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May 29, 2025

Illinois Environmental Protection Agency, DWPC  
Compliance Assurance Section #19  
2520 W Iles Ave.  
Post Office Box 19276  
Springfield, Illinois 62794-9276

RE: Nunda Township Road District, NPDES Phase II – 2024/2025, Annual Report  
IEPA Permit No. ILR40 -0100  
HR Green Job No. 2502368

To Whom It May Concern:

Please find enclosed the NPDES Phase II – Year 22 (2024/2025), 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 815-759-8386.

Sincerely,

**HR GREEN, INC.**

A handwritten signature in black ink, appearing to read 'Andrea H. Pracht'.

Andrea H. Pracht, P.E., CFM  
Project Manager – Water Resources

Enclosure: Nunda Township Road District Annual Update – 2024/2025

cc: Mr. Robert Parrish, Nunda Township Road District  
Mr. Steve Bicking, HR Green, Inc.

file://hrgmhnas/data/Exceptions/Municipalities/NUNDA/NPDES/Year\_22\_2025/ltr-iepa-cover-2025.docx



# 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, 2024 To March, 2025

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: Rob Parrish 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:

Robert W. Parrish

Printed Name:

5/27/25

Date:

Highway Commissioner

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

**Nunda Township Road District**  
**NPDES Phase II – Year Twenty-Two (March 2024 – March 2025) Annual Update**  
**IEPA Permit No. ILR40-0100**

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

There were no changes in Year 22 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, seven impaired waterbodies are within the Nunda Township Road District limits. The waterbodies are the Fox River (IL\_DT-22 & IL\_DT-23), Unnamed Tributary to the Fox River (Oakwood Hills) (IL\_DTZZB-01), Lake Defiance (IL\_RTB), Silver Lake (IL\_RTW), Griswold Lake (IL\_RTY), Lily Lake (IL\_RTZJ), and Island Lake (IL\_RTZI). The Fox River and Island Lake are the only waterways located within the Nunda Township Road District's jurisdiction which have a current TMDL, and no waterways in the area have a planned TMDL. The Fox River is impaired by chlorides in this reach. Island Lake is impaired by phosphorus. The Road District 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, the Nunda Township Road District is below the state average for low income and linguistically isolated. Therefore, the District 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 22 (2024/2025) 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 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: <https://nundaroaddistrict.com/bid-documents/#npdes>

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 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 22. However, NTRD is currently investigating involvement with the Friends of the Fox River committees or the Fox River Ecosystem Partnership for Year 23.

#### 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 23.

#### 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 22, volunteers picked up trash along the Township's roadways. The NTRD also has an extensive recycling program that collects oils and other potential stormwater pollutants and disposes of them in an appropriate manner.

**Public Participation/Involvement Evaluation:** In Year 22, NTRD did not have 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 23. 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. Two new outfalls were constructed or identified in Year 22.

#### 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 inspections in Year 22, 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 22.

#### 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 22 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 22, all the outfalls were inspected, with two new outfalls 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 22 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 22, the staff attended in-house training led by the foreman. For Year 23, NTRD is interested in investigating free webinars related to NPDES, salt application, and pollution prevention. The District plans on attending the 2026 McHenry/Lake County MS4 training if it is offered again.

### 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, 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 covered 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 23 Stormwater Activities**

Below are listed the various BMPs which have milestones to be completed in Year 23, 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 22**

In Year 22 the following construction projects disturbed more than 1 acre:

- Steuben Road reconstruction