



2019 NPDES Phase II Stormwater Report



Boneyard Creek Community Day Volunteers

Prepared by:
Justin Swinford, P.E., Civil Engineer II
Beth Reinke, Engineering Technician II
Engineering Division
Public Works Department



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, 2019 To March, 2020

Permit No. ILR40 0462

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

Name: City of Urbana Mailing Address 1: 706 Glover Avenue

Mailing Address 2: _____ County: Champaign

City: Urbana State: IL Zip: 61802 Telephone: (217) 384-2342

Contact Person: Carol J. Mitten Email Address: cjmitten@urbanaininois.us
(Person responsible for Annual Report)

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

Urbana

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))

Carol J. Mitten
Owner Signature:

Carol J. Mitten
Printed Name:

5.29.20

Date:

Interim Public Works Director
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

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42) and may also prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
ANNUAL FACILITY INSPECTION REPORT
NPDES PHASE II PERMIT FOR STORMWATER DISCHARGES
FROM
MUNICIPAL SEPARATE STORM SEWER SYSTEMS

CITY OF URBANA, ILLINOIS
NPDES Permit No. ILR 400462

REPORTING PERIOD:

April 1, 2019 through March 31, 2020

MS4 OPERATOR INFORMATION:

City of Urbana, Illinois
706 Glover Avenue
Urbana, Illinois 61802
(217) 384-2377
Carol J. Mitten, Interim Director of Public Works

GOVERNMENTAL ENTITY IN WHICH MS4 IS LOCATED:

Urbana, Illinois

INTRODUCTION/BACKGROUND:

The 1987 amendments to the Clean Water Act required the United States Environmental Protection Agency (USEPA) to address stormwater runoff in two phases. Phase I of the National Pollution Discharge Elimination System (NPDES) Stormwater Program became effective in 1990. Phase I of the NPDES Stormwater Program applies to large and medium Municipal Separate Storm Sewer System (MS4) communities and eleven industrial categories including construction sites disturbing 5 or more acres of land. Phase II of the NPDES Stormwater Program became effective March 10, 2003 and applies to small MS4's 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 responsible for implementing both phases of the NPDES Stormwater Program.

As a small MS4, the City of Urbana (the City) was required to comply with Phase II of the NPDES Stormwater Program by submitting a Notice of Intent (NOI) to IEPA by March 10, 2003. The NOI served as the application documentation for the NPDES Phase II Permit that applies to stormwater discharges from storm sewers and drainage ways within the City's jurisdiction for a permit period of five (5) years. The NOI outlined a plan of implementation for six minimum control measures with a target to improve stormwater quality.

The 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 City has developed a plan, tailored to its own needs, to address the six minimum control measures over the term of their NPDES Phase II Permit. As a part of the NOI, the City created Best Management Practices (BMPs) for each minimum control measure and established measurable goals for each. BMPs were created to build upon existing City programs.

The City collaborates with neighboring communities that also have MS4 permits to share common resources and develop a regional consistency in fulfilling the requirements of the NPDES Phase II Stormwater Program. This MS4 technical committee, called the Champaign County Stormwater Partnership (CCSWP), has created an informational website, www.ccstormwater.org to help address two of the required minimum control measures: Public Education and Outreach, and Public Participation and Involvement.

The City submitted its second NOI to IEPA on January 17, 2008. The City received its 2008-2013 ILR40 NPDES permit on February 26, 2009. On October 31, 2013, the City was subject to an MS4 Audit performed by IEPA. A thorough review of the City's records showed general compliance with their ILR40 Permit.

The third NOI was submitted to IEPA on September 25, 2013. The City received its 2016-2021 ILR40 NPDES permit on February 10, 2016. The City continues to document and record all compliance efforts and report progress annually to IEPA. This document serves as the report for the activities in Year 4 of this permit.

PERMIT COMPLIANCE ASSESSMENT:

The City proposed forty-five (45) BMPs during Year 4 of its third MS4 permit to address the required minimum control measures. The City was able to implement all forty-five of the BMPs. The City has been able to build upon past good practices in Pollution Prevention/Good Housekeeping and Illicit Discharge Detection and Elimination in conjunction with due diligence efforts in Public Education and Outreach, Public Participation/Involvement and Construction Site Runoff Control.

For details regarding the implementation of BMPs for Year 4 of its third MS4 permit, please refer to **Attachment A – 2019 NPDES Stormwater Activity**.

INFORMATION COLLECTED AND ANALYZED:

The City maintains a database of observed and reported storm and sanitary sewer problems; performs periodic outfall/discharge monitoring; and assesses physical/habitat characteristics of its creeks and ditches.

STORMWATER ACTIVITIES FOR YEAR 5 OF CURRENT PERMIT:

For details regarding the City’s proposed stormwater activities for Year 5 of the current permit cycle (April 1, 2020 to March 31, 2021), please refer to **Attachment B – 2020 Proposed NPDES Stormwater Activity**.

The City has engaged a consultant, Crawford, Murphy & Tilly, to create a Stormwater Master Plan. Work began in Year 4 and should be completed in year 5 of the current permit cycle. The Stormwater Master Plan will focus on asset management and planning of future stormwater infrastructure, best management practices, and Stormwater Utility Fee programs. A technical advisory committee was formed to allow for input from public and private stakeholders.

OTHER GOVERNMENTAL ENTITY RELIANCE:

Although the City of Urbana is currently and will continue to participate in and share resources with the local MS4 Group, CCSWP, it does not rely on other government entities to satisfy its permit obligations. Collaborative events that promote public education, outreach, participation and involvement include the annual Boneyard Creek Community Day, the annual Rain Barrel & Composter Sale, and the biennial Erosion Control & Green Infrastructure Conference.

YEAR 4 CONSTRUCTION PROJECTS & ADDITIONAL ACTIVITIES:

City of Urbana construction projects that disturbed one acre or more:

- NONE

City of Urbana construction projects that disturbed less than one acre:

- Miscellaneous Sewer Repairs (point repairs) Project
- Concrete Sidewalk Repair Project
- Miscellaneous Street Resurfacing and Patching Projects

Additional Activities

- Adopt Urbana Program – 355 lbs. of trash collected

Respectfully submitted,



Carol J. Mitten
Interim Director of Public Works
Date: 5/29/2020

ATTACHMENT A - 2019 NPDES STORMWATER ACTIVITY

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 4 MILESTONE	DESCRIPTION OF YEAR 4 ACTIVITIES
1.1	Public Education and Outreach	Distribute Paper Material	Distribute written materials which discuss proper disposal practices for household hazardous waste and stormwater pollution prevention efforts. The educational materials shall include information on the potential impacts and effects on storm water discharge due to climate change.	Distribute material via City website and have a brochure on stormwater pollution prevention available to the public at the Public Works facility.	Distribute written materials to the public. Update the City website as needed.	Maintained inventories of printed materials that discuss household hazardous waste and stormwater pollution prevention. Printed materials were available to the public at the Public Works Department Office and posted on the City website.
1.2	Public Education and Outreach	Speaking Engagement	Be available for speaking engagements to business groups, service clubs, developers, engineers/architects, contractors, and neighborhood groups about stormwater management, green infrastructure, and water pollution prevention measures.	Speak at group engagements when requested.	Be available to speak at group engagements when requested.	May 2, 2019 - Presentation at APWA Illinois Chapter Annual Conference: "Detention Pond Post Construction Maintenance/Inspection Program"
1.3	Public Education and Outreach	Public Service Announcement	Broadcast Public Service Announcement regarding sustainable stormwater, green infrastructure, or water pollution prevention measures. PSA or videos will be broadcast on public television or on local radio stations.	Broadcast one Public Service Announcement annually.	Broadcast one Public Service Announcement (PSA).	On January 8, 2020, an inlet cleaning PSA was posted on the City website in advance of a forecasted significant rainfall. "After the Storm," a video about water quality, was shown eleven times on Urbana's public access television channel.
1.4	Public Education and Outreach	Community Event	Hazardous material drop-off day for recycling hazardous household waste.	Apply for funding when grant rounds are announced by the IEPA and if successful conduct drop-off days.	Apply for funding if grant is announced and if successful conduct drop-off days.	One Champaign County household hazardous waste (HHW) collection event was held October 26, 2019. 377 55-gallon drums of HHW was collected.
1.5	Public Education and Outreach	Medication Take Back Program	The program provides a collection box to allow residents to properly dispose of pharmaceuticals in an effort to help prevent drug abuse, to reduce accidental poisonings of children and pets, and to limit the impact on the environment. Residents may drop off unwanted or expired medications in a collection box at the Urbana Police Department. The program accepts prescription and over-the-counter medicines, liquid medicine in leak proof containers, and veterinary pharmaceuticals.	Operate medication take back program annually.	Operate medication take back program annually.	The City continues to administer a medication take back program.
1.6	Public Education and Outreach	Class Education Material	Be available to schools for tours / demonstrations of facilities and equipment to provide students an opportunity to become familiar with Urbana's efforts to prevent stormwater pollution and promote sustainable stormwater management.	Be available to speak to classes when requested.	Be available to speak to classes when requested.	May 15, 2019: The Parkland College National Green Infrastructure Training Certification Program (NGICP) class was briefed on construction and maintenance of Urbana's Broadway Avenue bioswale and toured the garden.
1.7	Public Education and Outreach	Stormwater Education Credit Program	City will provide credits on stormwater utility fees to educational institutions on an annual basis at a rate of \$5 per student for providing instruction in stormwater management, green infrastructure, or water pollution prevention in accordance with an approved curriculum by the City.	Offer stormwater education credit annually	Offer stormwater education credit annually.	Stormwater education credits are currently included in the credit and incentive program. The Urbana School District has not participated in the program to date.
1.8	Public Education and Outreach	Other Public Education	Maintain and update City stormwater website highlighting sustainable stormwater, green infrastructure, and water pollution prevention measures.	Maintain website and update annually	Update City website as needed.	The City website has been updated with the latest information on sustainability, green infrastructure, water quality and climate change.
1.9	Public Education and Outreach	Resident Communications	Improve communications between Urbana staff and residents adjacent to projects to keep residents informed of project progress. Publicize and staff a phone line for residents to report sewer problems and follow up with resident reports.	Contact all residents adjacent to projects at the beginning and end of projects. Follow up a minimum of once after sewer problems have been reported. BMP will be implemented on an as-needed basis.	Initiate residential communications during projects. Record and follow-up on sewer complaints.	Complaints are currently tracked and recorded in a GIS database. Project progress communications to residents are included in any ongoing projects. Projects are posted on City website.
2.1	Public Participation & Involvement	Sustainability Advisory Commission	Have a sustainability advisory commission assist the mayor and city council in identifying the highest priorities for city government and citizens to achieve sustainable management of natural resources (water and energy in particular) and shall recommend goals to achieve a workable means to reach these goals.	Hold monthly meetings	Hold monthly meetings.	The Sustainability Advisory Commission met 10 times during the reporting period. A list of the meeting dates and agenda items are posted on the City's website.
2.2	Public Participation & Involvement	Stakeholder Meeting	Participate in Salt Fork Watershed Implementation Committee.	Attend committee meetings.	Attend committee meetings.	The City maintained membership on the committee and attended meetings.
2.3	Public Participation & Involvement	Program Coordination	On-going committee meetings of the Cooperating MS4s (City of Urbana, City of Champaign, Village of Savoy, Champaign County, and University of Illinois) to discuss NPDES Phase II requirements. The group identifies as the Champaign County Stormwater Partnership (CCSWP) and maintains a website, www.ccstormwater.org .	Hold quarterly meetings.	Hold 4 committee meetings.	The City participated in four quarterly CCSWP meetings. Agendas and Minutes are on file at Public Works Engineering Division.
2.4	Public Participation & Involvement	Other Public Involvement	Community creek clean-up event.	Sponsor one community creek clean-up event annually.	Sponsor one community creek clean-up event.	The 2019 annual community-wide Boneyard Creek Community Day event occurred on April 13, 2019. In Urbana, seventy (70) volunteers cleaned 2.3 shoreline miles of the Boneyard Creek & St. Joseph drainage ditch and collected 9 cubic yards of trash.
2.5	Public Participation & Involvement	Stormwater Public Meeting	Provide a minimum of one public meeting annually for the public to provide input as to the adequacy of the City's program.	Hold annual meeting for public input.	Hold meeting.	The City created a Technical Advisory Committee for input from public and private stakeholders as part of the Stormwater Master Plan.
2.6	Public Participation & Involvement	Environmental Justice	Identify environmental justice areas within the City and provide information to the public.	Provide information on City website and discuss at Stormwater Public Meeting.	Post information on website and discuss at annual meeting.	Environmental Justice Areas have been identified and posted on the City Website. No discussion occurred.
3.1	Illicit Discharge Detection & Elimination	Storm Sewer Map Preparation	Update storm sewer system map annually.	Review and update map annually.	Update storm sewer map.	City storm sewer maps were regularly updated with information reported by the Operations Division, Engineering field crews and through various projects.
3.2	Illicit Discharge Detection & Elimination	Regulatory Control Program	Enforce illegal discharge and illegal dumping ordinances.	Enforce illegal discharge and illegal dumping ordinances.	Enforce illegal discharge and illegal dumping ordinances.	City illegal discharge and illegal dumping ordinances were enforced.
3.3	Illicit Discharge Detection & Elimination	Detection & Elimination Prioritization Plan	Investigate public and sewer operations staff reports of illicit discharges.	Continue staffing phone line for residents to call and report complaints. Respond and investigate each report per plan.	Continue hotline. Plan implemented.	Administrative/operations/engineering staff were available to record and respond to reports of illicit discharges. Eight illicit discharge inquiries were investigated.

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 4 MILESTONE	DESCRIPTION OF YEAR 4 ACTIVITIES
3.4	Illicit Discharge Detection & Elimination	Illicit Discharge Tracing Procedures	Utilize field investigations including sewer televising and dye testing to investigate any illegal discharges reported by the public.	Investigate all illegal discharges reported by the public and sewer operations staff utilizing sewer televising and dye testing to determine if an illegal discharge has occurred or an illegal connection exists.	Investigate all reported illegal discharges or connections.	City Staff investigated eight illicit discharge reports - two were confirmed. One (abandoned petroleum tank disturbed by a construction project) occurred in Champaign, upstream of Urbana city limits. The other (food truck discharging grease to a storm sewer) was reported and mitigated by the Urbana-Champaign Sanitary District. No illegal connections were reported or investigated.
3.5	Illicit Discharge Detection & Elimination	Illicit Source Removal Procedures	Facilitate the disconnection of illegal connections from City owned storm sewers.	Facilitate the disconnection of illegal connections from City owned storm sewers, on an as-needed basis.	Disconnect all identified illegal connections from the storm sewer system.	No illegal connections to the storm sewer system were reported.
3.6	Illicit Discharge Detection & Elimination	Program Evaluation & Assessment	Internal Phase 2 committee to meet and review NPDES Phase 2 illicit discharge program, and implement changes if needed.	Meet annually to review program, and recommend and implement changes if necessary.	Conduct annual meeting.	One sewer crew meeting was held and the illicit discharge program was discussed at that meeting.
3.7	Illicit Discharge Detection & Elimination	Sewer Activity Report	Annual report to the Urbana-Champaign Sanitary District documenting all sanitary sewer activity and Phase 2 activities.	Submit annual report to the Urbana-Champaign Sanitary District	Submit annual report.	The Annual Sewer Activity report was completed in February 2019 and submitted to the Sanitary District.
3.8	Illicit Discharge Detection & Elimination	Visual Dry Weather Screening	Visual inspection of outfalls during dry weather. If needed, perform water quality sampling on suspicious discharges at outfalls.	Inspect storm outfalls once per year during dry weather periods. Perform water quality sampling on suspicious discharges on as-needed basis.	Visually inspect storm outfalls discharging to state waterways.	Storm sewer outfalls were inspected along the Saline Branch, Boneyard Creek, St. Joseph Drainage Ditch, and McCullough Creek.
3.9	Illicit Discharge Detection & Elimination	Public Notification	Develop, publicize, and staff a hotline for residents to report illegal discharges.	Daily staffing of existing hotline.	Continue staffing of hotline.	Administrative/operations/engineering staff were available to record and respond to resident complaints. Publicizing efforts are ongoing.
3.10	Illicit Discharge Detection & Elimination	Other Illicit Discharge Controls	Inspect each new development to inspect for illegal connections.	Inspect each development. Number of inspections dependent on number of developments.	Inspect each development.	The Building Safety Division of Community Development and the Engineering Division of Public Works inspected building and site construction activities for single-family residential, multi-family residential, commercial/industrial, and institutional development during the reporting period.
4.1	Construction Site Runoff Control	Regulatory Control Program	Enforce erosion and sediment control ordinance.	Enforce erosion and sediment control ordinance.	Enforce erosion and sediment control ordinance.	The City's erosion and sediment control ordinance was enforced during reporting period.
4.2	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Distribute and update erosion/sediment control BMP Standard Practice Manual.	Distribute and update BMP Standard Practice Manual.	Distribute and update BMP Standard Practice Manual.	The most recent Manual of Practice is posted on the City website for public access.
4.3	Construction Site Runoff Control	Other Waste Control Programs	Enforce construction site waste regulations in erosion and sediment control ordinance.	Enforce construction site waste regulations in erosion and sediment control ordinance.	Enforce construction site waste regulations.	Construction site waste regulations were enforced as part of the erosion control permit program.
4.4	Construction Site Runoff Control	Site Plan Review Procedures	Review erosion control plans submitted by developers for each project.	Complete review of each soil erosion and sediment control plan, on as-needed basis. Perform field inspection.	Review each project submitted.	The Engineering Division conducted reviews of all erosion control plans submitted. The Engineering Division also performed field inspections of all erosion control devices installed. Eight Class 1 and 33 Class 2 erosion control permits were issued in 2019.
4.5	Construction Site Runoff Control	Public Information Handling Procedures	Publicize and staff a hotline for residents to report soil erosion/sediment non-compliance. Follow through with resident complaints and take appropriate action against contractors, as needed.	Publicize and staff a hotline. Investigate complaints and take appropriate action on as-needed basis.	Staff a hotline, investigate complaints and take action as required.	Administrative/operational/engineering staff were available to record and respond to all soil erosion/sediment complaints. Appropriate actions were taken in accordance with the City's erosion and sediment control ordinance.
4.6	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Conduct construction site inspections.	Inspect all construction sites weekly or after rain events > 0.5 inches.	Conduct inspections weekly or after rain events > 0.5-inches.	Site inspections were conducted for all sites on a weekly basis or after a significant rainfall event.
5.1	Post-Construction Runoff Control	Community Control Strategy	Implement credit and incentive program utilizing stormwater fee funds to encourage sustainable on-site stormwater management and green infrastructure.	Provide credits and incentives to property owners to manage stormwater on-site utilizing green infrastructure and best management practices identified by the City's Stormwater Credit and Incentive Manual	Budget \$15,000 for funding incentives.	Funds were budgeted for the incentives program. The City provided incentives for 86 rain barrels purchased by Urbana residents.
5.2	Post-Construction Runoff Control	Regulatory Control Program	Waiting for State guidance on regulatory control program. State is considering including volumetric standards as part of ILR-10 and ILR-40 permits.	City will monitor state progress on regulatory requirements and will comply with any regulatory requirements that the State adopts.	Monitor State progress on regulatory controls. Enforce storm water management requirements on new development and redevelopment.	The City continued to monitor State progress on regulatory controls. City has storm water management requirements in its Land Development and Subdivision Code.
5.3	Post-Construction Runoff Control	Long Term O&M Procedures	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual.	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual. Continue to require operation and maintenance agreements for new detention basins.	The City distributed materials regarding maintenance of items listed in the Credit and Incentive Manual. The Credit and Incentive Manual is also available on the City website for public access. City requires operation and maintenance agreement for all new detention basins. Agreement contains operation and maintenance procedures for detention basins.
5.4	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Review submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual regarding green infrastructure and post-construction BMPs.	Review all submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual.	Review all submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual on an as-needed basis. Review all storm water management plans for new development and redevelopment.	No credit or incentive applications for green infrastructure were received in Year 4 of the current permit cycle. The Engineering Division reviews and approves all storm water management plans for new development.
5.5	Post-Construction Runoff Control	Site Inspections during Construction	Inspect construction of green infrastructure and post-construction BMPs to verify proper installation in accordance with stormwater utility fee credit and incentive program.	Inspect the installation of all new green infrastructure and post construction BMPs as part of the credit and incentive program	Inspect the installation of all new green infrastructure and post construction BMPs as part of the credit and incentive program on an as-needed basis. Inspect all new detention basins.	No credit or incentive applications for green infrastructure were received in Year 3 of the current permit cycle. Engineering Division inspects detention basins during construction.
5.6	Post-Construction Runoff Control	Post-Construction Inspections	Inspect green infrastructure and post construction BMPs to ensure they are operating properly as part of the stormwater utility fee credit and incentive program.	Annual inspection of green infrastructure and post construction BMPs in order to qualify for credit on stormwater utility fee.	Inspect existing green infrastructure and stormwater BMPs. Inspect all existing detention basins over a 5 to 7 year period.	No credit or incentive applications for green infrastructure were received in 2019. The City has begun inspection of existing detention basins and green infrastructure. Engineering Division completed 7 detention basin inspections in 2019 and plans to inspect all detention basins (now numbering 169) on a five to seven year cycle or more often if needed.

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 4 MILESTONE	DESCRIPTION OF YEAR 4 ACTIVITIES
6.1	Pollution Prevention & Good Housekeeping	Employee Training Program	Salt and calcium application training for snow plow applicators.	Conduct training annually for all snow plow operators.	Complete training session.	The annual snow training session was completed on October 29, 2019.
6.2	Pollution Prevention & Good Housekeeping	Hazardous Material Spill Training	Training for the abatement and containment of hazardous material spills	Conduct annual training for 100% of firefighters.	Complete training session.	City of Urbana firefighters participated in Haz-Mat training for the abatement and containment of hazardous material spills.
6.3	Pollution Prevention & Good Housekeeping	Inspection and Maintenance Program	Storm sewer cleaning.	Perform routine maintenance and cleaning of storm sewer system and catch basins on a systematic basis.	Clean 35,000 feet of storm sewer pipe and spend 100 hours cleaning inlets or manholes. Inspect 30,000 feet of storm sewer pipe and 75 manholes.	Money was budgeted in FY19-20 and will be combined with FY20-21 budget for a project involving the cleaning and inspection of larger diameter storm sewers.
6.4	Pollution Prevention & Good Housekeeping	Inspection and Maintenance Program	Street Sweeping.	Sweep central business district 20 times per year and residential and arterial streets 5 times per year, weather permitting.	Complete street sweeping.	Street sweeping occurred as scheduled. Approximately 4,000 lane miles of streets and parking lots were swept. Leaves and other organic matter were sent to the Landscape Recycling Center for composting and trash was transported to an approved disposal facility.
6.5	Pollution Prevention & Good Housekeeping	Municipal Operations Waste Disposal	Control vehicle and equipment washing by performing all washes in enclosed washing bay that drains directly to sanitary sewer.	Wash public works vehicles and equipment as needed in enclosed bays which drain directly to sanitary sewer.	Use enclosed bay to wash all vehicles.	In accordance with City policy, all automobiles, vans, and trucks were washed in local commercial facilities where size allows. Larger trucks and equipment were washed inside the Public Works garages, which are equipped with oil and grease separators that discharge to the sanitary sewer or washed outside in the waste collection pit area, which drains to the sanitary sewer.
6.6	Pollution Prevention & Good Housekeeping	Municipal Operations Waste Disposal	Oil and fluid disposal program to recycle or dispose of oils and fuels by a licensed recycler or waste hauler.	Disposal of wastes by a licensed recycle or waste hauler.	Recycle or dispose of property of oils and other motor vehicle fluids.	All fleet waste products were picked up and disposed of by Heritage-Crystal Clean. Manifests, invoices, and purchase orders are on file in the Fleet office at Public Works. In 2019, two 55-gallon drums of crushed oil filters and 770 gallons of used oil were collected by Heritage-Crystal Clean.
6.7	Pollution Prevention & Good Housekeeping	Other Municipal Operations Controls	Maintain "Snow & Ice Control Plan" procedure manual and update to document all procedures required for compliance with NPDES Phase 2.	Annual review and update of manual.	Complete review and update of manual.	The annual "Snow & Ice Control Plan" review was completed in October 2019, with only minor map route changes.
6.8	Pollution Prevention & Good Housekeeping	Other Municipal Operations Controls	Maintain fire departments hazardous spill response plan and update to comply with NPDES Phase 2.	Annual review and update of manual.	Complete review and update of manual.	Fire Department Haz-mat Response Plan was reviewed and updated as needed.

ATTACHMENT B - 2020 PROPOSED NPDES STORMWATER ACTIVITY

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 5 MILESTONE
1.1	Public Education and Outreach	Distribute Paper Material	Distribute written materials which discuss proper disposal practices for household hazardous waste and stormwater pollution prevention efforts. The educational materials shall include information on the potential impacts and effects on storm water discharge due to climate change.	Distribute material via City website and have a brochure on stormwater pollution prevention available to the public at the Public Works facility.	Distribute written materials to the public. Update the City website.
1.2	Public Education and Outreach	Speaking Engagement	Be available for speaking engagements to business groups, service clubs, developers, engineers/architects, contractors, and neighborhood groups about stormwater management, green infrastructure, and water pollution prevention measures.	Speak at group engagements when requested.	Be available to speak at group engagements when requested.
1.3	Public Education and Outreach	Public Service Announcement	Broadcast Public Service Announcement regarding sustainable stormwater, green infrastructure, or water pollution prevention measures. PSA or videos will be broadcast on public television or on local radio stations.	Broadcast one Public Service Announcement annually.	Broadcast one Public Service Announcement.
1.4	Public Education and Outreach	Community Event	Hazardous material drop-off day for recycling hazardous household waste.	Apply for funding when grant rounds are announced by the IEPA and if successful conduct drop-off days.	Apply for funding if grant is announced and if successful conduct drop-off days.
1.5	Public Education and Outreach	Medication Take Back Program	The program provides a collection box to allow residents to properly dispose of pharmaceuticals in an effort to help prevent drug abuse, to reduce accidental poisonings of children and pets, and to limit the impact on the environment. Residents may drop off unwanted or expired medications in a collection box at the Urbana Police Department. The program accepts prescription and over-the-counter medicines, liquid medicine in leak proof containers, and veterinary pharmaceuticals.	Operate medication take back program annually.	Operate medication take back program annually.
1.6	Public Education and Outreach	Class Education Material	Be available to schools for tours / demonstrations of facilities and equipment to provide students an opportunity to become familiar with Urbana's efforts to prevent stormwater pollution and promote sustainable stormwater management.	Be available to speak to classes when requested.	Be available to speak to classes when requested.
1.7	Public Education and Outreach	Stormwater Education Credit Program	City will provide credits on stormwater utility fees to educational institutions on an annual basis at a rate of \$5 per student for providing instruction in stormwater management, green infrastructure, or water pollution prevention in accordance with an approved curriculum by the City.	Offer stormwater education credit annually.	Offer stormwater education credit annually.
1.8	Public Education and Outreach	Other Public Education	Maintain and update City stormwater website highlighting sustainable stormwater, green infrastructure, and water pollution prevention measures.	Maintain website and update annually.	Update City website.
1.9	Public Education and Outreach	Resident Communications	Improve communications between Urbana staff and residents adjacent to projects to keep residents informed of project progress. Publicize and staff a phone line for residents to report sewer problems and follow up with resident reports.	Contact all residents adjacent to projects at the beginning and end of projects. Follow up a minimum of once after sewer problems have been reported. BMP will be implemented on an as-needed basis.	Initiate residential communications during projects. Record and follow-up on sewer complaints.
2.1	Public Participation & Involvement	Sustainability Advisory Commission	Have a sustainability advisory commission assist the mayor and city council in identifying the highest priorities for city government and citizens to achieve sustainable management of natural resources (water and energy in particular) and shall recommend goals to achieve a workable means to reach these goals.	Hold monthly meetings.	Hold monthly meetings.
2.2	Public Participation & Involvement	Stakeholder Meeting	Participate in Salt Fork Watershed Implementation Committee.	Attend committee meetings.	Attend committee meetings.
2.3	Public Participation & Involvement	Program Coordination	On-going committee meetings of the Cooperating MS4s (City of Urbana, City of Champaign, Village of Savoy, Champaign County, and University of Illinois) to discuss NPDES Phase II requirements.	Hold quarterly meetings.	Hold 4 committee meetings.
2.4	Public Participation & Involvement	Other Public Involvement	Community creek clean-up event.	Sponsor one community creek clean-up event annually.	Sponsor one community creek clean-up event.

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 5 MILESTONE
2.5	Public Participation & Involvement	Stormwater Public Meeting	Provide a minimum of one public meeting annually for the public to provide input as to the adequacy of the City's program.	Hold annual meeting/open house for public input.	Hold meeting/open house.
2.6	Public Participation & Involvement	Environmental Justice	Identify environmental justice areas within the City and provide information to the public.	Provide information on City website and discuss at Stormwater Public Meeting.	Post information on website and discuss at meeting.
3.1	Illicit Discharge Detection & Elimination	Storm Sewer Map Preparation	Update storm sewer system map annually.	Review and update map annually.	Update storm sewer map.
3.2	Illicit Discharge Detection & Elimination	Regulatory Control Program	Enforce illegal discharge and illegal dumping ordinances.	Enforce illegal discharge and illegal dumping ordinances.	Enforce illegal discharge and illegal dumping ordinances.
3.3	Illicit Discharge Detection & Elimination	Detection & Elimination Prioritization Plan	Investigate public and sewer operations staff reports of illicit discharges.	Continue staffing phone line for residents to call and report complaints. Respond and investigate each report per plan.	Staff hotline, investigate illicit discharge reports and respond per plan.
3.4	Illicit Discharge Detection & Elimination	Illicit Discharge Tracing Procedures	Utilize field investigations including sewer televising and dye testing to investigate any illegal discharges reported by the public.	Investigate all illegal discharges reported by the public and sewer operations staff utilizing sewer televising and dye testing to determine if an illegal discharge has occurred or an illegal connection exists.	Investigate all reported illegal discharges or connections.
3.5	Illicit Discharge Detection & Elimination	Illicit Source Removal Procedures	Facilitate the disconnection of illegal connections from City owned storm sewers.	Facilitate the disconnection of illegal connections from City owned storm sewers, on an as-needed basis.	Disconnect all identified illegal connections from the storm sewer system
3.6	Illicit Discharge Detection & Elimination	Program Evaluation & Assessment	Internal Phase 2 committee to meet and review NPDES Phase 2 illicit discharge program, and implement changes if needed.	Meet annually to review program, and recommend and implement changes if necessary.	Conduct annual meeting.
3.7	Illicit Discharge Detection & Elimination	Sewer Activity Report	Annual report to the Urbana-Champaign Sanitary District documenting all sanitary sewer activity and Phase 2 activities.	Submit annual report to the Urbana-Champaign Sanitary District.	Submit annual report.
3.8	Illicit Discharge Detection & Elimination	Visual Dry Weather Screening	Visual inspection of outfalls during dry weather. If needed, perform water quality sampling on suspicious discharges at outfalls.	Inspect storm outfalls once per year during dry weather periods. Perform water quality sampling on suspicious discharges on as-needed basis.	Visually inspect storm outfalls discharging to state waterways.
3.9	Illicit Discharge Detection & Elimination	Public Notification	Develop, publicize, and staff a hotline for residents to report illegal discharges.	Daily staffing of existing hotline.	Continue staffing of hotline.
3.10	Illicit Discharge Detection & Elimination	Other Illicit Discharge Controls	Inspect each new development to inspect for illegal connections.	Inspect each development. Number of inspections dependent on number of developments.	Inspect each development.
4.1	Construction Site Runoff Control	Regulatory Control Program	Enforce erosion and sediment control ordinance.	Enforce erosion and sediment control ordinance.	Enforce erosion and sediment control ordinance.
4.2	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Distribute and update erosion/sediment control BMP Standard Practice Manual.	Distribute and update BMP Standard Practice Manual.	Distribute and update BMP Standard Practice Manual.
4.3	Construction Site Runoff Control	Other Waste Control Programs	Enforce construction site waste regulations in erosion and sediment control ordinance.	Enforce construction site waste regulations in erosion and sediment control ordinance.	Enforce construction site waste regulations.
4.4	Construction Site Runoff Control	Site Plan Review Procedures	Review erosion control plans submitted by developers for each project.	Complete review of each soil erosion and sediment control plan, on as-needed basis. Perform field inspection.	Review each project submitted.
4.5	Construction Site Runoff Control	Public Information Handling Procedures	Publicize and staff a hotline for residents to report soil erosion/sediment non-compliance. Follow through with resident complaints and take appropriate action against contractors, as needed.	Publicize and staff a hotline. Investigate complaints and take appropriate action on as-needed basis.	Staff a hotline, investigate complaints and take action as required.
4.6	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Conduct construction site inspections.	Inspect all construction sites weekly or after rain events > 0.5 inches.	Conduct inspections weekly or after rain events > 0.5-inches.
5.1	Post-Construction Runoff Control	Community Control Strategy	Implement credit and incentive program utilizing stormwater fee funds to encourage sustainable on-site stormwater management and green infrastructure.	Provide credits and incentives to property owners to manage stormwater on-site utilizing green infrastructure and best management practices identified by the City's Stormwater Credit and Incentive Manual.	Budget \$15,000 for funding incentives.
5.2	Post-Construction Runoff Control	Regulatory Control Program	Waiting for State guidance on regulatory control program. State is considering including volumetric standards as part of ILR-10 and ILR-40 permits.	City will monitor state progress on regulatory requirements and will comply with any regulatory requirements that the State adopts.	Monitor State progress on regulatory controls. Enforce storm water management requirements on new development and redevelopment.

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 5 MILESTONE
5.3	Post-Construction Runoff Control	Long Term O&M Procedures	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual.	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual.	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual. Continue to require operation and maintenance agreements for new detention basins.
5.4	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Review submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual regarding green infrastructure and post-construction BMPs.	Review all submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual.	Review all submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual on an as-needed basis. Review all storm water management plans for new development and redevelopment.
5.5	Post-Construction Runoff Control	Site Inspections during Construction	Inspect construction of green infrastructure and post-construction BMPs to verify proper installation in accordance with stormwater utility fee credit and incentive program.	Inspect the installation of all new green infrastructure and post construction BMPs as part of the credit and incentive program.	Inspect the installation of all new green infrastructure and post construction BMPs as part of the credit and incentive program on an as-needed basis. Inspect all new detention basins.
5.6	Post-Construction Runoff Control	Post-Construction Inspections	Inspect green infrastructure and post construction BMPs to ensure they are operating properly as part of the stormwater utility fee credit and incentive program.	Annual inspection of green infrastructure and post construction BMPs in order to qualify for credit on stormwater utility fee.	Inspect existing green infrastructure and stormwater BMPs. Inspect all existing detention basins over a 5 to 7 year period.
6.1	Pollution Prevention & Good Housekeeping	Employee Training Program	Salt and calcium application training for snow plow applicators.	Conduct training annually for all snow plow operators.	Complete training session.
6.2	Pollution Prevention & Good Housekeeping	Hazardous Material Spill Training	Training for the abatement and containment of hazardous material spills.	Conduct annual training for 100% of firefighters.	Complete training session.
6.3	Pollution Prevention & Good Housekeeping	Inspection and Maintenance Program	Storm sewer cleaning.	Perform routine maintenance and cleaning of storm sewer system and catch basins on a systematic basis.	Clean 35,000 feet of storm sewer pipe and spend 100 hours cleaning inlets or manholes. Inspect 30,000 feet of storm sewer pipe and 75 manholes.
6.4	Pollution Prevention & Good Housekeeping	Inspection and Maintenance Program	Street Sweeping.	Sweep central business district 20 times per year and residential and arterial streets 5 times per year, weather permitting.	Complete street sweeping.
6.5	Pollution Prevention & Good Housekeeping	Municipal Operations Waste Disposal	Control vehicle and equipment washing by performing all washes in enclosed washing bay which drains directly to sanitary sewer.	Wash public works vehicles and equipment as needed in enclosed bays which drain directly to sanitary sewer.	Use enclosed bay to wash all vehicles.
6.6	Pollution Prevention & Good Housekeeping	Municipal Operations Waste Disposal	Oil and fluid disposal program to recycle or dispose of oils and fuels by a licensed recycler or waste hauler.	Disposal of wastes by a licensed recycle or waste hauler.	Recycle or dispose of properly of oils and other motor vehicle fluids.
6.7	Pollution Prevention & Good Housekeeping	Other Municipal Operations Controls	Maintain "Snow & Ice Control Plan" procedure manual and update to document all procedures required for compliance with NPDES Phase 2.	Annual review and update of manual.	Complete review and update of manual.
6.8	Pollution Prevention & Good Housekeeping	Other Municipal Operations Controls	Maintain fire departments hazardous spill response plan and update to comply with NPDES Phase 2.	Annual review and update of manual.	Complete review and update of manual.