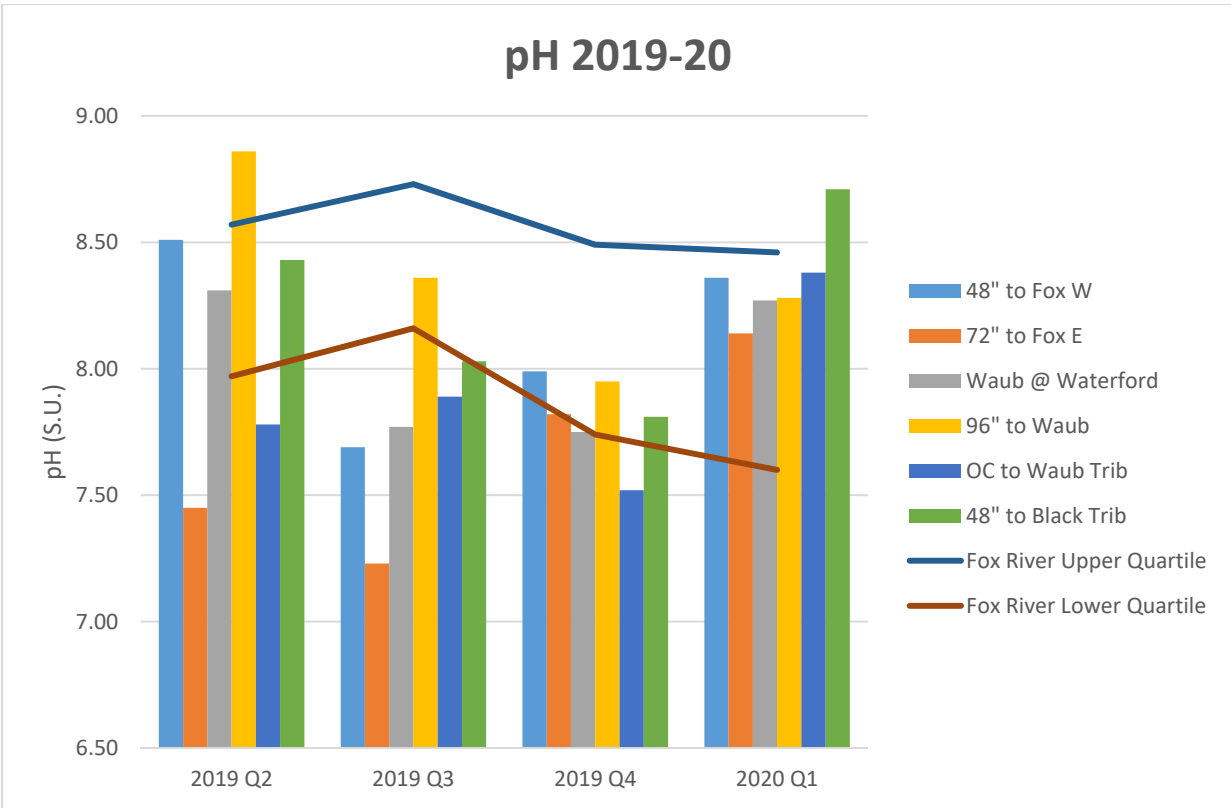
The City continued its water quality monitoring program throughout the reporting period. Samples are collected quarterly at the locations listed below.

- The 48 inch storm sewer discharging to the Fox River near the intersection of West Park Avenue and River Street
- The 72 inch storm sewer discharging to the Fox River near Hurds Island Park, south of North Avenue
- The 96 inch storm sewer discharging to Waubonsie Creek near the intersection of Raintree Road and Gregory Street
- An open channel in the Waubonsie Creek watershed near the intersection of Ellington Drive and Keating Drive
- Waubonsie Creek near the City limits at Waterford Drive
- The 48 inch storm sewer discharging to a tributary of Blackberry Creek near the intersection of Coach and Surrey Lane and Lakeview Drive

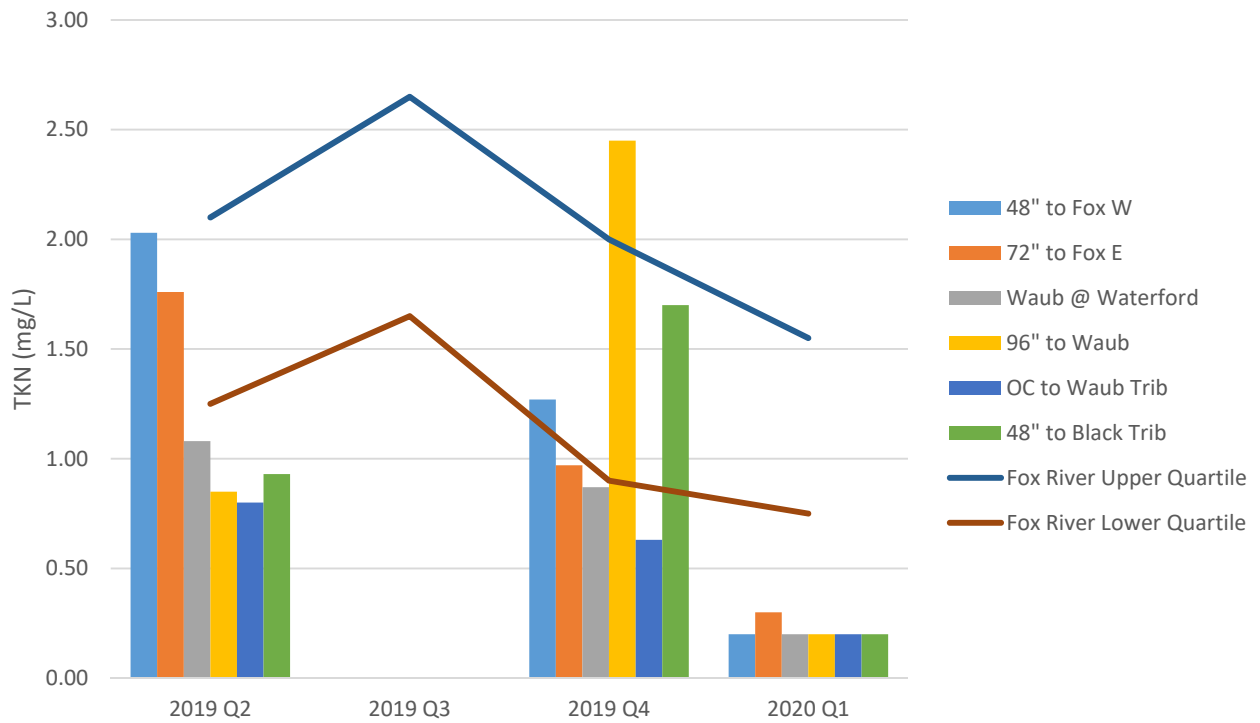
Each sample is tested for: pH, Total Suspended Solids (TSS), Total Kjeldahl Nitrogen (TKN), Total Phosphorus, fecal coliforms, chlorides, and Total Petroleum Hydrocarbons (TPH). In addition, samples collected from the storm sewer discharges to the Fox River are tested for mercury and polychlorinated biphenyls (PCBs) biannually. All samples are collected within 48 hours of a precipitation event greater than or equal to one quarter inch within a 24-hour period.

Extensive water quality data has been collected on behalf of the Fox River Study Group (FRSG) by the Illinois State Water Survey, the Fox Metro Water Reclamation District, and the Fox River Water Reclamation District. This data includes more than 14 years of water quality testing performed on samples collected along the Fox River and its tributaries. In February 2019 the Illinois State Water Survey published a report titled “Water Quality Trend Analysis for the Fox River Watershed: Stratton Dam to the Illinois River.” The report included analysis of data collected at Geneva (upstream of Aurora) and Montgomery (downstream of Aurora), determining Upper and Lower Quartile values by month for water quality parameters including pH, TSS, TKN, and Total Phosphorus.

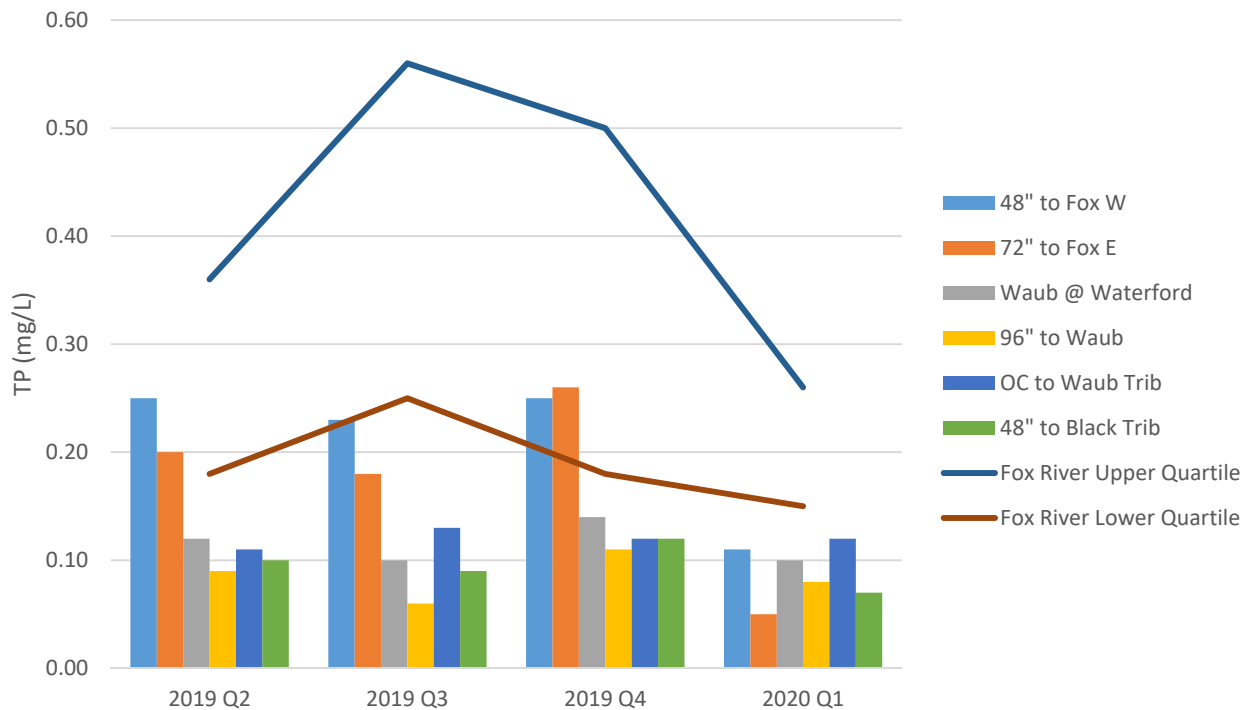
Results from the City’s water quality monitoring program are shown in the following charts. Charts for pH, TSS, TKN, and Total Phosphorus also include Fox River Upper and Lower Quartile values, based on data reported in the Water Quality Trend Analysis. These Upper and Lower Quartile values indicate whether the monitoring data collected by Aurora is within the range of values typical for the Fox River for the given time of year.



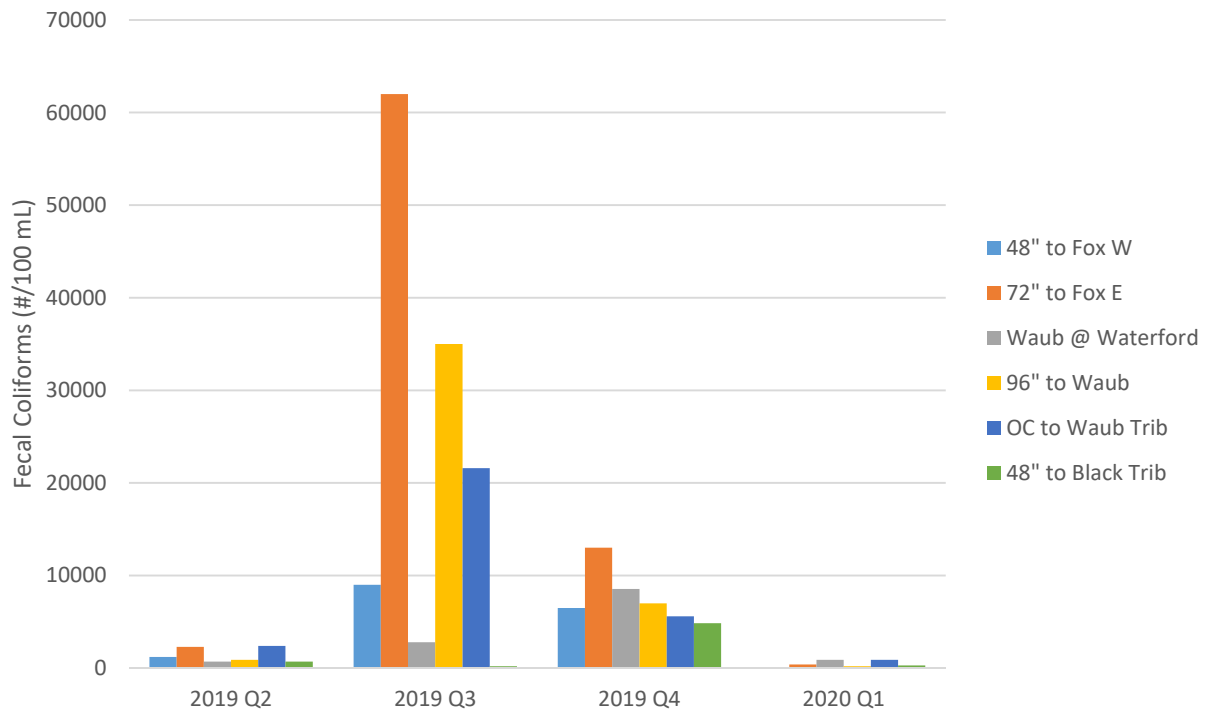
## Total Kjeldahl Nitrogen 2019-20



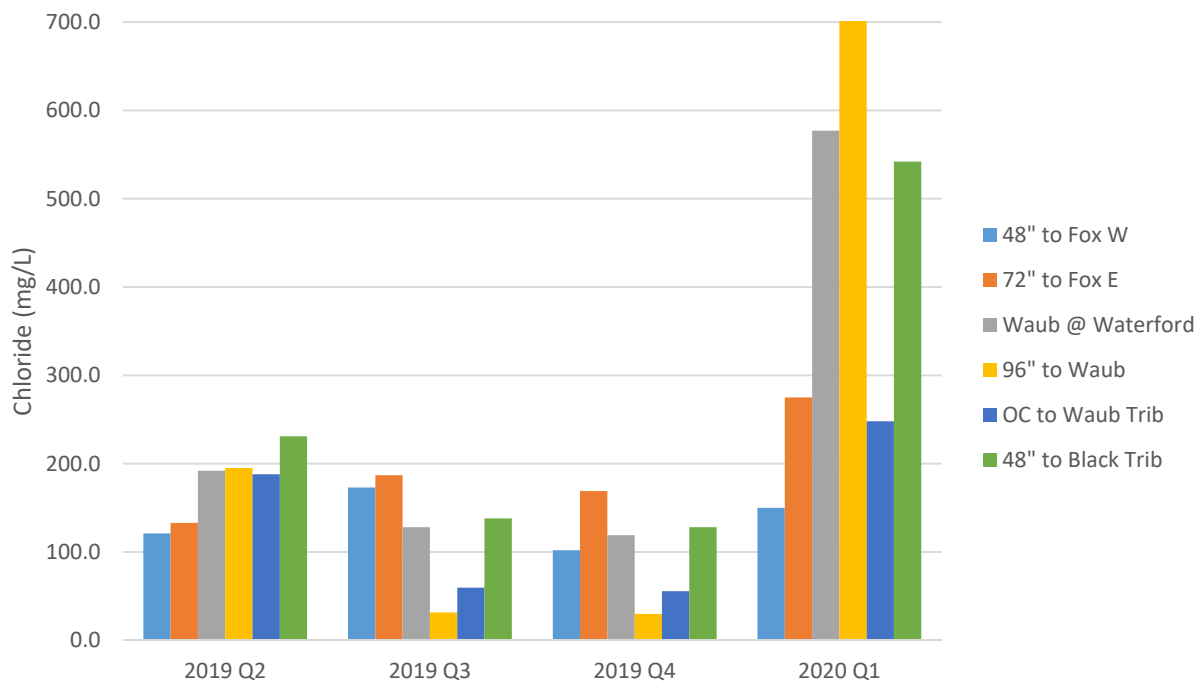
## Total Phosphorus 2019-20



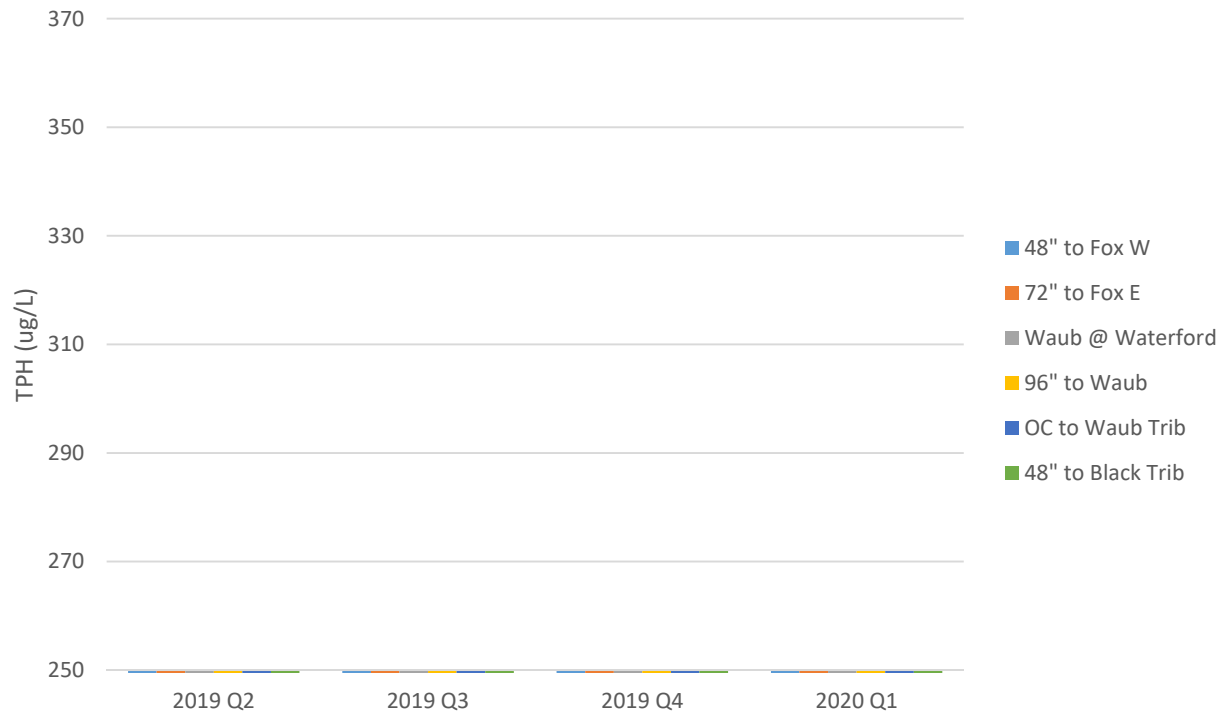
## Fecal Coliforms 2019-20



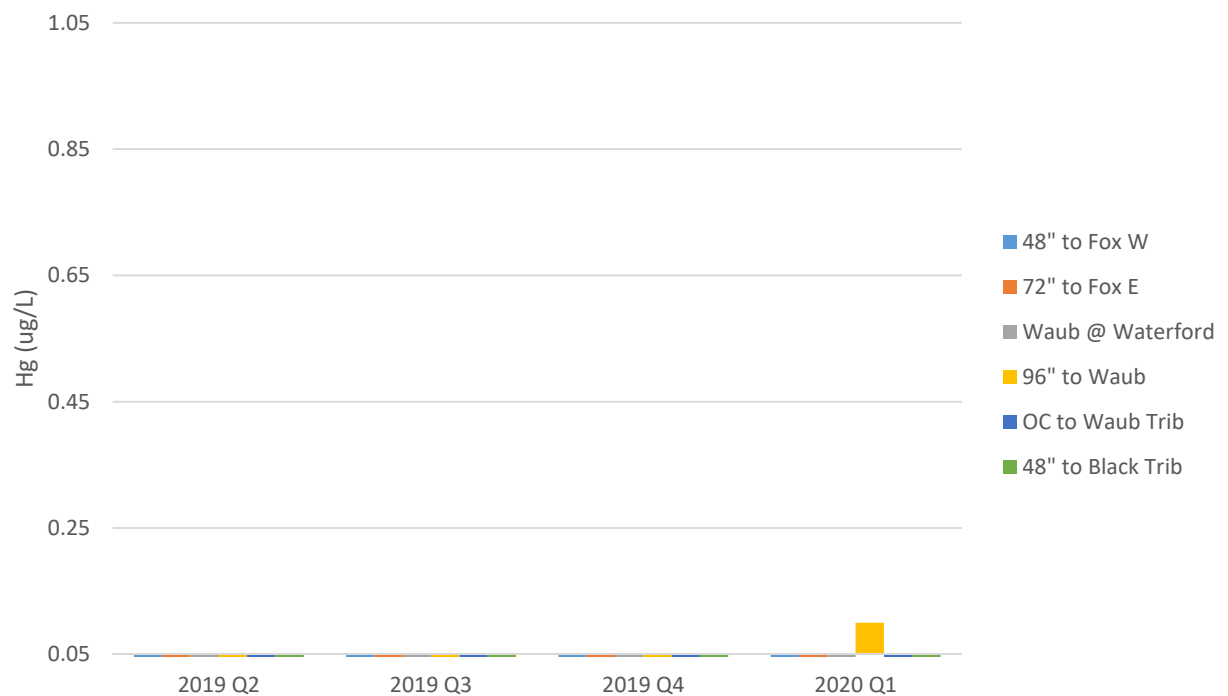
## Chloride 2019-20



## Total Petroleum Hydrocarbon 2019-20

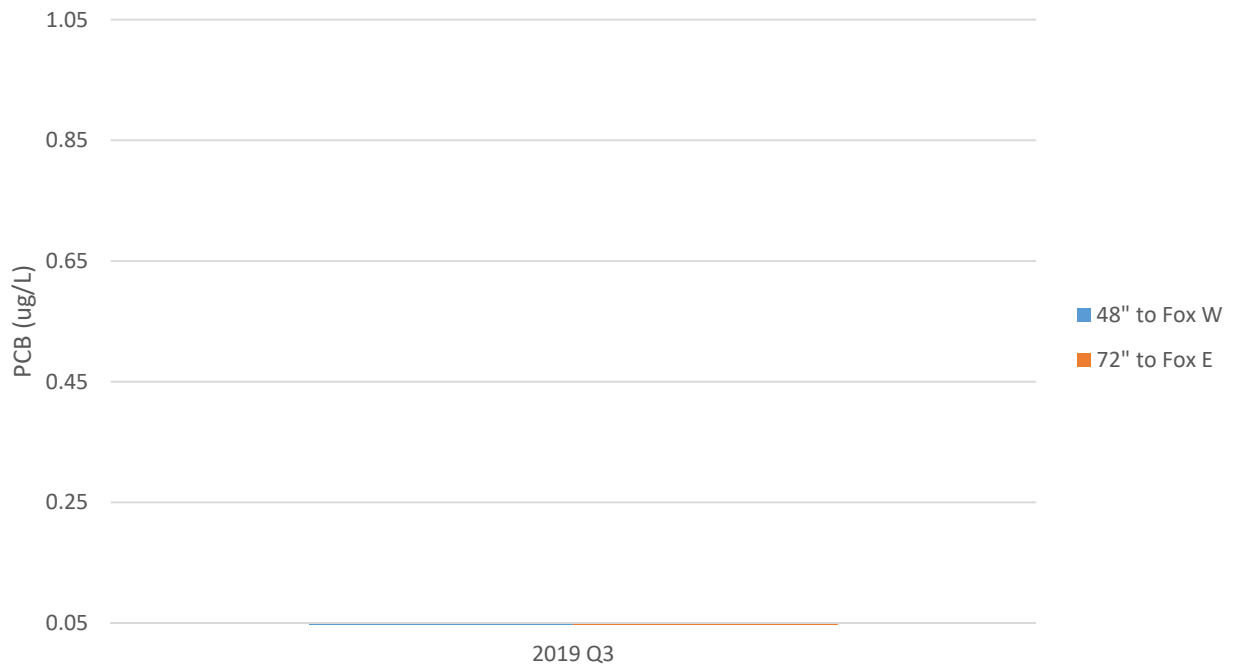


## Mercury 2019-20





## Polychlorinated Biphenyl 2019-20



#### **IV. SUMMARY OF STORMWATER ACTIVITIES PLANNED FOR THE NEXT REPORTING PERIOD**

##### **PUBLIC EDUCATION AND OUTREACH**

- Distribute one flyer through an Aurora school.
- Make one public presentation in Aurora.
- Provide links to educational resources on the City's web site.

##### **PUBLIC INVOLVEMENT/PARTICIPATION**

- Participate in the FRSG by attending monthly meetings, tracking annual phosphorus load reduction, and providing annual financial support.
- Present the City's stormwater management program at a publicly noticed City Council or Committee meeting.
- Inform residents of a telephone number for reporting stormwater related issues.
- Coordinate an event with Aurora schools to educate children about water quality and collect water quality data. Priority will be placed on schools located within environmental justice areas.

##### **ILLICIT DISCHARGE DETECTION AND ELIMINATION**

- Maintain and improve the City's GIS-based sewer atlas.
- Document all reports of suspicious discharges, along with investigative measures taken and any enforcement actions.
- Update the Prioritization Plan for dry weather outfall screening.
- Perform dry weather screening of City outfalls according to the Prioritization Plan.
- Trace and remove all illicit discharges.
- Require new inlets and catch basins installed as part of capital improvement projects and new development to be cast with the statement "Dump No Waste, Drains to River."
- Maintain and service pet waste receptacles weekly.

##### **CONSTRUCTION SITE RUNOFF CONTROL**

- Review site plans for effective soil erosion and sediment controls, controls for non-stormwater discharges from the construction site, and compliance with General NPDES Permit No. ILR10.
- Provide the public with opportunities for input on proposed development and re-development at publicly noticed meetings.
- Conduct site inspections throughout construction for all permitted development sites.

##### **POST-CONSTRUCTION RUNOFF CONTROL**

- Review site plans for appropriate structural and non-structural BMPs, including green infrastructure, as well as compliance with General NPDES Permit No. ILR10.
- Require Long-Term O&M Plans for stormwater management facilities in accordance with the Kane County Stormwater Ordinance.

- Conduct site inspections during construction and at the completion of construction to ensure consistency with the approved construction plans.
- Incorporate permanent erosion control measures and native plantings, where appropriate, in the design of new and retrofit flood management projects.

#### **POLLUTION PREVENTION/GOOD HOUSEKEEPING**

- Provide staff training and a written exam on stormwater pollution prevention for municipal operations, illicit discharge detection and elimination, and maintenance of green infrastructure. Verify the qualifications of contractors hired to maintain, repair, or replace BMPs.
- Document City procedures and control measures designed to reduce the discharge of pollutants from municipal operations in a Stormwater Pollution Prevention Plan for the new Public Works Facility.

#### **V. RELIANCE ON ANOTHER GOVERNMENT ENTITY**

The City is not relying on any other government entity to satisfy the requirements of General NPDES Permit No. ILR40; however, the City benefits from Kane County's stormwater activities, including a number of Public Education and Outreach BMPs. Please see Kane County's Annual Facility Inspection Report for additional information about these activities.

#### **VI. CITY CONSTRUCTION PROJECTS WITH 1 ACRE OR MORE DISTURBED AREA**

- ATC Regional Enhancement Project
- Montgomery Road Shared Use Path
- South Eola Road Stormwater Management and Conveyance Improvements
- Farnsworth Avenue Bridge Removal and Replacement