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May 25, 2022

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 – 2021/2022, Annual Report
IEPA Permit No. ILR40 -0100
HR Green Job No. 220639

Dear Ms. LeMasters:

Please find enclosed the NPDES Phase II – Year 19 (2021/2022), 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.

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

Logan Gilbertsen, P.E., CFM
Project Manager - Resources Engineer

Sk/LG

Enclosure: Nunda Township Road District Annual Update – 2021/2022

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, 2021 To March, 2022

Permit No. ILR40 0100

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:


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

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 Nineteen (March 2021 – March 2022) Annual Update
IEPA Permit No. ILR40-0100

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Part A. Changes to Best Management Practices

There were no changes in Year 19 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 19 (2021/2022) 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. There is a dedicated NPDES/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 (<http://nundaroaddistrict.com/npdesiepa/2019-npdes/>) 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 to 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 is 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 19. However, NTRD is currently investigating involvement with the Friends of the Fox River committees or the Fox River Ecosystem Partnership for Year 20.

B.4 Public Hearing

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

Status: NTRD has scheduled an NPDES presentation for the board meeting on July 8th 2022.

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 the collected waste bags. In Year 19, approximately 8 to 10 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 19, 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 scheduled to have an NPDES presentation at a board meeting this summer. 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 19.

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. On May 18th 2021, NTRD visited Outfalls #1 through #21 and #48 through #94 for a total of 66 outfalls. During the inspection, NTRD has identified a few outfalls that require repair or maintenance, but 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 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 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 19 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 19, approximately 66 outfalls were inspected. Some outfalls were found to require maintenance and NTRD will work to repair or clean the identified outfalls. 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. Approximately 66 outfalls were inspected in Year 19 and NTRD will continue annual inspections. NTRD is continuing 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 19, all staff received training for proper salt application procedures. For Year 20, 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 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 20 Stormwater Activities

Below are listed the various BMPs which have milestones to be completed in Year 20, 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 19

In Year 19 there were no construction projects that disturbed more than one acre.