



# Illinois Environmental Protection Agency

Bureau of Water • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

## Notice of Intent for New or Renewal of General Permit for Discharges from Small Municipal Separate Storm Sewer Systems - MS4's

### Part I. General Information

1. MS 4 Operator Name: City of Naperville

2. MS4 Mailing Address: 400 South Eagle Street

City: Naperville State: Il

3. Operator Type: City Other: \_\_\_\_\_

4. Operator Status: Local Other: \_\_\_\_\_

5. Name(s) of governmental entity(ies) in which MS4 is located:

DuPage County \_\_\_\_\_

Will County \_\_\_\_\_

6. Area of land that drains to your MS4 in square miles: 227

7. Latitude and Longitude at approximate geographical center of MS4 for which you are requesting authorization to discharge:

Latitude:			Longitude:		
<u>41</u>	<u>46</u>	<u>16.05</u>	<u>-88</u>	<u>9</u>	<u>12.12</u>
Degrees	Minutes:	Seconds:	Degrees:	Minutes:	Seconds:

8. Name(s) of known receiving waters

East Branch DuPage River and tributaries

West Branch DuPage River and tributaries

Waubansee Creek

DuPage River and tributaries

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

9. Persons responsible for implementation or coordination of Stormwater Management Program:

Name: William J. Novack Title: Director of TED/City Engineer Phone: (630) 420-6704

Area of Responsibility: Stormwater Runoff Control

Name: James Holzapfel Title: Director of Public Utilities-Water Phone: (630) 305-5320

Area of Responsibility: Wastewater Collection/Treatment Water Distribution

Name: Richard Dublinski Title: Director of Public Works Phone: (630) 420-6752

Area of Responsibility: Stormwater Maintenance

Name: \_\_\_\_\_ Title: \_\_\_\_\_ Phone: \_\_\_\_\_

Area of Responsibility: \_\_\_\_\_

Part II. Best Management Practices (include shared responsibilities) which have been implemented or are proposed to be implemented in the MS4 area:

**A. Public Education and Outreach**

Qualifying Local Programs:

Co-permit with the County of DuPage. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals (include shared responsibilities)

- A.1 Distributed Paper Material

Brief Description of BMP:

Co-permit with the County of DuPage. The City of Naperville has worked with DuPage County to help develop and distribute the following material. Paper materials assist in providing information for programs, procedures, and research to residents and non-residents of DuPage County. DuPage County has partnered with both the Conservation Foundation of DuPage County and S.C.A.R.C.E. (School and Community Assistance for Recycling and Composting Education) to develop and distribute various water quality related brochures and fact sheets. These paper materials provide information about various county-wide programs, including stream bank stabilization; the promotion of best management practices; and provide general guidance on how to improve water quality throughout the County. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Go to Additional Pages

Year 1:

Continue to update and review water quality information as necessary.

Year 2:

Continue to update and review water quality information as necessary.

Year 3:

Continue to update and review water quality information as necessary.

Year 4:

Continue to update and review water quality information as necessary.

Year 5:

Continue to update and review water quality information as necessary.

A.2 Speaking Engagement

Brief Description of BMP:

Co-permit with the County of DuPage. Speaking engagements provide the City of Naperville and DuPage County an additional outlet to inform the public about stormwater issues, procedures, and information. Staffs from the DuPage County Stormwater Management Division as well as members of the Conservation Foundation and S.C.A.R.C.E. have spoken at a number of engagements meant to promote water quality and recycling. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Continue support of County funded groups. Encourage staff participation in speaking engagement opportunities.

Year 2:

Continue support of County funded groups. Encourage staff participation in speaking engagement opportunities.

Year 3:

Continue support of County funded groups. Encourage staff participation in speaking engagement opportunities.

Year 4:

Continue support of County funded groups. Encourage staff participation in speaking engagement opportunities.

Year 5:

Continue support of County funded groups. Encourage staff participation in speaking engagement opportunities.

Go to Additional Pages

Brief Description of BMP:

Co-Permitted with the County of Dupage. Public service announcements are utilized to reach large groups of people and inform them of issues regarding stormwater management and water quality.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage

Milestones:

Year 1:

Continue to update and air County public service announcements. The City will air the County announcements on the City's Public Service Channel.

Year 2:

Continue to update and air County public service announcements. The City will air the County announcements on the City's Public Service Channel.

Year 3:

Continue to update and air County public service announcements. The City will air the County announcements on the City's Public Service Channel.

Year 4:

Continue to update and air County public service announcements. The City will air the County announcements on the City's Public Service Channel.

Year 5:

Continue to update and air County public service announcements. The City will air the County announcements on the City's Public Service Channel.

Go to Additional Pages

A.4 Community Event

Brief Description of BMP:

Co-permit with the County of DuPage. Community events allow the Stormwater Management Division personnel to provide information to the general public about a variety of stormwater management and water quality issues in a relaxed setting. Through a variety of community events DuPage County is able to reach a broad group of people comprised of residents, non-residents, and business leaders. Participation in these events is helpful to supplementing the flow of information from the County to the public.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Continue community events, review and update materials and events as needed.

Year 2:

Continue community events, review and update materials and events as needed.

Year 3:

Continue community events, review and update materials and events as needed.

Year 4:

Continue community events, review and update materials and events as needed.

Year 5:

Continue community events, review and update materials and events as needed.

Go to Additional Pages

A.5 Classroom Education Material (You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. Classroom education materials assist in the teaching of topics related to stormwater management, the environment, and water quality. "Hands on" demonstrations, and physical models help facilitate understanding of a topic beyond what is written in a textbook. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Continue the development of education materials, and sponsorship of environmental clubs. Review and update classroom

Year 2:

Continue the development of education materials, and sponsorship of environmental clubs. Review and update classroom education materials as necessary.

Year 3:

Continue the development of education materials, and sponsorship of environmental clubs. Review and update classroom education materials as necessary.

Year 4:

Continue the development of education materials, and sponsorship of environmental clubs. Review and update classroom education materials as necessary.

Year 5:

Continue the development of education materials, and sponsorship of environmental clubs. Review and update classroom education materials as necessary.

Go to Additional Pages

A.6 Other Public Education (You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. Other public education initiatives allow further opportunities to promote stormwater management and water quality issues.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Continue to review and update public education information.

Year 2:

Continue to review and update public education information.

Year 3:

Continue to review and update public education information.

Year 4:

Continue to review and update public education information.

Year 5:

Continue to review and update public education information.

Go to Additional Pages

**B. Public Participation/Involvement**

Measurable Goals (include shared responsibilities)

Qualifying Local Programs:

Co-permit with the County of DuPage. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Brief Description of BMP:

Co-permit with the County of DuPage. The knowledge gained from public opinion can assist in creating programs that address concerns and situations effectively. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Review and update public panel information.

Year 2:

Review and update public panel information.

Year 3:

Review and update public panel information.

Year 4:

Review and update public panel information.

Year 5:

Review and update public panel information.

Go to Additional Pages

B.2 Educational Volunteer

B.3 Stakeholder Meeting

(You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. Stakeholder meetings provide the opportunity for individuals and groups of people with a vested interest in stormwater management and water quality to exchange ideas and goals. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Continue support of the Municipal Engineers and DuPage River Salt Creek Working Groups.

Year 2:

Continue support of the Municipal Engineers and DuPage River Salt Creek Working Groups.

Year 3:

Continue support of the Municipal Engineers and DuPage River Salt Creek Working Groups.

Year 4:

Continue support of the Municipal Engineers and DuPage River Salt Creek Working Groups.

Year 5:

Continue support of the Municipal Engineers and DuPage River Salt Creek Working Groups.

Go to Additional Pages

B.4 Public Hearing

(You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. Public hearings allow for community members, both public and private, to gain insight into different stormwater programs and initiatives. Public information meetings allow for an open forum giving citizens first hand knowledge of various programs, policies, and projects while giving citizens the opportunity to discuss their viewpoints and provide input concerning appropriate stormwater management, water quality policies, and best management practices. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Continue to implement updates and review all amendments to appendices of the Stormwater Management Plan. Hold Public hearings as necessary for any ordinance change, watershed plan, or variance.

Year 2:

Continue to implement updates and review all amendments to appendices of the Stormwater Management Plan. Hold Public hearings as necessary for any ordinance change, watershed plan, or variance.

Year 3:

Continue to implement updates and review all amendments to appendices of the Stormwater Management Plan. Hold Public hearings as necessary for any ordinance change, watershed plan, or variance.

Year 4:

Continue to implement updates and review all amendments to appendices of the Stormwater Management Plan. Hold Public hearings as necessary for any ordinance change, watershed plan, or variance.

Year 5:

Continue to implement updates and review all amendments to appendices of the Stormwater Management Plan. Hold Public hearings as necessary for any ordinance change, watershed plan, or variance.

Go to Additional Pages

B.5 Volunteer Monitoring

(You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. Volunteer monitoring provides an opportunity for an interested person to become involved in the collection of water quality data throughout DuPage County. The collected data can be used to identify impairments to a water body and help develop proposed water quality improvement projects. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Continue support for volunteer monitoring opportunities.

Year 2:

Continue support for volunteer monitoring opportunities.

Year 3:

Continue support for volunteer monitoring opportunities.

Year 4:

Continue support for volunteer monitoring opportunities.

Year 5:

Continue support for volunteer monitoring opportunities.

Go to Additional Pages

B.6. Program Involvement (You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. Program Coordination is imperative to ensure that programs sponsored by DuPage County are reaching their desired objectives. The City will evaluate and seek to move to a regional wide NOI with DuPage

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Review and update programs as necessary.

Year 2:

Review and update programs as necessary.

Year 3:

Review and update programs as necessary.

Year 4:

Review and update programs as necessary.

Year 5:

Review and update programs as necessary.

Go to Additional Pages

B.7 Other Public Involvement



**C. Illicit Discharge Detection and Elimination**

Qualifying Local Programs:

Co-permit with the County of DuPage.

Measurable Goals (include shared responsibilities)

C.1 Sewer Map Preparation (You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. The City by intergovernmental agreement partners with DuPage County to administer and maintain a map showing the locations of all MS4 outfalls and the location of all waters of the United States that receive discharges from those outfalls. for the City of Naperville in both DuPage and Will County areas. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Maintain accurate up to date mapping

Year 2:

Maintain accurate up to date mapping

Year 3:

Maintain accurate up to date mapping

Year 4:

Maintain accurate up to date mapping

Year 5:

Maintain accurate up to date mapping

Go to Additional Pages

C.2 Regulatory Control Program (You may need to go to the next page to fill in this information)

DuPage County and the City of Naperville both adopted an IDDE ordinance and cooperative intergovernmental regulatory processes. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

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

Year 2:

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

Year 3:

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

Year 4:

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

Year 5:

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

Go to Additional Pages

C.3 Detection/Elimination Prioritization Plan (You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. DuPage County has begun developing a detection and elimination prioritization plan. Once the prioritization plan has been developed, DuPage County will use that plan to coordinate the monitoring of MS4 outfalls in Naperville both in Will and DuPage County by intergovernmental agreement with the City. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage. Priority outfalls will prioritized in steps following the County plan.

Milestones:

Year 1:

2 Steps (1 & 2)

Year 2:

2 Steps (3 & 4)

Year 3:

2 Steps (5 & 6)

Year 4:

2 Steps (7 & 8)

Year 5:

Go to Additional Pages

C.4 Illicit Discharge Tracing Procedures

C.5 Illicit Source Removal Procedures (You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. Distribute educational materials pertaining to illicit discharges to Naperville residents and businesses. DuPage County and Naperville maintain an Illicit Discharge Detection and Elimination Hotline, where interested parties are able to report suspect discharges from the storm sewer system into waterways located within DuPage County and Will county portions of Naperville. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

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

Year 2:

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

Year 3:

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

Year 4:

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

Year 5:

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

Go to Additional Pages

C.6 Program Evaluation and Assessment

C.7 Visual Dry Weather Screening (You may need to go to the next page to fill in this information)

Co-permit with the County of DuPage. Perform the visual screening of MS4 outfalls discharging to Waters of the State during dry-weather conditions. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Screen 10% of selected outfalls.

Year 2:

Screen 15% of selected outfalls.

Year 3:

Screen 20% of selected outfalls.

Year 4:

Screen 25% of selected outfalls.

Year 5:

Screen 30% of selected outfalls.

Go to Additional Pages

C.8 Pollutant Field Testing (You may need to go to the next page to fill in this information)

Brief Description of BMP:

Co-permit with the County of DuPage. 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.

Measurable Goals, including frequencies:

Co-permit with the County of DuPage.

Milestones:

Year 1:

Monitor 50% selected outfalls.

Year 2:

Monitor 60% selected outfalls.

Year 3:

Monitor 70% selected outfalls.

Year 4:

Monitor 80% selected outfalls.

Year 5:

Monitor 90% selected outfalls.

Go to Additional Pages

- C.9 Public Notification
- C.10 Other Illicit Discharge Controls

**D. Construction Site Runoff Control**

Measurable Goals (include shared responsibilities)

Qualifying Local Programs:

The City of Naperville has an existing ordinance in place, which addresses soil erosion and sedimentation control associated with construction site activities. This ordinance has been adopted as Title 5, Chapter 9 of the City of Naperville Municipal Code. This section specifies requirements for obtaining a soil erosion and sedimentation control permit, for which plans are to be submitted, reviewed and approved by the City, prior to issuance of a permit. Financial surety is also required in association with the permit to guarantee completion of the erosion and sedimentation control plan. This section also includes controls requiring conformance to plans and completion of improvements prior to issuance of building and occupancy permits.

D.1 Regulatory Control Program (You may need to go to the next page to fill in this information)

Brief Description of BMP:

DuPage County adopted and implemented a Countywide Stormwater and Floodplain Ordinance (Stormwater Ordinance) in 1991, which was updated five times since the first NOI was issued in February 2002, most recently in February 2006. The Stormwater Ordinance promotes effective, equitable, acceptable and legal Stormwater management, water quality, and natural resource protection measures.

The Stormwater Ordinance was comprehensively re-written in 2012 and 2013, so it is relatively current. However, acknowledging that the stormwater field is evolving, we recognize that continuous revisions will be necessary, especially as the time from the last re-write increase Stormwater Ordinance strictly regulates impacts to wetlands, wetland buffer and riparian habitat. DuPage County has been granted a General Permit by the U.S. Army Corps of Engineers to review impacts to wetlands because the Stormwater Ordinance is considered to be more restrictive in this area than the Federal regulations. Among other post-construction BMPs, the Stormwater Ordinance encourages the use of native vegetation in detention basins, the creation of wetlands, the restoration of riparian and wetland buffer habitat, and the stabilization of eroding streambanks. In addition to the regulations set forth in the Stormwater Ordinance, the DuPage County Building Code (Article I, Section 8-128 and Section 8-129 Grade Regulations and Landscape Regulations) also sets forth guidelines and regulations for all developments, large or small within the County of DuPage. All communities within DuPage County (except two which have opted out to other counties) have adopted and are required to enforce the minimum requirements in the Stormwater Ordinance. Communities may enforce the regulations themselves or opt to have DuPage County regulate and enforce them on their behalf.

Measurable Goals, including frequencies:

The Stormwater Ordinance was comprehensively re-written in 2012 and 2013, so it is relatively current. However, acknowledging that the stormwater field is evolving, we recognize that continuous revisions will be necessary, especially as the time from the last re-write increases.

Milestones:

Year 1:

Adjust Naperville regulations as appropriate.

Year 2:

Adjust Naperville regulations as appropriate.

Year 3:

Adjust Naperville regulations as appropriate.

Year 4:

Adjust Naperville regulations as appropriate.

Year 5:

Adjust Naperville regulations as appropriate.

Go to Additional Pages

D.2 Erosion and Sediment Control BMPs (You may need to go to the next page to fill in this information)

Brief Description of BMP:

The City of Naperville has an existing ordinance in place, which addresses soil erosion and sedimentation control associated with construction site activities. This ordinance has been adopted as Title 5, Chapter 9 of the City of Naperville Municipal Code. This section specifies requirements for obtaining a soil erosion and sedimentation control permit, for which plans are to be submitted, reviewed and approved by the City, prior to issuance of a permit. Financial surety is also required in association

with the permit to guarantee completion of the erosion and sedimentation control plan. This section also includes controls requiring conformance to plans and completion of improvements prior to issuance of building and occupancy permits.

The DuPage County Water Quality Best Management Practices Technical Manual (BMP Manual) and the DuPage County Countywide Stormwater And Flood Plain Ordinance 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 and Stormwater Ordinance 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. DuPage County also requires the sediment and erosion control plan for all developments to be designed using the standards of the "Procedures And Standards For Urban Soil Erosion And Sedimentation Control In Illinois" (Blue Book), unless the Stormwater Ordinance is more restrictive, before a building permit will be issued for the proposed work.

Measurable Goals, including frequencies:

Update Naperville practices as county BMP guidance resources evolve.

Milestones:

Year 1:

Adjust Naperville regulations as appropriate.

Year 2:

Adjust Naperville regulations as appropriate.

Year 3:

Adjust Naperville regulations as appropriate.

Year 4:

Adjust Naperville regulations as appropriate.

Year 5:

Adjust Naperville regulations as appropriate.

Go to Additional Pages

D.3 Other Waste Control Program

D.4 Site Plan Review Procedures (You may need to go to the next page to fill in this information)

Brief Description of BMP:

Review construction permit submittals to identify opportunities for avoidance of impacts to channels, wetlands, and adjoining property.

Every project contemplated for construction within the City of Naperville is required to submit engineering plans for review and approval prior to construction. The plans are reviewed for conformance with all City Standards including storm water regulations and floodplain management requirements. The engineering plans must also include a plan to address soil erosion and sedimentation control. The City of Naperville has a staff of six (6) project engineers who work to review these plans. The City also utilizes a select group of pre-qualified outside consultants for specialty reviews on projects with complex drainage.

Measurable Goals, 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.

Milestones:

Year 1:

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

Year 2:

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

Year 3:

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

Year 4:

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

Year 5:

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

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- D.5 Public Information Handling Procedures
- D.6 Site Inspection/Enforcement Procedures (You may need to go to the next page to fill in this information)

Brief Description of BMP:

The City of Naperville has always been dedicated to construction quality control by providing and training a team of inspection personnel. During periods of high construction, the City also utilizes the services of pre-qualified engineering consultants along with engineering interns.

The City also has a staff of four (4) Code Enforcement Officers who ensure the provisions of the Municipal Code are followed by the property owners throughout the City. If the Inspection Team has difficulty bringing a contractor into compliance, then Code Enforcement can be utilized to impose daily fines.

Measurable Goals, including frequencies:

As new members are added to the 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 a refreshed and up-to-date training.

Milestones:

Year 1:

Continue with site inspections and Code Enforcement practices.

Year 2:

Continue with site inspections and Code Enforcement practices.

Year 3:

Continue with site inspections and Code Enforcement practices.

Year 4:

Continue with site inspections and Code Enforcement practices.

Year 5:

Continue with site inspections and Code Enforcement practices.

Go to Additional Pages

- D.7 Other Construction Site Runoff Controls

**E. Post-Construction Runoff Control**

Qualifying Local Programs:

Post-construction runoff is controlled through a number of sections within the City of Naperville Municipal Code and Engineering Design Manual for Public Improvements. Stormwater runoff control requirements are specified to store and control the release rate from a developed area. While Best Management Practices (BMP's) are encouraged in the development of all sites to promote better water quality, they are now required in the DuPage County portion of Naperville. Provisions for ownership and long-term maintenance of permanent facilities are specified through the dedication of easements on recorded plats. In conjunction with the soil erosion and sedimentation control requirements, procedures are specified for acceptance and conveyance of storm water management facilities including permanent erosion and sedimentation control devices and structures. In addition to meeting the requirements specified by the approved plans, a maintenance bond is required for a period of one year after acceptance to protect against defects in materials and workmanship. Prior to expiration of the maintenance bond the City again inspects all facilities. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals (include shared responsibilities)

E.1 Community Control Strategy

E.2 Regulatory Control Program

E.3 Long Term O & M Procedures (You may need to go to the next page to fill in this information)

Brief Description of BMP:

Over the past forty (40) years, the City of Naperville has utilized recorded development agreements and recorded plats as the documents to delineate responsibilities for long-term maintenance of storm water management facilities. The facilities are maintained by a small number of groups including the City, the Naperville Park District, residential homeowner associations, and commercial property owner associations. When problems have arisen in the past, the City has notified the responsible party.

Measurable Goals, 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 look into better educating the parties, especially the residential homeowner associational and the maintenance 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.

Milestones:

Year 1:

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

Year 2:

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

Year 3:

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

Year 4:

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

Year 5:

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

Go to Additional Pages

E.4 Pre-Construction Review of BMP Designs (You may need to go to the next page to fill in this information)



In the DuPage County portion of the City of Naperville, Naperville follows the county-wide Stormwater Ordinance. The ordinance requires all developments to incorporate BMPs where practical. Naperville city staff will review construction plans, reports, modeling and specifications to ensure compliance with the new provisions.

Measurable Goals, 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.

Milestones:

Year 1:

Have City staff trained in the review and design of permanent BMPs. Continue to enforce the new Stormwater Ordinance provisions.

Year 2:

Have City staff trained in the review and design of permanent BMPs. Continue to enforce the new Stormwater Ordinance provisions.

Year 3:

Have City staff trained in the review and design of permanent BMPs. Continue to enforce the new Stormwater Ordinance provisions.

Year 4:

Have City staff trained in the review and design of permanent BMPs. Continue to enforce the new Stormwater Ordinance provisions.

Year 5:

Have City staff trained in the review and design of permanent BMPs. Continue to enforce the new Stormwater Ordinance provisions.

Go to Additional Pages

E.5 Site Inspections During Construction (You may need to go to the next page to fill in this information)

Naperville continually inspects sites under construction to ensure that required improvements are installed. Completed sites are documented with record plans and certified by an engineer as required by city codes.

Measurable Goals, including frequencies:

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

Milestones:

Year 1:

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

Year 2:

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

Year 3:

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

Year 4:

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

Year 5:

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

Go to Additional Pages

E.6 Post-Construction Inspections

Post Construction sites are required to submit As-built permit applications to ensure the project has met all requirements of the original permit. The As-built certification must be signed off before occupancy of a site may take place. Engineering staff, wetland staff and drainage staff to ensure the site meets full compliance complete inspections. Developments that involve BMPs and/or wetland, wetland buffer or riparian mitigation are annually inspected for the City by DuPage County for compliance with Stormwater Ordinance provisions and maintenance and monitoring plans until the requirements therein are satisfied.

Measurable Goals, including frequencies:

Follow Dupage County and City ordinance requirements

Milestones:

Year 1:

Continue to offer employee training on site inspections

Year 2:

Continue to offer employee training on site inspections

Year 3:

Continue to offer employee training on site inspections

Year 4:

Continue to offer employee training on site inspections

Year 5:

Continue to offer employee training on site inspections

Go to Additional Pages

E.7 Other Post-Construction Runoff Controls

**F. Pollution Prevention/Good Housekeeping**

Measurable Goals (include shared responsibilities)

Qualifying Local Programs:

The City of Naperville performs routine maintenance tasks which minimize and eliminate storm water pollution. The employees involved in these operations are trained in regards to the operation of equipment, maintenance of infrastructure, and best management practices. Current operations include routine schedules for catch basin cleaning and street sweeping. The fall leaf pick-up program is provided as a residential municipal service. In addition, to the benefit of the residents, this program also serves as a best management practice by limiting the amount of debris and organic material, which could otherwise enter the storm sewer system. The City's hazardous materials response team and household hazardous waste drop-off facility also provide important services that ultimately prevent waste from polluting the storm sewer system.

The City of Naperville performs routine maintenance tasks which minimize and eliminate storm water pollution. The employees involved in these operations are trained in regards to the operation of equipment, maintenance of infrastructure, and best management practices. Current operations include routine schedules for catch basin cleaning and street sweeping. The fall leaf pick-up program is provided as a residential municipal service. In addition, to the benefit of the residents, this program also serves as a best management practice by limiting the amount of debris and organic material, which could otherwise enter the storm sewer system. The City's hazardous materials response team and household hazardous waste drop-off facility also provide important services that ultimately prevent waste from polluting the storm sewer system.

F.1 Employee Training Program

(You may need to go to the next page to fill in this information)

The City of Naperville performs routine maintenance tasks, which minimize and eliminate storm water pollution. The employees involved in these operations are trained in regards to the operation of equipment, maintenance of infrastructure, and best management practices. Current operations include routine schedules for catch basin cleaning and street sweeping. The seasonal leaf pick-up program is provided as a residential municipal service for all areas of the City.

In addition to the benefit for the residents, this program also serves as a best management practice by limiting the amount of debris and organic material, which could otherwise enter the storm sewer system. The City's hazardous materials response team and household hazardous waste drop-off facility also provide important services that ultimately prevent waste from polluting the storm sewer system. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, 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 and has maintained this accreditation. The accreditation speaks for the professionalism and training that takes place in the department.

Milestones:

Year 1:

Continue individual employee training and work to retain department accreditation.

Year 2:

Continue individual employee training and work to retain department accreditation.

Year 3:

Continue individual employee training and work to retain department accreditation.

Year 4:

Continue individual employee training and work to retain department accreditation.

Year 5:

Continue individual employee training and work to retain department accreditation.

Go to Additional Pages

F.2 Inspection and Maintenance Program (You may need to go to the next page to fill in this information)

Brief Description of BMP:

The ILR40 NPDES permit requires that an operation and maintenance program be developed and implemented with the goal in mind of preventing or reducing pollutant runoff from municipal operations in the storm sewer system. Naperville has developed an inspection and maintenance program that includes routine catch basin cleaning and vacuum street sweeping. Public Works has developed a preliminary inspection and maintenance program for inspecting, maintaining and cleaning components of the (MS4) Municipal Separate Storm Sewer. Critical areas of the MS4 system are inspected at least once a year and maintenance is performed as appropriate.

Additionally, DuPage County has a program for removing debris from the mainstem waterways. The County will continue to follow their established guidelines to remove timber debris from regional waterways.

Measurable Goals, including frequencies:

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

Milestones:

Year 1:

The City will continue good housekeeping practices and proper operation of the Springbrook Water Reclamation Facility.

Year 2:

The City will continue good housekeeping practices and proper operation of the Springbrook Water Reclamation Facility.

Year 3:

The City will continue good housekeeping practices and proper operation of the Springbrook Water Reclamation Facility.

Year 4:

The City will continue good housekeeping practices and proper operation of the Springbrook Water Reclamation Facility.

Year 5:

The City will continue good housekeeping practices and proper operation of the Springbrook Water Reclamation Facility.

Go to Additional  
Pages

F.3 Municipal Operations Storm Water Control(You may need to go to the next page to fill in this information)

The City of Naperville owns and operates a separate storm sewer collection system. There are no combined flows with sanitary sewers; this storm sewer system is completely separated from the sanitary sewer system. The Storm Sewer Section of the Department of Public Works operates and maintains the storm sewer system. Public Works and the Engineering Team of the Transportation, Engineering and Development Business Group meet to discuss operational issues and how they will be addressed.

For the most part the system is a gravity system with the exception of four storm water pumping stations. The pumping stations are located at the Naper Boulevard/Burlington Northern Railroad Underpass, the Old Plank Park Stormwater Basin, the Country Commons Park Stormwater Basin and the Kingsley Basin. Public Works performs regular inspections and maintenance of these pumping stations. When expertise or additional mechanical assistance is needed a contractor is utilized.

Measurable Goals, 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 maintaining the mapping in up-to-date condition will continue.

Milestones:

Year 1:

The Department of Public Works and the Engineering Team will continue to update the mapping of the City Storm Sewer System.

Year 2:

The Department of Public Works and the Engineering Team will continue to update the mapping of the City Storm Sewer System.

Year 3:

The Department of Public Works and the Engineering Team will continue to update the mapping of the City Storm Sewer System.

Year 4:

The Department of Public Works and the Engineering Team will continue to update the mapping of the City Storm Sewer System.

Year 5:

The Department of Public Works and the Engineering Team will continue to update the mapping of the City Storm Sewer System.

Go to Additional Pages

F.4 Municipal Operations Waste Disposal (You may need to go to the next page to fill in this information)

The ILR40 permit requires that procedures be developed for properly disposing of waste removed from the separate storm sewers and areas such as dredge spoil, accumulated sediments, floatables, and other debris.

Measurable Goals, including frequencies:

In October 2008 the Department of Public Works moved into the 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 storm water management facility. Temporary storage of materials before being properly disposed of may occurs 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.

Milestones:

Year 1:

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

Year 2:

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

Year 3:

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

Year 4:

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

Year 5:

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

Go to Additional Pages

F.5 Flood Management/Assess Guidelines (You may need to go to the next page to fill in this information)

DuPage County, a Cooperating Technical Partner with FEMA, is updating the Flood Insurance Rate Maps (FIRM) on a countywide basis. The DFIRM maps will continue to be updated as the County completes floodplain mapping for other watersheds in DuPage County using its HSPF/FEQ/PVSTATS methodology. The City will evaluate and seek to move to a regional wide NOI with DuPage County as applicable.

Measurable Goals, including frequencies:

Corrections and updates will be made to the DFIRM maps and the dual-county issues will be resolved.

Milestones:

Year 1:

Corrected and updated DFIRM maps will be processed by FEMA

Year 2:

Corrected and updated DFIRM maps will be approved and adopted by FEMA

Year 3:

Corrected and updated DFIRM maps will be approved and adopted by FEMA

Year 4:

Corrected and updated DFIRM maps will be approved and adopted by FEMA

Year 5:

Corrected and updated DFIRM maps will be approved and adopted by FEMA

Go to Additional  
Pages

F.6 Other Municipal Operations Controls



## Part III. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fines and imprisonment.

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)).

William J. Novack

Director of TED/City Engineer

May 26, 2016

Authorized Representative Name

Title

Date


  
Authorized Representative Signature

You may complete this form online and save a copy locally before printing and signing the form. It should then be sent to:

Illinois Environmental Protection Agency  
Bureau of Water  
Division of Water Pollution Control  
Attn: Permit Section  
P.O. Box 19276  
1021 North Grand Avenue East  
Springfield, IL 62794-9276

A. Public Education and Outreach

BMP Number \_\_\_\_\_

Add Another BMP

Delete Last Entry

B. Public Participation/Involvement

BMP Number \_\_\_\_\_

Add Another BMP

Delete Last Entry

C. Illicit Discharge Detection and

BMP Number \_\_\_\_\_

Add Another BMP

Delete Last Entry

Additional Info - Page 4

D. Construction Site Runoff Control

BMP Number \_\_\_\_\_

Add Another BMP

Delete Last Entry

E. Post-Construction Runoff Control

BMP Number \_\_\_\_\_

Add Another BMP

Delete Last Entry

F. Pollution Prevention/Good

BMP Number \_\_\_\_\_

Add Another BMP

Delete Last Entry