



# 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

Acrobat Reader 8.0 or above installed to use the form

### 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, 2017 To March, 2018

Permit No. ILR40 400396

#### MS4 OPERATOR INFORMATION: (As it appears on the current permit)

Name: City of Naperville Mailing Address 1: 400 S. Eagle Street  
Mailing Address 2: County: DuPage  
City: Naperville State: IL Zip: 60540 Telephone: 630-420-6704  
Contact Person: William J. Novack Email Address: novackw@naperville.il.us  
(Person responsible for Annual Report)

#### Name(s) of governmental entity(ies) in which MS4 is located: (As it appears on the current permit)

City of Naperville

#### 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:  
William J. Novack

Printed Name:

  
Date:  
Director of T.E.D.

Title:

EMAIL COMPLETED FORM TO:

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

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.

**CITY OF NAPERVILLE  
NPDES PHASE II  
ANNUAL REPORT  
YEAR 2**

**A. Changes to Best Management Practices**

In year 2, the city maintained City Stormwater Plan information on the city website. This document as well as all other ILR40 General Permit requirements is available on the city website.

1. Public Education and Outreach – **None**
2. Public Participation/Involvement – **None**
3. Illicit Discharge Detection & Elimination – **None**
4. Construction Site Runoff Control – **None**
5. Post-Construction Runoff Control – **None**
6. Pollution Prevention/Good Housekeeping – **None**

**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 minimum control measures.**

**Best Management Practices:**

**BMP No. A1-Distributed Paper Material, A2-Speaking Engagement, A3-Public Service Announcement, A4-Community Event, A5-Classroom Education Material, A6-Other Public Education**

Co-permitted with DuPage County.

**BMP No. B.1-Public Panel, B.3-Stakeholder Meeting**

Co-permitted with DuPage County.

**BMP No. B.4-Public Hearing**

Co-permitted with DuPage County.

**BMP No. B.5-Volunteer Monitoring**

Co-permitted with DuPage County.

**BMP No. B.6-Program Coordination**

Co-permitted with DuPage County.

**BMP No. C.1-Storm Sewer Map Preparation**

**Measurable Goal(s), including frequencies:**

Co-permitted with DuPage County.

**Year 2 Milestones:**

In year 2, the city worked with DuPage County to maintain the accuracy of mapping.

**Completed tasks in Year 2:**

Minor updates were made to the mapping as anticipated.

#### **BMP No. C.2-Regulatory Control Program**

**Measurable Goal(s), including frequencies:**

Co-permitted with DuPage County.

**Year 2 Milestones:**

Review the effectiveness of the program by evaluating how well the cooperating permit holders have communicated and exchanged information.

**Completed tasks in Year 2:**

During Year 2, the City of Naperville continued to be a Full Participant in the county's IDDE program. The City remains fully committed to working cooperatively with the County as issues arise. The city maintains an intergovernmental agreement with DuPage County enabling DuPage to manage IDDE efforts in the Naperville outfalls located in Will County.

#### **BMP No. C.3-Detection/Elimination Prioritization Plan**

**Measurable Goal(s), including frequencies:**

Co-permitted with DuPage County. Priority outfalls will be prioritized in steps following the County plan.

**Year 2 Milestones:**

2 steps (3&4)

**Completed Tasks in Year 2:**

Co-permitted with DuPage County, who continues to sample and monitor the outfalls throughout the county and implement steps.

This year the City also investigated six (6) suspected illicit discharges: 17-001 Riverwalk Dental; 17-002 Gartner Bridge; 17-003 Edward Hospital; 17-004 Aquagenics Technologies; 17-005 North Central College; 17-006 South Eagle Street. All incidents were reported via concerned residents and were coordinated with DuPage County and the IEPA. The responsible party remedied the situation.

#### **BMP No. C.5 -Illicit Source Removal Procedures**

**Measurable Goal(s), including frequencies:**

Co-permitted with DuPage County.

**Year 2 Milestones:**

Continue tracing any illicit discharges detected. Review the outcomes of the illicit dischargers that were detected the previous year. Enforce the removal of illicit discharges. Publicize educational materials with DuPage County.

**Completed tasks in Year 2:**

During Year 2, the City of Naperville continued to be a Full Participant in the county's IDDE program. The City remains fully committed to working cooperatively with the County as issues arise. The city maintains an intergovernmental agreement with DuPage County enabling DuPage to manage IDDE efforts in the Naperville outfalls located in Will County.

#### **BMP No. C.7-Visual Dry Weather Screening**

**Measurable Goal(s), including frequencies:**

Co-permitted with DuPage County.

**Year 2 Milestones:**

Screen 15% of selected outfalls

**Completed tasks in Year 2:**

Co-permitted and coordinated with DuPage County. The DuPage County report will include the details of the dry weather survey, adding Naperville outfalls in Will County.

#### **BMP No. C.8-Pollutant Field Testing**

**Measurable Goal(s), including frequencies:**

Co-permitted with DuPage County. Conduct monitoring for the following chemical parameters when visual characterization of the discharge indicates an illicit nature: surfactants, ammonia, potassium, fluoride, conductivity, and PH. The city will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

**Year 2 Milestones:**

Monitor 60% of selected outfalls

**Completed Tasks in Year 2:**

Co-permitted and coordinated with DuPage County. The DuPage County report will include the details, the outfall monitoring results adding Naperville outfalls in Will County.

#### **BMP No. D.1-Regulatory Control Program**

Co-permitted with DuPage County.

#### **BMP No. D.2-Erosion Control and Sediment Control BMPs**

**Measurable Goal(s), including frequencies:**

Update Naperville practices as county BMP guidance resources evolve.

**Year 2 Milestones:**

Adjust Naperville regulations as appropriate.

**Completed Tasks in Year 2:**

No adjustments identified.

#### **BMP No. D.4-Site Plan and Review Procedures**

**Measurable Goal(s), including frequencies:**

The Engineering Team reviews the plans in concert with the city's Development Review Team. The entire Development Review Team meets weekly to review the status of projects and discuss issues surrounding various projects. All new development projects are brought before

the entire Engineering Team for everyone's comments and background knowledge. As new engineers are brought into the Engineering Team they are trained.

**Year 2 Milestones:**

Continue Engineering Team review of construction plans and provide training and checking of any new Engineering Team members. Review permits at pace of submittals.

**Completed Tasks in Year 2:**

The Development Review Team and Engineering Team continued their coordinated weekly meetings and review of projects.

**BMP No. D.6-Site Inspections/Enforcement Procedures:**

**Measurable Goal(s), including frequencies:**

As new members are added to the Code Enforcement Team they are cross trained by their peers. However, in the upcoming period we will include an overall training on soil erosion and sedimentation control so the entire group has refreshed and up-to-date training.

**Year 2 Milestones:**

Continue with site inspections and Code Enforcement practices.

**Completed tasks in Year 2:**

In addition to using site inspectors and Code Enforcement officers to evaluate construction site erosion compliance and corrective action, we utilize Engineering Technician during the project administration phases to monitor and control surety and project close-out. Unannounced spot inspections at randomly selected sites are also conducted at work sites, the owners were notified of deficiencies and follow up was conducted. The following work site locations were inspected in 2017 – 2119 Fisher Driver; Linden Woods Subdivision; Heatherfield Subdivision.

In addition, the team upgrades training associated with the inspection and enforcement processes included in the city's stormwater plan. Improvements were made to scheduling, record keeping, inspections, and site audits. NPDES Phase II staff training was conducted for the engineering staff and the SESC team on April 20 and May 2, respectively.

**BMP No. E.3-Long Term O&M Procedures**

**Measurable Goal(s) including frequencies:**

The older facilities that have been in place for many years do not have recurrence periods for inspections. The City has learned of problems in the past either through calls for assistance from the responsible party or based on complaints from residents or business owners. The City will continue to provide assistance to those responsible parties but will also investigate better educating the parties, especially the residential homeowner associations and the maintenance that is addressed by that party. In most of the legal documents, the city has the right, but not the obligation, to perform maintenance if it is not performed by the party after proper notification by the city with the city being reimbursed for their costs.

**Year 2 Milestones:**

Continue to enforce the provisions of the development agreements and plats and work with the responsible parties to address long-term issues.

**Completed tasks in Year 2:**

During Year 2 the Department of Public Works and the TED Business Group has responded to numerous site drainage concerns. The City and homeowners' associations know their responsibilities and work well together to make sure the drainage systems function as intended to provide flood risk reduction and water quality management. The Public Works Department developed a program to create floating wetlands to promote improved water quality.

#### **BMP E.4-Preconstruction Review of BMP Designs**

**Measurable Goal(s), including frequencies:**

The DuPage County Water Quality Best Management Practices Technical Guidance Document (BMP Manual) will provide guidance on the design and implementation of development practices that prevent stormwater quality degradation and enhance the overall quality of stormwater. The BMP manual will promote and give guidelines on the installation of vegetated filter strips, vegetated swales, infiltration systems, permeable pavers, manufactured structures, and stormwater detention BMPs such as dry detention basins, wet detention basins, constructed wetland detention basins and underground detention basins. Revisions to the Stormwater Ordinance will more clearly require new developments in DuPage County to incorporate BMPs into their design that will treat all runoff. Further, a water quality fund will be set up to accept fees from applicants who are unable to incorporate BMPs. The water quality fund will be used to fund water quality projects that would not otherwise be required under the Stormwater Ordinance, such as planting an eroding detention basin with native vegetation, restoring a wetland, or stabilizing a streambank. Revisions will also be made to more clearly require that a security is collected to aid in the enforcement of the proper construction and maintenance of BMPs.

**Year 2 Milestones:**

Have city staff trained in the review and design of PCBMP's. Continue to enforce the new Stormwater Ordinance provisions.

**Completed tasks in Year 2:**

Staff continued training efforts to improve review practices.

- February 28, 2017 – Green Infrastructure and Grants Symposium for MS4 Communities
- April 27, 2017 - Will County Floodplain Mapping Open House
- October 24, 2017 – West Branch Watershed Workshop
- October 25, 2017 – Contech Presentation on Stormwater Treatment Units and Underground Detention Systems
- DuPage County Municipal Engineers Group – Technical Sessions; 2/9/17; 4/4/17; 9/7/17
- Will County Stormwater Management Planning Committee – 1/13/17; 1/19/17; 3/7/17; 9/12/17; 10/3/17

#### **BMP No. E.5-Site Inspections During Construction**

**Measurable Goal(s), including frequencies:**

During this five-year permit phase, Naperville will ensure that all inspection staff recognize inappropriate construction site discharge and proper regulatory procedures for amending the violation. Incidents of Non-Compliance may be issued for a site if the infraction meets the reporting criteria.



**Year 2 Milestones:**

Continue to conduct regular site inspections during construction. Conduct staff training on recognizing inappropriate discharge from a construction site.

**Completed tasks in Year 2:**

During Year 2 city staff continued to perform regular site inspections to ensure compliance with erosion and sediment control.

**BMP No. E.6-Post Construction Inspections**

**Measurable Goal(s), including frequencies:**

Follow DuPage County and City ordinance requirements.

**Year 2 Milestones:**

Continue to offer employee training on-site inspections.

**Completed tasks in Year 2:**

The team upgrades training associated with the inspection and enforcement processes included in the city's stormwater plan. Improvements were made to scheduling, record keeping, inspections, and site audits. Engineering staff and Soil Erosion and Sediment Control Team participated in a Phase II training session on April 20 and May 2.

**BMP No. F-1-Employee Training Program**

**Measurable Goal(s), including frequencies:**

Members of the City's Department of Public Works attend the American Public Works Association (APWA) training classes and expositions. In 2006, the City of Naperville's Department of Public Works became an Accredited Department by APWA. The accreditation speaks for the professionalism and training that takes place in the department.

**Year 2 Milestones:**

Continue individual employee training and work to retain department accreditation.

**Completed tasks in Year 1:**

During Year 2 TED Business Group used an NPDES training video to educate employees about Phase II requirements related to stormwater pollution prevention for municipal operations and illicit discharge detection and elimination. The Phase II training session was conducted on April 20 and May 2.

**BMP No. F.2-Inspection and Maintenance Program**

**Measurable Goal(s), including frequencies:**

The Public Works Department currently inspects and maintains the MS4 on an as-needed complaint basis, which is tracked by a database program called City Works. Public Works will implement a routine preventive maintenance program for long-term maintenance of the MS4 in the future. In addition, the Department of Public Utilities has one wastewater treatment plant which treats the city's sewage and the remnants of sludge from the sewage.

**Year 2 Milestones:**

Continue good housekeeping practices and proper operation of the Springbrook Water Reclamation facility.

**Completed tasks in Year 2:**

The Department of Public Works continued maintaining the system based on both complaint and historical basis, knowing certain areas required more frequent maintenance than others and proactively conducting that maintenance before problems arose. The Department of Public Utilities continued proper operations of the Springbrook Water Reclamation facility.

**BMP No. F.3-Municipal Operations of Stormwater Control**

**Measurable Goal(s), including frequencies:**

The city has completed mapping the City's storm sewer system. The city has been consolidating data with DuPage County as well. Work to maintain the mapping in up-to-date condition will continue.

**Year 2 Milestones:**

The Department of Public Works and the Engineering Team will continue to meet to discuss maintenance and operation of the city's storm sewer system.

**Completed tasks in Year 2:**

Continued update of the system operation occurred in Year 2.

In Year 2, during the 2017/18 winter season, the city used approximately 14,661 tons of salt. Staff has reduced road salt usage by lowering the application rates for the salt when possible. Under certain circumstances, only hills, curves, intersections, arterials, and Priority 1 streets (collector and neighborhood connector roadways) have been salted. Procedures have also been modified to postpone application of salt to residential side streets until after snow plowing has been completed under certain conditions. As a result, although residential streets may not be completely free of snow and ice, they will be safe and passable based on the traffic volume for vehicles driving at a reasonable speed for the conditions.

Note that the City did experience a period of 9 consecutive days with snowfall. Cumulative total snowfall amount was 25 inches over this period. A significant amount of road salt was needed for this unusual weather.

**BMP No. F.4-Municipal Operations and Waste Disposal**

**Measurable Goal(s), including frequencies:**

In October 2008, the Department of Public Works moved into a new facility at Jefferson Avenue and Fort Hill Drive. The facility includes many environmental friendly designs such as bio swales and native vegetation in the stormwater management facility. Temporary storage of materials before being disposed of may occur at this site with the BMPs acting as an additional environmental barrier.

The City of Naperville also has and operates a Household Hazardous Waste Drop-off facility. The city has numerous agreements with the State of Illinois, the counties and nearby municipalities to help co-fund this facility. Residents, even those well beyond the borders of the City of Naperville, can come to this facility and drop off household hazardous waste at no cost. This facility is located at Fort Hill Drive next door to the Public Works Facility.

**Year 2 Milestones:**



Continue to own and operate the City's Household Hazardous Waste drop-off facility.

**Completed tasks in Year 2:**

In Year 2, residents with an interest in recycling organics such as food scraps can rent either a 64-gallon or a 96-gallon yard waste cart for an annual fee. Residents choosing to utilize this service can place all their yard waste and food waste in the provided cart, thereby diverting more waste away for the landfill.

In 2017, more than 74,160 gallons of hazardous materials were collected at the City of Naperville's Household Hazardous Waste facility, which is 6,165 more gallons than 2016. This facility collects hazardous waste from the public and serves several surrounding counties in the region. Operation of this facility is funded by several partner agencies.

**BMP No. F.5-Flood Management/Assess Guidelines**

**Measurable Goal(s), including frequencies:**

Corrections and updated DFIRM maps and the dual-county issues will be resolved.

**Year 2 Milestones:**

In 2017, FEMA was still in the process of correcting and updating DFIRM maps.

**Completed tasks in Year 2:**

Staff coordinated the data review with FEMA.

**C. Attach results of information collected and analyzed, including monitoring data, if any during the reporting period.**

The DuPage River Salt Creek Working Group collects monitoring data for the DuPage County area.

**D. Attach a summary of the stormwater activities you plan to undertake during the next reporting cycle (including an implementation schedule.)**

Refer to the NOI for activities that the City of Naperville will undertake during Year 3.

**E. Attach notice that you are relying on another entity to satisfy some of your permit obligations.**

The City of Naperville co-permitted with DuPage County, per resolution No. R17-037. The City of Naperville is also an active member of the DuPage River Salt Creek Working Group.

**F. Attach a list of construction projects that your entity has paid for during the construction period.**

PROJECT	LOCATION	DESCRIPTION
2017 Maintenance Improvement Program (MIP)	Various Locations	Roadway reconstruction and rehabilitation
Wolf's Crossing Road Re-alignment	Wolf's Crossing Road south of 95 <sup>th</sup> Street	Re-alignment of Wolf's Crossing Road in association with construction of a new development.
2017 Sidewalk Gap Filling Program	Various Locations	Sidewalk construction