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, 2018 To March, 2019

Permit No. ILR40 00546

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

Name: City of Danville Mailing Address 1: 17 W. Main Street

Mailing Address 2: 1155 E. Voorhees Street, Suite A County: Vermilion

City: Danville State: IL Zip: 61832 Telephone: 217-431-2321

Contact Person: Eric Childers Email Address: echilders@cityofdanville.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 Danville

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 ☐
2. Public Participation/Involvement ☐
3. Illicit Discharge Detection & Elimination ☐
4. Construction Site Runoff Control ☐
5. Post-Construction Runoff Control ☐
6. Pollution Prevention/Good Housekeeping ☐

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: Date: 5/30/19

Eric N Childers Assistant City Engineer

Printed Name: 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.

City of Danville
Department of Community Development
1155 E. Voorhees Street, Suite A
Danville, IL 61832
Phone: 217.431.2382
Fax: 217.431.3444

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

City of Danville, Illinois
NPDES PERMIT NO. ILR400546

DATE: May 30, 2019

REPORTING PERIOD: March 1, 2018 to February 28, 2019

MS4 OPERATOR INFORMATION:

City of Danville
1155 E. Voorhees Street, Suite A
Danville, Illinois 61832
(217) 431-2382

INTRODUCTION:

The City of Danville is required to comply with Phase II of the NPDES Stormwater Program (ILR40 / MS4 permit), administered by the Illinois EPA. This report details the efforts the City of Danville has undertaken for the period Year 3 from March 1, 2018 through February 28, 2019 of the current permit, effective March 1, 2016.

The City received this General NPDES Permit for Discharges from Small MS4 issued by the IEPA on February 10, 2016 with an expiration date of February 28, 2021. The purpose of the permit is for municipalities to implement programs and practices to control stormwater pollution and thereby improve stormwater quality in their communities.

Danville has developed a plan tailored to the needs of the City, to address the six required Best Management Practices over the term of the NPDES Phase II Permit. The Plan takes into account

the environmental and physical needs of the City, while also accounting for time, personnel, and money needed to fulfill the measurable goals established for each BMP.

The City of Danville is currently working under an NOI written and submitted to the IEPA in May 2017. This report describes the status of the best management practice (BMP) activities as listed on the current NOI and summarizes the activities proposed during the next permit year.

Per ILR40 Part V.C, each permittee must submit an annual report which provides an assessment of the appropriateness and effectiveness of the BMPs, a status of compliance, results of information collected and analyzed, a summary of the storm water activities, any change in identified BMPs, a notice if the permittee is relying on another entity to satisfy some of the permit obligations, and updated summary of any BMP constructed or implemented pursuant to any approved TMDL.

The following constitutes Danville's 2018-2019 annual report.

A. STATUS OF COMPLIANCE

Below we provide an annual evaluation of each of the six Best Management Practices categories and the measurable goals for each. A status of compliance with permit conditions, an assessment of the appropriateness of the identified BMPs, the progress toward achieving compliance for the reporting year, and the identified measurable goals for each of the minimum control measures are discussed.

The general permit specifies that all permitted facilities establish annual goals for each of the six minimum control measures. The following is a brief summary of the BMPs chosen for each minimum control measure, the status of compliance for each goal associated with the BMPs chosen, an assessment of BMP appropriateness, and the progress towards meeting each goal.

B. CHANGES TO BEST MANAGEMENT PRACTICES (BMPs)

The City was issued a General NPDES permit on February 10, 2016 with an effective date of March 1, 2016. This permit expires February 28, 2021. A new NOI was submitted to IEPA in May 2017.

No changes to the BMPs have occurred since the previous NOI was submitted.

C. RESULTS OF INFORMATION COLLECTED AND ANALYZED

1 – Data Collected during Monitoring and Assessment Program

All outfall monitoring data collected and analyzed during the reporting period was visual observation only. A blank copy of the visual inspection report is included in Attachment C. Most of the information is auto-populated from the in-field collection. However, some notes and any additional information considered beneficial for the report is added while in the

office. The reports are filed in the Community Development department, as well as given to Public Works Operations to address maintenance and inspection concerns.

Between March 1, 2018 and February 28, 2019, several outfalls were inspected during both wet and dry weather conditions. During those inspections two outfalls were determined in need of repair. The plan was to stabilize the line discharge areas for pipe discharge conditions and existing erosion issues. The Public Work crews and contractor repaired both locations.

2 – Data Collected regarding SSOs and Green Infrastructure BMPs

The City of Danville experienced 6 sanitary sewer overflows during the reporting year.

No sanitary sewer cross connections were discovered or reported this year.

Danville has created an inventory of stormwater infrastructure facilities. At the end of the reporting year, we have documented 68 wet and dry stormwater basins, 2 underground storage facilities, and 5 green infrastructure facilities in Danville. Of these, the City owns 9 of the basins, and 2 of the green infrastructure facilities.

D. FUTURE STORM WATER ACTIVITIES

Danville has several upcoming projects with some portion of stormwater management infrastructure improvements.

1) Jackson-Voorhees Streets Shared Use Path Extension - This project will replace inlets and storm sewers to improve drainage along Jackson Streets, as well as constructing curb and gutter and a concrete shared use (bicycle/pedestrian) path. The project began in April 2019, and is scheduled to be complete by the fall of 2019.

2) Denmark & Old Ottawa Roadway Improvements – This project will improve the roadway and incorporate sidewalks and storm inlets for improved drainage. This project is scheduled to start in 2020.

3) 2019 Storm Drainage Improvements Various Locations – This project will reconstruct and/or improvement drainage in several problem areas within the City. The City has targeted five areas for improvements during the 2019 construction season.

4) Fairchild-Hazel Street Intersection Improvements – This project consist of street widening, storm sewer improvements, and traffic signal upgrades at this intersection. The project is planned for the 2020 construction season.

E. RELIANCE ON ANOTHER GOVERNMENT ENTITY

The City of Danville does not rely on another government entity to satisfy permit obligations.

F. CONSTRUCTION PROJECT LIST 2018-2019:

The following construction projects were undertaken or ongoing by the City of Danville between March 1, 2018 and February 28, 2019:

(1) Voorhees Bridge replacement
(2) May & Rogers Drainage Improvements
(3) English & Jackson Intersection Improvements
(4) 422 N. Vermilion Pavement Improvements
(5) 2018 Sewers, miscellaneous storm/sanitary sewer replacements
(6) 2018 Infrastructure Improvements (Overlay, Sealcoat, Micro-surface at various street locations)

G. ATTACHMENTS A AND B:

"Attachment A – 2018-2019 NPDES Compliance Report" summarizes the BMP activities that were implemented for the compliance period March 1, 2018 through February 28, 2019. A status designation of "Completed" indicates that the activity fully meets the milestone proposed in the Notice of Intent. A status designation of "Substantially Completed" indicates that a majority of the activity has been completed, but still has some incomplete parts. A status of "Partially Completed" indicates that the activity was started, but at least 50% has yet to be finished. A status of "Incomplete – Forthcoming" indicates the activity has not been started, but we have plans to begin within the next reporting year. A status of "Incomplete" indicates the activity was incomplete at the end of the reporting year.

For Year 3 (2018-2019), the City of Danville has 38 BMPs outlined in the NOI. 25 of BMPs were completed, 2 were substantially completed, 6 were partially completed, and 5 were incomplete.

"Attachment B – Notice of Intent Proposed Measureable Goals and Milestones" includes a list of milestones established for the next permit period, Year 4 March 1, 2019 to February 29, 2020.

H. ADDITIONAL PROGRAM COMPLIANCE:

1. Stormwater Master Plan

In an effort to better understand the stormwater management needs and priorities therein, the City hired a private consultant in 2016 to develop a Stormwater Master Plan for identifying stormwater needs throughout the City. This comprehensive study of the stormwater program needs developed a list of 40 stormwater and flood management projects ranging from improving drainage to assisting private homeowners. The Master Plan also lays out the personnel and fiscal requirements needed for stormwater maintenance and for meeting the NPDES permit requirements. The City Council approved the plan in April 2016 and is available to view on the City of Danville's Stormwater Management webpage: www.cityofdanville.org/stormwater

2. Status of Compliance with the Monitoring and Assessment Program

Under Part V. Monitoring, Recordkeeping, and Reporting, the new permit requires the permittee to develop and implement a monitoring and assessment program to evaluate the effectiveness of the BMPs being implemented to reduce pollutant loading and water quality impacts. The program was required to be established within 180 days of the permit issuance date.

The City of Danville drafted their Monitoring Program during the summer of 2016. A visual monitoring program for the large outfalls (24" and larger) was established to best fulfill the requirements of the permit, while meeting the time and monetary constraints Danville is faced with. The program was tested during the fall of 2016 and implemented in November 2016.

An entirely new data collection system was established to implement this program. Outfall monitoring criteria were input into ArcGIS. Monitoring data and photos are collected in the field utilizing an iPad. The reports are then downloaded and compiled once back in the office. A blank copy of the report forms can be found in Attachment C. A copy of the Standard Operating Procedure for the monitoring program can be found in Attachment D.

Although an outfall monitoring program has been established, the City of Danville is performing these inspections on an emergency-only and available personnel basis. Limited staff and no funding mechanism for a stormwater management program, has prevented the full implementation of the Monitoring and Assessment Program. Until funding is secured, outfall investigations will only be performed if pollution is reported. Once funding is available, the program should be able to be re-established relatively quickly, to return this portion of the program to compliance.

This report hereby represents the City of Danville's stormwater management program, designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the Illinois Pollution Control Board Rules and Regulations and the Clean Water Act.

This report is respectfully submitted to the Illinois Environmental Protection Agency (IEPA) as the annual summary of Danville's efforts to fulfill the requirements of General NPDES Permit No. ILR400546.

If you have any questions about this report, please me at (217) 431-2259 or email echilders@cityofdanville.org.

Sincerely,

Eric N. Childers
Assistant City Engineer
City of Danville

ATTACHMENT A - 2018-2019 NPDES COMPLIANCE REPORT - CITY OF DANVILLE, ILLINOIS

BMP ID	STATUS	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 3 MILESTONE	MILESTONE YEAR 3 ACTIVITIES
A.1	SUBSTANTIALLY COMPLETED	Public Education and Outreach	Distributed Paper Material	Distribute stormwater runoff awareness brochure to local agencies and public buildings. Investigate other potential material distribution ideas that can promote BMP's. Update website to include stormwater runoff and pollution prevention materials.	Update website regularly, at least quarterly. Track webpage hits. See an increase in visitors to page. Distribute updated Preventing Pollution handout.	Evaluate existing outreach methods. Continue website efforts. Investigate further outreach efforts to possibly include Twitter use or other brochure distribution.	Website for stormwater and pollution prevention materials was reviewed and updated accordantly Preventing Pollution flyer is available at both the City Hall and Public Works buildings.
A.2	COMPLETED	Public Education and Outreach	Speaking Engagement	Promote and make available speaking engagements about storm water pollution and best management practices upon request of citizens or public organizations.	Participate in at least one speaking engagement annually. Contact the middle school(s) each fall to gage interest. Include information on the website about our availability for public speaking. Consider contacting HOAs, as well.	Have staff available for speaking engagements about stormwater pollution and best management practices when requested. Post information on the website about staff availability for speaking engagements.	The City Engineering staff continues to incorporate stormwater best management practices into discussion during public meetings and project planning. City staff has reached out to Aldermen in the EJ designated wards to offer speaking engagements. Information is available on the website.
A.6	COMPLETED	Public Education and Outreach	Other Public Education	Improve communications between residential and commercial activities adjacent to projects to keep both residences and business owners informed on a construction project progress. Publicize project information via City web site and provide staff phone lines for residents to report problems.	Update the stormwater website with information regarding current City of Danville construction projects. Update as needed, at least quarterly, to maintain accurate information. Follow up on any citizen concerns received via the "report a problem" form.	Establish guidelines for all staff to communicate project information and follow up procedures. Provide an easy-to-find and easy-to-use link on the website for reporting project, pollution, and other concerns.	The Sustainability section of the website includes past and recent projects, ways to help installing BMPs, and available Sustainable publications. There are several pages with links for reporting problems.
B.2	COMPLETED	Public Participation/ Involvement	Educational Volunteer	Have staff personnel volunteer and available to speak to groups, businesses, and owners on storm water pollution and best management practices when opportunities arise.	Participate in at least one speaking engagement annually. Contact the middle school(s) each fall to gage interest. Include information on the website about our availability for public speaking. Consider contacting HOAs, as well.	Proactively contact schools regarding speaking opportunities. Have staff available for speaking engagements about storm water pollution and best management practices when requested. Plan to participate in at leaset 1 event per year	The City Engineering staff continues to incorporated stormwater best management practices into discussion during public meetings and project planning. City staff has reached out to Aldermen and others to offer speaking engagements. Information is available on the website.
B.3	COMPLETED	Public Participation/ Involvement	Stakeholder Meeting	Provide a minimum of one public meeting annually for the public to provide input as to the adequacy of the permittee's MS4 program.	Establish the February Public Works Committee Meeting (held the second Tuesday of each month) to be our annual MS4 program evaluation meeting.	Post a notice on the City's homepage and stormwater management webpages advertising the meeting. Collect, evaluate, and consider any citizen concerns raised at the meeting.	City hosted a public meeting during the March Public Works Committee Meeting, with an open forum for NPDES comments. No public comments were received.
B.5	COMPLETED	Public Participation/ Involvement	Volunteer Monitoring	Review and update as needed the current web-based system for reporting problems on storm water pollution issues. Review the City's response plan.	Public awareness, involvement, concerns, and reporting activity on illegal discharges, dumping, and soil erosion with all City activities.	Update the web based system for public to report problems about storm water issues. Create a prominent link to "Report flooding, erosion, pollution, or illegal dumping". Review City response plan.	The City website and stormwater webpage have a link to “Report flooding, erosion, pollution, or illegal dumping”. We also accept phone calls from citizens with the same concerns. The completed forms are automatically emailed to the City Engineer, Assistant City Engineer, and the Stormwater Engineer.
B.6	COMPLETED	Public Participation/ Involvement	Program Involvement	Identify environmental justice (EJ) areas and include appropriate public involvement and participation	Pursue identifying the EJ areas within the City of Danville. Engage with the aldermen of the ward(s) identified and explore various ways to include appropriate involvement with their citizen group(s).	Engage with aldermen of the ward(s) identified and explore various ways to include appropriate involvement with their constituents.	The City of Danville has identified Wards 1 and 4 as our EJ areas. Letters offering public speaking engagements, as well as the new Preventing Pollution flyers were sent to the Aldermen, as well as to citizen groups within these wards. City Planners have incorporated EJ within the current Neighborhood Wellness Plan for the City.
B.7	PARTIALLY COMPLETED	Public Participation/ Involvement	Other Public Involvement	Encourage storm drain stenciling and stream cleanup programs to the public by providing web based information about public volunteer opportunities about storm inlet stenciling. Provide information on equipment use. Provide at least one community cleanup day per year. Coordinate with other agencies such as Keep Vermilion County Beautiful.	Post information about how citizens can go about a storm drain stenciling effort. Update as needed. Track any stenciling reported by citizens. Coordinate efforts annually for community cleanup day(s).	Provide assistance and monitor stenciling and community cleanup programs. Coordinate, lead and promote at least one community clean up day each year. Partner with KVCB or other groups to combine efforts	The City updated the stormwater website to include information and links to the Prairie Rivers Network in Champaign, which provides storm drain stenciling kits for free. The Public Works Department during current City street projects that require repair or new structures, replace inlet castings when available, with castings having the logo "Dump No Waste - Drains to River" . During the current year no inlets were stenciled.
C.1	COMPLETED	Illicit Discharge Detection & Elimination	Storm Sewer Map Preparation	Continue mapping program and televising of storm and sanitary sewers. Incorporate a data inventory for detection of illicit discharges.	Update mapping system with collected data. Track length and locations of sewers televised annually.	Collect and update data to map inventory and continue televising sewers.	Staff members continue to gather GPS coordinates and structure information of storm and sanitary structures within the City. The information has been added to current GIS maps. City sewer staff continues televising sewers and document cross connections to engineering staff.

ATTACHMENT A - 2018-2019 NPDES COMPLIANCE REPORT - CITY OF DANVILLE, ILLINOIS

BMP ID	STATUS	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 3 MILESTONE	MILESTONE YEAR 3 ACTIVITIES
C.2	COMPLETED	Illicit Discharge Detection & Elimination	Regulatory Control Program	Identify, respond and eliminate illicit discharges of substances on streets, sidewalks and within sewers.	Enforce City ordinances 93.04, 93.05 and 93.06 pertaining to placing or depositing substances on streets, sidewalks and other public places. Have the Regulatory Compliance officer inspect and monitor reported violations.	Respond to illicit discharge and illegal dumping reports and enforce ordinance.	The City responds to all potential illicit discharges and illegal dumping that are reported or observed by City personnel. There were 31 illegal dumpings reported this year.
C.3	PARTIALLY COMPLETED	Illicit Discharge Detection & Elimination	Detection/ Elimination Prioritization Plan	Evaluate sewer mapping and televised sewers for cross connections and/or direct discharges to streams and ditches.	Prioritize areas for inspections as they are reported or discovered. Develop program to eliminate cross connection or repair lines and manholes.	Conduct inventory and investigations, and prioritize sites. Continue reviewing mapping and video of sewers for elimination of cross connections and broken sewer lines.	The Street and Sewer Department continues to monitor for sewer cross connections for detection and evaluation as part of ongoing televising. The department continues to perform testing through normal maintenance and documentation of sewer lines. Any cross connections are reported and investigated.
C.4	COMPLETED	Illicit Discharge Detection & Elimination	Illicit Discharge Tracing Procedures	Testing visual and/or laboratory testing of discharges identified during observed or public reported events.	Tests being performed by visual inspection or samples taken for laboratory testing of alleged illicit discharges at the site. If illicit discharges are found, a corrective action is developed.	Record the number of illicit connections found, repaired/replaced during observed or reported events.	Visual testing was conducted on all inspected outfalls. 0 suspected illicit discharges were found via these inspections, and no sanitary cross connections were found.
C.5	COMPLETED	Illicit Discharge Detection & Elimination	Illicit Source Removal Procedures	Develop plan of action for elimination of illicit discharges upon their discovery.	A standard practice plan of procedures for remediating illicit discharges upon their discovery, notification, and documentation.	Review plan and modify as necessary. Use of notification and removal procedures.	City sewer crews and the engineering department worked with the City plumbing inspector to ensure issues had been addressed. A standard of practice plan of procedures for remediating illicit discharge and SSO's has been developed. 6 SSOs occurred this year.
C.7	INCOMPLETE	Illicit Discharge Detection & Elimination	Visual Dry Weather Screening	Perform Dry weather outfall screening as part of the Outfall Monitoring Program.	Survey and inspect outfall locations, record and develop a recording schedule during dry weather. Begin detection/elimination program of any areas of concern. Monitor and record outfall conditions for needed repairs.	Continue outfall inspection as part of Outfall Monitoring Program. Continue emergency maintenance work. Add or eliminate outfalls to priority list, as appropriate. Danville's goal is to inspect all priority outfalls once during dry weather and once during wet weather each year.	Program is being performed on emergency only basis until a stormwater fund has been developed. There has been continue reporting of any emergency concerns to Operations for maintenance/investigation of outfalls. Operations repaired 2 failing outfalls during the year.
D.1	COMPLETED	Construction Site Runoff Control	Regulatory Control Program	Develop a new erosion control and sediment control ordinance to address construction site runoff control for all construction project.	Adoption of a City erosion and sediment control ordinance. Develop a checkoff list based on construction size and complexity of project for all new projects.	Chapter 170 of the City Code for Erosion and Sediment Control was adopted in May 2017. All new development projects with 2000 sf or greater of land disturbance require erosion control review.	Chapter 170 of the City Code for Erosion and Sediment Control was adopted in May 2017. All new development projects with 2000 sf or greater of land disturbance require erosion control review. 3 Class 2 permits and 2 Class 1 permit were issued during the reporting year.
D.2	INCOMPLETE	Construction Site Runoff Control	Erosion and Sediment Control BMPs	As part of developing an ordinance for erosion and sediment control, ensure best management practices are followed by distributing a manual for erosion/sediment control.	Distribute and update BMP Standard Practice Manual for public access at public buildings and on the City's web site.	Begin to develop BMP Standard Practice Manual in line with the erosion and sediment control ordinance.	Manual still needs to be developed and completed.
D.4	COMPLETED	Construction Site Runoff Control	Site Plan Review Procedures	Review erosion control plans/practices submitted for each new site project, to meet the new Erosion Control Ordinance requirements.	Complete review of each soil erosion and sediment control plan on an as needed basis and follow up with field inspection(s) during construction to enforce owner/permittee inspection and maintenance requirements.	Review each project submitted and document inspections.	All land disturbance permits are reviewed for sediment and erosion control plans. Periodic site inspections are preformed to verify plans are being followed. 3 Class 2 permits were received this reporting year. 2 Class 1 permits were received this reporting year.
D.5	COMPLETED	Construction Site Runoff Control	Public Information Handling Procedures	Publicize and update as needed the existing on line contact information for reporting soil erosion/sediment non-compliance issues.	Investigate complaints and take appropriate actions.	Update the web based system for public to report problems about storm water issues. Create a prominent link to "Report flooding, erosion, pollution, or illegal dumping". Review City response plan.	The City of Danville will continue to monitor any issues reported via the online forms. No known erosion control issues were reported by the public.
D.6	COMPLETED	Construction Site Runoff Control	Site Inspection/ Enforcement Procedures	Conduct construction site inspections as a means to "spot-check" owners/contractors/permittees to ensure they are fulfilling their permit requirements for regular inspections and maintenance. Document and track inspections.	Conduct construction site inspections as a means to "spot-check" owners/contractors/permittees to ensure they are fulfilling their permit requirements for regular inspections and maintenance. Document and track inspections.	Inspect all site construction sites at least once during the project to verify owners/contractors/permittee are fulfilling their permit requirements. Perform close-out inspections to authorize permit closeout / occupancy authorizations at the end of a project to ensure site is fully stabilized before permit is closed. Document and track inspections.	Inspect sites with ILR10 permits at least once during construction, and at permit close-out. Verify site conditions meet permit, and the permittee is meeting the permit requirements for inspections and maintenance of erosion control. Document and track inspections.

ATTACHMENT A - 2018-2019 NPDES COMPLIANCE REPORT - CITY OF DANVILLE, ILLINOIS

BMP ID	STATUS	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 3 MILESTONE	MILESTONE YEAR 3 ACTIVITIES
E.1.1	INCOMPLETE	Post-Construction Runoff Control	Community Control Strategy	Within 3 years of this permit (NLT Mar 1, 2019), develop and implement a process to assess the water quality impacts in the design of all new and existing flood management projects that discharge to the MS4.	Investigate a process to assess water quality impacts in flood managements projects. Initiate any ordinance requirements to enact this program.	Investigate a process to assess water quality impacts in flood management projects.	The City will continue to investigate and research a process to assess water quality impacts.
E.1.2	INCOMPLETE	Post-Construction Runoff Control	Community Control Strategy	Develop and implement a program to minimize the volume of stormwater runoff and pollutants from public surfaces through i. Annual training for all MS4 employees who manage or are directly involved in routine maintenance, repair, or replacement of public surfaces in green infrastructure. ii. Annual training for all contractors retained to manage or carry out routine maintenance, repair or replacement of public surfaces in green infrastructure or LID techniques.	Find or develop an appropriate training program to facilitiate the construction of LID facilities.	Find or develop an appropriate training program to facilitiate the construction of LID facilities.	No training has been implemented to date.
E.2.1	COMPLETED	Post-Construction Runoff Control	Regulatory Control Program	Use of a formal checklist as a guide for final approval of construction site work.	Final inspection checklist being used as documentation of providing final approval of all construction sites and issuing corrective actions if applicable.	Create a formal Erosion Control checklist. Inspect construction site for erosion and sediment control issues during final inspections.	Formal checklist developed is used of construction site for erosion and sediment control issues during final inspections.
E.2.2	COMPLETED	Post-Construction Runoff Control	Regulatory Control Program	Require all regulated construction sites to have post-construction management plans that meet or exceed the requirements of ILR10.	All construction sites of 1.0 acres or more are required to receive an ILR10 permit issued by the Illinois EPA per the current and new revision of the stormwater ordinance.	Require all Construction sites of 1.0 acres or more to receive an ILR10 permit.	All land disturbance permits are reviewed for IRL10 permit requirements. 2 ILR10 permits were issued during the reporting year.
E.2.3	COMPLETED	Post-Construction Runoff Control	Regulatory Control Program	Require long-term operation and maintenance plans for all new stormwater management facilities.	Require long-term operation and maintenance plans for all new stormwater management facilities.	Include operations and maintenance plan requirements in stormwater ordinance.	Operations and maintenance plan requirements are in the updated stormwater ordinance effective May 2017.
E.2.4	COMPLETED	Post-Construction Runoff Control	Regulatory Control Program	Develop, implement and enforce a program to address and minimize the volume and pollutant load of stormwater runoff from projects from new development and redevelopment, adopting strategies that incorporate the infiltration, reuse and evapotranspiration of stormwater into the project to the maximum extent practicable.	Require both water quantity and water quality control for development projects.	Include water quality and water quantity requirements in updated stormwater ordinance, including use of green infrastructure strategies.	We have Included water quality and water quantity requirements in updated stormwater ordinance effective May 2017, including use of green infrastructure strategies.
E.4	COMPLETED	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Perform site plan reviews for stormwater BMPs to ensure water quality and water quantity control, as well as constructability and long-term operation and maintenance.	During permitting process ensure conformance with ordinances regulating water quality and water quantity control.	Develop amended stormwater ordinance to include both water quantity and water quality control requirements.	All development and redevelopment that disturbs 5000 sf or more of land will have to meet the requirements of the stormwater management ordinance, which includes water quality requirements.
E.5	COMPLETED	Post-Construction Runoff Control	Site Inspections During Construction	Require owners / permittees to perform regular site inspections during the life of a construction project. Provide a formal checklist for large (1 ac+) permitted sites to fulfill erosion control requirements for weekly and after-rain inspections. A pre-construction meeting shall be set up for all large construction activities to review SWPPP's and discuss erosion and sediment control procedures.	Under the new erosion control ordinance, all permittees are required to perform regular site inspections and subsequent maintenance, to meet the requirements of Part IV.B.4.a.vii, as well as Parts IV.B.4.a.i and .iv of the MS4 permit.	Perform random enforcement "spot check" inspections, to verify permittees are fulfilling their inspection and maintenance requirements.	Current inspections by City personnel occur on occasion to enforce ILR10 requirements.
E.6.1	COMPLETED	Post-Construction Runoff Control	Post-Construction Inspections	Inspect each permitted construction site during final inspection for conformance with the project specific BMPs as part of the building inspection process. Perform site inspections when issues are reported by the public.	Inspect each permitted construction site during final inspection for conformance with the project specific BMP's as part of the building inspection process. Perform site inspections when issues are reported by the public.	Inspect permitted post-construction sites. Respond to reported public issues.	No erosion control issues were reported on permitted sites by the public this year. Any post construction issues will continue to be inspected when reported.

ATTACHMENT A - 2018-2019 NPDES COMPLIANCE REPORT - CITY OF DANVILLE, ILLINOIS

BMP ID	STATUS	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 3 MILESTONE	MILESTONE YEAR 3 ACTIVITIES
E.6.2	INCOMPLETE	Post-Construction Runoff Control	Post-Construction Inspections	Perform maintenance inspections of all City-owned water quality and water quantity stormwater facilities at least once every 3 years. Perform maintenance inspections or request maintenance inspection records of all privately owned water quality and water quantity stormwater facilities at least once every 3 years.	Create an inventory of all stormwater facilities and stormwater quality facilities in the City. Begin inspections of stormwater facilities.	Create an inventory of all stormwater facilities and stormwater quality facilities in the City. Begin inspections of stormwater facilities, and collection of requested maintenance documents. Facilities should be inspected every 3 years. *Program is being performed on emergency only basis until a stormwater fund is developed.	Inventory of stormwater ponds was created. Inventory of green infrastructure / water quality facilities was created. There are about 70 ponds and 5 water quality facilities in Danville. 0 ponds were inspected this year.
E.7	PARTIALLY COMPLETED	Post-Construction Runoff Control	Other Post-Construction Runoff Controls	Develop and implement a program to minimize the volume of stormwater runoff and pollutants from existing privately owned developed property.	Implement the 8 different categories required per ILR40 Part IV.B.5.e	Implement the 8 different categories required per ILR40 Part IV.B.5.e	i. not yet addressed. ii.a partially complete ii.b complete ii.c not yet addressed. ii.d. complete ii.e complete ii.f complete ii.g complete.
F.1	COMPLETED	Pollution Prevention/Good Housekeeping	Employee Training Program	Provide training for employees for storm water quality issues or that have routine contact with chemical substances, pesticides and herbicide applications, salt and calcium applications, or abatement and containment of hazardous material spills.	Conduct applicable training annually and for all new employees. Part IV.B.6.a-d Provide RainCheck training video for all public works field crew personnel.	Provide applicable annual training for Public Works personnel.	RainCheck Stormwater Pollution Prevention for MS4s training video was available to Public Works personnel for review. We trained 28 operations crew members and managers in early 2019.
F.2.1	PARTIALLY COMPLETED	Pollution Prevention/Good Housekeeping	Inspection and Maintenance Program	Document City's annual storm water maintenance program.	Provide routine maintenance to all public storm water infrastructure as needed and per maintenance schedule. Document maintenance activities.	Document City's annual storm water maintenance program within the annual report.	The Street and Sewer Department cleaned/repaired storm sewer lines and various catch basins as part of the city's maintenance program, on an emergency basis. Call out logs document work that has been performed. During Year 3 the City contracted services for storm sewer televising and cleaning. Approximately 8600 LF of storm sewers were cleaned.
F.2.2	SUBSTANTIALLY COMPLETED	Pollution Prevention/Good Housekeeping	Inspection and Maintenance Program	Prepare Storm Water Pollution Prevention Plan (SWPPP) for all applicable municipal facilities.	Provide SWPPP for each facility and conduct an annual inspection report.	Update the SWPPP for Public Works; perform SWPPP inspection. Create SWPPP for South Street; perform SWPPP inspection.	Public Works SWPPP was updated. A reinspection of delinquent item found most items have been addressed from the previous years SWPPP inspection. Operations is working towards correcting any outstanding items. South Street SWPPP inspection was completed in 2018.
F.4.1	COMPLETED	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Maintain garbage and yard waste collection.	Garbage and yard waste collection is provided on a weekly basis to keep waste out of storm sewer systems.	Continue garbage and yard waste collection methods.	The yard waste (YW) collection system had weekly collections designated by zones within the City. The YW program collected 268.4 tons of grass, 288.9 tons of leaves and 400.8 tons of brush through totes or waste bags during the calendar year. Collected materials are composted at the City's designated YW facility. Total intake at YW facility 958.2 tons.
F.4.2	PARTIALLY COMPLETED	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Control vehicle and equipment washing by performing all washes in an enclosed washing bay which drains to sanitary sewer.	Wash public works vehicles and equipment as needed in an enclosed bay.	Wash public works vehicles and equipment as needed in an enclosed bay.	The City has a designated bay system area for washing all large public works vehicles to ensure the runoff is contained. Currently all vehicles are washed on an asphalt and parking lot which was recently reconfigured to drain to an oil/water separator. Approximately 20 vehicles per month are washed, using 400 gallons of water and 5 gallons of Grrr Heavy Duty Cleaner.
F.4.3	COMPLETED	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Oil and fluid disposal program to dispose of oils and fuels by a licensed waste hauler.	Dispose of oil and used oil filters every other month. Dispose of other fluids as needed (approximately every 6 months)	Dispose of oil and used oil filters every other month. Dispose of other fluids as needed (approximately every 6 months)	Disposal of oil, oil filters, and other fluids were disposed of by way of a licensed waste hauler throughout the year to ensure no waste was contaminating storm water discharges. 750 gallons of oil and 240 used oil filters were collected this year.
F.4.4	PARTIALLY COMPLETED	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Maintain a proper disposal area for all vactor truck disposal materials from both sanitary and storm sewer systems. All liquids shall be discharged to the sanitary sewer system and all dry materials collected and disposed of as solid waste.	Dispose of all vactor truck materials at the proper disposal area. *City of Danville's disposal area has become inadequate. City to design a new system to meet compliance requirements.	Ensure all vactor trucks are using the facility. This includes all trucks which have collected stormwater, not just sanitary sewer collections.	Liquid collections are currently disposed of at a downstream manhole. Solid collections are dried at Public Works then disposed of at the landfill. All truckloads of sanitary waste and storm sewer waste are collected throughout the year using the City's vacuum trucks. Each truckload is 2100 gallons.

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BMP ID	STATUS	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 3 MILESTONE	MILESTONE YEAR 3 ACTIVITIES
F.6	COMPLETED	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Sweep all streets in the City at least once before September and twice between September and November.	Reducing storm sewer clogging at inlets and piping. Increase the street sweeping frequency as needed.	Sweep all streets in the City at least once before September and twice between September and November. Track lane-miles swept and volume of debris collected.	The street sweeping program was in effect during the spring and fall months. The City collected 3963 cubic yards of leaves and debris from city streets. A total of 3704 lane-miles were swept, averaging 370 per month during the 10 months excluding October and November. With 383 and 337 lane-miles swept during these two months. Each outside lane of curbed roadway was swept about 4 times during the year, with each sweeping session comprised of two passes of the sweeper.

ATTACHMENT B - 2019-2020 NPDES STORMWATER ACTIVITY PLAN - CITY OF DANVILLE, ILLINOIS

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 4 MILESTONE
A.1	Public Education and Outreach	Distributed Paper Material	Distribute stormwater runoff awareness brochure to local agencies and public buildings. Investigate other potential material distribution ideas that can promote BMP's. Update website to include stormwater runoff and pollution prevention materials.	Update website regularly, at least quarterly. Track webpage hits. See an increase in visitors to page.	Evaluate existing outreach methods. Continue outreach efforts.
A.2	Public Education and Outreach	Speaking Engagement	Promote and make available speaking engagements about storm water pollution and best management practices upon request of citizens or public organizations.	Proactively contact schools regarding speaking opportunities. Have staff available for speaking engagements about storm water pollution and best management practices when requested. Plan to participate in at least 1 event per year.	Have staff available for speaking engagements about storm water pollution and best management practices when requested. Plan to participate in at least 1 event per year.
A.6	Public Education and Outreach	Other Public Education	Improve communications between residential and commercial activities adjacent to projects to keep both residences and business owners informed on a construction project progress. Publicize project information via City web site and provide staff phone lines for residents to report problems.	Update the stormwater website with information regarding current City of Danville construction projects. Update as needed, to maintain accurate information. Follow up on any citizen concerns received via the "report a problem" form.	Create and update regularly, a map of current and proposed City of Danville construction projects, along with a brief description of each and anticipated construction timeframe. Maintain link and follow-up on reported concerns.
B.2	Public Participation/ Involvement	Educational Volunteer	Promote and make available speaking engagements about storm water pollution and best management practices upon request of citizens or public organizations.	Proactively contact schools regarding speaking opportunities. Have staff available for speaking engagements about storm water pollution and best management practices when requested. Plan to participate in at least 1 event per year.	Have staff available for speaking engagements about storm water pollution and best management practices when requested. Plan to participate in at least 1 event per year.
B.3	Public Participation/Involvement	Stakeholder meeting	Provide a minimum of one public meeting annually for the public to provide input as to the adequacy of the permittee's MS4 program.	Establish the February Public Works Committee Meeting (held the second Tuesday of each month) to be our annual MS4 program evaluation meeting.	Post a notice on the City's homepage and stormwater management webpages advertising the meeting. Collect, evaluate, and consider any citizen concerns raised at the meeting.
B.5	Public Participation/ Involvement	Volunteer Monitoring	Review and update as needed the current web-based system for reporting problems on storm water pollution issues. Review the City's response plan.	Monitor and address any concerns and reported activity on illegal discharges, dumping, and soil erosion within the City.	Continue to use and refine the web based reporting system on storm water management.
B.6	Public Participation/ Involvement	Program Involvement	Identify environmental justice areas and include appropriate public involvement/participation	Pursue identifying the environmental justice areas within the City of Danville. Engage with the aldermen of the ward(s) identified and explore various ways to include appropriate involvement with their citizen group(s).	Participate in at least one EJ project or outreach effort each year
B.7	Public Participation/ Involvement	Other Public Involvement	Encourage storm drain stenciling and stream cleanup programs to the public by providing web based information about public volunteer opportunities about storm inlet stenciling. Provide information on equipment use.	Post information about how citizens can go about a storm drain stenciling effort. Update as needed. Track any stenciling reported by citizens. Coordinate efforts annually for community cleanup day(s).	Provide assistance and monitor stenciling and community cleanup programs. Partner with KVCB or other groups to combine efforts.

ATTACHMENT B - 2019-2020 NPDES STORMWATER ACTIVITY PLAN - CITY OF DANVILLE, ILLINOIS

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 4 MILESTONE
C.1	Illicit Discharge Detection & Elimination	Storm Sewer Map Preparation	Continue mapping program and televising of storm and sanitary sewers. Incorporate a data inventory for detection of illicit discharges.	Update mapping system with collected data. Track length and locations of sewers televised annually.	Collect and update data to map inventory and continue televising sewers.
C.2	Illicit Discharge Detection & Elimination	Regulatory Control Program	Identify, respond and eliminate illicit discharges of substances on streets, sidewalks and within sewers.	Enforce City ordinances 93.04, 93.05 and 93.06 pertaining to placing or depositing substances on streets, sidewalks and other public places. Have the Regulatory Compliance officer inspect and monitor reported violations.	Respond to illicit discharge and illegal dumping reports and enforce ordinance.
C.3	Illicit Discharge Detection & Elimination	Detection/ Elimination Prioritization Plan	Evaluate sewer mapping and televised sewers for cross connections and/or direct discharges to streams and ditches.	Prioritize areas for inspections as they are reported or discovered. Develop program to eliminate cross connection or repair lines and manholes.	Inventory conducted and sites prioritized. Continue reviewing mapping and video of sewers for elimination of cross connections and broken sewer lines.
C.4	Illicit Discharge Detection & Elimination	Illicit Discharge Tracing Procedures	Testing visual and/or laboratory testing of discharges identified during observed or public reported events.	Tests being performed by visual inspection or samples taken for laboratory testing of alleged illicit discharges at the site. If illicit discharges are found, a corrective action is developed.	Record the number of illicit connections found, repaired/replaced during observed or reported events.
C.5	Illicit Discharge Detection & Elimination	Illicit Source Removal Procedures	Develop plan of action for elimination of illicit discharges upon their discovery.	A standard practice plan of procedures for remediating illicit discharges upon their discovery, notification, and documentation.	Continue use of notification and removal procedures.
C.7	Illicit Discharge Detection & Elimination	Visual Dry Weather Screening	Perform Dry weather outfall screening as part of the Outfall Monitoring Program.	Survey and inspect outfall locations, record and develop a recording schedule during dry weather. Begin detection/elimination program of any areas of concern. Monitor and record outfall conditions for needed repairs.	Continue outfall inspections as part of Outfall Monitoring Program . Continue emergency maintenance work. Add or eliminate outfalls to priority list, as appropriate. Danville's goal is to inspect all priority outfalls once during dry weather and once during wet weather each year.
D.1	Construction Site Runoff Control	Regulatory Control Program	Develop a new erosion and sediment control ordinance to address construction site runoff control for all construction projects.	Adoption of a City erosion and sediment control ordinance. Develop a checkoff list based on construction size and complexity of project for all new projects.	Enforce permit requirements, plan and development review requirements, site inspection requirements and site closeout requirements.
D.2	Construction Site Runoff Control	Erosion and Sediment Control BMPs	As part of developing an ordinance for erosion and sediment control, ensure best management practices are followed by distributing a manual for erosion/sediment control.	Provide links to both the Illinois Urban Manual and the IDOT Erosion and Sediment Contro Field Guide on the City of Danville's stormwater webpage.	Continue to offer these erosion control manuals as a means of providing the best information to the designers and contractors in Danville.
D.4	Construction Site Runoff Control	Site Plan Review Procedures	Review erosion control plans/practices submitted for each new site project, to meet the new Erosion Control Ordinance requirements.	Complete review of each soil erosion and sediment control plan on an as needed basis and follow up with field inspection(s) during construction to enforce owner/permittee inspection and maintenance requirements.	Review each project submitted and document inspections. Track all erosion control permits, submittals, and inspections related to each permit under the new erosion control ordinance.
D.5	Construction Site Runoff Control	Public Information Handling Procedures	Publicize and update as needed the existing on line contact information for reporting soil erosion/sediment non-compliance issues.	Continue to use and refine the web based reporting system on storm water management. Investigate complaints and take appropriate actions.	Continue to use and refine the web based reporting system on storm water management. Investigate complaints and take appropriate actions.

ATTACHMENT B - 2019-2020 NPDES STORMWATER ACTIVITY PLAN - CITY OF DANVILLE, ILLINOIS

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 4 MILESTONE
D.6	Construction Site Runoff Control	Site Inspection/ Enforcement Procedures	Conduct construction site inspections as a means to "spot-check" owners/contractors/permittees to ensure they are fulfilling their permit requirements for regular inspections and maintenance. Document and track inspections.	Conduct construction site inspections as a means to "spot-check" owners/ contractors/ permittees to ensure they are fulfilling their permit requirements for regular inspections and maintenance. Document and track inspections.	Inspect Class 1 and Class 2 sites under the new erosion control ordinance as required by ordinance. Verify site conditions meet permit, and the permittee is meeting the permit requirements for inspections and maintenance of erosion control. Document and track inspections.
E.1.1	Post-Construction Runoff Control	Community Control Strategy	Within 3 years of this permit (NLT Mar 1, 2019), develop and implement a process to assess the water quality impacts in the design of all new and existing flood management projects that discharge to the MS4.	Investigate a process to assess water quality impacts in flood management projects.	Continue to investigate a process to assess water quality impacts in flood management projects.
E.1.2	Post-Construction Runoff Control	Community Control Strategy	Develop and implement a program to minimize the volume of stormwater runoff and pollutants from public surfaces through i. Annual training for all MS4 employees who manage or are directly involved in routine maintenance, repair, or replacement of public surfaces in green infrastructure. ii. Annual training for all contractors retained to manage or carry out routine maintenance, repair or replacement of public surfaces in green infrastructure or LID techniques.	Find or develop an appropriate training program to facilitiate the construction of LID facilities.	Provide annual training for stormwater management of runoff and pollutants from public facitlities.
E.2.1	Post-Construction Runoff Control	Regulatory Control Program	Use of a formal checklist as a guide for final approval of construction site work.	Inspect construction site for erosion and sediment control issues during final inspections.	Inspect construction site for erosion and sediment control issues during final inspections. Begin use of new construction site inspection checklist as part of close-out processes. Track permit inspections and close-out dates.
E.2.2	Post-Construction Runoff Control	Regulatory Control Program	Require all regulated construction sites to have post-construction management plans that meet or exceed the requirements of ILR10.	All construction sites of 1.0 acres or more are required to receive an ILR10 permit issued by the Illinois EPA per the current and new revision of the stormwater ordinance.	All land disturbance permits are reviewed for IRL10 permit requirements.
E.2.3	Post-Construction Runoff Control	Regulatory Control Program	Require long-term operation and maintenance plans for all new stormwater management facilities.	Include operations and maintenance plan requirements in stormwater ordinance.	Enforce O&M plan requirements as required by stormwater management ordinance. Track O&M plans.
E.2.4	Post-Construction Runoff Control	Regulatory Control Program	Develop, implement and enforce a program to address and minimize the volume and pollutant load of stormwater runoff from projects from new development and redevelopment, adopting strategies that incorporate the infiltration, reuse and evapotranspiration of stormwater into the project to the maximum extent practicable.	Require both water quantity and water quality control for development projects.	Enforce water quantity and water quality control for development projects within the stormwater management ordinance.

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BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 4 MILESTONE
E.4	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Perform site plan reviews for stormwater BMPs to ensure water quality and water quantity control, as well as constructability and long-term operation and maintenance.	Enact stormwater ordinance which requires both stormwater quantity and quality control. Perform reviews in accordance with stormwater ordinance to ensure constructability and long-term operation and maintenance of BMPs.	Enforce stormwater ordinance which requires both stormwater quantity and quality control. Perform reviews in accordance with stormwater ordinance to ensure constructability and long-term operation and maintenance of BMPs.
E.5	Post-Construction Runoff Control	Site Inspections During Construction	Require owners / permittees to perform regular site inspections during the life of a construction project. Provide a formal checklist for large (1 ac+) permitted sites to fulfill erosion control requirements for weekly and after-rain inspections. A pre-construction meeting shall be set up for all large construction activities to review SWPPP's and discuss erosion and sediment control procedures.	Per the erosion control ordinance, all permittees are required to perform regular site inspections and subsequent maintenance, to meet the requirements of Part IV.B.4.a.vii, as well as Parts IV.B.4.a.i and .iv of the MS4 permit.	Perform occassional site inspections as part of the erosion control ordinance verification/enforcement process. Track permits and inspections.
E.6.1	Post-Construction Runoff Control	Post-Construction Inspections	Inspect each permitted construction site during final inspection for conformance with the project specific BMPs as part of the building inspection process. Perform site inspections when issues are reported by the public.	Inspect each permitted construction site during final inspection for conformance with the project specific BMP's as part of the building inspection process. Perform site inspections when issues are reported by the public.	Inspect permitted post-construction sites. Respond to reported public issues.
E.6.2	Post-Construction Runoff Control	Post-Construction Inspections	Perform maintenance inspections of all City-owned water quality and water quantity stormwater facilities at least once every 3 years. Perform maintenance inspections or request maintenance inspection records of all privately owned water quality and water quantity stormwater facilities at least once every 3 years.	Begin inspection of City-owned stormwater ponds. Enforece O&M inspection requirements as outlined in the stormwater management ordinance.	Perform maintenance inspections of all City-owned water quality and water quantity stormwater facilities at least once every 3 years. The City owns 6 wet basins, 1 dry basin, and 2 green infrastructure facilities.
E.7	Post-Construction Runoff Control	Other Post-Construction Runoff Controls	Develop and implement a program to minimize the volume of stormwater runoff and pollutants from existing privately owned developed property.	Implement the 8 different categories required per ILR40 Part IV.B.5.e	Continue implementation of completed categories. Develop program for souce identification (i); evaluation of flood control as related to climate change (iii). Improve education on green infrastructure BMPs (ii).
F.1	Pollution Prevention/ Good Housekeeping	Employee Training Program	Provide training for employees for storm water quality issues or that have routine contact with chemical substances, pesticides and herbicide applications, salt and calcium applications, or abatement and containment of hazardous material spills.	Conduct applicable training annually and for all new employees. Part IV.B.6.a-d Provide RainCheck training video for all public works field crew personnel.	Provide training to Public Works and Parks Department Personnel annually.
F.2.1	Pollution Prevention/ Good Housekeeping	Inspection and Maintenance Program	Document City's annual storm water maintenance program.	Provide routine maintenance to all public storm water infrastructure as needed and per maintenance schedule. Document maintenance activities.	Document City's annual storm water maintenance program within the annual report.

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BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASUREABLE GOAL	YEAR 4 MILESTONE
F.2.2	Pollution Prevention/ Good Housekeeping	Inspection and Maintenance Program	Prepare Storm Water Pollution Prevention Plan (SWPPP) for all applicable municipal facilities.	Update SWPPPs as needed. Follow up on inspections from previous year; perform annual inspection. Goal is to reduce findings of concern by 10% each year.	Update SWPPPs as needed. Follow up on inspections from previous year; perform annual inspection each fall. Goal is to reduce findings of concern by 10% each year.
F.4.1	Pollution Prevention/ Good Housekeeping	Municipal Operations Waste Disposal	Maintain garbage and yard waste collection.	Garbage and yard waste collection is provided on a weekly basis to keep waste out of storm sewer systems.	Continue garbage and yard waste collection methods.
F.4.2	Pollution Prevention/ Good Housekeeping	Municipal Operations Waste Disposal	Control vehicle and equipment washing by performing all washes in an enclosed washing bay which drains to sanitary sewer.	Construct a washbay during the summer or fall of 2018 to contain and treat all washwater from municipal vehicle washing.	Wash all public works vehicles and equipment in an enclosed bay.
F.4.3	Pollution Prevention/ Good Housekeeping	Municipal Operations Waste Disposal	Oil and fluid disposal program to dispose of oils and fuels by a licensed waste hauler.	Dispose of oil and oil filters every other month for oil. Dispose of other fluids as needed.	Dispose of oil every other month for oil. Dispose of other fluids as needed.
F.4.4	Pollution Prevention / Good Housekeeping	Municipal Operations Waste Disposal	Maintain a proper disposal area for all vactor truck disposal materials from both sanitary and storm sewer systems. All liquids shall be discharged to the sanitary sewer system and all dry materials collected and disposed of as solid waste.	Dispose of all vactor truck materials at the proper disposal area. Look into the possibility of construction a new facility with a larger capacity and better filter system.	Ensure all vactor trucks are using the facility. This includes all trucks which have collected stormwater, not just sanitary sewer collections.
F.6	Pollution Prevention/ Good Housekeeping	Other Municipal Operations Controls	Sweep all streets in the City at least once before September and twice between September and November.	Reducing storm sewer clogging at inlets and piping. Increase the street sweeping frequency as needed.	Sweep all streets in the City at least once before September and twice between September and November. Track lane-miles swept and volume of debris collected.

ATTACHMENT C

Outfall Inspection Form

Priority

#

Section 1: Background Data

Outfall ID: Approx. Location:	Discharges to:
Date:	Last Rainfall Time:
Inspector:	Inspector 2:
Temperature:	Rainfall:
Land Use in Drainage Area:	
Notes (e.g., origin of outfall, if known):	

Section 2: Outfall Description

Location	Material	Shape	Number	Size	Submerged
					In Water
					With Sediment
Flow Present?					
Flow Temp.					
Flow Amount					
Erosion					

Section 3: Physical Indicators for Flowing or Submerged Outfalls

Indicator	Description	Severity
Odor		
Color		
Turbidity		
Floatables		

Section 4: Physical Indicators for Both Flowing and Non-Flowing Outfalls

Indicator	Description	Comments
Outfall Damage		
Deposits/Stains		
Abnormal Vegetation		
Poor Pool Quality		
Pipe Benthic Growth		

GIS Notes:

Maintenance Notes:

Standard Operating Procedure: Outfall Inspection

Purpose of the SOP:

This SOP provides a basic checklist for conducting storm drainage system outfall inspections utilizing the iPad.

Planning Considerations:

- ☐ Outfall inspections are to occur at each location twice each year – once during dry conditions (72 hours since rainfall) and once after a recent rainfall (1/2" or more rain within the last 24 hours).
- ☐ Be sure tablet is sufficiently charged before leaving the office.
- ☐ Consider grouping inspections located in close proximity.
- ☐ Be aware of easements to access outfalls.
- ☐ Expect most outfalls to be somewhat difficult to access. Woods, difficult terrain, private property and/or water-access only are to be expected.
- ☐ Do not enter private property without arranging permissions ahead of time.

Equipment List:

- ☐ PPE (Vest, boots, etc.)
- ☐ Outfall Inspection iPad
- ☐ Sample bottle
- ☐ Sampling Pole
- ☐ Disposable gloves
- ☐ Infrared thermometer
- ☐ Tape Measure
- ☐ Pruning Shears (for trimming briars, etc.)
- ☐ Machete (optional, but helpful)
- ☐ 5 gallon bucket
- ☐ Stop watch
- ☐ Hand wipes

Field Methods:

- ☐ Inspect outfall only if it is safe to do so. Be sure of footing, especially in wet conditions, look for poison ivy, etc.
- ☐ Open "Collector" App on the iPad.
  - Open "Engineering – Storm Outfall inspections" map
  - Zoom to current location. Locate appropriate outfall dot.
  - Click on outfall dot to open inspection form.
  - Click the edit button, then "Edit".
  - While wearing gloves, collect a sample of any flow. Characterize the outfall by recording information in the Outfall Inspection Form.
    - Use the tape measure to verify pipe size.
    - Use the sample bottle to characterize visual and olfactory information.
    - Attempt to identify any dry weather flow.
    - Attempt to identify any unusual wet weather flow.
    - Use the 5 gallon bucket (or sample bottle as appropriate) and a timer to estimate flow rate.
  - Click "Update" when all criteria have been completed.
- ☐ Open "Photo Date Stamp" App on the iPad.
  - Click "Take Photo".
  - Take 1 to 3 photos of the outfall and surrounding area, trying to capture the location and all notable criteria (physical condition of pipe, nearby erosion, characteristics of flow, etc.).

- ☐ Reopen "Collector" App, click on the outfall dot, click the edit button and "Edit".
  - Click the Camera logo, then "Add", then "Choose From Library".
  - Click "Camera Roll", then select the appropriate photos. Then click "Done".
  - Click "Update".
- ☐ If the outfall dot is not in the correct location to accurately indicate the outfall location:
  - Click on the outfall dot.
  - Click the edit button, then "Edit".
  - Click on the screen in the correct location to move the dot.
  - Click "Update".
- ☐ If an outfall of 24" diameter or greater is found which is not in the GIS:
  - While standing at the appropriate location, click the "+" to "Collect a new feature"
  - Follow the monitoring criteria above.
  - Be sure to notify the GIS personnel of the new outfall and subsequent piping.
- ☐ Follow the procedures below if an illicit discharge or sanitary discharge is suspected.

Procedure for suspected sanitary discharge:

- ☐ Document observations on the Outfall Inspection Form
- ☐ Take photos
- ☐ Immediately Contact Construction & Maintenance Manager
- ☐ Remind them to follow SOP for Sanitary Sewer Overflows. SSOs must be reported to IEPA within 24 hours.
- ☐ Notify Assistant City Engineer and/or Stormwater Engineer as a matter of record.

Procedure for suspected illicit discharge:

- ☐ Document observations on the Outfall Inspection Form
- ☐ Take photos
- ☐ Visually inspect general area for possible sources.
- ☐ Notify Stormwater Engineer and Assistant City Engineer.
- ☐ Stormwater engineer or Assistant City Engineer shall report to Construction & Maintenance Manager.
- ☐ Illicit Discharges shall be logged. Discharges shall be tracked upstream by PW until source can be found and removed.

Procedure for non-suspected discharge:

- ☐ Document observations on the Outfall Inspection Form
- ☐ Take photos
- ☐ If outfall flow appears to most likely be groundwater, report findings to Construction & Maintenance Manager as a matter of record.

Acronyms Used In Inspection Form

RCP: reinforced concrete pipe

CMP: corrugated metal pipe

PVC: polyvinyl chloride

HDPE: high-density polyethylene

VC: vitrified clay

ATTACHMENT E

City of Danville MS4 Monitoring Plan - Contents

Sampling Plan Update 2

1. Update #1 – December 2016 2
2. Update #2 – May 2017 2

Sampling Plan Overview 2

1. Background 2
2. Monitoring and Assessment Plan Requirements 3
3. City of Danville's Monitoring and Assessment Plan Approach 3
   a. 2016 Baseline Assessments and Inspections 4
   b. Prioritization and Re-inspection 4

Sampling Plan 5

1. Designating priority inspection areas. 5
2. Create Site Inventory and Watershed Map for Each Monitoring Category 5
   a. Utilize GIS Maps 5
   b. Sewer Personnel Inspections 6
3. Perform Baseline Inspections 7
   a. Dry-Weather IDDE and Structural Inspections 7
   b. Wet Weather Outfall Monitoring Inspections 7

Corrective Action, Documentation and Reporting 8

1. Visual Monitoring and/or Illicit Discharge Reporting, Documenting and Follow-up 8
2. Outfall/Pipe structural issues Reporting, Documenting and Follow-up 8

Annual Re-evaluation of Priority Locations 8

1. Re-inspection 8
2. Long-term Monitoring and Evaluation 8
3. Detailed inspection approach / Plan of Action (January 2017) 9

Other MS4 Requirements 10

1. Site Walks / SWPPP Inspections for Target Locations 10
2. WQ BMP Inventory and Inspections 10
   a. Create a Stormwater BMP inventory from known WQ BMPs 10
   b. Perform a wet-weather visual inspection of each WQ BMP owned by the City of Danville. 10
   c. Add Private BMPs to the Inventory. 10
3. Detect and Address Non-Stormwater and Illegal Dumping 11
   a. Create a Non-Stormwater Discharges Outreach and Reporting Program 11
   b. Create an Illegal Dumping Program 11

City of Danville

MS4 Monitoring Plan – August 26, 2016

To be implemented beginning Fall 2016. Initial implementation to be reported in the Annual Report documenting March 2016 to February 2017.

Sampling Plan Update

1. Update #1 – December 2016

Since the end of August, 2016, the City of Danville has been working to implement this sampling plan. Task lists and schedules have been drawn up. Historic sewer maps have been referenced. GIS layers and various maps have been created or updated. And this plan has been referenced as, and is considered to be, a living document.

Changes found to be needed for various reason, have been made to this document. Previous version(s) are available for back reference.

2. Update #2 – May 2017

Since December 2016, the City of Danville has continued to implement this sampling plan. We have continued to find additional outfall pipes while in the field and in various as-builts which have been referenced. We have also found that several pipes thought to be 24" or larger are in fact smaller than our priority sizing criteria.

Other edits to this report include cleaning up some details and expanding the Baseline Inspections and Detailed Inspections Approach sections.

Sampling Plan Overview

1. Background

The State of Illinois issues a General National Pollutant Discharge Elimination System (NPDES) Permit No ILR40 to Small Municipal Separate Storm Sewer Systems (MS4s). The most recent MS4 permit was issued in February 2016, becoming effective March 1, 2016.

The permit has a variety of stormwater Best Management Practices (BMPs) to be implemented. Several of the BMPs coincide closely together, and can be implemented alongside each other.

Part IV.3.a of the permit requires the permittee to "develop, implement and enforce a program to detect and eliminate illicit connections".

Part IV.3.b requires the permittee to "develop, if not already complete, a storm system map, showing the location of all outfalls" with the requirement that the map be updated with any new modifications.

Part IV.3.h requires the permittee to "conduct periodic inspections of the storm sewer outfalls in dry weather…placing priority on outfalls with the greatest potential for non-storm water discharges. Major/high priority outfalls shall be inspected at least annually."

Parts IV.3.a and IV.3.h together will be considered an Illicit Discharge Detection & Elimination (IDDE) Program.

Part V.A of the permit requires the permittee to "develop and implement a monitoring and assessment program to evaluate the effectiveness of the BMPs being implemented to reduce pollutant loadings and water quality impacts within 180 days of the effective date of this permit".

The information presented herein is the City of Danville's Monitoring and Assessment Plan, incorporating the other permit requirements, to be established and implementation started no later than August 28, 2016.

2. Monitoring and Assessment Plan Requirements

ILR40 allows for monitoring and assessing stormwater BMPs through a variety of methods, presented in Part V.A.1 and V.A.2 Some of the various monitoring options include visual monitoring for MS4 permittees serving populations of less than 25,000, as well as in-stream monitoring, sediment monitoring, site-specific monitoring, assessing physical/habitat characteristics, and outfall/discharge monitoring.

3. City of Danville's Monitoring and Assessment Plan Approach

It is our understanding of the ILR40 permit that the State of Illinois would prefer for municipalities to perform comprehensive in-stream water quality monitoring. This monitoring would include sampling and testing for parameters including total suspended solids, total nitrogen, total phosphorous, fecal coliform, chlorides, and oil and grease. However, contractor-performed sampling and lab testing is an expensive endeavor which Danville cannot budget at this time.

The City of Danville has decided to approach the Monitoring and Assessment requirements through visual evaluation of outfalls/discharges. Though the City serves a population greater than 25,000 (approximately 33,000), visual observations of stormwater at priority outfalls will serve the intent of the permit, without creating issues due to the funding limitations which generally restrict laboratory-based monitoring. Using a basic checklist, field personnel can monitor both dry and wet weather events to include the visual monitoring requirements listed (color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen or other obvious indicators of stormwater pollution). Personnel can also assess outfalls for any structural issues such as broken pipes, heavy erosion, or blocked flow ways. Visual monitoring on this level will be superior to a simple sediment monitoring program (an acceptable form of monitoring for any sized municipality), looking only for turbidity of outfall discharge waters.

Regular annual inspections of storm sewer systems for the various pollution indicators creates an Illicit Discharge Detection and Stormwater Pollution Monitoring and Assessment program, serving as an indication of upstream

stormwater control. Illicit Discharges are non-stormwater flows, often sanitary sewer cross-connections or industrial discharges. Stormwater pollution sources are usually spills, leaks, or materials dumped onto the ground and washed into nearby storm drains or waterways.

a. 2016 Baseline Assessments and Inspections

The ILR40 MS4 permit is effective from March 2016 to February 2021. To evaluate the effectiveness of the stormwater BMPs during the permit's 5 year period, initial baseline assessments are needed. Subsequent inspections will help determine what progress is being made, and will guide inspection and mitigation efforts. As previously stated, the permit requires the following:

*Illicit Discharge Detection & Elimination (IDDE)

*Monitoring and Assessment to evaluate effectiveness of BMPs

-Outfall monitoring with visual observations

Because the IDDE and Monitoring and Assessment inspections go hand-in-hand, we plan to implement them together. Dry weather outfall monitoring will be used to inspect for Illicit Discharges, as well as structural integrity inspections of specific outfall structures. Wet-weather outfall monitoring will occur at the same locations to inspect for discharges that may be carried by stormwater (surface oil spills, etc.) but may not be constantly flowing like other illicit discharges (ie, cross-connections from sanitary sewers or illegal discharges from industrial areas).

Outfalls monitored in wet weather can indicate pollution upstream. Flows with bad odor, unusual color, or signs of oil, etc. can be tracked upstream to hopefully pinpoint and then eliminate the pollutant sources.

b. Prioritization and Re-inspection

There are estimated to be over 300 outfall pipes within the City of Danville. This includes pipes flowing to stormwater ponds, streams, creeks and Lake Vermillion. Danville has chosen to monitor only the large pipe outfalls – those pipes 24" and larger. These larger pipes will generally have larger and/or more impervious drainage areas, with the highest potential for stormwater pollution. Monitoring these locations will give us a broad view of the water quality within the City of Danville.

Referencing historic maps and current GIS data, we found 123 such outfalls (as of May 2017). The watersheds for these pipes collect stormwater from the majority of the city. After the program has been fully developed and an initial inspection has been performed, sites can be re-evaluated to see if they are still considered high-priority. Any cleanup, mitigation or maintenance performed should be taken into consideration as to the need for further monitoring at each individual site. Pipes found to have a trend of no signs of pollution, with lower pollution potential watersheds, may be removed from the monitoring as deemed appropriate.

Sampling Plan

1. Designating priority inspection areas.

To incorporate the IDDE and Monitoring and Assessment inspections, the City of Danville will designate priority inspection areas based outfall pipe size. Utilizing current GIS information, along with employee knowledge, and historic maps and inspection reports, outfalls with pipes of 24" or larger will be targeted for the initial monitoring.

Erosion is most often caused by large volumes of stormwater flowing quickly across a site or out of a pipe and into a waterway or other open channel. The largest volumes of stormwater will generally be coming from the largest pipes. We plan to prioritize outfall monitoring at the largest outfalls in our system. Using some historic infrastructure maps and GIS information, Danville estimates we have hundreds of outfall pipes, but a limited number of large (24" or greater) pipes. These outfalls will be monitored and inspected for stormwater flow and structural integrity, including erosion issues.

Though the larger pipes will all be initially inspected, the watersheds with the greatest potential for non-stormwater discharges come from the industrial sites in Danville. Danville has a great history and culture of industry and manufacturing. Along with this comes the site conditions which often contribute to stormwater pollution. Outdoor areas holding storage tanks, fueling areas, chemical usage, etc. often accompany an industrial site. Within the 18 square miles of Danville's city limits, over 340 structures covering approximately 240 acres are industrial buildings, with an unknown area of associated outdoor storage areas. Knowing this, we decided to inspect 24" outfall pipes, because this will provide the most thorough monitoring of the City's wide variety of land uses.

2. Create Site Inventory and Watershed Map for Each Monitoring Category

a. Utilize GIS Maps

The City of Danville has a well-developed GIS system, with roads, buildings, waterways, sanitary sewers, etc. included in it. Danville has also been working to include the stormwater system in the GIS. The GIS currently contains about 10,000 stormwater structures and about 70 miles of stormwater piping. Though formidable, this number is estimated to be about one-quarter to one-half of the total stormwater structures in Danville. We will continue to update the GIS as data is collected through site plans and field crew inspections. It is our understanding that we have until the end of the permit cycle (February 2021) to complete the storm sewer map in its entirety.

The GIS system also has a complete LIDAR topographical map of Danville and the surrounding areas. As of November 2016, Danville has used this topographic map, along with a computer software program, to create a watershed map of the City. The map includes all waterways and stream paths, including flow paths through

individual lots and down city streets. Watershed delineations will also be possible, with watersheds able to be outlined for any given point on the map.

We have, however, discovered limitations to our watershed maps. The maps only account for the terrain of the land. Stormwater pipes which go under or through barriers, such as railroad beds, are not taken into account. Due to this current limitation, the watershed maps will only be marginally useful at this time. They will give us a rough idea of contributing areas. And if certain pipes are known to cross physical barriers, we can manually check upstream to track the sub-watersheds as appropriate.

City Staff has worked this fall to map all the 24" and larger outfalls into the GIS system. Considerable time cross-referencing current GIS data with historic maps has given a complete list of large outfalls to be inspected.

The GIS team has worked this fall to create a monitoring program for an iPad, which can be used to monitor outfalls in the field. All outfall monitoring parameters (date, inspector, pipe size, weather conditions, flow characteristics like volume, color, clarity and smell) have been added to an app on the iPad. Inspectors can pull up each outfall in GIS. The inspection is performed. Location information is automatically recorded. Photos can be attached to the inspection. Data is then uploaded in real-time to Danville's GIS. Meaning, anyone in the office can access the information collected immediately.

The data is immediately usable and searchable within the GIS system. Inspection reports can be found based on any of the reporting criteria, and past reports for any given outfall can be retrieved. Reports can be run, as needed, to be available in printed format as well. File creation is a bit cumbersome, but is done for each inspection. Data is auto-populated, then additional notes are added as appropriate. Paper reports are created for public works crew members, MS4 reporting, or other such instances. A sample data report is now included in this plan.

b. Sewer Personnel Inspections

Danville continues to update the stormwater maps, and plans to utilize sewer inspection and maintenance personnel when available to collect data in a more structured means. If specific piping information is needed for certain outfall locations, personnel will be asked to gather this data for use in identifying monitoring locations and/or requirements. The storm sewer information will then also be put into the GIS maps to continue the mapping effort. Per the City of Danville stormwater master plan, approximately 10% of the stormwater infrastructure should be inspected each year for structural integrity. These inspections will be done by the Public Works sewer crews. The sewer crews will have to be "borrowed" to assist with stormwater projects on an as-needed basis. Implementation of the stormwater master plan will be commensurate with funding availability.

To perform water quality monitoring inspections, we will employ the Stormwater Engineer, the Engineering Technician, and the Junior Engineer, as needed. The Stormwater Engineer will coordinate the program, and lead the in-field sampling effort. However, the Stormwater Engineer works only part-time. The Engineering Technician and Junior engineer will need to assist with field work to keep up with the monitoring requirements.

3. Perform Baseline Inspections

a. Dry-Weather IDDE and Structural Inspections

Using the iPad and GIS system, locate each outfall in need of monitoring. Perform a dry-weather visual inspection of each outfall. Use the iPad to document the structural state of the outfall, as well as visually inspect any flow in the outfall system. The SOP for Outfall Inspections shall be used and followed. Dry-weather inspections shall be performed at least 48 hours after the last rain event of 1" or less and at least 72 hours after the last rain event of more than 1". Flow found during dry-weather inspections is often a sign of concern, and possibly an illicit discharge. It may also be groundwater seepage, or a water main break. Investigate and document any flows found. Monitoring reports shall then be given to Public Works Construction and Maintenance Manager for follow-up.

Priority dry-weather (IDDE) inspections shall take place annually. Due to the fact that large stormwater pipes will often discharge to rivers and creeks, the outfalls are likely to be in difficult to reach locations, with woods and/or shrubbery making access and visual inspection difficult. Care shall always be taken to ensure safety. Inspections in the winter months when plant growth has died back will facilitate site access.

b. Wet Weather Outfall Monitoring Inspections

Using the iPad and GIS system, locate each outfall in need of monitoring. Perform a wet-weather visual inspection of each outfall. Use the iPad to document the structural state of the outfall, as well as visually inspect any flow in the outfall system. The SOP for Outfall Inspections shall be used and followed. Wet-weather inspections shall be performed within 24 hours of the last rain event of 1/2" or more. Flow with any discernable pollutants is a sign of concern. Investigate and document any flows found. Monitoring reports shall then be given to Public Works Construction and Maintenance Manager for follow-up.

Priority wet-weather inspections shall take place annually. Due to the fact that large stormwater pipes will often discharge to rivers and creeks, the outfalls are likely to be in difficult to reach locations, with woods and/or shrubbery making access and visual inspection difficult. Care shall always be taken to ensure safety. Inspections in the winter months when plant growth has died back will facilitate site access.

Corrective Action, Documentation and Reporting

1. Visual Monitoring and/or Illicit Discharge Reporting, Documenting and Follow-up

a. If any illicit discharges are found or suspected, reporting must be done immediately according to the Standard Operating Procedures (SOP) for IDDE Corrective Action, Documentation & Reporting form (to be created by City of Danville).

b. All other visual monitoring findings and reports shall be documented and reported per the SOP for Stormwater Monitoring (to be created by City of Danville) in a timely manner (within 1 week if corrective measures are necessary, and within 2 weeks if no corrective measures are required.)

2. Outfall/Pipe structural issues Reporting, Documenting and Follow-up

a. For structural conditions of stormwater pipe, conduit, manholes or other structures, reports shall be documented and reported per the SOP for Outfall / Pipe Conditions Corrective Action, Documentation & Reporting (to be created by City of Danville) in a timely manner (within 1 week if corrective measures are necessary, and within 2 weeks if no corrective measures are required.)

b. Follow-up conversations and/or inspections shall take place as soon as practicable to ensure the stormwater conveyance system is restored to a fully functioning capacity. Broken, clogged or otherwise dysfunctional stormwater piping can cause erosion and/or flooding issues within the City of Danville.

Annual Re-evaluation of Priority Locations

1. Re-inspection

After the first round of IDDE / Monitoring and Assessment inspections are complete, inspection points should be evaluated and prioritized for future inspections. Points which had obvious signs of Illicit Discharges or Stormwater Pollution should remain as high priority locations, to be inspected again within one year. Areas with no signs of pollutants for 2 years or more can be dropped to an inspection frequency of every 2 years.

Follow-up inspections shall take place for any site for which remedial action has taken place. The site shall be evaluated for the effectiveness of the remediation and of the inspection procedures.

Determinations should be made as to whether specific locations can be removed from the priority inspection list, or if new areas need to be added to the list. A means of tracking the points of inspection, priority levels for inspection frequency, and inspection results should be created.

2. Long-term Monitoring and Evaluation

Each outfall shall be evaluated over the permit period (2016-2021) to determine the long-term effectiveness of the IDDE and Stormwater Monitoring programs. Illicit discharges and outfall inspection results should be tracked to see long-term trends in monitoring results. It is anticipated (and the purpose of the NPDES permit) that the monitoring program will show a positive trendline toward a reduction in illicit discharges and pollutant loads. If trends show an increase in pollutants, the program should be re-evaluated to determine a better and/or different

approach to the MS4 program. Additional and/or different BMPs may be necessary to better meet the intent of the permit.

3. Detailed inspection approach / Plan of Action (January 2017)

A map of the city with all the large outfalls has been created. The map has been broken into 11 sections, to aid in tracking the outfall locations.

Each outfall is visually inspected for structural problems, erosion upstream or downstream, discoloration, excessive plant growth, and pollutants in the discharge. A sampling pole may be used to collect any flow that is difficult to reach, to allow for visual inspection.

The sampling form is filled in as best as possible to denote outfall conditions. Reports are finalized in the office. Notes are added as necessary. A priority level is assigned with 1 being a severe/emergency priority. 2 is high priority with significant maintenance needed. 3 is medium priority with some maintenance needed. 4 is minor maintenance needed. And 5 is no maintenance needed.

Other MS4 Requirements

1. Site Walks / SWPPP Inspections for Target Locations

Per ILR40 Part IV.6.b, "the permittee shall design, install, implement, and maintain effective pollution prevention measures to minimize the discharge of pollutants from municipal properties, infrastructure, and operations." And for these measures, must "provide regular inspection of municipal storm water management BMPs."

The City of Danville operates several municipal storage facilities. The two main facilities are the Public Works Department building and the South Street storage facility. The Public Works Department building houses most of the municipal trucks, an indoor maintenance facility, a salt storage dome, fuel and oil storage, concrete and gravel storage, parks department storage, as well as leasing part of the facility to Ameren.

South Street storage facility houses a salt dome, gravel and landscaping storage, a vacuum truck cleanout facility, roadway brick storage, paint and chemical storage, and other miscellaneous stored items.

PWD has a site SWPPP, written in 2014. The most recent site inspection took place during the first week of August 2016. Pollution prevention concerns and stormwater mapping concerns have been addressed in the report. A revised SWPPP was drafted in the fall of 2016. Public works personnel began addressing the inspection report concerns soon after the inspection.

The South Street storage facility was inspected using the PWD SWPPP as an inspection guide in September 2016. Pollution prevention concerns and stormwater mapping concerns have been addressed in the report. Public works personnel began addressing the inspection report concerns soon after the inspection. A draft SWPPP was written in the fall of 2016. As of May 2017, a large portion of the site has been sold. Only the salt dome and vactor truck dumping station remain in City possession. See the 2016-2017 MS4 annual report for further details.

The remaining municipal storage facilities are much smaller. They include the golf course (fuel and chemical storage), police station (fuel storage), four fire stations (backup generators with fuel storage), and the City Pool (chemical storage). These sites will be inspected as deemed necessary.

2. WQ BMP Inventory and Inspections

a. Create a Stormwater BMP inventory from known WQ BMPs

i. Ponds, permeable pavers/concrete, WQ swales, cisterns, bioretentions, raingardens, etc.

ii. Inventory should include a link to site plans, photos, and maintenance agreements as applicable.

b. Perform a wet-weather visual inspection of each WQ BMP owned by the City of Danville.

Document the structural state of the BMP, as well as visually inspect any flow in the system. Ensure the BMP is working as designed, is not clogged, eroded, causing erosion, plant materials are in good condition, flooding is not occurring, etc. Note any maintenance that needs performed to meet any Maintenance Agreement requirements. Inspection reports shall include site map with GPS/GIS coordinates, map of watershed and approx. watershed size, photos and photo location/direction, pipe/outfall conditions (sedimentation/erosion, broken/degraded structures, etc). BMPs should be inspected at least every 3 years.

c. Add Private BMPs to the Inventory.

As Danville moves forward with "green" initiatives, and small-scale stormwater BMPs are implemented on private property, a means of inspection and monitoring should be developed to ensure these facilities are being

maintained properly. Possibilities include access permission within the maintenance agreements, with the City performing the inspections and issuing maintenance requirements to the property owners, or sending owners maintenance reminders with instructions and reporting measures within the reminder. The former is much more labor intensive for the City, but will likely result in better BMP maintenance. The latter is less labor intensive, but may result in poor to mediocre maintenance taking place. BMPs should be inspected at least every 3 years.

3. Detect and Address Non-Stormwater and Illegal Dumping

a. Create a Non-Stormwater Discharges Outreach and Reporting Program

Non-stormwater discharges are a direct source of stormwater pollution. These can include a wide variety of sources: Oils & grease from restaurants, oil and other liquids from at-home car repairs, car wash water, dog waste, paints and chemicals from at-home projects, fertilizer use, sidewalk salt, etc.

Per ILR40 Part IV.B.3.d, Danville shall "implement a plan to detect and address non-stormwater discharges, including illegal dumping" and shall "inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste and the requirements and mechanisms for reporting such discharges" (IV.B.3.e). And must "distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies" with information on the following topics: (IV.B.1.a)

i. Storage and disposal of fuels, oils and similar materials
ii. Use of soaps, solvents or detergents
iii. Paint and related décor
iv. Lawn and garden care; and
v. Winter de-icing material storage and use.

Public education through the city's website is the best and most cost-effective means of addressing these issues. The City of Danville's stormwater website www.danville-stormwater.org currently has some of the required information posted. There is now a "Report a Stormwater Problem" button prominently displayed on the page. Any reports received are directed to the City Engineer, Assistant City Engineer and Stormwater Engineer. We have also updated the site with a significant amount of information about homeowner pollution prevention and construction site erosion control. We will continue to develop the website and the information it contains to fully incorporate all of the required materials.

b. Create an Illegal Dumping Program

Illegal Dumping is often associated with stormwater pollution, and as-such Danville is required to implement a program to detect and address illegal dumping per the MS4 permit. Illegal dumping often occurs in the same areas of a city or town on a recurring basis. Creating a database and GIS map of illegal dumping locations can

facilitate an inspection schedule for these areas. Public education and information on reporting illegal dumping shall be included in the program.

i. Danville's City Code currently prohibits illegal dumping, as well as littering. Both infractions are subject to fines. The City's website www.cityofdanville.org has a means of reporting illegal dumping. The button to report stormwater issues on the stormwater page is also noted as a means of reporting illegal dumping.

It may also be beneficial to offer additional public education through flyers and the city's website. Danville intends to create an illegal dumping flyer and/or webpage for public education about the risks and costs of illegal dumping. It will include information on how to report illegal dumping. We plan to highlight the stormwater reporting link currently on the website as well.