CITY OF URBANA, ILLINOIS
DEPARTMENT OF PUBLIC WORKS

ENGINEERING DIVISION

MEMORANDUM

TO: Mayor Laurel L. Prussing and Members of the City Council
FROM: William R. Gray, Public Works Director
Gale L. Jamison, Assistant City Engineer
Bradley M. Bennett, Senior Civil Engineer
DATE: September 5, 2013
RE: Phase II Stormwater Permit Program – Notice of Intent

Action Requested

The Engineering Division recommends approval of the attached resolution authorizing the Mayor to sign the City of Urbana's Notice of Intent (NOI) Phase II stormwater permit application. The application is to be submitted to the Illinois Environmental Protection Agency (IEPA).

Background and Facts

For many years, urban stormwater runoff has been a source of great concern because of its potential to carry harmful pollutants into nearby watercourses. Some pollutants in urban stormwater 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 (EPA) to address stormwater runoff. Phase II of the National Pollution Discharge Elimination System (NPDES) Stormwater Program, which regulates stormwater runoff in small Municipal Separate Storm Sewer Systems (MS4s), including the City of Urbana, began on March 10, 2003. The IEPA is responsible for implementing the NPDES Stormwater Program in the State of Illinois.

The NOI serves as the application for the NPDES Phase II Permit that covers all stormwater discharge from sewers under the City's jurisdiction. The NOI outlines a plan to implement six minimum control measures that target the improvement of stormwater quality. The six minimum measures outlined in the NOI include 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

As part of the NOI, the City defines each best management practice (BMP), outlines measurable goals for each BMP, and documents procedures for all compliance efforts. Full implementation of the six minimum measures is required at the end of a five-year permit cycle in 2019.

The City's Phase II stormwater permit expires on March 31, 2014. The IEPA has requested that the City submit a new NOI permit application by September 30, 2013. The proposed NOI permit application form is attached for your reference. Most of the revisions to the NOI are minor ones that add or eliminate certain BMPs based on staff's experience with their effectiveness. The NOI has also been updated to reflect the stormwater management program components funded by the new stormwater utility fee, including the credit and incentive programs. The new NOI contains 43 BMPs while the 2007 application contained 46 BMPs. The proposed BMPs satisfy Urbana's requirements to meet the stormwater pollution control measures set forth by the EPA.

The proposed NOI was presented to the Sustainability Advisory Commission at their August 22, 2013 meeting. The Sustainability Advisory Commission did not have any comments regarding the proposed NOI.

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 last ten years of Phase II stormwater permit cycles and are funded by the new stormwater utility fee. Staff does not anticipate that any additional time or funds would be required to implement the proposed BMPs in the NOI beyond what is included in the stormwater management program funded by the stormwater utility fee.

Recommendations

It is recommended that a resolution be adopted authorizing the Mayor to sign the City of Urbana's Notice of Intent Phase II Stormwater Permit form to be submitted to the IEPA.

Attachments: Notice of Intent (NOI) Application Form
A Resolution Approving an Illinois Environmental Protection Agency Notice of Intent for Phase II of the National Pollution Discharge Elimination System Stormwater Program (2013)