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May 28, 2021

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 – 2010/2020, Annual Report & Notice of Intent
HR Green Job No. 210433

Dear Ms. LeMasters:

Please find enclosed the NPDES Phase II – Year 18, Annual Report and an updated Notice of Intent 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). Additionally included is an updated Notice of Intent corresponding to the current ILR40.

If you have any questions, please contact me.

Sincerely,

HR GREEN, INC.

A handwritten signature in black ink, appearing to read 'Logan Gilbertsen'.

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

Enclosure: Nunda Township Road District Annual Update – 2020/2021
Notice of Intent ILR40

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, 2020 To March, 2021

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:

5-19-21
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

Nunda Township Road District
NPDES Phase II – Year Eighteen (March 2020 – March 2021) Annual Update

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Part A. Changes to Best Management Practices

There were no changes in Year 18 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 required modification to reach underserved communities. The screening tool did not identify any areas within the Nunda Township Road district that were highly linguistically isolated or low income populations.

Part B. Status of Compliance with Permit Conditions

The status of BMPs and measurable goals performed in Year 18 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.

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/>.

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 18 due to the Covid 19 pandemic. NTRD is 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: Stormwater has been discussed at Township board meetings in Year 18.

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. Participation in the program has remained steady in Year 18. 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 18.

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 18, NTRD understands the importance of training and education and hopes to implement it more consistently in Year 19.

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 18.

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. More than 20% of the outfalls were visited and inspected in Year 18. No illicit discharges were found or suspected.

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 18, NTRD understands the importance of training and education and hopes to implement it more consistently in Year 19. NTRD will actively seek out virtual training seminars for staff.

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 19 Stormwater Activities

Below are listed the various BMPs which have milestones to be completed in Year 19, as outlined in the NOI renewal submitted in 2021. 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 18

In year 18 there were no construction projects that disturbed more than one acre.