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May 28, 2021

Ms. Terri LeMasters
Illinois Environmental Protection Agency, DWPC
Compliance Assurance Section #19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Re: City of Plano, NPDES Phase II Annual Update and Notice of Intent (2020/2021)
HR Green Job No. 210703

Dear Ms. LeMasters:

Enclosed please find the NPDES Phase II Year 18 Annual Update and current Notice of Intent (NOI) for the City of Plano. As the representative of the City of Plano, HR Green, Inc. coordinated with the City in the completion of the enclosed Annual Facility Inspection Report and NOI for continued coverage under the General Permit ILR40, issued by the Illinois EPA.

If you have any questions, please contact me at 815-759-8370.

Sincerely,

HR GREEN, INC.

A handwritten signature in black ink, appearing to read 'Logan Gilbertsen'.

Logan Gilbertsen, P.E., CFM
Lead Engineer - Water Resources

Enclosure: Annual update – City of Plano
Notice of Intent (ILR40)

cc: Darrin Boyer – Water Reclamation Supervisor
Tony Simmons – HR Green, Inc.



Illinois Environmental Protection Agency

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

Division of Water Pollution Control ANNUAL FACILITY INSPECTION REPORT

for NPDES Permit for Storm Water Discharges from Separate Storm Sewer Systems (MS4)

This fillable form may be completed online, a copy saved locally, printed and signed before it is submitted to the Compliance Assurance Section at the above address. Complete each section of this report.

Report Period: From March, 2020 To March, 2021

Permit No. ILR40 0714

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

Name: City of Plano Mailing Address 1: 17 E Main Street

Mailing Address 2: _____ County: Kendall

City: Plano State: IL Zip: 60545 Telephone: 630-552-8275

Contact Person: Darrin Boyer Email Address: dboyer@cityofplanoil.org
(Person responsible for Annual Report)

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

City of Plano

THE FOLLOWING ITEMS MUST BE ADDRESSED.

A. Changes to best management practices (check appropriate BMP change(s) and attach information regarding change(s) to BMP and measurable goals.)

- | | | | |
|--|--------------------------|---|--------------------------|
| 1. Public Education and Outreach | <input type="checkbox"/> | 4. Construction Site Runoff Control | <input type="checkbox"/> |
| 2. Public Participation/Involvement | <input type="checkbox"/> | 5. Post-Construction Runoff Control | <input type="checkbox"/> |
| 3. Illicit Discharge Detection & Elimination | <input type="checkbox"/> | 6. Pollution Prevention/Good Housekeeping | <input type="checkbox"/> |

B. Attach the status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, and your identified measurable goals for each of the minimum control measures.

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

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

E. Attach notice that you are relying on another government entity to satisfy some of your permit obligations (if applicable).

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

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Darrin Boyer
Owner Signature:

Darrin Boyer
Printed Name:

5/26/2021
Date:

Director of Water Reclamation / Public
Title:

EMAIL COMPLETED FORM TO: epa.ms4annualinsp@illinois.gov

or Mail to: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
WATER POLLUTION CONTROL
COMPLIANCE ASSURANCE SECTION #19
1021 NORTH GRAND AVENUE EAST
POST OFFICE BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

**NPDES Phase II – Year 18 (March 2020- March 2021) Annual Update
City of Plano, Kendall County**

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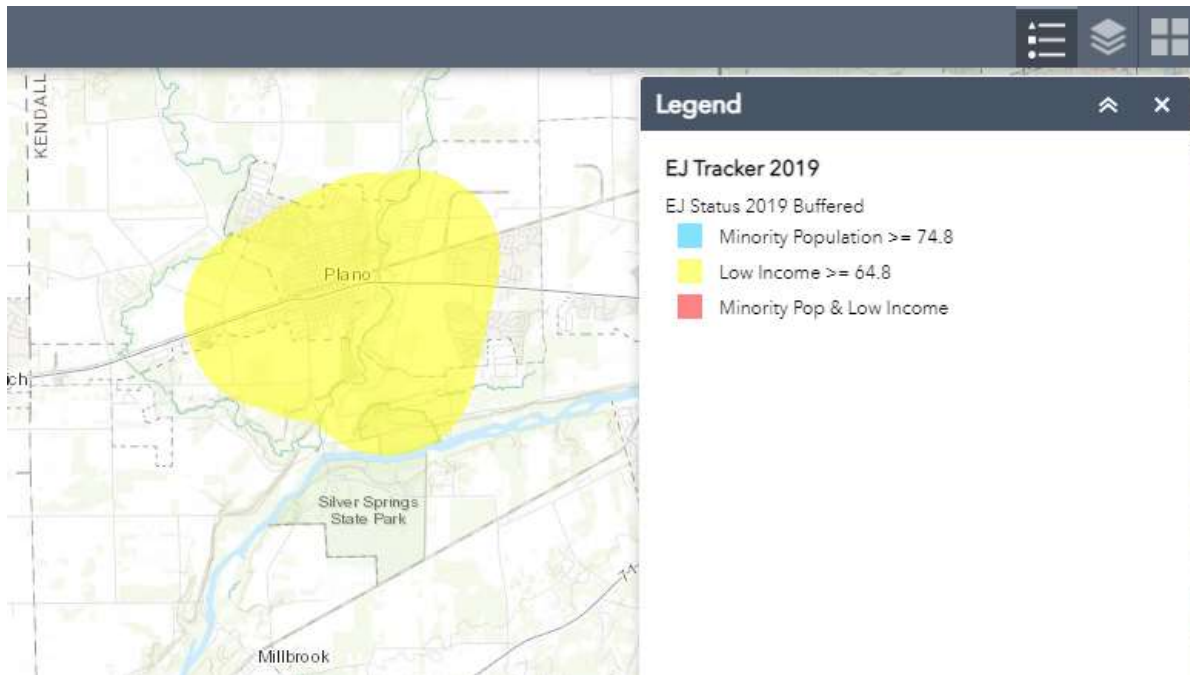
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Part A. Changes to Best Management Practices

There were no changes in Year 18 to the Best Management Practices (BMPs) that were outlined in the NOI submitted to the IEPA in November 2014.

The City has reviewed the Illinois Environmental Protection Agency's (IEPA) website for information regarding approved or ongoing Total Maximum Daily Load (TMDL) limits on Lower Fox River watershed and the tributary streams which the Municipal Separate Storm Sewer System (MS4) is tributary to. There are currently no TMDLs approved or ongoing, therefore no changes to the existing BMP's will be required to comply with a TMDL at this time.

The City has also reviewed the EPA's Environmental Justice mapper reports and has determined that there are no changes required to the program to tailor communications to residents. There are no demographics data showing large populations of linguistically isolated residents within the City. According to the mapper, the City does have populations of low income residents and this will be taken into account moving forward with the program.



Part B. Status of Compliance with Permit Conditions

The status of BMPs and measurable goals performed in Year 18 (2020/2021) are described below.

1. Public Education and Outreach

A. 4 - Public Education and Outreach

Measurable Goals: Provide Case-studies on the website from previous years, continue public notice in the radio and newspaper, focus door-to-door flyer to be distributed by volunteers, record data as to the amount of material collected, Plan for 10% increase from previous year.

Status: The City continues to operate its Fall leaf pickup and Spring/Summer brush pickup programs for residents. In Year 18, approximately 1,275 cubic yards of leaves and yard waste were collected by the City. This yard waste was delivered to the City's Wastewater Treatment Plant where it is mixed with bio-solids and composted.

Additionally, the City continues to partner with Kendall County's "Prescription Drug Take Back Program." Residents can drop off all prescription drugs at the Plano Police Department. This provides residents with a safe method of disposing of medications that could potentially be flushed down drains and end up in local waterways.

The City also maintains information on the City's website that provides information about rain barrels. The link provides information about sales through The Conservation Foundation and provides information water conservation, benefits of rain barrels and about the work that The Conservation Foundation does within the area.

Due to staffing and budgetary limitations, no radio or newspaper ads were placed. Additionally, paper materials were not delivered door-to-door. Moving forward, the City feels that electronic public education and outreach will be the most effective method of providing education materials.

Public Education and Outreach Evaluation –

The City feels that this program requires some updates. The City's website is set for updating and stormwater management and pollution prevention will be heavily incorporated into this website update. Additionally, the City feels that incorporating stormwater management and pollution prevention into more public events will increase the reach of the program.

2. Public Participation/Involvement

B.6 – Program Involvement

Measurable Goals: Identification, funding and construct stormwater improvement projects and continue to represent the City at Kendall County Stormwater Management Planning Committee meetings.

Status: The City provides a representative to attend the Kendall County Stormwater Management Planning Committee meetings when they occur. During the COVID-19 pandemic the meetings were reduced. The City also continues to

enforce their ordinances which models after the Kendall County-wide Ordinance. Additionally, the City continues to strive for stormwater projects by matching projects with available funding sources.

The City participated in the Fox River Study Group. The study group is diverse coalition of stakeholders that uses science to guide the region toward a cleaner, safer and more beautiful Fox River. The group uses research, data and collaboration to support sustainable policies and development across the Fox River watershed. The City of Plano is one of the Local Government agencies who participate and attend meetings regularly.
<https://www.foxriverstudygroup.org/about>

The City continues to work with multiple Homeowners Association (HOA) regarding stormwater detention basin maintenance and cleanup. Together the City and HOAs will perform annual inspections of the basins. HOAs will have the basins cleaned by removing manmade waste which impedes the function of the basins and reduces water quality.

While working with local HOA's the City has removed nearly two dozen tires, multiple bags of trash and performed vegetation management by removing invasive trees and phragmites from detention basins.

Lastly, the City has promoted a rain barrel sale through The Conservation Foundation and has encouraged residents to utilize rain barrels at their private residences.

Public Participation/Involvement –

The City feels that this program is effective but will make efforts to incorporate stormwater management and pollution prevention into more public events.

3. Illicit Discharge Detection and Elimination

C.1 Storm Sewer Map Preparation

Measurable Goals: Identify and map the drainage areas tributary to each outfall.

Status: The City has begun a City-wide effort to map all its infrastructure, including their stormsewers. The work has included the mapping of outfalls to creeks. Most of the outfalls have been completed and are reflected in the City's GIS. As of Year 18, all storm sewers and structures within newer parts of town have been mapped. Approximately 70% of the storm sewer system within the historic part of town has been mapped.

The City continues the mapping effort and has plans to work with a consultant to generate outfall maps to assist in outfall inspections and potential tracing of illicit discharges.

Illicit Discharge Detection and Elimination –

The City feels that this program is has made progress but intends on hiring a consultant to assist with this aspect of the program. The consultants roll will be training staff in outfall inspections and with the development of the outfall map, prioritization schedule and documentation sheets.

4. Construction Site Runoff Control

D.2 Erosion and Sediment Control BMPs

Measurable Goals: Periodic Inspection (as required by the SWPPP) of the SWPPP's of all construction sites.

Status: The City continues to enforce its Erosion and Sediment Control measures listed in the Kendall County SMO on construction projects. This is accomplished by a thorough permit review process and inspections during the building process. Building permits are not issued unless erosion control measures are included on the plans. During construction, all sites including single family homes are required to have silt fences up for the entirety of construction.

Construction Site Runoff Evaluation –

The City feels that this program is effective and does not plan on making any changes to the program at this time. The City will continue to adopt updates to the Kendall County SMO.

5. Post-Construction Runoff Control

E.3 Long Term O&M Procedures

Measurable Goals: Identification of stormwater management structure maintenance and responsibilities, Inspect approximately 50% of facilities (detention/retention). Budget for repairs as necessary

Status: The City engages with multiple Home Owners Associations (HOA) regarding stormwater detention/retention basin maintenance and cleanup. Together the City and HOAs will perform annual inspections of the basins. HOAs and the City work to have the basins cleaned by removing debris and waste which impedes the function of the basins and reduces water quality. The City continues to map all the basins within the corporate limits and continues inspections of all the detention basins.

In Year 18, the City removed more than two dozen tires, multiple bags of trash and many invasive shrubs and species.

The Kendall County SMO also has standards for long term maintenance of stormwater facilities. The City enforces the ordinance.

In addition to basin maintenance, the City regularly utilizes the Vector truck to clean and inspect catch basins through the City. This is typically don't as staffing permits but the City has made substantial progress towards cleaning the City's catch basins.

Post-Construction Runoff Control Evaluation

The Village feels that this program is effective and does not plan on making any changes to the program at this time. The new NOI (2021) will build upon the existing program.

6. Pollution Prevention/Good Housekeeping

F.2 Inspection and Maintenance Program

Measurable Goals: The City performs monthly City-wide street sweeping. The City also continues to implement the catch basin cleaning program.

Status: Public works has continued to perform street sweeping throughout the year to reduce the amount of sediment and debris entering the MS4. Staff routinely reviews manhole/inlet functionality during rain events to determine cleaning needs. While a “worst is first” criteria has worked, the City plans to expand their mapping effort to map all manholes/inlets to assist with routine inspections of the structures.

Pollution Prevention/Good Housekeeping Evaluation –

The City feels that this program is effective but would like to improve upon the program. The City intends on partnering with a consultant to perform in-house training and to recommend virtual training for staff. Additionally, the consultant may assist with developing a inspection and maintenance schedule for cleaning catch basins, stormwater basins.

Part C. Information and Data Collection Results

No illicit discharges were reported in Year 18.

Part D. Summary of Proposed Year 19 Stormwater Activities

The City of Plano will be submitting a new NOI in conjuncture with this annual update for coverage under the General NPDES Permit No.: ILR40 which became effective on March 1, 2021. This NOI was submitted to the IEPA in May of 2021.

Below are listed the various BMPs which have milestones to be completed in Year 19, as outlined in the NOI as part of the current NPDES permit that expires February 28, 2022. The specific milestone to be completed for each BMP is shown.

- A.1 – Include NPDES Phase II information on the City’s website. This information will include information regarding climate change and stormwater pollutants impacts on water bodies.
- A.4 – Conduct leaf and brush pickup as needed during the Spring/Summer/Fall seasons. Maintain prescription drug recycling program. Include information about stormwater management and pollution prevention at public events.
- B.3 - Participate in or promote a local watershed group meeting or host a local watershed group meeting in a municipal facility at least once annually.
- B.4 - Present ongoing program summary at least once annually at a public meeting or a selected City Board meeting.
- B.5 - Inspect basins annually to ensure debris and waste has been removed and that basins are functioning correctly.
- B.6 – Continue to strive for stormwater projects by matching projects with available funding sources.
- C.1 – Continue to maintain and update their digital storm sewer map. Incorporate newly constructed or located storm sewers to the storm sewer map.
- C.2 – Continue to enforce the SMO or similar code to prohibit non-storm water discharges into the MS4.
- C.3 – Develop the prioritization plan for identify high priority outfalls for inspection and annual inspection schedules
- C.4 – Develop and implement Tracing Procedures and update/modify as necessary.
- C.5 – Develop and Implement Removal Procedures and update/modify as necessary.
- C.7 – Identify and visit all high priority outfalls and 20% of remaining outfalls. Maintain a record of outfall inspection forms.
- D.1&D.2 – Update and enforce the SMO and Ordinance 2009-3 as required.
- D.4 – Utilize and update plan review checklists as required.
- D.5 - Maintain Public Information Handling Procedures through the online RequestTracker.
- E.2 – Enforce the SMO, participate in the SMO revision process and adopt amendments.
- E.3 – Perform annual inspections and remove manmade waste to improve basin functionality.
- E.4 – City staff and/or their engineer will continue to review proposed best management practices prior to construction.
- F.1 – Provide training to City staff who manage or are directly involved in the routine maintenance, repair or replacement of public surfaces in current green infrastructure techniques or to implement or utilize stormwater BMPs.
- F.2 – Inspect manholes/inlets for functionality and improve mapping efforts. Clean and maintain as necessary.

Part E. Notice of Qualifying Local Program

There are currently no Qualifying Local Programs that the Village wishes to rely on to meet the NPDES Phase II requirements.

Part F: Construction Projects Conducted During Year 18

In year 18, one project disturbed more than one acre:

Project Name:	Plano High School
Project Owner:	Plano School District #88
Permit Number:	ILR10BH88
Status:	In process