



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 0361

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

Name: City of Joliet Mailing Address 1: 150 W. Jefferson Street

Mailing Address 2: _____ County: Will

City: Joliet State: IL Zip: 60432 Telephone: 815-724-4260

Contact Person: Greg Ruddy Email Address: gruddy@jolietcity.org
(Person responsible for Annual Report)

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

City of Joliet

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))

Greg Ruddy
Owner Signature:
Greg Ruddy

Printed Name:

05/26/21
Date:
Director of Public Works

Title:

EMAIL COMPLETED FORM TO: 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

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39) Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42) and may also prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.



**ANNUAL FACILITY INSPECTION REPORT
NPDES PERMIT FOR STORMWATER DISCHARGES
FROM MUNICIPAL SEPARATE STORM SEWER
SYSTEMS (MS4)**

**CITY OF JOLIET, ILLINOIS
2021 ANNUAL FACILITY INSPECTION REPORT
MARCH 2020 TO FEBRUARY 2021 REPORTING PERIOD**

Table of Contents

Part A. Changes to Best Management Practices A-1

Part B. Status of Compliance with Permit ConditionsB-1

Part C. Information and Data Collection Results C-1

Part D. Summary of Planned Stormwater ActivitiesD-1

Part E. Notice of Reliance on another Government EntityE-1

Part F. Construction Projects Conducted F-1

Part A. Changes to Best Management Practices

Note: X indicates BMPs performed as proposed in the MS4 Program NOI
 ✓ indicates changes to BMPs proposed

| Year 1 | Year 2 | Year 3 | Year 4 | Year 5 | |
|---|--------|--------|--------|--------|---|
| 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 |
| | | | | | B.2 Educational Volunteer |
| | | | | | B.3 Stakeholder Meeting |
| | | | | | B.4 Public Hearing |
| | | | | | B.5 Volunteer Monitoring |
| | | | | | 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 |
| | | | | | C.3 Detection/Elimination Prioritization Plan |
| X | X | X | X | X | C.4 Illicit Discharge Tracing Procedures |
| | | | | | C.5 Illicit Source Removal Procedures |
| | | | | | C.6 Program Evaluation and Assessment |
| X | X | X | X | X | C.7 Visual Dry Weather Screening |
| X | X | X | X | X | C.8 Pollutant Field Testing |
| | | | | | C.9 Public Notification |
| | | | | | C.10 Other Illicit Discharge Controls |

| Year 1 | Year 2 | Year 3 | Year 4 | Year 5 | |
|--|--------|--------|--------|--------|--|
| MS4 | | | | | |
| D. Construction Site Runoff Control | | | | | |
| | | | | | D.1 Regulatory Control Program |
| | | | | | D.2 Erosion and Sediment Control BMPs |
| | | | | | D.3 Other Waste Control Program |
| | | | | | D.4 Site Plan Review Procedures |
| X | X | X | X | X | D.5 Public Information Handling Procedures |
| X | X | X | X | X | D.6 Site Inspection/Enforcement Procedures |
| X | X | X | X | X | D.7 Other Construction Site Runoff Controls |
| E. Post-Construction Runoff Control | | | | | |
| | | | | | E.1 Community Control Strategy |
| | | | | | E.2 Regulatory Control Program |
| | | | | | E.3 Long Term O&M Procedures |
| | | | | | E.4 Pre-Const Review of BMP Designs |
| X | X | X | X | X | E.5 Site Inspections During Construction |
| X | X | X | X | X | 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 |
| | | | | | 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

The City has developed a Stormwater Management Plan and posted it on the City's stormwater webpage. The status of BMPs and measurable goals performed for the reporting year is summarized below.

1. Public Education and Outreach

The City committed to perform activities and services related to the Public Education and Outreach minimum control measure under BMP numbers A.1, A.3, and A6. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. A1 – Distributed Educational Material

Brief Description of BMP: The City makes materials available to the public pertaining to stormwater quality education.

Milestone: Develop a storm water education poster

BMP Status: Stormwater quality education materials are located on the City's website for public use. The City partners with the Lower DuPage River Watershed Coalition and Lower DuPage River Watershed Group for education and outreach, which has additional stormwater quality and pollution prevention activities and materials on its website. The 2020 Spring Expo was not held due to COVID-19, therefore educational materials were not distributed at this event.

BMP No. A3 – Public Service Announcement

Brief Description of BMP: Public/cable education spot addressing storm water education.

Milestone: Produce and air a series of ads on local or cable television addressing storm water education to the public. The ads will rotate and air once a month.

BMP Status: A digital billboard ad for catch basin cleaning was created.

BMP No. A6 – Other Public Education

Brief Description of BMP: A section of the City's website is dedicated to help educate the public on storm water quality.

Milestone: The City will expand the website to include additional information and links to proposed public programs. Expand on the Sustainability page information.

BMP Status: The City expanded its website to include information on its updated rain barrel program implemented through The Conservation Foundation.

The City continues to provide storm drain stenciling as needed.

2. Public Participation/Involvement

The City committed to perform activities and services related to the Public Participation/Involvement minimum control measure under BMP number B.7. The status or progress for the measurable goal related to these BMP is presented below.

BMP No. B.7 – Other Public Involvement

Brief Description of BMP: An outreach program with local educational institutions will be developed to educate residents on storm water issues. Educational programs will be established and maintained each year.

Milestone: Provide education and teaching aides.

BMP Status: The City holds open public meetings to provide an opportunity for residents to ask questions about water quality issues. The MS4 program NOI, stormwater management plan, and annual reports are available on the City's Public Works Stormwater webpage.

3. Illicit Discharge Detection and Elimination

The City committed to perform activities related to the Illicit Discharge Detection and Elimination minimum control under BMP numbers C.1, C.2, C.4, C7, and C.8. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. C1 – Storm Sewer Map Preparation

Brief Description of BMP: Develop a separate storm sewer system map.

Milestone: Update the GIS storm sewer system map as new information becomes available.

BMP Status: The City has developed a storm sewer system map and converted 100% to GIS format to provide greater accessibility. Each year, the GIS maps are updated to include any new storm sewer pipes, outfalls and receiving water.

BMP No. C2 – Regulatory Control Program

Brief Description of BMP: The City will expand the program that indicates the restrictions of discharging non-stormwater into the storm sewer system, detects these discharges before they become a problem, and establish enforcement procedures.

Milestone: Educate staff on the application of the revised policies and maintain the program.

BMP Status: The City has developed an ordinance that prohibits illicit discharges into the storm drain system. Staff have been trained on the job on revised polices and program implementation.

BMP No. C4 – Illicit Discharge Tracing Procedures

Brief Description of BMP: Modify the complaint tracking system to identify illegal connections and illicit discharges to record locations on the GIS system and document previous actions. Make this information available to field staff to ensure resolution. Develop written notification with tracking system to ensure future compliance.

Milestone: Produce yearly summaries of known, new, and eliminated sources.

BMP Status: The City has a complaint tracking system to track illegal connections and illicit discharges on its GIS system. Field staff have access to the GIS to aid in resolutions.

BMP No. C.7 – Visual Dry Weather Screening

Brief Description of BMP: Areas with suspicious discharges will be inspected to determine suspected direct connections to the wastewater system and identify areas where wastewater might be leaking into adjacent storm drain pipes. Approximately 25% of storm outfalls are to be screened each year with high priority locations screened on an annual basis

Milestone: Inspect / screen stormwater outfalls. Educate staff and public on identifying suspicious discharges.

BMP Status: The City inspects outfalls for suspicious discharges to determine if they are directly connected or leaking into to the system. 283 of the City’s 283 outfalls were screened.

BMP No. C.8 – Pollutant Field Testing

Brief Description of BMP: Each year a number of storm water drain system outfalls will be sampled and tested to identify outfalls with illicit discharges.

Milestone: Maintain program.

BMP Status: Any outfalls with active flows were tested using a hand held multi-parameter probe.

4. Construction Site Runoff Control

The City committed to perform activities and services related to the Construction Site Runoff Control minimum control measure under BMP numbers D.5, D.6, and D.7

BMP No. D5 – Public Information Handling Procedures

Brief Description of BMP: The City will expand the tracking process whereby public complaints, concerns, permits, etc. are logged to include Public Works / Roadways issues. The tracking process will be implemented throughout the life of the storm water management program.

Milestone: Maintain the tracking process.

BMP Status: Due to software modification issues, the online system has not been developed. Public information is tracked within the City file network using Gov Outreach and Vueworks.

BMP No. D6 – Site Inspection/Enforcement Procedures

Brief Description of BMP: Perform site inspections and initiate enforcement procedures as needed.

Milestone: Investigate alternate methods to reduce amounts of large scale soil stripping. Educate public on new soil stripping policies

BMP Status: The City implemented the County and local ordinance for stormwater BMPs / controls at construction sites. Active construction sites are inspected weekly. The inspector filed multiple site inspection reports, and the observed deficiencies were given to the on-site contractor/foreman for correction and followed up. The City utilized project phasing to minimize large-scale soil stripping through the platting and bonding processes.

BMP No. D7 – Other Construction Site Runoff Controls

Brief Description of BMP: The City will modify the existing requirements for storm water pollution prevention program for construction site operators to include the use of catch all inlet protectors instead of filter fabric, and define the procedure for site dewatering during construction.

Milestone: Maintain the requirements through site review and staff training.

BMP Status: Site review and on the job staff training was performed as needed.

5. Post-Construction Runoff Control

The City committed to perform activities and services related to the Post-Construction Site Runoff Control minimum control measure under BMP numbers E.5 and E.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. E5 – Site Inspection During Construction

Brief Description of BMP: The City will develop coordinating procedure between staff and Certified Site Operation inspected sites, an inspection check sheet, and establish penalties and consequences for non-compliance.

Milestone: Provide additional staff education on current policies.

BMP Status: The City implemented the County and local ordinance for post-construction stormwater BMPs / controls for new development. The City developed coordinating procedures between staff and Certified Site Operation inspected sites, inspection check sheets, and established penalties and consequences for non-compliance. The City continues to perform inspections and maintain the procedures.

BMP No. E.6 –Post Construction Inspections

Brief Description of BMP: The City has identified priority sites that warrant inspections before and after significant rain events.

Milestone: Maintain inspections. Prepare site maps showing the location of priority sites.

BMP Status: The City identified priority sites by maintenance district and provided them to each district foreman for inspection before and after significant rain events. The City performed the inspections and will add additional priority sites as necessary.

6. Pollution Prevention/Good Housekeeping

The City committed to perform activities for BMP numbers F.1 and F.2. The status or progress for each of the measurable goals related to these BMPs is presented below.

BMP No. F1 – Employee Training Program

Brief Description of BMP: The City will run a staff education program to train City staff regarding the importance of storm water pollution and good housekeeping practices.

Milestone: Maintain the program and continue to train staff within the storm water training program.

BMP Status: The City provided for additional staff education, including training on salt usage, equipment cleaning, and maintenance yard BMPs. Equipment use and yard cleaning training occurs as part of operations throughout the year.

BMP No. F2 – Inspection and Maintenance Program

Brief Description of BMP: Establish a tracking method to document the street sweeping debris, grate cleaning, and ditch cleaning with quarterly summaries.

Milestone: Begin transition to online tracking using MS4 program. Add additional locations, including ditch & sewer grate cleaning to tracking log.

BMP Status: The City has identified priority sites that warrant inspections before and after significant rain events. The City established a tracking method with quarterly summaries to document street sweeping debris, grate cleaning, and ditch cleaning. The transition to an online system has been delayed due to software development issues.

The City inspected and maintained a portion of its stormwater system. Catch basin cleaning was performed by the street sweepers and on an as needed basis by hand by City crews. Downtown streets were swept every night Monday through Friday. On average, every street is swept 6 times a year removing over 630 tons of debris that otherwise would be discharged into the local waterways.

Road salt and deicing chemicals are stored in a permanent structure, protected from rainfall and stormwater runoff. Salt spreading equipment is routinely calibrated.

The City operates and maintains a municipal rain garden at 900 Westwood Avenue. This garden filters and cleans storm water from approximately 12 city blocks before being discharged to the Des Plaines River. In addition to removing dirt, debris and road salt, the site also reduces the volume of storm water discharge that previously contributed to local flooding problems. Maintenance is performed each year, including invasive plant control and debris removal.

Part C. Information and Data Collection Results

The City is an active member of the Lower DuPage Watershed Coalition, Lower Des Plaines Watershed Workgroup and Hickory / Spring Creek Watershed Planning Group and their regional water quality monitoring programs. Data collected is available for public use and may be used for program evaluation and implementation.

Part D. Summary of Planned Stormwater Activities

The following table summarizes the BMPs committed to for the next program implementation year. Specific BMPs and measurable goals are presented following the table.

Note: X indicates BMP commitment

| | |
|---|---|
| | |
| 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 | |
| X | B.1 Public Panel |
| | B.2 Educational Volunteer |
| | B.3 Stakeholder Meeting |
| | B.4 Public Hearing |
| | B.5 Volunteer Monitoring |
| | 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 |
| | 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 |
| X | C.8 Pollutant Field Testing |
| | C.9 Public Notification |
| | C.10 Other Illicit Discharge Controls |

| | |
|--|--|
| | |
| MS4 | |
| D. Construction Site Runoff Control | |
| X | D.1 Regulatory Control Program |
| | D.2 Erosion and Sediment Control BMPs |
| | D.3 Other Waste Control Program |
| | D.4 Site Plan Review Procedures |
| X | D.5 Public Information Handling Procedures |
| X | D.6 Site Inspection/Enforcement Procedures |
| X | D.7 Other Construction Site Runoff Controls |
| E. Post-Construction Runoff Control | |
| | E.1 Community Control Strategy |
| | E.2 Regulatory Control Program |
| | E.3 Long Term O&M Procedures |
| | 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 |
| 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 |
| X | F.4 Municipal Operations Waste Disposal |
| | F.5 Flood Management/Assess Guidelines |
| X | F.6 Other Municipal Operations Controls |

1. Public Education and Outreach

The City will perform activities and services related to the Public Education and Outreach minimum control measure. BMPs will be implemented under BMP number A.1, A.3, and A.6 as described below

BMP No. A1 – Distributed Educational Materials

Brief Description of BMP: The City makes materials available to the public pertaining to stormwater quality education. Stormwater quality education materials are located on the City's website for public use. The City partners with the Lower DuPage River Watershed Coalition and Lower DuPage River Watershed Group for education and outreach, which has additional stormwater quality and pollution prevention activities and materials on its website.

Measurable Goal(s), including frequencies: The City will continue to update its educational material each year.

Milestones: Continue to provide resident educational material each year. Maintain and update the website.

BMP No. A3 – Public Service Announcement

Brief Description of BMP: The City uses local and cable television to promote stormwater education.

Measurable Goal(s), including frequencies: Produce and air a series of ads on local or cable television addressing storm water education to the public. The ads will rotate and air once a month.

Milestones: Continue implementation.

BMP No. A6 – Other Public Education

Brief Description of BMP: A section of the City's website is dedicated to help educate the public on storm water quality.

Measurable Goal(s), including frequencies: The City will maintain the website to include additional information and links to proposed public programs.

Milestones: Maintain the website public education information.

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 number B.1 and B.7 as described below.

BMP No. B1 – Public Panel

Brief Description of BMP: The stormwater program is presented at a public meeting to inform the public and provide an opportunity for input. The MS4 program NOI, stormwater management plan, and annual reports are available on the City's Public Works Stormwater webpage.

Measurable Goal(s), including frequencies: Annually present the stormwater program at a public meeting.

Milestones: Presentation at a public meeting.

BMP No. B7 – Other Public Involvement

Brief Description of BMP: The City developed an outreach program with local educators to encourage resident education on storm water.

Measurable Goal(s), including frequencies: Educational programs will be established and maintained each year.

Milestones: Continue implementation.

3. Illicit Discharge Detection and Elimination

The City commits to perform activities related to the Illicit Discharge Detection and Elimination minimum control. BMPs will be implemented under BMP numbers C.1, C.2, C.4, C.7, and C.8 as described below.

BMP No. C1 – Storm Sewer Map Preparation

Brief Description of BMP: The City has a drafted storm sewer system map. It is being converted to GIS format to provide greater accessibility.

Measurable Goal(s), including frequencies: The City will continue to convert its separate storm sewer map into GIS format until is 100% complete and incorporate any new storm sewer pipes, outfalls, and receiving waters.

Milestones: Update the GIS storm sewer system map as new information becomes available.

BMP No. C2 – Regulatory Control Program

Brief Description of BMP: The City will expand the portions of its regulatory program concerning non-stormwater discharges to storm system.

Measurable Goal(s), including frequencies: The City will implement the program that indicates the restrictions of discharging non-stormwater into the storm sewer system, detects these discharges before they become a problem, and establish enforcement procedures.

Milestones: Continue implementation.

BMP No. C4 – Illicit Discharge Tracing Procedures

Brief Description of BMP: The City currently has a complaint tracking system which it will expand to include illegal and illicit discharge complaints on its current GIS system.

Measurable Goal(s), including frequencies: The complaint tracking system will be modified to identify illegal connections and illicit discharges on its GIS system. Field staff have access to the GIS to aid in resolutions.

Milestones: Maintain the tracking program.

BMP No. C7 – Visual Dry Weather Screening

Brief Description of BMP: The City inspects suspicious discharges to determine if they are directly connected or leaking into to the sanitary sewer.

Measurable Goal(s), including frequencies: The City will continue inspecting the storm system.

Milestones: Maintain the survey system.

BMP No. C.8 – Pollutant Field Testing

Brief Description of BMP: Each year a number of storm sewer outfalls along with critical outfall locations will be inspected and sampled to identify illicit discharges.

Measurable Goal(s), including frequencies: Approximately 25% of storm outfalls to be inspected and sampled each year with critical locations tested on a yearly basis.

Milestones: Continue implementation.

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.5, D.6, and D.7 as described below.

BMP No. D1 – Regulatory Control Program

Brief Description of BMP: The current ordinance requires a party proposing to perform site grading, stripping, excavating, or filling of land to submit a site permit. The party must describe sediment and erosion control measures on the permit. The City also utilizes field inspectors to monitor these measures and enforce the City's requirements through routine inspections. The City also performs site review programs to review the individual pre-construction sites to ensure consistency with the sediment and erosion control requirements.

Measurable Goal(s), including frequencies: The City will perform site inspections to enforce the ordinance.

Milestones: Implement the control ordinance.

BMP No. D5 – Public Information Handling Procedures

Brief Description of BMP: The City will expand its tracking process whereby public complaints, concerns, permits, etc. are logged to include Public Works/Roadway issues.

Measurable Goal(s), including frequencies: The tracking process will be implemented throughout the life of the storm water management program.

Milestones: Maintain the tracking process.

BMP No. D6 – Site Enforcement/Inspection Procedures

Brief Description of BMP: The City will modify the bonding and letter of credit process to account for long extended long-term site stabilization funding.

Measurable Goal(s), including frequencies: The procedures will be implemented throughout the life of the storm water management.

Milestones: Educate public on new soil stripping policies.

BMP No. D7 – Other Construction Site Runoff Controls

Brief Description of BMP: The City modified the existing requirements for its storm water pollution prevention program for construction site operators. It now includes the use of catch-all inlet protectors instead of filter fabric. The City also modified its procedures for construction site dewatering.

Measurable Goal(s), including frequencies: The requirements will continue to be maintained.

Milestones: Continue implementation. Maintain policies.

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.5 and E.6. as described below.

BMP No. E.5 – Site Inspection During Construction

Brief Description of BMP: The City developed coordinating procedures between staff and Certified Site Operation inspected sites, inspection check sheets, and establish penalties and consequences for non-compliance.

Measurable Goal(s), including frequencies: Site inspection procedures will be maintained.

Milestones: Continue implementation.

BMP No. E.6 – Post-Construction Inspections

Brief Description of BMP: The City identified priority sites that warrant inspections before and after significant rain events.

Measurable Goal(s), including frequencies: Priority sites will continue to be inspected and new sites added as necessary.

Milestones: Continue implementation.

6. Pollution Prevention/Good Housekeeping

The City will perform activities and services related to the Pollution Prevention/Good Housekeeping minimum control measure. BMPs will be implemented under BMP numbers F.1, F.2, F.3, F.4, and F.6 as described below.

BMP No. F1 – Employee Training Program

Brief Description of BMP: The City runs education programs to train City staff on the importance of stormwater pollution prevention and good housekeeping practices.

Measurable Goal(s), including frequencies: The staff training program will continue to be maintained.

Milestones: Continue implementation.

BMP No. F2 – Inspection and Maintenance Program

Brief Description of BMP: The City established a tracking method with quarterly summaries to document street sweeping debris, grate cleaning, and ditch cleaning.

Measurable Goal(s), including frequencies: Continue the tracking and documenting cleaning efforts.

Milestones: Maintain and utilize the tracking process.

BMP No. F3 – Municipal Operations Storm Water Control

Brief Description of BMP: The City will implement a City-wide street sweeping program.

Measurable Goal(s), including frequencies: Provide street sweeping six times per year, on average.

Milestones: Implement a street sweeping program.

BMP No. F4 – Municipal Operations Waste Disposal

Brief Description of BMP: Waste vehicle fluids and materials are stored in appropriate containers for recycling or proper disposal.

Measurable Goal(s), including frequencies: Properly dispose or recycle vehicle fluids annually.

Milestones: Properly dispose or recycle vehicle fluids.

BMP No. F6 – Other Municipal Operations Control

Brief Description of BMP: The City will perform good housekeeping in facility waste storage areas.

Measurable Goal(s), including frequencies: Facility waste storage areas are swept clean and waste dumpsters lids are kept closed when not in use.

Milestones: Perform good housekeeping in facility waste storage areas.

