

Nunda Township Road District
NPDES Phase II – Year Seventeen (March 2019 – March 2020) Annual Update

Table of Contents

Part A. Changes to Best Management PracticesA-1

Part B. Status of Compliance with Permit Conditions.....B-1

Part C. Information and Data Collection Results C-1

Part D. Summary of Year 18 Stormwater Activities D-1

Part E. Notice of Qualifying Local ProgramE-1

Section D – Construction Site Runoff ControlE-2

Section E – Post-Construction Runoff ControlE-3

Part F. Construction Projects Conducted During Year 17 F-1

Part A. Changes to Best Management Practices

There were no changes in Year 17 to the Best Management Practices (BMPs) that were outlined in the NOI permit submitted in 2016.

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 Fox River is impaired by chlorides in this reach. The Road District's has minimized the use of road salt for de-icing activities. They also work to minimize the release of other potential pollutants with their recycling program.

Part B. Status of Compliance with Permit Conditions

The status of BMPs and measurable goals performed in Year 17 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 posts a stormwater update including the current NOI, previous annual updates and an article pertaining to stormwater pollution. The stormwater article will receive an update shortly. These postings are available at the Township's website at: <http://nundaroaddistrict.com/npdesiepa/>.

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 EJ areas within the MS4. According to the EPA mapper, the NTRD does not have any EJ areas within the limits it governs.

Public Education and Outreach Evaluation: NTRD feels that the information on their website is sufficient

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: NTRD did not participate in a local watershed group meeting in Year 17, but may be interested in beginning involvement with the Friends of the Fox River committees.

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 17.

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 and NTRD reports that interest seems low. Their

own employees, the sheriff's department, and other volunteers are cleaning roads. 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. The NTRD has continued and will continue to provide recycling services 24 hours a day, 365 days a year.

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 continues updating their outfall map as needed. The outfalls are visited on a regular basis while roadside drainage systems are being maintained. No new outfalls were constructed or identified in Year 17.

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 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 has continued developing training to perform activities such as illicit discharge tracing procedures and visual dry weather outfall screening. While NTRD did not provide training to employees in Year 17, NTRD understands the importance of training and education and hopes to implement it more consistently in Year 18.

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 is currently 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 17.

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: 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. Due to the characteristics of the NTRD jurisdiction, 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. Outfalls are inspected regularly during roadside drainage maintenance, and NTRD is continuing to develop tracing procedures and train staff at weekly meetings on visual dry weather screening.

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: While NTRD did not provide training to employees in Year 17, NTRD understands the importance of training and education and hopes to implement it more consistently in Year 18.

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 18 Stormwater Activities

Below are listed the various BMPs which have milestones to be completed in Year18, as outlined in the NOI as submitted in 2016. 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 17

In May 2019 (Year 17), the Township completed construction on one project that required a Notice of Intent and that disturbed over one acre:

Facility:	Nunda Township Road District Site Detention
County:	McHenry
NPDES Permit No:	ILR10AV40
Status:	Approved

In February 2020, the Township also applied for a NPDES permit for the following project:

Facility:	Lily Lake Road Construction
County:	McHenry
NPDES Permit No.:	ILR10BJ90
Status:	Submitted for Approval