



CITY OF URBANA, ILLINOIS
DEPARTMENT OF PUBLIC WORKS
ENGINEERING DIVISION

MEMORANDUM

TO: Mayor Laurel Lunt Prussing and Members of the City Council
FROM: William R. Gray, Public Works Director
Gale L. Jamison, Assistant City Engineer
Bradley M. Bennett, Civil Engineer
DATE: December 6th, 2007
RE: Phase II Storm Water Permit Program

Introduction

The Engineering Division recommends:

- Approval of the attached ordinance authorizing the Mayor and Clerk to sign the City of Urbana's Notice of Intent (NOI) Phase II storm water permit application. The application is to be submitted to the Illinois Environmental Protection Agency (IEPA).
- The Public Works Director be the duly authorized representative of the City to submit all reports required by the Phase II permit or requested by IEPA.

Background and Facts

For many years, urban storm water runoff has been a source of great concern because of its potential to carry harmful pollutants into nearby watercourses. Some pollutants in urban storm water can damage lakes and streams, harm aquatic life and disrupt sensitive wetland habitats. As a result of these concerns, the 1987 amendments to the Clean Water Act required the United States Environmental Protection Agency (U.S. EPA) to address storm water runoff. Phase II of the National Pollution Discharge Elimination System (NPDES) Storm Water Program began on March 10, 2003 and applied to small Municipal Separate Storm Sewer Systems (MS4s) which include the City of Urbana. The IEPA is responsible for implementing the NPDES Storm Water Program in the State of Illinois.

Urbana is required to comply with Phase II of the NPDES Storm Water Program by submitting a NOI to the IEPA. The NOI was approved by the City Council at their February 17, 2003 meeting. The NOI served as the application for the NPDES Phase II Permit that covered all storm water discharge from sewers under City jurisdiction. The NOI outlined a plan to implement six minimum control measures that target the improvement of storm water quality. The six minimum measures outlined in the NOI included the following items:

- 1) Public Education and Outreach
- 2) Public Participation and Involvement
- 3) Illicit Discharge Detection and Elimination
- 4) Construction Site Runoff Control
- 5) Post-Construction Runoff Control
- 6) Pollution Prevention and Good Housekeeping

The City of Urbana has been addressing the six minimum measures by implementing Best Management Practices (BMPs) that were identified in the NOI. As part of the NOI, the City defined each BMP, outlined measurable goals for each BMP, documented procedures and is recording all compliance efforts. Full implementation of the six minimum measures is required at the end of a five-year permit cycle in 2008.

The City's Phase II storm water permit expires on February 29th, 2008. The IEPA has requested that the City submit a new NOI permit application by the end of January 2008. The proposed NOI permit application form is attached for your reference. Most of the revisions to the NOI are minor ones that reflect adding or eliminating certain Best Management Practices (BMPs) based on staff's experience with their effectiveness. The new NOI contains 46 BMPs while the 2003 application contained 47 BMPs. The proposed BMPs satisfy Urbana's requirements to meet the storm water pollution control measures set forth by the Environmental Protection Agency (EPA).

Fiscal Impact

The BMPs that are documented in the NOI permit application are based upon existing programs and activities that the City has successfully implemented during the first five year Phase II storm water permit cycle. Staff does not anticipate that any additional time would be required to implement the proposed BMPS in the NOI than what the City is presently committing to the permit program.

Recommendations

It is recommended that an ordinance be adopted authorizing the Mayor and Clerk to sign the City of Urbana's Notice of Intent Phase II Storm Water Permit form to be submitted to the Illinois Environmental Protection Agency (IEPA) and that the Public Works Director be the duly authorized representative of the City to submit all reports required by the Phase II Permit or requested by the IEPA.

ORDINANCE NO. 2007-12-136

AN ORDINANCE AUTHORIZING THE EXECUTION OF THE NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM PHASE II STORM WATER NOTICE OF INTENT

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF URBANA, ILLINOIS, AS FOLLOWS:

Section 1. That the 1987 amendments to the federal Clean Water Act require the United States Environmental Protection Agency (U.S. EPA) address storm water runoff in two phases. Phase II of the National Pollution Discharge Elimination Systems (NPDES) which begins March 10, 2003, is applicable to the City of Urbana. The Illinois Environmental Protection Agency (IEPA) administers the implementation of the Phase II Storm Water Program in the State of Illinois. Storm water discharges from the City of Urbana are regulated under the provisions of IEPA General NPDES Permit No. ILR40. NPDES Permit No. ILR40 requires the filing of a Notice of Intent (NOI) prior to February, 2008.

Section 2. That the Mayor of the City of Urbana, Illinois, be and the same is hereby authorized to execute and deliver and the City Clerk of the City of Urbana, Illinois, be and the same is authorized to attest to said NOI for and on behalf of the City of Urbana, Illinois, and that the Director of Public Works of the City of Urbana, Illinois, be and the same is hereby authorized to be the representative of the City of Urbana, to submit all reports required by General NPDES Permit No. ILR40 or requested by IEPA.

PASSED by the City Council this ____ day of _____, 2007.

AYES:

NAYS:

ABSTAINS:

Phyllis D. Clark, City Clerk

APPROVED by the Mayor this ____ day of _____, 2007.

Laurel Lunt Prussing

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
NOTICE OF INTENT
FOR GENERAL PERMIT FOR DISCHARGES FROM
SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS
(MS4s)**

Input forms in Word format are available
by via email.
marilyn.davenport@epa.state.il.us
or by calling the Permit Section at
217/782-0610
See address for mailing on page 4

For Office Use Only – Permit No. ILR40_____

Part I. General Information

1. MS4 Operator Name: City of Urbana
2. MS4 Operator Mailing Address:
Street- 706 South Glover Avenue City- Urbana
State- Illinois Zip Code- 61802
3. Operator Type: City
4. Operator Status: Local
5. Name(s) of Governmental Entity(ies) in which MS4 is located: Urbana
6. Area of land that drains to your MS4 (in square miles): 7.7

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

Latitude: 40 06 35 Longitude: 88 12 40
 DEG. MIN. SEC. DEG. MIN SEC.

8. Name(s) of known receiving waters: *Attach additional sheets (Attachment 1) as necessary:*

- | | |
|--|--|
| <ol style="list-style-type: none"> 1. <u>Vermillion Basin-Vermilion River, Salt Fork</u> 3. <u>Embarras Basin-Embarras River</u> 5. _____ 7. _____ 9. _____ | <ol style="list-style-type: none"> 2. <u>Vermillion Basin-Unnamed tributary to Salt Fork</u> 4. _____ 6. _____ 8. _____ 10. _____ |
|--|--|

9. Persons Responsible for Implementation/Coordination of Storm Water Management Program:

<u>Name</u>	<u>Title</u>	<u>Telephone No.</u>	<u>Area of Responsibility</u>
<u>William R. Gray, P.E.</u>	<u>Public Works Director</u>	<u>217-384-2377</u>	<u>Primary Point of Contact</u>
<u>Gale L. Jamison, P.E.</u>	<u>Assistant City Engineer</u>	<u>217-384-2343</u>	<u>A.1.1, A.2.1,A.3.1, A.5.1, A.6.1, B.3.1, B.6.1, B.7.1, C.1.1, C.2.1, C.3.1, C.3.2, C.5.1, C.5.2, C.6.1, C.6.2, C.7.1, C.9.1, D.1.1, D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, E.1.1, E.2.1, E.3.1, E.4.1, E.5.1, E.6.1, F.2.4</u>
<u>Rodney Fletcher</u>	<u>Environmental Manager</u>	<u>217-384-2381</u>	<u>A.1.2, A.4.1, C.2.1</u>
<u>James Kelly</u>	<u>Operations Manager</u>	<u>217-384-2380</u>	<u>F.1.1, F.1.2, F.2.1, F.2.2, F.2.3, F.4.1, F.6.1</u>

Information required by this form must be provided to comply with 415 ILCS 5/39 (2000). Failure to do so may prevent this form from being processed and could result in your application being denied.

Rich Coyne	Sewer Crew Supervisor	217-384-2318	C.3.1
Corey Ireland	Plumbing Inspector	217-384-2435	C.10.1
Gordon Skinner	Building Safety Division Manager	217-384-2431	D.3.1
Barb Stiehl	Assistant to Public Works Director	217-384-2342	D.5.1
Michael Dilley	Fire Chief	217-384-2421	F.1.3, F.6.2
Larry Fredrick	Fleet Manager	217-384-2379	F.4.2
Mike Brunk	City Arborist	217-384-2393	F1.4, F.4.3

Part II. Best Management Practices (include shared responsibilities) Proposed to be Implemented in the MS4 Area

(Details of BMP implementation for each checked BMP number, e.g., A.1, E.2, is required in Part IV of this NOI.)

A. Public Education and Outreach

- A.1 Distributed Paper Material
- A.2 Speaking Engagement
- A.3 Public Service Announcement
- A.4 Community Event
- A.5 Classroom Education Material
- A.6 Other Public Education

B. Public Participation/Involvement

- B.1 Public Panel
- B.2 Educational Volunteer
- B.3 Stakeholder Meeting
- B.4 Public Hearing
- B.5 Volunteer Monitoring
- B.6 Program Coordination
- B.7 Other Public Involvement

C. Illicit Discharge Detection and Elimination

- C.1 Storm Sewer Map Preparation
- C.2 Regulatory Control Program
- C.3 Detection/Elimination Prioritization Plan
- C.4 Illicit Discharge Tracing Procedures
- C.5 Illicit Source Removal Procedures
- C.6 Program Evaluation and Assessment
- C.7 Visual Dry Weather Screening
- C.8 Pollutant Field Testing
- C.9 Public Notification
- C.10 Other Illicit Discharge Controls

D. Construction Site Runoff Control

- D.1 Regulatory Control Program
- D.2 Erosion and Sediment Control BMPs
- D.3 Other Waste Control Program
- D.4 Site Plan Review Procedures
- D.5 Public Information Handling Procedures
- D.6 Site Inspection/Enforcement Procedures
- D.7 Other Construction Site Runoff Controls

E. Post-Construction Runoff Control

- E.1 Community Control Strategy
- E.2 Regulatory Control Program
- E.3 Long Term O&M Procedures
- E.4 Pre-Const Review of BMP Designs
- E.5 Site Inspections During Construction
- E.6 Post-Construction Inspections
- E.7 Other Post-Const Runoff Controls

F. Pollution Prevention/Good Housekeeping

- F.1 Employee Training Program
- F.2 Inspection and Maintenance Program
- F.3 Muni Operations Storm Water Control
- F.4 Municipal Operations Waste Disposal
- F.5 Flood Management/Assess Guidelines
- F.6 Other Municipal Operations Controls

Part III. Qualifying Local Programs

Attach additional sheets (Attachment 2) as necessary:

(Describe any qualifying local programs that you will implement in lieu of new permitting requirements.)

1. Public Education and Outreach:

2. Public Participation/Involvement:

3. Illicit Discharge Detection and Elimination:

4. Construction Site Runoff Control:

5. Post-Construction Runoff Control:

6. Pollution Prevention/Good Housekeeping:

Note: Intentionally left blank.

Part IV. Measurable Goals (include shared responsibilities) Proposed to be Implemented by the MS4

Attach additional sheets (Attachment 3) as necessary

(BMP No. should match that checked in Part II of this NOI. The applicant may repeat the same BMP No. where more than one BMP of similar type is to be implemented. Where necessary, attach additional sheets to provide more detail on each specific BMP.)

BMP No. A.1.1

Brief Description of BMP: Maintain and update storm water quality website highlighting Phase 2 regulations and describing permit process and BMPs.

Measurable Goal(s), including frequencies: Maintain and update annually.

Milestones: Year 1: Update website.
Year 2: Update website.
Year 3: Update website.
Year 4: Update website.
Year 5: Update website.

BMP No. A.1.2

Brief Description of BMP: Distribute written materials which discuss recycling options and storm water pollution prevention efforts.

Measurable Goal(s), including frequencies: Distribute the material at community functions and through other means to the public.

Milestones: Year 1: Distribute written materials to the public.
Year 2: Distribute written materials to the public.
Year 3: Distribute written materials to the public.
Year 4: Distribute written materials to the public.
Year 5: Distribute written materials to the public.

BMP No. A.2.1

Brief Description of BMP: Be available for speaking engagements to business groups, service clubs, developers, engineers/architects, contractors, and neighborhood groups about Phase 2.

Measurable Goal(s), including frequencies: Speak at group engagements when requested.

Milestones: Year 1: Be available to speak at group engagements when requested.
Year 2: Be available to speak at group engagements when requested.
Year 3: Be available to speak at group engagements when requested.
Year 4: Be available to speak at group engagements when requested.
Year 5: Be available to speak at group engagements when requested.

Part V. 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 gather and evaluate 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 fine and imprisonment.

Authorized Representative Name and Title

Signature

Date

Laurel Lunt Prussing, Mayor

Ms. Phyllis D. Clark, City Clerk

Mail completed form to:

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
ATTN: PERMIT SECTION
POST OFFICE BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276**

Copy and complete this page if additional pages are necessary:

**Attachment 1
Not Applicable**

Copy and complete this page if additional pages are necessary:

**Attachment 2
Not Applicable**

Copy and complete this page if additional pages are necessary:

Attachment 3

Part IV. (Continued) Measurable Goals (include shared responsibilities) Proposed to be Implemented by the MS4

BMP No. A.3.1

Brief Description of BMP: Broadcast Public Service Announcement describing Phase 2 regulations and Urbana's efforts to comply on Public Access TV.

Measurable Goal(s), including frequencies: Broadcast one Public Service Announcement annually.

Milestones: Year 1: Broadcast one Public Service Announcement.
Year 2: Broadcast one Public Service Announcement.
Year 3: Broadcast one Public Service Announcement.
Year 4: Broadcast one Public Service Announcement.
Year 5: Broadcast one Public Service Announcement.

BMP No. A.4.1

Brief Description of BMP: Hazardous material drop-off day for recycling hazardous household waste.

Measurable Goal(s), including frequencies: Apply for funding when grant rounds are announced by the IEPA and if successful conduct drop-off days.

Milestones: Year 1: Apply for funding if grant is announced and if successful conduct drop-off days.
Year 2: Apply for funding if grant is announced and if successful conduct drop-off days.
Year 3: Apply for funding if grant is announced and if successful conduct drop-off days.
Year 4: Apply for funding if grant is announced and if successful conduct drop-off days.
Year 5: Apply for funding if grant is announced and if successful conduct drop-off days.

BMP No. A.5.1

Brief Description of BMP: Be available to schools for tour/demonstrations of facilities and equipment to provide students an opportunity to become familiar with Urbana's efforts to clean up storm water runoff.

Measurable Goal(s), including frequencies: Speak to classes when requested.

Milestones: Year 1: Be available to speak to classes when requested.
Year 2: Be available to speak to classes when requested.
Year 3: Be available to speak to classes when requested.
Year 4: Be available to speak to classes when requested.
Year 5: Be available to speak to classes when requested.

BMP No. A.6.1

Brief Description of BMP: Improve communications between Urbana staff and residents adjacent to projects to keep residents informed on project progress. Publicize and staff a phone line for residents to report sewer problems, and follow-up with resident reports.

Measurable Goal(s), including frequencies: Contact all residents adjacent to projects at beginning and end of projects, and at start of major milestones during projects. Publicize and staff phone line for residents to report sewer problems. Follow-up a minimum of once after sewer problems have been reported. BMP will be implemented on an as-needed basis (i.e., as needed for each project or problem.)

Milestones: Year 1: Successful residential communications during projects. Successful recording and follow-up of residential sewer complaints.
Year 2: Repeat Year 1 Milestones.
Year 3: Repeat Year 1 Milestones.
Year 4: Repeat Year 1 Milestones.
Year 5: Repeat Year 1 Milestones.

BMP No. B.3.1

Brief Description of BMP: Participate in Salt Fork Watershed Implementation Committee.

Measurable Goal(s), including frequencies: Attend committee meetings.

Milestones: Year 1: Attend committee meetings.
Year 2: Attend committee meetings.
Year 3: Attend committee meetings.
Year 4: Attend committee meetings.
Year 5: Attend committee meetings.

BMP No. B.6.1

Brief Description of BMP: On-going committee meetings of the Cooperating MS4s (City of Urbana, City of Champaign, Village of Savoy, Champaign County and the University of Illinois) to discuss NPDES Phase II requirements.

Measurable Goal(s), including frequencies: Hold quarterly meetings.

Milestones: Year 1: 4 committee meetings held.
Year 2: 4 committee meetings held.
Year 3: 4 committee meetings held.
Year 4: 4 committee meetings held.
Year 5: 4 committee meetings held.

BMP No. B.7.1

Brief Description of BMP: Community creek clean-up event.

Measurable Goal(s), including frequencies: Sponsor one community creek clean-up event annually.

Milestones: Year 1: Sponsor one community creek clean-up event.
Year 2: Sponsor one community creek clean-up event.
Year 3: Sponsor one community creek clean-up event.
Year 4: Sponsor one community creek clean-up event.
Year 5: Sponsor one community creek clean-up event.

BMP No. C.1.1

Brief Description of BMP: Update storm sewer system map annually.

Measurable Goal(s), including frequencies: Review and update map annually.

Milestones: Year 1: Update storm sewer map.
Year 2: Update storm sewer map.
Year 3: Update storm sewer map.
Year 4: Update storm sewer map.
Year 5: Update storm sewer map.

BMP No. C.2.1

Brief Description of BMP: Enforce illegal discharge and illegal dumping ordinances.

Measurable Goal(s), including frequencies: Enforce illegal discharge and illegal dumping ordinances.

Milestones: Year 1: Enforce illegal discharge and illegal dumping ordinances.
Year 2: Enforce illegal discharge and illegal dumping ordinances.
Year 3: Enforce illegal discharge and illegal dumping ordinances.
Year 4: Enforce illegal discharge and illegal dumping ordinances.
Year 5: Enforce illegal discharge and illegal dumping ordinances.

BMP No. C.3.1

Brief Description of BMP: Investigate public reports of illicit discharges.

Measurable Goal(s), including frequencies: Continue staffing phone line for residents to call and report complaints. Respond and investigate each report per plan.

Milestones: Year 1: Continue hotline. Plan implemented.
Year 2: Continue hotline. Plan implemented.
Year 3: Continue hotline. Plan implemented.
Year 4: Continue hotline. Plan implemented.
Year 5: Continue hotline. Plan implemented.

BMP No. C.3.2

Brief Description of BMP: Investigate areas with a pattern of illicit discharges and enforce ordinances.

Measurable Goal(s), including frequencies: Implement plan to investigate areas with a pattern of illicit discharges on an as-needed basis, per plan in C.3.1. Levy penalties on an as-needed basis.

Milestones: Year 1: Plan implemented.
Year 2: Plan implemented.
Year 3: Plan implemented.
Year 4: Plan implemented.
Year 5: Plan implemented.

BMP No. C.5.1

Brief Description of BMP: Facilitate the disconnection of illegal connections from City owned storm and sanitary sewers.

Measurable Goal(s), including frequencies: Facilitate the disconnection of illegal connections from City owned storm sewers, on an as-needed basis.

Milestones: Year 1: Connections removed on as-needed basis.
Year 2: Connections removed on as-needed basis.
Year 3: Connections removed on as-needed basis.
Year 4: Connections removed on as-needed basis.
Year 5: Connections removed on as-needed basis.

BMP No. C.5.2

Brief Description of BMP: Facilitate the disconnection of illegal connections from privately owned storm and sanitary sewers.

Measurable Goal(s), including frequencies: Notify each resident to remove their connection and follow-up to ensure compliance, on an as-needed basis.

Milestones: Year 1: Notify residents and follow-up on an as-needed basis
Year 2: Notify residents and follow-up on an as-needed basis
Year 3: Notify residents and follow-up on an as-needed basis.
Year 4: Notify residents and follow-up on an as-needed basis.
Year 5: Notify residents and follow-up on an as-needed basis.

BMP No. C.6.1

Brief Description of BMP: Internal Phase 2 committee to meet and review NPDES Phase 2 illicit discharge program, and implement changes if needed.

Measurable Goal(s), including frequencies: Meet annually to review program, and recommend and implement changes if necessary.

Milestones: Year 1: Annual meeting conducted.
Year 2: Annual meeting conducted.
Year 3: Annual meeting conducted.
Year 4: Annual meeting conducted.
Year 5: Annual meeting conducted.

BMP No. C.6.2

Brief Description of BMP: Annual report to the Urbana-Champaign Sanitary District documenting all sanitary sewer activity and Phase 2 activities .

Measurable Goal(s), including frequencies: Submit annual reports to Urbana-Champaign Sanitary District.

Milestones: Year 1: Annual reports submitted to District.
Year 2: Annual reports submitted to District.
Year 3: Annual reports submitted to District.
Year 4: Annual reports submitted to District.
Year 5: Annual reports submitted to District.

BMP No. C.7.1

Brief Description of BMP: Visual inspection of outfalls during dry weather. If needed, perform water quality sampling on suspicious discharges at outfalls.

Measurable Goal(s), including frequencies: Inspect storm outfalls once per year during dry weather periods. Perform water quality sampling on suspicious discharges on as-needed basis.

Milestones: Year 1: Visually inspect storm outfalls discharging to state waterways.
Year 2: Visually inspect storm outfalls discharging to state waterways.
Year 3: Visually inspect storm outfalls discharging to state waterways.
Year 4: Visually inspect storm outfalls discharging to state waterways.
Year 5: Visually inspect storm outfalls discharging to state waterways.

BMP No. C.9.1

Brief Description of BMP: Develop, publicize, and staff a hotline for residents to report illegal discharges.

Measurable Goal(s), including frequencies: Daily staffing of existing hotline.

Milestones: Year 1: Continued staffing of hotline.
Year 2: Continued staffing of hotline.
Year 3: Continued staffing of hotline.

Year 4: Continued staffing of hotline.

Year 5: Continued staffing of hotline.

BMP No. C.10.1

Brief Description of BMP: Inspect each new development to inspect for illegal connections.

Measurable Goal(s), including frequencies: Inspect each development. Number of inspections dependant on number of developments.

Milestones: Year 1: Inspect each development.
Year 2: Inspect each development.
Year 3: Inspect each development.
Year 4: Inspect each development.
Year 5: Inspect each development.

BMP No. D.1.1

Brief Description of BMP: Enforce erosion and sediment control ordinance.

Measurable Goal(s), including frequencies: Enforce erosion and sediment control ordinance.

Milestones: Year 1: Enforce erosion and sediment control ordinance.
Year 2: Enforce erosion and sediment control ordinance.
Year 3: Enforce erosion and sediment control ordinance.
Year 4: Enforce erosion and sediment control ordinance.
Year 5: Enforce erosion and sediment control ordinance.

BMP No. D.2.1

Brief Description of BMP: Distribute and update erosion/sediment control BMP Standard of Practice Manual.

Measurable Goal(s), including frequencies: Distribute and update BMP Standard of Practice Manual.

Milestones: Year 1: Distribute and update BMP Standard of Practice Manual.
Year 2: Distribute and update BMP Standard of Practice Manual.
Year 3: Distribute and update BMP Standard of Practice Manual.
Year 4: Distribute and update BMP Standard of Practice Manual.
Year 5: Distribute and update BMP Standard of Practice Manual.

BMP No. D.3.1

Brief Description of BMP: Enforce construction site waste regulations in erosion and sediment control ordinance.

Measurable Goal(s), including frequencies: Enforce construction site waste regulations in erosion and sediment control ordinance.

Milestones: Year 1: Enforce construction site waste regulations.
Year 2: Enforce construction site waste regulations.
Year 3: Enforce construction site waste regulations.
Year 4: Enforce construction site waste regulations.
Year 5: Enforce construction site waste regulations.

BMP No. D.4.1

Brief Description of BMP: Review erosion control plans submitted by developers for each project.

Measurable Goal(s), including frequencies: Complete review of each soil erosion and sediment control plan, on as-needed basis. Perform field inspection.

Milestones: Year 1: Review each project submitted.
Year 2: Review each project submitted.
Year 3: Review each project submitted.
Year 4: Review each project submitted.
Year 5: Review each project submitted.

BMP No. D.5.1

Brief Description of BMP: Publicize and staff a hotline for residents to report soil erosion/sediment control non-compliance. Follow through with resident complaints and take appropriate action against contractors, as needed.

Measurable Goal(s), including frequencies: Publicize and staff a hotline. Investigate complaints and take appropriate action on as-needed basis.

Milestones: Year 1: Staff a hotline. Investigate complaints and take action as required.
Year 2: Staff a hotline. Investigate complaints and take action as required.
Year 3: Staff a hotline. Investigate complaints and take action as required.
Year 4: Staff a hotline. Investigate complaints and take action as required.
Year 5: Staff a hotline. Investigate complaints and take action as required.

BMP No. D.6.1

Brief Description of BMP: Conduct construction site inspections.

Measurable Goal(s), including frequencies: Inspect all construction sites weekly or after rain events > 0.5 inches.

Milestones: Year 1: Inspections conducted weekly or after rain events > 0.5-inches.
Year 2: Inspections conducted weekly or after rain events > 0.5-inches.
Year 3: Inspections conducted weekly or after rain events > 0.5-inches.
Year 4: Inspections conducted weekly or after rain events > 0.5-inches.
Year 5: Inspections conducted weekly or after rain events > 0.5-inches.

BMP No. E.1.1

Brief Description of BMP: Develop standards for post-construction BMPs.

Measurable Goal(s), including frequencies: Develop standards for post-construction BMPs.

Milestones: Year 1: _____
Year 2: _____
Year 3: _____
Year 4: _____
Year 5: **Standards for post-construction BMPs developed. Manual of Practice updated.**

BMP No. E.2.1

Brief Description of BMP: Review and update storm water ordinance to require post-construction BMPs in new developments.

Measurable Goal(s), including frequencies: Review and update storm water ordinance.

Milestones: Year 1: _____
Year 2: _____
Year 3: _____
Year 4: **Ordinance review complete. Language written to update ordinance.**
Year 5: **Ordinance revisions effective.**

BMP No. E.3.1

Brief Description of BMP: Review ordinance and update to require post-construction operation and maintenance plan for proposed BMPs.

Measurable Goal(s), including frequencies: Review and update storm water ordinance.

Milestones: Year 1: _____
Year 2: _____
Year 3: _____
Year 4: **Ordinance review complete. Language written to update ordinance.**
Year 5: **Ordinance revisions effective.**

BMP No. E.4.1

Brief Description of BMP: Review submitted plans for compliance with "Design Manual of Practice" standards regarding post-construction BMPs.

Measurable Goal(s), including frequencies: Develop a plan review procedure for post-construction BMP design. Review submitted plans on an as-submitted basis.

Milestones: Year 1: _____
Year 2: _____
Year 3: _____
Year 4: _____
Year 5: **Plan review procedure completed. Plans reviewed on an as-needed basis.**

BMP No. E.5.1

Brief Description of BMP: Inspect developments during construction phase to verify proper installation of post-construction BMPs.

Measurable Goal(s), including frequencies: Develop inspection procedures. Weekly inspections of each Project.

**Milestones: Year 1: _____
Year 2: _____
Year 3: _____
Year 4: _____
Year 5: Plan review procedure completed. Weekly inspections of construction projects.**

BMP No. E.6.1

Brief Description of BMP: Inspection of post-construction runoff BMPs to verify that BMPs are functioning properly.

Measurable Goal(s), including frequencies: Develop inspection procedures. Inspection of each project as needed to verify compliance with plans.

**Milestones: Year 1: _____
Year 2: _____
Year 3: _____
Year 4: Develop inspection procedures.
Year 5: Inspection procedures completed. Monthly inspection of construction projects.**

BMP No. F.1.1

Brief Description of BMP: Salt and calcium application training for snow plow applicators.

Measurable Goal(s), including frequencies: Conduct training annually for all snow plow operators.

**Milestones: Year 1: Training session completed.
Year 2: Training session completed.
Year 3: Training session completed.
Year 4: Training session completed.
Year 5: Training session completed.**

BMP No. F.1.2

Brief Description of BMP: Provide training to employees who have routine contact with chemical substances.

Measurable Goal(s), including frequencies: Provide annual Material Safety Datasheet (MSDS) training for 100% of employees who have routine contact with chemical substances.

**Milestones: Year 1: Training session completed.
Year 2: Training session completed.
Year 3: Training session completed.**

Year 4: Training session completed.

Year 5: Training session completed.

BMP No. F.1.3

Brief Description of BMP: Training for abatement and containment of hazardous material spills.

Measurable Goal(s), including frequencies: Conduct annual training for 100% of firefighters.

Milestones: Year 1: Training session completed.

Year 2: Training session completed.

Year 3: Training session completed.

Year 4: Training session completed.

Year 5: Training session completed.

BMP No. F.1.4

Brief Description of BMP: Pesticide and herbicide application training.

Measurable Goal(s), including frequencies: Annually review licensing. Provide annual training for all employees who apply pesticides or herbicides as part of their job duties.

Milestones: Year 1: License review and training session completed.

Year 2: License review and training session completed.

Year 3: License review and training session completed.

Year 4: License review and training session completed.

Year 5: License review and training session completed.

BMP No. F.2.1

Brief Description of BMP: Storm sewer cleaning.

Measurable Goal(s), including frequencies: Perform routine maintenance and cleaning of storm sewer system and catch basins.

Milestones: Year 1: Annual maintenance conducted.

Year 2: Annual maintenance conducted.

Year 3: Annual maintenance conducted.

Year 4: Annual maintenance conducted.

Year 5: Annual maintenance conducted.

BMP No. F.2.2

Brief Description of BMP: Storm inlet and manhole inspection and cleaning.

Measurable Goal(s), including frequencies: Inspect and clean all manholes and inlets as necessary.

Milestones: Year 1: Complete inspection of storm manholes and inlets, clean as necessary.

Year 2: Complete inspection of storm manholes and inlets, clean as necessary.

Year 3: Complete inspection of storm manholes and inlets, clean as necessary.

Year 4: Complete inspection of storm manholes and inlets, clean as necessary.

Year 5: Complete inspection of storm manholes and inlets, clean as necessary.

BMP No. F.2.3

Brief Description of BMP: Street Sweeping.

Measurable Goal(s), including frequencies: Sweep central business district 20 times per year and residential and arterial streets 5 times per year, weather permitting.

Milestones: Year 1: Complete street sweeping.
Year 2: Complete street sweeping.
Year 3: Complete street sweeping.
Year 4: Complete street sweeping.
Year 5: Complete street sweeping.

BMP No. F.2.4

Brief Description of BMP: Inspect Boneyard Creek for eroding stream banks or other signs of instability and erosion. Make recommendations for repairs as needed.

Measurable Goal(s), including frequencies: Inspect Boneyard Creek annually. Make repair recommendations, and construct repairs, on an as-needed basis

Milestones: Year 1: Inspection completed. Repairs recommended and constructed, as-needed.
Year 2: Inspection completed. Repairs recommended and constructed, as-needed.
Year 3: Inspection completed. Repairs recommended and constructed, as-needed.
Year 4: Inspection completed. Repairs recommended and constructed, as-needed.
Year 5: Inspection completed. Repairs recommended and constructed, as-needed.

BMP No. F.4.1

Brief Description of BMP: Control vehicle and equipment washing by performing all washes in enclosed washing bay which drains directly to sanitary sewer.

Measurable Goal(s), including frequencies: Wash public works vehicles and equipment as needed in enclosed bays which drain directly to sanitary sewer.

Milestones: Year 1: Use enclosed bay to wash all vehicles.
Year 2: Use enclosed bay to wash all vehicles.
Year 3: Use enclosed bay to wash all vehicles.
Year 4: Use enclosed bay to wash all vehicles.
Year 5: Use enclosed bay to wash all vehicles.

BMP No. F.4.2

Brief Description of BMP: Oil and fluid disposal program to dispose of oils and fuels by a licensed waste hauler.

Measurable Goal(s), including frequencies: Disposal of wastes by a licensed waste hauler. Dispose of oil every other month for oil. Dispose of other fluids as needed.

Milestones: Year 1: Disposal of oils every other month; other fluids as needed.
Year 2: Disposal of oils every other month; other fluids as needed.

Year 3: Disposal of oils every other month; other fluids as needed.

Year 4: Disposal of oils every other month; other fluids as needed.

Year 5: Disposal of oils every other month; other fluids as needed.

BMP No. F.4.3

Brief Description of BMP: Landscape Recycling Center (LRC).

Measurable Goal(s), including frequencies: Continue to provide the public a landscape waste drop-off location at the LRC.

Milestones: Year 1: Continue to Operate the LRC.

Year 2: Continue to Operate the LRC.

Year 3: Continue to Operate the LRC.

Year 4: Continue to Operate the LRC.

Year 5: Continue to Operate the LRC.

BMP No. F.6.1

Brief Description of BMP: Maintain "Snow & Ice Control Plan" procedure manual and update to document all procedures required for compliance with NPDES Phase 2.

Measurable Goal(s), including frequencies: Annual review and update of manual.

Milestones: Year 1: Complete review and update of manual.

Year 2: Complete review and update of manual.

Year 3: Complete review and update of manual.

Year 4: Complete review and update of manual.

Year 5: Complete review and update of manual.

BMP No. F.6.2

Brief Description of BMP: Maintain Fire Department's hazardous spill response plan and update as needed to comply with NPDES Phase 2.

Measurable Goal(s), including frequencies: Annual review and update of plan.

Milestones: Year 1: Complete review and update of plan.

Year 2: Complete review and update of plan.

Year 3: Complete review and update of plan.

Year 4: Complete review and update of plan.

Year 5: Complete review and update of plan.