



# 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, 2020 To March, 2021

Permit No. ILR40 0366

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

Name: Village of Lake Bluff Mailing Address 1: 40 East Center Avenue

Mailing Address 2: \_\_\_\_\_ County: Lake

City: Lake Bluff State: IL Zip: 60044 Telephone: 847-234-0774

Contact Person: Drew Irvin Email Address: dirvin@lakebluff.org  
(Person responsible for Annual Report)

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

Village of Lake Bluff Shields Township

Lake County

#### 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:

Drew Irvin

Printed Name:

05-28-2021

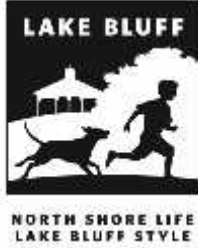
Date:

Village Administrator

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



# **Village of Lake Bluff, Illinois**

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
ANNUAL FACILITY INSPECTION REPORT  
NPDES PERMIT FOR STORM WATER DISCHARGES  
FROM MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)

## **2021 Annual Facility Inspection Report March 2020 to February 2021**

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## Part A. Changes to Best Management Practices

Information regarding the status of the Best Management Practices (BMPs) and measurable goals described in the Village of Lake Bluff's NOI is provided in the following table. No changes were made to the BMPs described in the Village's NOI during the reporting period.

**Note:** X indicates BMPs that were implemented in accordance with the MS4's NOI  
 ✓ indicates BMPs that were changed during the reporting period

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

| Village  |  |
|--|--|
| <b>D. Construction Site Runoff Control</b>       |  |
| X  | D.1 Regulatory Control Program               |
| X  | D.2 Erosion and Sediment Control BMPs        |
| X  | D.3 Other Waste Control Program              |
| X  | D.4 Site Plan Review Procedures              |
| X  | D.5 Public Information Handling Procedures   |
| X  | D.6 Site Inspection/Enforcement Procedures   |
|  | D.7 Other Construction Site Runoff Controls  |
| <b>E. Post-Construction Runoff Control</b>       |  |
|  | E.1 Community Control Strategy               |
| X  | E.2 Regulatory Control Program               |
| X  | E.3 Long Term O&M Procedures                 |
| X  | E.4 Pre-Const Review of BMP Designs          |
| X  | E.5 Site Inspections During Construction     |
| X  | E.6 Post-Construction Inspections            |
|  | E.7 Other Post-Const Runoff Controls         |
| <b>F. Pollution Prevention/Good Housekeeping</b> |  |
| 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      |

## Part B. Status of Compliance with Permit Conditions

### Stormwater Management Activities

The stormwater management activities that the Village performed during the reporting period, including the Village's BMPs and measureable goals, are described in detail in the Village's NOI. The NOI and annual reports can be viewed at <http://www.lakebluff.org/residents/stormwater-solutions>. The Village's MS4 Stormwater Management Plan can also be found on the website.

A brief summary of the implementation status of the Village's stormwater management program BMPs is provided below.

### A. Public Education and Outreach

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.*

The Village provides public education and outreach information relating to the impact of stormwater discharges. The Village newsletter was published twice during the reporting period and contained stormwater information. The following fact sheets are distributed and available on the Village's website:

- After the Storm
- Rivers and Streams Begin at your Front Door
- Storm Sewers – Rivers Beneath our Feet
- Fertilization
- Going Native
- Lawn Watering
- Managing Your Household Chemicals
- Pet Waste and Water Quality
- Rethinking Yard Care

Links to additional information available from other agencies include:

- EPA Green Infrastructure Website
- Lake County Stormwater Management Commission
- McHenry-Lake County Soil and Water Conservation District

Lake County SMC provided additional public education services as part of countywide program implementation.

## **B. Public Participation/Involvement**

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.*

The Village's website publicizes a hotline number for resident reporting of potential stormwater pollution issues.

SMC provided public participation and involvement services as part of countywide program implementation.

The Village performed an environmental justice assessment for its program. No changes to the program resulted from the assessment.

## **C. Illicit Discharge Detection and Elimination**

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.*

The Village has developed a complete storm drain system map for use in implementing the program. The Village continued its multi-year process of replacing the paper storm sewer maps with GIS-based maps.

Illicit discharge detection and elimination training was provided to Village maintenance and operations staff. Formal pollution prevention and illicit discharge detection and elimination training opportunities were limited by COVID-19, but informal supervisor / work task training still occurred.

Dry weather outfall inspections were performed in 2020. No illicit discharges were observed this reporting year.

## **D. Construction Site Runoff Control**

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI. Enforce WDO.*

The Village continues to enforce the Watershed Development Ordinance (WDO). Construction sites are inspected on a monthly basis and immediately following any rainfall event of ½" or greater. Deficiencies were noted occasionally at residential building sites. Typically, issues include tracking of sediment onto Village streets, lack of silt fence maintenance, improper dewatering, and lack of inlet sediment baskets. Response included instructions and assistance to contractors to correct the deficiencies.

## **E. Post-Construction Runoff Control**

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI. Enforce WDO.*

The Village continues to enforce the WDO. Site plans are reviewed with respect to WDO requirements.

## **F. Pollution Prevention/Good Housekeeping**

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.*

Formal pollution prevention and illicit discharge detection and elimination training opportunities were limited by COVID-19, but informal supervisor / work task training still occurred.

Street sweeping was performed 4-6 times per year in select locations throughout the Village.

Approximately 20% of MS4 catch basins were cleaned and inspected.

Approximately 10% of the storm drain system was cleaned and inspected. The Village has a written standard procedure for maintenance of the system.

Inspection of the Public Works Maintenance Yard was performed, including implementation of structural and maintenance activity BMPs.

Road salt is stored in a permanent structure to protect deicing materials from rainfall and runoff. Excess material is stored with temporary tarping.

## Part C. Information and Data Collection Results

Water quality sampling is periodically conducted both upstream and downstream of the Village's stormwater discharges to the East Skokie River. Water quality samples are collected at outfalls to Lake Michigan.

Four sampling points are included in the Village's monitoring program:

- ) 1 - East Skokie North – water drains into Village
- ) 2 - East Skokie South –water drains out of Village
- ) A - Outfall to Lake Michigan
- ) B - Outfall to Lake Michigan.

At these locations, the physical characteristics are observed and water quality samples (grab samples) are collected. Collected water quality samples are tested for: pH, dissolved oxygen, chloride, nitrate, nitrite, ammonia, total kjeldahl nitrogen, phosphorus, total dissolved solids, total suspended solids and fecal coliform.

The most recent data collected (2020) show water quality concentrations in similar ranges to previous years' sampling. Water quality data is available from the Village. This information will be used to assess program implementation.

## Part D. Summary of Future Stormwater Activities

The table below indicates the stormwater management activities that the Village plans to undertake during the next reporting period. Additional information about the stormwater management activities that the Village will perform during the year is provided in the section following the table.

**Note: X indicates BMPs that will be implemented**

| Village   |   |
|---|---|
| <b>A. Public Education and Outreach</b>               |   |
| X   | A.1 Distributed Paper Material                |
| X   | A.2 Speaking Engagement                       |
| X   | A.3 Public Service Announcement               |
| X   | A.4 Community Event                           |
| X   | A.5 Classroom Education Material              |
| X   | A.6 Other Public Education                    |
| <b>B. Public Participation/Involvement</b>            |   |
| X   | B.1 Public Panel                              |
|   | B.2 Educational Volunteer                     |
| X   | B.3 Stakeholder Meeting                       |
| X   | B.4 Public Hearing                            |
| X   | B.5 Volunteer Monitoring                      |
| X   | B.6 Program Coordination                      |
| X   | B.7 Other Public Involvement                  |
| <b>C. Illicit Discharge Detection and Elimination</b> |   |
| 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         |
| X   | C.7 Visual Dry Weather Screening              |
| X   | C.8 Pollutant Field Testing                   |
| X   | C.9 Public Notification                       |
| X   | C.10 Other Illicit Discharge Controls         |

| Village  |  |
|--|--|
| <b>D. Construction Site Runoff Control</b>       |  |
| X  | D.1 Regulatory Control Program               |
| X  | D.2 Erosion and Sediment Control BMPs        |
| X  | D.3 Other Waste Control Program              |
| X  | D.4 Site Plan Review Procedures              |
| X  | D.5 Public Information Handling Procedures   |
| X  | D.6 Site Inspection/Enforcement Procedures   |
|  | D.7 Other Construction Site Runoff Controls  |
| <b>E. Post-Construction Runoff Control</b>       |  |
|  | E.1 Community Control Strategy               |
| X  | E.2 Regulatory Control Program               |
| X  | E.3 Long Term O&M Procedures                 |
| X  | E.4 Pre-Const Review of BMP Designs          |
| X  | E.5 Site Inspections During Construction     |
| X  | E.6 Post-Construction Inspections            |
| X  | E.7 Other Post-Const Runoff Controls         |
| <b>F. Pollution Prevention/Good Housekeeping</b> |  |
| X  | F.1 Employee Training Program                |
| X  | F.2 Inspection and Maintenance Program       |
| X  | F.3 Municipal Operations Storm Water Control |
| X  | F.4 Municipal Operations Waste Disposal      |
| X  | F.5 Flood Management/Assess Guidelines       |
| X  | F.6 Other Municipal Operations Controls      |



### **Stormwater Management Activities**

The Village plans to continue to perform a variety of stormwater management activities, as described in detail in the Village's NOI and in brief below.

#### **A. Public Education and Outreach**

The Village is committed to implementing the Public Education and Outreach component of its SMPP. The Village's Public Education and Outreach program includes: the distribution of educational material to the community or conducting equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce those impacts; supporting classroom education; supporting storm drain stenciling efforts; and, supporting SWALCO events.

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.*

#### **B. Public Participation/Involvement**

The Village is committed to implementing the Public Participation/Involvement component of its SMPP. The Village's Public Participation/Involvement program includes: maintaining a process for receiving and processing citizen input; attending and publicizing stakeholder meetings; presenting program information at a public meeting at least once annually; and, publicizing IDDE reporting contact numbers.

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.*

#### **C. Illicit Discharge Detection and Elimination**

The Village will conduct activities related to the Illicit Discharge Detection and Elimination (IDDE) minimum control measure. According to IEPA's General NPDES Permit No. ILR40, the Village's IDDE program must include:

- ) 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-storm water 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.

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.*

**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 community by the Village.

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI. Enforce WDO.*

**E. Post-Construction Runoff Control**

As described above, the countywide WDO establishes the minimum stormwater management requirements for development in Lake County. The WDO establishes standards for post-construction site runoff control. These standards apply to any new development or redevelopment resulting in over 0.5 acres of new impervious area. The Village's SMPP also includes inspection procedures for pre-WDO developments, streambanks and shorelines, streambeds, and detention/retention ponds.

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI. Enforce WDO.*

**F. Pollution Prevention/Good Housekeeping**

The Village is committed to implementing the Pollution Prevention/Good Housekeeping component of its SMPP. The Village's Pollution Prevention/Good Housekeeping program includes: the evaluation and improvement of municipal policies and procedures to reduce the discharge of pollutants from municipal activities and operations; and, a training program for municipal employees.

*Measurable Goal(s): Implement BMPs and track progress of BMP implementation, as described in the NOI.*

## Part E. Notice of Reliance on another Government Entity

The Lake County Stormwater Management Commission (SMC) both serves as a Qualifying Local Program (QLP) for MS4s in Lake County, and provides shared services for MS4 communities. SMC has been implementing a comprehensive, countywide stormwater program which provides services under four of the six Minimum Control Measures at the issuance of the original NOI. In 2002, SMC formed an Ad Hoc Municipal Advisory Committee (MAC) specifically to advise MS4 communities on the NPDES Phase II Permit program. The MAC is comprised of municipal, township, drainage district, consultant and county representatives.

SMC has sponsored informational workshops and roundtable discussions and formed the Municipal Advisory Committee (MAC) to receive input on how SMC can best assist local governments during the permit application process and implementation period. Through these discussions, it was decided that each municipality (or small MS4) would submit its own "Notice of Intent" (NOI) to be covered under IEPA's statewide general permit; however, using the countywide approach municipalities may take credit for the programs and ordinances developed by SMC as well as tailor specific local BMP programs for compliance with the Phase II rules.

The NOI identifies existing SMC countywide services that meet four of the six Minimum Control Measures. These services include:

Minimum Control Measure A. Public Education and Outreach: SMC provides, through its Public Information Coordinator, various training workshops, homeowners workshops, brochures, training manuals, videos, etc., which qualify for credit.

Minimum Control Measure B. Public Participation and Involvement: SMC coordinates and participates in public meetings and committees, including the Municipal Advisory Committee (MAC), SMC Board of Commissioners, and Technical Advisory Committee (TAC), citizen watershed planning committees, Watershed Management Board (WMB), and volunteer support.

Minimum Control Measure D. Construction Site Runoff Control: SMC adopted the countywide Watershed Development Ordinance in 1992, which establishes the minimum stormwater management requirements for development in Lake County. The WDO, which is enforced by SMC as well as by certified communities in the county, establishes standards for construction site runoff control.

Minimum Control Measure E. Post-Construction Runoff Control: The Watershed Development Ordinance also establishes standards for post-construction runoff control.

As part of the countywide approach to comply with the NPDES Phase II program, SMC has provided the following assistance to municipalities:

- ) Supported NPDES II presentations to local board
- ) Developed model Notice of Intent (NOI)
- ) Provided countywide receiving streams map
- ) Developed specific BMP Measurable Goals and program development tasks

- ) Served as clearinghouse for all support information and acts as a liaison to IEPA and USEPA
- ) Supported the Municipal Advisory Committee (MAC)
- ) Drafted models of the Annual Performance Reports and specific BMP Measurable Goals
- ) Provided model Illicit Discharge Ordinance language and a Lake County Guidance Manual for Illicit Discharge Detection and Elimination (IDDE)
- ) Developed training workshops for municipal employees regarding IDDE program development, good housekeeping
- ) Continued to enforce and amend the Lake County Watershed Development Ordinance (WDO)

