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HORDEEN COM

June 1, 2023

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 – 2022/2023, Annual Report

IEPA Permit No. ILR40 -0100 HR Green Job No. 2302496

Dear Ms. LeMasters:

Please find enclosed the NPDES Phase II – Year 20 (2022/2023), Annual Report for the Nunda Township Road District. As the representative of the Township, HR Green, Inc. coordinated with the Township 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 at 815-759-8370.

Sincerely,

HR GREEN, INC.

Logan Gilbertsen, P.E., CFM

Project Manager - Water Resources

JG/LG

Enclosure: Nunda Township Road District Annual Update - 2022/2023

cc: Mr. Mike Lesperance, Nunda Township Road District

Mr. Steve Bicking, 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, 2022 To March, 2023			Permit No. ILR40 0100		
MS4 OPERATOR INFORMATION: (As it appears or	the curren	it permit)			
Name: Nunda Township Road District		Mailing Address 1: 3518 Bay Road			
Mailing Address 2:			County: McHenry		
City: Crystal Lake Sta	ate: IL	Zip: 60012	Telephone: 815-459-4410		
Contact Person: Mike Lesperance (Person responsible for Annual Report)	Email	Address: highway@	nundaroaddistrict.com		
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.					
<ul> <li>A. Changes to best management practices (check appropriate BMP change(s) and attach information regarding change(s) to BMP and measurable goals.)</li> </ul>					
Public Education and Outreach	4. Cons	truction Site Runoff Co	ontrol 🔲		
2. Public Participation/Involvement	5. Post-	Construction Runoff C	ontrol		
3. Illicit Discharge Detection & Elimination	6. Pollu	tion Prevention/Good I	lousekeeping		
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 n	nonitoring data, if any	during the reporting period.		
<ul> <li>D. Attach a summary of the storm water activities you pl implementation schedule.)</li> </ul>	lan to unde	rtake during the next r	eporting cycle ( including an		
E. Attach notice that you are relying on another government	nent entity	to satisfy some of you	permit obligations (if applicable).		
F. Attach a list of construction projects that your entity h	as paid for	during the reporting pe	eriod.		
Any person who knowingly makes a false, fictitious, or fro commits a Class & felpny. A second or subsequent offen	audulent ma se after cor	aterial statement, orally nviction is a Class 3 felo	or in writing, to the illinois EPA ony. (415 ILCS 5/44(h))		
Owner Signature:	_	6-1	-23		
Mike Lisperance		Highway Comn	ale. nissioner		
Printed Name:			itle:		

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

# Nunda Township Road District NPDES Phase II – Year Twenty (March 2022 – March 2023) Annual Update IEPA Permit No. ILR40-0100

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# Part A. Changes to Best Management Practices

There were no changes in Year 20 to the Best Management Practices (BMPs) that were outlined in the NOI renewal permit submitted in 2021.

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.

The Township has also reviewed the EPA's Environmental Justice (EJ) Screening tool to determine if the current program requires modification to reach underserved communities. According to the screening tool, only 15% of the population is low income and only 2% is linguistically isolated within the Nunda Township Road District, which is below the state average. Therefore, it NTRD assumes that program modifications are not necessary at this time.

# Part B. Status of Compliance with Permit Conditions

The status of BMPs and measurable goals performed in Year 20 (2022/2023) 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 once per year.

Status: The NTRD posts a stormwater update including the current NOI, previous

annual updates and an article pertaining to stormwater pollution. There is a dedicated NPDRES/IEPA tab on the website to promote this information. The tab includes a link to NTRD's Stormwater Management Plan. The postings are

available at the Township's website at: http://nundaroaddistrict.com/npdesiepa/.

Additionally, there are sub-tabs which offer links related to climate change and

stormwater information. For example, the 2019 NPDES tab

(<a href="http://nundaroaddistrict.com/npdesiepa/2019-npdes/">http://nundaroaddistrict.com/npdesiepa/2019-npdes/</a>) has a link to NASA's climate change website, to IEPA's "Water Quality for Citizens" website, and to a brochure entitled "Rain Gardens for Illinois." Additionally, there are links too some local watershed groups, such as the Boone-Dutch Creeks Watershed

Alliance and the Silver-Sleepy Creek Watershed.

**Public Education and Outreach Evaluation:** NTRD feels that the information on their website offers sufficient information to provide residents with information about their NPDES program, as well as about stormwater and climate change.

#### 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 20.

However, NTRD is currently investigating involvement with the Friends of the Fox River committees or the Fox River Ecosystem Partnership for Year 21.

**B.4 Public Hearing** 

Measurable Goals: Present ongoing NPDES Phase II program summary at least once annually at

a public meeting.

Status: NTRD plans to schedule an NPDES presentation for the board meeting in

Year 21.

**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). NTRD provides volunteers with garbage bags and disposes of the collected waste bags. In Year 20, volunteers picked up trash along the Township's roadways. The NTRD also 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:** In Year 20, NTRD has had volunteers participate in the Adopt-A-Highway program. Additionally, NTRD feels that their website provides sufficient educational information about the NPDES program. The Township is investigating local watershed groups and is planning to schedule an NPDES presentation for a board meeting in Year 21. 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 20.

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. During the inspection, NTRD has identified one (1) new outfall and no illicit discharges were found. 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. Staff

successfully completed outfall inspections in Year 20.

#### 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 continuing to develop 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 20 and no illicit discharges were found during inspections.

#### 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:

In Year 20, all the outfalls were inspected, with one (1) new outfall identified. No illicit discharges were found. NTRD has tracing and removal procedures in place and is prepared to initiate these procedures if an illicit discharge is identified in the future. 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. All outfalls were inspected in Year 20 and NTRD will continue annual inspections. NTRD continues to develop tracing procedures and to train staff 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: In Year 20, the staff did not attend any training courses. For Year 21, NTRD is

interested in investigating free webinars related to NPDES, salt application,

and pollution prevention.

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

Measurable Goals: The NTRD has developed an operation and maintenance program to address

the maintenance needs of its properties. The Program includes a description of all Properties, Fleet and Building Maintenance, Erosion Control procedures for new construction or other land disturbance, Maintenance of the MS4 and proper waste disposal including hazardous waste and procedures for the

prevention and containment of hazardous material spills.

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

Program. The NTRD has comprehensive recycling and waste services for its

residents, as highlighted on their website: http://nundaroaddistrict.com/recycling/

NTRD accepts car and truck batteries, cans, bottles, brush, paint, waste oils, light bulbs, some electronics, and tires. Their website has a map of their facility for proper sorting of recycled material and offers a schedule for when certain wastes are accepted. Additionally, NTRD has a Green Guide on their website which offers detailed information about recycling and where to dispose of household hazardous wastes. By accepting material for recycling and offering information about proper waste disposal procedures for residents, NTRD is helping to minimize illegal dumping and pollution into local waterways.

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. NTRD also has a comprehensive recycling program which helps to minimize illegal dumping and pollution into local waterways.

# 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 21 Stormwater Activities

Below are listed the various BMPs which have milestones to be completed in Year 21, as outlined in the NOI renewal submitted in 2021. The specific milestone to be completed for each BMP is shown.

- A.1 Prepare an educational article once a year and post it online. This article may include information relating to the impacts of climate change on precipitation and stormwater pollution.
- B.3 Participate in a local watershed group meeting or offer to host a local watershed group meeting at a municipal facility.
- 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. Continue to keep record of the screenings.
- 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 20

In Year 20 there were no construction projects that disturbed more than one acre.



D 1391 Corporate Drive | Suite 103 | McHenry, IL 60050
Main 815.385.1778 ★ Fax 815.385.1781

HRGREEN COM

June 1, 2023

Mr. Mike Lesperance Highway Commissioner Nunda Township Road District 3518 Bay Road Crystal Lake, Illinois 60012

RE:

NPDES Phase II, 2022/2023 Annual Update

IEPA Permit No. ILR40-0100 HR Green Job No. 2302496

Dear Mr. Lesperance:

HR Green, Inc. has completed its review of your stormwater program for compliance with the NPDES Phase II Requirements and has submitted your Year-Twenty (2022/2023) Annual Report to the Illinois Environmental Protection Agency (IEPA), as required under General Permit ILR40. In the Year- Twenty Annual Report, your Road District is required to describe the actions completed within the past permitting year, from April 1, 2022 to March 31, 2023, and to demonstrate that these actions satisfy the tasks that were listed in the Notice of Intent (NOI), which was submitted in May 2021. It also allows the opportunity to make changes to the proposed tasks if the needs of the community change or if the previously proposed Best Management Practices (BMPs) are found to be inappropriate or ineffective for promoting stormwater quality.

HR Green, Inc. has compiled a list of measurable goals for your township to complete by the end of next year (2023/2024), as part of the current NPDES Permit No. ILR40, which expires February 28, 2026. Please review the items below and let me know if you have any questions or would like to make any changes.

The following are items that your NOI specifies are to be completed prior to March 31, 2024:

- A.1 Prepare an educational article once a year and post it online. This article may include information relating to the impacts of climate change on precipitation and stormwater pollution.
- B.3 Participate in a local watershed group meeting or offer to host a local watershed group meeting at a municipal facility.
- 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. Continue to keep record of the screenings.
- 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.

Please contact me if you have any questions or need additional information.

Sincerely,

HR GREEN, INC.

Logan Gilbertsen, P.E., CFM

Project Manager - Water Resources

cc: Steve Bicking, P.E., CFM, D.WRE - HR Green, Inc.





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