



August 7, 2017

Ms. Terri LeMasters
Illinois Environmental Protection Agency, DWPC
Compliance Assurance Section #19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

RE: Nunda Township Road District, NPDES Phase II - Year 14, Annual Report
HR Green Job No. 170957

Dear Ms. LeMasters:

Please find enclosed the NPDES Phase II – Year 14, Annual Report for the Nunda Township Road District. As the representative of the Township, HR Green, Inc. coordinated with them in the completion of the Annual Report for continued coverage under the General Permit, issued by the Illinois Environmental Protection Agency (IEPA).

If you have any questions, please contact me.

Sincerely,

HR GREEN, INC.

A handwritten signature in black ink, appearing to read 'Logan Gilbertsen', written over a white background.

Logan Gilbertsen, P.E., CFM
Water Resources Engineer

Enclosure

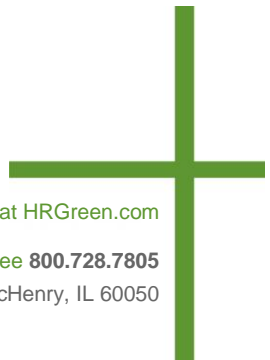
cc: Mr. Mike Lesperance, Nunda Township Road District
Mr. Akram Chaudhry, HR Green, Inc.

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Join the **Centennial Celebration** at HRGreen.com

Phone 815.385.1778 Fax 815.385.1781 Toll Free 800.728.7805

420 N. Front Street, Suite 100, McHenry, IL 60050





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, 2016 To March, 2017

Permit No. ILR40

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

Name: Nunda Township Road District Mailing Address 1: 3518 Bay Road

Mailing Address 2: County: McHenry

City: Crystal Lake State: IL Zip: 60012 Telephone: 815-459-4410

Contact Person: Mike Lesperance Email Address: highway@nundaroaddistrict.com
(Person responsible for Annual Report)

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

Nunda Township Road District

THE FOLLOWING ITEMS MUST BE ADDRESSED.

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

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

B. Attach the status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, and your identified measurable goals for each of the minimum control measures.

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

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

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

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

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))


Owner Signature:
Mike Lesperance

Printed Name:

8-4-17
Date:
Highway Commissioner

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.

Nunda Township Road District
NPDES Phase II – Year Fourteen (March 2016 – March 2017) Annual Update

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Part A. Changes to Best Management Practices

There were no changes in Year 13 to the Best Management Practices (BMPs) that were outlined in the NOI permit for Years 11-15.

The Township has reviewed the Illinois Environmental Protection Agency's (IEPA) website for information regarding approved or ongoing Total Maximum Daily Load (TMDL) limits on streams within the Municipal Separate Storm Sewer System (MS4) service area. According to the 303 (d) Listed Water Maps, five impaired waterbodies are within the Nunda Township Road District limits. The waterbodies are the Fox River (IL_DT-22), Lake Killarney (IL_RTZV), Silver Lake (IL_RTW), Griswold Lake (IL_RTY) and Lily Lake (IL_RTZJ). The Fox River is the only waterway located within the Nunda Township Road District's jurisdiction which has a current TMDL and no waterways in the area have a planned TMDL.

The Road District has reviewed the impairments and the likely causes of these impairments to determine if there is anything that can be done within the township to help reduce pollution in the waterways. Many of the lakes impairments appear to be caused by nutrients. The Road District operates a roadway drainage system that consists primarily of open grassed channels which are not fertilized by the Road District. It is unlikely that runoff from these ditches and swales is a contributor to the nutrient impairments. The Fox River is impaired by chlorides in this reach, the Road District's employees attend training to minimize the use of road salt for de-icing activities and has begun using alternatives to rock salt for snow and ice removal.

The Fox River reach IL_DT-22 has a TMDL for fecal coliform. The road district does not operate a waste water treatment plant and the Road District's jurisdiction only extends to from right of way to right of way along township roads. It is extremely unlikely that the Road District is contributing to the fecal coliform concentrations in the Fox River and therefore there are no changes to the existing BMP's that will be required to comply with a TMDL at this time.

The Township has reviewed Part V. Monitoring, Recordkeeping and Reporting of the General NPDES Permit ILR-40 and has begun an evaluation of BMPs based on the estimated effectiveness from published research. The Road District will begin monitoring the pollutant reduction from the operation of grassed channels rather than a traditional storm sewer system.

Part B. Status of Compliance with Permit Conditions

The status of BMPs and measurable goals performed in Year 14 are described below.

1. Public Education and Outreach

A.1 Post Relevant Information Online

Measurable Goals: The NTRD currently utilizes web based educational outreach. An article pertaining to stormwater will be included on the township webpage and will be updated at least one time per year. Research the existence of Environmental Justice areas within the MS4 and modify the education and outreach accordingly.

Status: The NTRD will post a stormwater update including the current NOI, previous annual updates and an article pertaining to stormwater pollution was distributed in the Spring 2016 newsletter. These postings are available at the Township's website at: <http://www.nundatownship.com>. Articles pertaining to stormwater will be posted throughout the year 15.

The Township has researched the existence of EJ areas within the MS4 using the <https://ejscreen.epa.gov/mapper/> tool and has determined that there are no EJ areas within the MS4. No changes to the education and outreach will be made to accommodate any EJ areas.

The Township is in the process of updating their website to include climate change information. Currently, the suggested EPA climate change page is being updated, so other sources may need to be identified. <http://epa.gov/climatechange/>

Public Education and Outreach Evaluation: NTRD feels that the information on their website is sufficient but is considering providing brochures or other educational information at their annual Touch-a-Truck event.

2. Public Participation/Involvement

B.3 Stakeholder Meeting

Measurable Goals: Participate in a local watershed group meeting or offer to host a local watershed group meeting at a Township facility.

Status: In Year 14, the Boone-Dutch Creek Watershed Plan was approved by the IEPA. The Road District's representative (HR Green, Inc.) attended watershed group meetings and contributed to the preparation of this plan. The Road District will offer to host future watershed group meetings at their facility. The NTRD jurisdiction covers portions of the Silver Creek and Sleepy Hollow Creek Watersheds as well as portions of the Boone Creek Watershed. These watershed have EPA approved watershed-based plans. The watershed-based plans can be found here:
<http://www.foxriverecosystem.org/Boone-Dutch.htm>
<http://www.foxriverecosystem.org/silver-sleepy.htm>

B.4 Public Hearing

Measurable Goals: Present ongoing NPDES Phase II program summary at least once annually at a public meeting.

Status: NTRD is not required to participate in Township meetings and therefore NTRD did not present the NPDES program at an annual meeting in Year 14 but has planned on presenting information relating to the NPDES program and water quality at a public meeting in Year 15.

B.6 Program Coordination

Measurable Goals: The NTRD has an Adopt-A-Highway program whereby public or private organizations or clubs can offer to clean up highway ditches (part of the MS4) on a bi-annual basis. The NTRD will continue to promote this program to provide opportunities for public involvement.

Status: The NTRD has promoted the Adopt-A-Highway program whereby public or private organizations or clubs can offer to clean up highway ditches (part of the MS4) on a bi-annual basis. Currently, there are no official volunteers participating in this program however, the Sheriff's Department and other volunteers complete unofficial roadside clean up's that the NTRD supports and provides bags and disposal services for. Additionally, the NTRD has an extensive recycling program that collects oils, paints and other potential stormwater pollutants and disposes of them in an appropriate manner.

Public Participation/Involvement Evaluation: NTRD has received interest in the Adopt-A-Highway program however no volunteers have officially signed up. NTRD is supporting the unofficial roadway cleanup efforts and plans on doing so until official volunteers are found. The Road District is optimistic about the future of the Public Participation/Involvement BMP.

3. Illicit Discharge Detection and Elimination

C.1 Storm Sewer Map Preparation

Measurable Goals: The NTRD will continue to update the Outfall Map along with mapping all of its known or observed storm sewers and culverts as needed.

Status: The NTRD contracted a consultant firm in 2013 to prepare an updated outfall map. This map is on file at the Township. The outfalls are visited on a normal basis while roadside drainage systems are being maintained. No new outfalls were constructed or identified in Year 14.

C.2 Illicit Discharge Detection and Elimination (IDDE) Ordinance – N/A. See C.9.

C.3 Detection/Elimination Prioritization Plan

Measurable Goals: The NTRD will utilize Dry Weather Screening to identify illicit discharges. The Storm Sewer Outfall Map has been prioritized and the outfalls will be visited at least once every 5 years. High priority outfalls will be identified and visited annually.

Status: The Township and the Township's Engineer will continue utilizing Dry Weather Screening to identify illicit discharges, as needed. The outfalls are visited on a regular basis while roadside drainage systems are being maintained. The Road District's jurisdiction is primarily within residential land use areas. There are minimal industrial and commercial areas adjacent to the Road District's roadways and therefore no high priority outfalls have been identified to date.

C.4 Illicit Discharge Tracing Procedures

Measurable Goals: The NTRD will continue to develop, train, and educate employees in relevant positions to perform activities such as illicit discharge tracing procedures and visual dry weather stormwater outfall screening. The NTRD will utilize these Tracing Procedures to find the source of illicit discharges. The Storm Sewer Outfall Map will assist in identifying areas to be inspected.

Status: The NTRD will continue developing, training, and educating employees to perform activities such as illicit discharge tracing procedures and visual dry weather outfall screening. Weekly staff safety meetings are held and training occurs at these meetings. The Road District has been researching videos that can be shown to staff.

C.5 Illicit Source Removal Procedures

Measurable Goals: The NTRD will continue developing written procedures and performing Illicit Discharge evaluation in accordance with BMPs C.4 and C.7. If any illicit discharges are suspected or found, NTRD will inform the County for further enforcement action under the County Ordinances.

Status: The NTRD has continued developing written procedures and will continue to perform Illicit Discharge evaluation in accordance with BMPs C.4 and C.7. No updates were needed in year 14.

C.7 Visual Dry Weather Screening

Measurable Goals: The NTRD will use visual dry weather screening to identify illicit discharges. A multi-year schedule will be prepared for visiting each known outlet to perform the screening in accordance with the priority areas identified in C.3. A standardization form has been used to keep a record of the screenings as they take place.

Status: Outfalls were formally visited in the summer of 2011 and reports were filed. The NTRD contracted a consultant firm to visit outfalls and update the outfall map in the summer of 2013. This updated map is on file at the Township. The outfalls are visited on a regular basis while roadside drainage systems are being maintained. If an illicit discharge is found, it is documented and the tracing and removal procedures are followed. No high priority outfalls have been identified to date.

C.9 Public Notification of Illicit Discharge Ordinance—N/A.

The NTRD's ownership is limited to roadway ROW within the Township. Any illicit discharges found within the Township will be enforced by the County under its IDDE Ordinance.

Illicit Discharge Detention and Elimination Evaluation: NTRD feels that the IDDE program is effective. More attention will be paid to documenting all inspections however, the Road District regularly inspects the roadside ditches and outfalls.

4. Construction Site Runoff Control

Development within Nunda Township is regulated by McHenry County. The County Stormwater Management Ordinance includes provisions for the control of storm water runoff during construction. The McHenry County Department of Planning and Development also has procedures for the orderly review of new development. The County Zoning and Subdivision Control Ordinances along with the County Watershed Development Ordinance include provisions for the control of stormwater runoff during construction.

5. Post-Construction Runoff Control

Development within Nunda Township is regulated by McHenry County. The County Stormwater Management Ordinance includes provisions for the control of storm water runoff after construction. The McHenry County Department of Planning and Development also has procedures for the orderly review of new development. The County Zoning and Subdivision Control Ordinances along with the County Watershed Development Ordinance include provisions for the control of stormwater runoff after construction.

6. Pollution Prevention/Good Housekeeping

F.1 Staff Training

Measurable Goals: The NTRD will continue to train and educate its employees in relevant positions to perform activities such as illicit discharge tracing procedures and visual dry weather stormwater outfall screening. The NTRD will also seek other opportunities for training through seminars and other training materials widely available.

Status: The NTRD has continued training municipal employees in relevant positions. When available, staff members attend training hosted by the County for responsible snow and ice control. Additionally, educational videos are shown at weekly safety meetings to act as a refresher course for stormwater pollution prevention.

F.2-F.4 NTRD Facility Operation and Maintenance Program

Measurable Goals: The NTRD will continue to implement the Operation and Maintenance program.

Status: The NTRD has continued to implement the Operation and Maintenance Program.

Facility Operation and Maintenance Program Evaluation: NTRD feels that the current Pollution Prevention/Good Housekeeping program is working well. The facility has a covers salt storage building that is graded to prevent any salt contaminated water from leaving the building. No fertilizers, herbicides or pesticides are used or kept onsite and all truck maintenance is performed indoors.

Part C. Information and Data Collection Results

The protocol established in the permit was followed; no illicit discharges were observed and no illicit discharges were tested.

Part D. Summary of Year 15 Stormwater Activities

Below are listed the various BMPs which have milestones to be completed in Year 15, as outlined in the NOI as part of the second permit term (for Years 11-15). The specific milestone to be completed for each BMP is shown.

- A.1 – Prepare at least one (1) educational article and publish in newsletter or post online at least once per year. Update the website to include information related to climate change.
- B.3 – Participate in or host a local watershed group.
- B.4 – Conduct a public meeting on the stormwater management plan.
- B.6 – Maintain Adopt-A-Highway program.
- C.1 – Update the Outfall Map, as necessary, to show outfall locations, receiving streams, storm sewers, and culverts.
- C.3 – Continue to utilize Dry Weather Screening to identify illicit discharges. The Storm Sewer Outfall Map will be used to visit the outfalls at least once every 5 years.
- C.4 – Continue to implement Illicit Discharge Tracing Procedures through the training and education of employees.
- C.5 – Continue developing written procedures and continue to perform Illicit Discharge evaluation in accordance with BMPs C.4 and C.7.
- C.7—Continue scheduled visits of known outfalls.
- F.1 – Train municipal employees in relevant positions and update the program, as needed.
- F.2-F.4 – Continue to implement the Operation and Maintenance Program.

Part E. Notice of Qualifying Local Program

Development in Nunda Township is regulated by McHenry County, which has adopted the McHenry County Watershed Development Ordinance. The following items are expected to be covered by the County's ordinance as described in the original NOI.

Section C – Illicit Discharge Detection and Elimination:

Per BMP No. C.2, an Illicit Discharge Detection and Elimination (IDDE) Ordinance has been adopted by the County.

Section D - Construction Site Runoff Control:

Development within Nunda Township is regulated by McHenry County. The County Zoning and Subdivision Control Ordinances along with the County Watershed Development Ordinance include provisions for the control of stormwater runoff during construction. The McHenry County Department of Planning and Development also has procedures for the orderly review of new development.

Section E - Post-Construction Runoff Control:

Development within Nunda Township is regulated by McHenry County. The County Zoning and Subdivision Control Ordinances along with the County Watershed Development Ordinance include provisions for the control of stormwater runoff during construction. The McHenry County Department of Planning and Development also has procedures for the orderly review of new development.

Part F: Construction Projects Conducted During Year 14

There were no construction projects initiated by the Township that disturbed more than one acre of land during Year 14.