

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
ANNUAL FACILITY INSPECTION REPORT
NPDES PERMIT FOR STORMWATER DISCHARGES
FROM MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)**

**VILLAGE OF NILES
NPDES PERMIT NUMBER ILR40**

REPORTING PERIOD:

March, 2018 to March, 2019

MS4 OPERATOR INFORMATION:

Village of Niles, Illinois
6849 Touhy Avenue
Niles, Illinois 60714
Fred Braun, Director of Public Works
(847) 588-7900

GOVERNMENTAL ENTITY IN WHICH MS4 IS LOCATED:

Niles, Illinois

INTRODUCTION/BACKGROUND

The 1987 amendments to the Clean Water Act required the United States Environmental Protection Agency (USEPA) to address storm water runoff in two phases. Phase I of the National Pollution Discharge Elimination System (NPDES) Storm Water Program became effective in 1990. Phase I of the NPDES Storm Water Program applied to large and medium MS4s and eleven industrial categories including construction sites disturbing 5 or more acres of land. Phase II of the NPDES Storm Water Program became effective March 10, 2003 and is applicable to small MS4s and construction sites disturbing between 1 and 5 acres of land. Phase II also expands the industrial “no exposure” exemption from Phase I. The Illinois Environmental Protection Agency (IEPA) is in charge of implementing both phases of the NPDES Storm Water Program.

As a small MS4, the Village of Niles was required to comply with Phase II of the NPDES Storm Water Program by submitting a Notice of Intent (NOI) to the IEPA. The NOI serves as the application documentation for the NPDES Phase II Permit that applies to storm water discharges from storm sewers and drainage ways within the Village’s jurisdiction for a permit period of five years. The NOI outlined a plan of implementation for six minimum control measures with a target to improve storm water quality. Those six minimum control measures are:

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 Village of Niles has developed a plan tailored to the needs of the Village to address the six minimum control measures over the term of the NPDES Phase II Permit. As part of the NOI, the Village defined Best Management Practices for each minimum control measure and established measurable goals for each. During the life of the permit the Village will document all compliance efforts and report progress annually to the IEPA. This document serves as the report for YEAR 3 of current permit (Year 15 total) activities.

SECTION A - CHANGES TO BEST MANAGEMENT PRACTICES

The Village of Niles believes the BMPs proposed in the NOI are adequate to support a program that will result in a reduction in pollutants in the Village’s storm water discharges.

Information regarding the status of all the BMPs and measurable goals described in the Village’s SWMP is provided in the following table

Note: X Indicates BMPs that were implemented in accordance with the Village’s SWMP
 √ Indicates BMPs that were change during Year 3

Year 3 Village of Niles		Year 3 Village of Niles	
A. Public Education and Outreach		D. Construction Site Runoff Control	
X	A.1 Distributed Paper Material	X	D.1 Regulatory Control Program
	A.2 Speaking Engagement	X	D.2 Erosion and Sediment Control BMPs
X	A.3 Public Service Announcement	X	D.3 Other Waste Control Program
	A.4 Community Event	X	D.4 Site Plan Review Procedures
	A.5 Classroom Education Material		D.5 Public Information Handling Procedures
X	A.6 Other Public Education	X	D.6 Site Inspection/Enforcement Procedures
			D.7 Other Construction Site Runoff Controls
B. Public Participation/Involvement		E. Post-Construction Runoff Control	
X	B.1 Public Panel		E.1 Community Control Strategy
	B.2 Education Volunteer	X	E.2 Regulatory Program
X	B.3 Stakeholder Meeting		E.3 Long Term O&M Procedures
X	B.4 Public Hearing		E.4 Pre-Const Review of BMP Designs
X	B.5 Volunteer Monitoring		E.5 Site Inspections During Construction
	B.6 Program Coordination	X	E.6 Post Construction Inspections
X	B.7 Other Public Involvement	X	E.7 Other Post-Construction Runoff Controls
C. Illicit Discharge Detection and Elimination		F. Pollution/Prevention/Good Housekeeping	
X	C.1 Storm Sewer Map Preparation	X	F.1 Employee Training Program
√	C.2 Regulatory Control Program	X	F.2 Inspection and Maintenance Program
	C.3 Detection/Elimination Prioritization Plan		F.3 Municipal Operations Storm Water Control
	C.4 Illicit Discharge Tracing Procedures		F.4 Municipal Operations Waste Disposal
	C.5 Illicit Source Removal Procedures		F.5 Flood Management/Assess Guidelines
	C.6 Program Evaluation and Assessment	X	F.6 Other Municipal Operations Controls
X	C.7 Visual Dry Weather Screening		
	C.8 Pollutant Field Testing		
	C.9 Public Notification		
	C.10 Other Illicit Discharge Controls		

Changes: C.2 Regulatory Control Program – Although not listed as a BMP and measurable goal on the NOI, the NOI’s Qualifying Local Program for IDDE proposed to inspect all industrial and non-retail commercial facilities at a minimum of once every five years. Niles updated our SWMP to inspect industrial and non-retail commercial facilities on an as-needed basis if an illicit discharge is noticed during routine operations or reported to the Village. This seems to be more appropriate for a MS4 community whose separate storm sewer areas serve a population of less than 25,000.

SECTION B – STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

The Best Management Practices (BMPs) along with Measurable Goals and Milestones for the March 2018 – March 2019 year (Year 3) are listed below. The Village has developed a Stormwater Management Plan and Notice of Intent that are posted on the Village’s NPDES/MS4 webpage along with the Annual Report.

SECTION B – STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

BMP ID	CATEGORY	BMP SUBCATEGORY/DESCRIPTION	YEAR 3 MILESTONE	DESCRIPTION OF YEAR 3 ACTIVITIES
A.1	Public Education and Outreach	Distributed Paper Material - Stormwater pollution prevention education for residents.	Revise articles and brochures as needed. Place in two newsletters and distribute.	Five brochures printed and distributed at Village facilities and website.
A.3	Public Education and Outreach	Public Service Announcements - Information provided to residents on water pollution, land use, watersheds and other issues.	Distribute Public Service announcement highlighting community accomplishments related to NPDES	Distributed several items to local media and residents (newsletters) about composting, leaf pickup, RWIS system, e-recycling, green business awards, and green initiatives.
A.6	Public Education and Outreach	Other Public Education - Promote water conservation techniques to residents.	Maintain and update website with resource material.	Updated website, distributed information in newsletter. Stormwater Management Plan was presented to the Stormwater Commission on 01/24/19.
B.1	Public Participation / Involvement	Public Panel - Stormwater Commission to help identify, evaluate and provide information on stormwater related issues in the Village.	Provide notice of meetings; maintain records of meetings; make documents available.	Notices of all meetings of the Stormwater Commission are posted in accordance with law. Meetings held on 5/31/18, 8/23/18 and 1/24/19. Documents are available for download on the Village website.
B.3	Public Participation / Involvement	Stakeholder Meeting - Provide representation	Continue to participate in relevant watershed planning committees.	Participated in the North Branch of the Chicago River Watershed Planning Council and the Lower Des Plaines River Watershed Planning Council.

SECTION B – STATUS OF COMPLIANCE WITH PERMIT CONDITIONS (CONTINUED)

BMP ID	CATEGORY	BMP SUBCATEGORY/DESCRIPTION	YEAR 3 MILESTONE	DESCRIPTION OF YEAR 3 ACTIVITIES
B.4	Public Participation / Involvement	Public Hearing – A public meeting or hearing when adopting or revising the Stormwater Management Plan will be held.	Presentation to general public or governing board.	The Stormwater Commission held several meetings. Stormwater Management Plan was presented to the Stormwater Commission on 1/24/19.
B.5	Public Participation / Involvement	Volunteer Monitoring - Develop program informing residents what is considered an illicit discharge.	Distribute brochure at municipal facilities and meetings. Follow-up on complaints.	Brochure was printed and distributed at Village facilities and placed on website for download. Complaints are reviewed by the Public Works Department. No complaints were filed this year.
B.7	Public Participation / Involvement	Other Public Involvement – Participate in watershed group organized to implement control measures which will reduce chloride concentration due to deicing activities	Continue to participate in relevant watershed work group.	Continue participation in the North Branch Chicago River Watershed Workgroup (NBWW) for water quality improvements in the rivers and tributaries. Coordinated the installation of two Road Weather Information System (RWIS) stations which will better coordinate the pre-treating of roads and reduce amount of deicing chemical used to clear roads and that enter the storm water system.
C.1	Illicit Discharge Detection and Elimination	Storm Sewer Map Preparation - Prepare a complete map of the storm sewer system.	Update map regularly with additional data and as improvements or new development occur. Incorporate data into GIS.	The storm sewer map is up-to-date. The Village’s internal GIS-based storm sewer is updated as soon as data is obtained for Capital Improvement Projects and storm sewer for new development. Public Works staff has access to the GIS-based map.

SECTION B – STATUS OF COMPLIANCE WITH PERMIT CONDITIONS (CONTINUED)

BMP ID	CATEGORY	BMP SUBCATEGORY/DESCRIPTION	YEAR 3 MILESTONE	DESCRIPTION OF YEAR 3 ACTIVITIES
C.2	Illicit Discharge Detection and Elimination	Regulatory Control Program – Use local ordinances to reduce illicit discharges from occurring.	Continue to develop IDDE program and identify methods, activities and enforcement to identify and remove illicit discharges.	Previously adopted ordinances to reduce the likelihood of illicit discharges were enforced as necessary by Village staff.
C.7	Visual Dry Weather Screening	Inspection Program - Conduct periodic inspections of the storm sewer outfalls in dry weather conditions for detection of non-storm water discharges.	Inspect major/high priority outfalls annually. Inspect at least 20% of the remaining low priority outfalls annually.	The Village has identified 13 priority outfalls that it will monitor each permit year. Including priority outfalls, the Village inspected 14 outfalls on 11/14/18. An inspection report was completed to document each outfall inspection.
D.1	Construction Site Runoff Control	Regulatory Control Program - Enforce provisions of the Watershed Management Ordinance adopted by the MWRD.	Enforce Watershed Management Ordinance and adopt amendments.	The Village continues to enforce the MWRD Watershed Management Ordinance. During the reporting period, the Village reviewed site plans for appropriate BMPs for 20 site development permits.
D.2	Construction Site Runoff Control	Erosion and Sediment Control - Enforce provisions of the Watershed Management Ordinance adopted by the MWRD.	Enforce Watershed Management Ordinance and adopt amendments.	The MWRD Watershed Management Ordinance was adopted and enforced. Approximately 46 SESC inspections were performed.
D.3	Construction Site Runoff Control	Other Waste Control Program - Require construction site operators to actively manage construction site waste to minimize adverse impacts to water quality.	Administer current ordinances. Enforce Watershed Management Ordinance and adopt amendments.	Community Development Department provided enforcement of the existing ordinances. Enforcement of the MWRD Watershed Management Ordinance continues.

SECTION B – STATUS OF COMPLIANCE WITH PERMIT CONDITIONS (CONTINUED)

BMP ID	CATEGORY	BMP SUBCATEGORY/DESCRIPTION	YEAR 3 MILESTONE	DESCRIPTION OF YEAR 3 ACTIVITIES
D.4	Construction Site Runoff Control	Site Plan Review Procedures – Continue to review plans in accordance with the Watershed Management Ordinance.	Review plans in accordance to the provisions of the Watershed Management Ordinance.	Enforcement of the MWRD Watershed Management Ordinance continues.
D.6	Construction Site Runoff Control	Site Inspection / Enforcement Procedures – Inspection and enforcement of site runoff controls.	Enforce Watershed Management Ordinance and adopt amendments.	Enforcement of the MWRD Watershed Management Ordinance continues.
E.2	Post-Construction Runoff Control	Regulatory Control Program - Inspection and enforcement of site runoff controls.	Enforce Watershed Management Ordinance and adopt amendments.	The village continues to enforce the MWRD Watershed Management Ordinance for new development and redevelopment within the Village.
E.6	Post-Construction Inspections	Post-Construction Inspections - Integrate the inventory information into a GIS solution and develop a maintenance schedule.	Maintain GIS and inspect/maintain storm water outfalls.	Maintenance schedule for stormwater controls established and implemented via database management software. 13 outfalls were inspected between 8/08/18-8/10/18. Annual Maintenance on Community Rain Garden and Neva bio-swale completed.
E.7	Post-Construction Runoff Control	Post-Construction Runoff Controls - Enforce provisions of the Watershed Management Ordinance adopted by the MWRD.	Enforce Watershed Management Ordinance and adopt amendments. Maintain GIS and inspect/maintain BMPs.	Enforcement of the MWRD Watershed Management Ordinance continues. BMPs inspected between 8/07/18-8/10/18. An inspection report was completed to document each BMP inspection.

SECTION B – STATUS OF COMPLIANCE WITH PERMIT CONDITIONS (CONTINUED)

BMP ID	CATEGORY	BMP SUBCATEGORY/DESCRIPTION	YEAR 3 MILESTONE	DESCRIPTION OF YEAR 3 ACTIVITIES
F.1	Pollution Prevention / Good Housekeeping	Employee Training Program - Develop standard operating procedures to prevent the release of pollutants into the Village's storm sewer system.	Provide a training seminar to educate department employees on pollution prevention in the workplace	Pollution prevention program training was completed for Public Works employees on 6/27/18 and 6/28/18.
F.2	Pollution Prevention / Good Housekeeping	Inspection and Maintenance Program - Clean storm drains on a routine bases to eliminate pollutants	Clean 25% of catch basins on high traffic routes and local roads.	The Village cleaned 23,500 feet of storm sewer (81,800 total) and 492 catch basins during the year. The Village also swept approximately 3,600 curb miles of streets.
F.6	Pollution Prevention / Good Housekeeping	Other Municipal Operations Controls - Develop a spill prevention and control plan and conduct training.	Conduct refresher/new training as required. Distribute brochures to municipal facilities. Assess the effectiveness of the identified BMPs.	Spill prevention training included as part of Illicit Discharge Detection and Elimination Trainings on 6/27/18 and 6/28/18. Continue assessment of effectiveness based on published research for the removal of pollutants of concern.

SECTION C – RESULT OF INFORMATION COLLECTED

The Village of Niles serves a population of less than 25,000 and visually observed the storm water discharge. No samples were collected during the reporting period.

The Village is part of a regional work group that facilitates collection and analysis of water quality monitoring data to achieve attainment of water quality standards and designated uses for the watershed.

This is a breakdown of the Village of Niles’ sewer system by type and size of sewer main:

Size (Inches)	Type of Sewer Main (feet)		
	Combined	Sanitary	Storm
Unknown	7586	19090	93105
4		661	5929
6		3786	14132
8	5351	116668	15334
10	6882	30361	19882
12	57593	41032	74095
15	49393	18884	43091
16	331		311
18	24715	7451	34545
21	9203	689	7818
24	9185	2337	37473
27	7755	856	9349
30	3971	437	13621
33	332	756	2240
36	7078	267	30689
42	5017	721	12422
48	7559		11795
54	1181		2836
60	2750		640
66	4322		336
72			3278
*Elliptical	5940		2605

The Niles Public Works Department records the activities and projects completed on an ongoing basis, and is responsible for maintenance of Village utilities and infrastructure including:

- Water System
- Water Plant
- Sewer
- Forestry
- Streetlights/Traffic Signals
- Sidewalks
- Streets
- Signs
- Facilities
- Right-of-way Maintenance
- Municipal Fleet
- Bus Transportation

The information obtained and recorded demonstrates the diversity of our programs and helps us develop long and short term capital improvement programs. Our department budget provides detailed information on operational and capital expenses.

SECTION D – SUMMARY OF PLANNED STORMWATER ACTIVITIES

The table below indicates the stormwater management activities that the Village plans to undertake during Year 4 of the current permit. Additional information about the BMPs that the Village will implement during Year 4 is provided in the section following the table.

Note: X Indicates BMPs that will be implemented during Year 4

Year 4 Village of Niles		Year 4 Village of Niles	
D. Public Education and Outreach		D. Construction Site Runoff Control	
X	A.1 Distributed Paper Material	X	D.1 Regulatory Control Program
	A.2 Speaking Engagement	X	D.2 Erosion and Sediment Control BMPs
X	A.3 Public Service Announcement	X	D.3 Other Waste Control Program
	A.4 Community Event	X	D.4 Site Plan Review Procedures
	A.5 Classroom Education Material		D.5 Public Information Handling Procedures
X	A.6 Other Public Education	X	D.6 Site Inspection/Enforcement Procedures
			D.7 Other Construction Site Runoff Controls
E. Public Participation/Involvement		E. Post-Construction Runoff Control	
X	B.1 Public Panel		E.1 Community Control Strategy
	B.2 Education Volunteer	X	E.2 Regulatory Program
X	B.3 Stakeholder Meeting		E.3 Long Term O&M Procedures
X	B.4 Public Hearing		E.4 Pre-Const Review of BMP Designs
X	B.5 Volunteer Monitoring		E.5 Site Inspections During Construction
	B.6 Program Coordination	X	E.6 Post Construction Inspections
X	B.7 Other Public Involvement	X	E.7 Other Post-Construction Runoff Controls
F. Illicit Discharge Detection and Elimination		F. Pollution/Prevention/Good Housekeeping	
X	C.1 Storm Sewer Map Preparation	X	F.1 Employee Training Program
X	C.2 Regulatory Control Program	X	F.2 Inspection and Maintenance Program
	C.3 Detection/Elimination Prioritization Plan		F.3 Municipal Operations Storm Water Control
	C.4 Illicit Discharge Tracing Procedures		F.4 Municipal Operations Waste Disposal
	C.5 Illicit Source Removal Procedures		F.5 Flood Management/Assess Guidelines
	C.6 Program Evaluation and Assessment	X	F.6 Other Municipal Operations Controls
X	C.7 Visual Dry Weather Screening		
	C.8 Pollutant Field Testing		
	C.9 Public Notification		
	C.10 Other Illicit Discharge Controls		

Planned stormwater activities include:

- Sewer line cleaning & televising
- Catch basin inspection, cleaning and rebuilding
- Sewer inlet inspection, cleaning & rebuilding
- Debris removal detention/retention facilities
- Street Sweeping
- Outfall and System inspections
- Participate in watershed groups

- Update GIS information
- Adhere to the requirements of MWRD’s WMO and amendment when adopted
- Site Plan Review and Site Inspections

SECTION E – NOTICE RELYING ON OTHER ENTITY

The Village is not relying on any other government entity to satisfy permit obligations. The Village is participating within MWRD’s regional chloride monitoring program that monitors local waterbodies for chloride concentrations.

SECTION F – LIST OF CONSTRUCTION PROJECTS

For the period from March 2018 to February 2019, the Village initiated and or/completed the following construction projects.

- 2018 Street Resurfacing
- 2018 Water main replacement
- Morton Grove-Niles 20-Inch Water Supply Transmission Main

SECTION G – SUMMARY OF BMPs

ID #	Location	Common Name	Type	O&M Plan
BMP001	7114 W. Touhy, Niles, IL	Community Rain Garden	Rain Garden	NO
BMP002	5600 Jarvis, Niles, IL	Neva Bioswale	Bio-swale	YES
BMP003	Lee and Ottawa, Niles, IL	Oak Park Bio-swale	Bio-swale	NO
BMP004	7655 W Dempster St, Niles, IL	Notre Dame Rain Garden	Rain Garden	NO
BMP005	5600 Jarvis, Niles, IL	5600 Jarvis Permeable pavement	Permeable Pavement	YES
BMP006	5757 Howard St , Niles, IL	Fed-Ex Bio Infiltration	Bio-infiltration	YES
BMP007	7247 N Waukegan Rd, Niles, IL	Holiday inn Express	Infiltration basin	YES
BMP008	9400 N Milwaukee Ave, Niles, IL	Panera infiltration zone	Infiltration basin	YES
BMP009	7720 Lehigh	Molto – Detention Basin	Detention Bio-infiltration basin	YES
BMP010	7847 Caldwell	Niles Rec Center - Underground	Underground Infiltration basin	YES
BMP011	7847 Caldwell	Niles Rec Center - Rain Garden	Rain Garden	YES
BMP012	Ottawa & Lee	Oak Park Permeable Pavement	Permeable Pavement	NO