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May 31, 2019

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 – 2018/2019, Annual Report  
HR Green Job No. 190557

Dear Ms. LeMasters:

Please find enclosed the NPDES Phase II – Year 16, 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 that reads 'Logan Gilbertsen'.

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

Enclosure: Nunda Township Road District Annual Update

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



# 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 \_\_\_\_\_

#### 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))**

  
\_\_\_\_\_  
Mike Lesperance  
Owner Signature:

5-30-19  
\_\_\_\_\_  
Date:  
Highway Commissioner

Printed Name:

Title:

EMAIL COMPLETED FORM TO: [epa.ms4annualinsp@illinois.gov](mailto:epa.ms4annualinsp@illinois.gov)

or Mail to: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
WATER POLLUTION CONTROL  
COMPLIANCE ASSURANCE SECTION #19  
1021 NORTH GRAND AVENUE EAST  
POST OFFICE BOX 19276  
SPRINGFIELD, ILLINOIS 62794-9276

IL 532 2585 WPC 691 Rev 6/10 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 Sixteen (March 2018 – March 2019) Annual Update**

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## **Part A. Changes to Best Management Practices**

There were no changes in Year 16 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 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 15 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 no EJ areas within the MS4. No changes to the education and outreach will be made to accommodate any EJ areas.

**Public Education and Outreach Evaluation:** NTRD feels that the information on their website is sufficient. In Year 16 they provided educational information to attendees 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:** NTRD participated in a local watershed group meeting hosted by the McHenry County Conservation District at the Prairie View Education Center in May 2018.

#### 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 16.

#### 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 normal basis while roadside drainage systems are being maintained. No new outfalls were constructed or identified in Year 16.

#### 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, 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.

### **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 16.

### **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: The NTRD has continued training municipal employees in relevant positions. Additionally, training on tracing and screening procedures takes place 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 17 Stormwater Activities**

Below are listed the various BMPs which have milestones to be completed in Year 17, 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 16**

In year 16, no projects initiated by the Township exceeded one acre of disturbance.

In May 2019 (Year 17), the Township was in the process of constructing 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:	CONSTRUCTION IN PROCESS

An update on the status of this permit will be provided in the 2019/2020 annual update.