

ADMINISTRATIVE REVISIONS TO THE NOTICE OF INTENT

Revisions to the original Notice of Intent (NOI) are reflected below.

MS4 Operator Mailing Address: Yes _____ No X _____

Persons Responsible: Yes _____ No X _____

Name: _____

Title: _____

Telephone Number: _____

Area of Responsibility: _____

Introduction

In 2003, Madison County (County), Illinois, and its communities created a Co-Permittee Group to join forces in complying with the National Pollutant Discharge Elimination System (NPDES) for Municipal Separate Storm Sewer Systems (MS4) Phase II requirements. As stated in the original 2003 Notice of Intent (NOI), the County and the Co-Permittee communities were to pool resources and work together to comply with the commitments made within the NOI for the benefit of all within the County.

The Co-Permittee Group was active during this reporting period. Significant progress was made sharing Best Management Practices (BMPs) for document retention, outfall mapping, operation procedures, and maintenance activities.

Best Management Practice (BMP) Summary of 2014-2015 Activities

In 2003, each member of the Co-Permittee Group submitted a NOI in compliance with the first 5-year cycle. In 2008, a NOI was submitted in compliance with the next 5-year cycle, as written in the first MS4 permit. The 2009 NOI was submitted in compliance with additional requirements of the Illinois Environmental Protection Agency (IEPA) in the second MS4 permit. As stated in the 2003, 2008, and 2009 NOI, each Co-Permittee Member identified certain activities to comply with the Phase II requirements. Each community submitted an NOI in September 2013 for coverage under the third IEPA NPDES MS4 Phase II 5-year permit cycle that was anticipated to start with the 2014-2015 permit year. Below is an abbreviated summary of the BMPs that were written in the NOI for each of the minimum control measures.

March 2014-March 2015:

- 1) **A.1-** Brochures incorporating green infrastructure and other related BMPs were to be published and displayed by each community in a public place, or on the community website, if applicable.
- 2) **A.4-** Madison County sponsored and participated in water-quality public events.
- 3) **A.5-** Madison County coordinates and participates in various events providing educational opportunities for local students.
- 4) **A.6-** Madison County participates in educational programs, including involvement in the Green Schools Program.
- 5) **B.3-** The Co-Permittee group met (4) times throughout the year to provide training and updates on various topics.
- 6) **B.6-** Each community was made aware of County sponsored events. Madison County was responsible for program development and coordination.

- 7) **B.7-** Madison County is starting to implement watershed plans to reduce flooding and improve water quality throughout the County. Public involvement is a critical component of these plans through open houses, surveys, and stakeholder meetings.
- 8) **C.1-** Communities were to review outfall map completeness and update revised or new storm sewer systems.
- 9) **C.2, 9-** Revisions to existing illicit discharge ordinances have been delayed until completion of the County Stormwater Master Plan. Madison County is working with the Stormwater Commission to prepare a Master Plan for the County. The Master Plan is currently in development.
- 10) **C.5-** Communities reviewed the inlet stenciling program. Standards for inlet stencils were available to the Co-Permittee Group upon request. The County is working to assist communities with resources to complete their inlet stenciling program as well as auditing the condition of existing markings.
- 11) **C.7-** Communities were to conduct illicit discharge inspections of facilities and outfall points. Illicit discharge detection training was included during one quarterly meeting.
- 12) **D.1, D.2, D.4, E.3, E.4-** Revisions to construction and post-construction stormwater ordinances have been delayed until the completion of the County Stormwater Master Plan. Training was provided on understanding, interpreting, and enforcing stormwater ordinances in place at this time.
- 13) **D.5-** Madison County continued to maintain a stormwater hotline number to address public concerns related to stormwater issues.
- 14) **D.6, E.5-** The County provided review for CESSWI requirements and continuing education opportunities for Co-Permittee members.
- 15) **F.1-** Provide training for employees whose work may impact stormwater runoff.
- 16) **F.3-** Communities are to review and update O&M manuals annually. Operations training was provided during a quarterly meeting.
- 17) **F.6-** The County has been conducting internal audits with IEPA staff to assess MS4 activities and NPDES permit compliance within the Co-Permittee Group.

The following pages highlight any changes made to the BMPs from the NOI, BMP status, and activities planned for the next reporting year. Additional information is also provided from the County and each Community.

COMMUNITY NAME: City of Troy

PERMIT #: ILR400461

IEPA Annual Report for Stormwater Discharges from MS4 Communities- Period: March 2014 through March 2015

A. Changes to Best Management- Were there any changes to the BMPs?		B. The status of compliance with the permit, the appropriateness of the BMP and progress towards achieving reduction of discharged pollutants to the MEP, and identified measurable goals for each of the minimum control measures.	C. Provide results of information collected and analyzed, including monitoring data. Information attached?		D. Summarize the stormwater activities you plan to undertake with an implementation schedule	
Comment	YES NO		If attached information, describe.	YES NO	Activity	Schedule
BMP No. A.1- Distributed Paper Materials- Informational Brochures						
Milestone For Reporting Year: Brochures were posted in a public location and available to residents.						
	X	The City has stormwater brochures available to residents at the City Clerks's office.		X	The City will continue to make brochures available through the upcoming permit cycle.	Ongoing through 2014-2019 permit cycle.
BMP No. A.4- Community Event- attend and participate in water-quality oriented public events						
Milestone For Reporting Year: Attend at least two such events each year.						
	X	The County participated in multiple water-quality oriented public events, including the Lewis & Clark Water Festival, the Confluence Trash Bash, and the Mississippi EarthTones Festival.	See Page 10 and Exhibits A.4-A to A.4-C for more information.	X	The County will continue to attend at least two water related events per year.	Ongoing through 2014-2019 permit cycle.
BMP No. A.5- Classroom Education Material						
Milestone For Reporting Year: No specific milestone.						
	X		Review of Classroom Educational Materials (See Page 10)	X	The following schools are within the City jurisdiction: Silver Creek Elem., Henning Elem., St. Paul's Lutheran Elem., and Alternative School. The City will work with the County to coordinate educational opportunities.	Ongoing through 2014-2019 permit cycle.

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Comment	YES NO		If attached information, describe.	YES NO	Activity	Schedule
BMP No. A.6- Educational Presentations						
Milestone For Reporting Year: Make at least two school presentations. Continue educational programs.						
	X	Madison County schools operate a Green Schools program which educates children about the need to recycle and explore "green" options in their lives.		X	The County will continue involvement in educational programs.	
BMP No. B.6- Program Involvement- Coordinate Meetings and Annual Reports						
Milestone For Reporting Year: The community will continue to meet to share BMPs and training opportunities.						
	X	The Madison County MS4 Co-Permittee Group held four quarterly training meetings during the 2014-2015 permit year. Meetings were held: - July 15, 2014 - September 10, 2014 - December 10, 2014 - March 18, 2015 A representative of the City attended all meetings.	See Page 10 and attached Exhibit B.6/ F.1-A for review of meetings and topics.	X	The City will continue to meet with the Co-Permittee Group to share BMPs and training opportunities.	Ongoing through 2014-2019 permit cycle.
BMP No. B.7- Other Public Involvement- Participate in Recycling, Sustainability and Green Infrastructure Programs						
Milestone for Reporting Year: Participate in two recycling, sustainability, and green infrastructure programs.						
	X	The County sponsored numerous recycling, sustainability, and green infrastructure programs including Pharmaceutical Drop-off, Hazardous Waste Collection, Christmas Tree Recycling, and Invasive Species Removal.	Review of Program Material (See Page 11)	X	The City will continue to participate in and promote programs related to stormwater activities.	Ongoing through 2014-2019 permit cycle.

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Comment	YES NO		If attached information, describe.	YES NO	Activity	Schedule
BMP No. C.1- Storm Sewer Map Preparation						
<u>Milestone for Reporting Year:</u> Collect all available outfall mapping data						
	X	The City is 100% complete with their outfall mapping program.		X	The City will review map completeness and update with revised or new storm sewer systems.	Ongoing through 2014-2019 permit cycle.
BMPs No. C.2, C.9- Regulatory Control Program- Ordinance language for Illicit discharge/public notification						
<u>Milestone for Reporting Year:</u> Modifications to the ordinance will be completed as part of this process. Communication brochures will be distributed throughout the community.						
	X	The City's Ordinance contains a section on illicit discharge.		X	Enforce illicit discharge ordinances regularly.	
BMP No. C.5- Inlet Stenciling						
<u>Milestone for Reporting Year:</u> Complete a survey sample of inlet markers installed previously and assess conditions.						
	X	The City has marked 750 out of approximately 800 inlets. The presence and condition of inlet markers is being confirmed by Madison County and IEPA during routine audits. Replacement of missing and worn inlet markers is ongoing.		X	Continue to replace missing and worn inlet markers.	Ongoing through 2014-2019 permit cycle.

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Comment	YES NO		If attached information, describe.	YES NO	Activity	Schedule
BMP No. C.7- Visual Dry Weather Screening- Illicit Discharge Detection						
Milestone for Reporting Year: Include training in one quarterly meeting. Conduct inspection of facilities and outfall points.						
	X	The Co-permittee group reviewed illicit discharge detection and elimination procedures September 2014 quarterly meeting. The City attended the meeting.		X	Continue to conduct inspections of City facilities and outfall points.	Ongoing through 2014-2019 permit cycle.
BMPs No. D.1 and E.2 and D.4 and E.3 and E.4- Site Plan and Pre-Construction Review Procedures						
Milestone for Reporting Year: Madison County provided an update to the Co-Permittee Group on progress with the Stormwater Master Plan						
	X	The City's Ordinance contains sections on construction site runoff control. Madison County has continued to work towards a county-wide Stormwater Master Plan.		X	Continue to enforce erosion and sediment control ordinances.	
BMP No. D.2- Erosion and Sediment Control BMP's						
Milestone for Reporting Year: Include BMP training in one quarterly meeting						
	X	Operations training was provided during the December 10, 2014 quarterly meeting. The City attended the meeting.		X	Continue to attend training as part of Co-permittee group.	Ongoing through 2014-2019 permit cycle.
BMP No. D.5- Stormwater Hotline						
Milestone for Reporting Year: Madison County will continue to provide support to communities with communicating hotline requests.						
	X	Madison County received numerous hotline calls during the reporting period. Many complaints are addressed by the communities prior to calls to the hotline.		X	Madison County will continue to provide support to communities by communicating hotline requests.	Ongoing through 2014-2019 permit cycle.

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Comment	YES NO		If attached information, describe.	YES NO	Activity	Schedule
BMPs No. D.6 and E.5- Training for Construction Site Inspectors						
Milestone for Reporting Year: Madison County sponsored training courses for construction site inspectors. The courses addressed specific technical issues regarding construction site runoff as well as post development.						
		X Review for CESSWI requirements and continuing education opportunities for Co-Permittee members was provided during quarterly meetings. The City attended all but one meeting. The City has 1 certified CESSWI inspector on staff.			X Madison County and the Co-Permittee group will continue to explore opportunities for additional training seminars.	Ongoing through 2014-2019 permit cycle.
BMP No. F.1- Employee Training Program						
Milestone for Reporting Year: The Co-Permittee Group will hold and Operations Training class as part of continuing education opportunities.						
		X The City attended all quarterly meetings. The Madison County Health Department held Larvicide Application Training for municipalities and townships on April 16, 2013 covering the application of larvicide briquettes.	See Page 10 and attached Exhibit B.6/ F.1-A for review of meetings and topics.	X	The Co-Permittee Group will continue to offer Operations Training and other educational and training opportunities throughout the permit year.	Ongoing through 2014-2019 permit cycle.
BMP No. F.3- Other Municipal Operations Controls- Standard Operating Procedures						
Milestone for Reporting Year: Operation procedures for street department activities were reviewed and modified as needed. Co-Permittee meetings included reference to review and update requirements.						
		X The City does not have a formal stormwater operations plan on file. Stormwater operation procedures for the street department were reviewed during the permit year and modified as needed.			X Operation procedures will be reviewed annually and modified as appropriate.	Ongoing through 2014-2019 permit cycle.

ADDITIONAL INFORMATION

<p>BMP A.4</p>	<p>Water Quality Oriented Public Events - Nature Day and Water Festival See Attached Exhibit A.4-A</p>
<p>BMP A.4</p>	<p>Water Quality Oriented Public Events - Mississippi Earthtones Festival See Attached Exhibit A.4-B</p>
<p>BMP A.4</p>	<p>Water Quality Oriented Public Events - Riverbend Earth Day Festival See Attached Exhibit A.4-C</p>
<p>BMP A.6</p>	<p>Classroom Educational Materials - Madison County Soil and Water District The Madison County Soil and Water Conservation District assists with the educational requirements through a number of initiatives. They provide historic aerial maps, flood maps, topography maps, soil type maps, and other data resources. These resources are used by students, developers, environmental and engineering firms, and individuals. The Soil Survey for Madison County was digitized in 2002 and is now available at no cost. Each year the Soil and Water District provide monetary awards to the best conservation 4-H project at the Madison County Fair. This has allowed school aged children to learn different methods of conservation and how it could potentially benefit stormwater quality and quantity. The Madison County Soil and Water District also supplies literature to schools and organizations for Earth Day and Arbor Day. The literature includes themes such as conservation and stormwater. Through funding from the Madison County Farm Bureau, the University of Illinois Extension Office, and the Madison County Soil and Water District, an educational coordinator works to deliver presentations and supply schools with literature related to stormwater pollution.</p>
<p>BMP A.6</p>	<p>Classroom Educational Materials - Madison County Green Schools Program Madison County schools operate a Green Schools program which educates children about the need to recycle and explore "greener" options in many facets of their lives, as well as operating large scale recycling programs. See Exhibit A.6 for additional details.</p>
<p>BMP B.6/F.1</p>	<p>Stakeholder Meetings - Co-Permittee Group Training Opportunities The Madison County MS4 Co-Permittee Group held four quarterly training meetings during the 2014-2015 permit year. Topics covered included a review of proposed changes Phase II requirements in the third MS4 permit cycle, outfall mapping, illicit discharge detection and elimination, operations training, and annual report requirements. See attached Exhibit B.6/F.1-A. Madison County Health Department conducted larvicide training for municipal and township employees during 2014. See attached Exhibit B.6/F.1-B.</p>

ADDITIONAL INFORMATION

BMP B.7	<p>Community Events</p> <p>Throughout the year, Madison County sponsored many community events that could positively impact stormwater quality. These activities encourage public participation to prevent pollutants from getting into the sanitary and storm sewer system.</p> <p>The pharmaceutical drop-off program included nine police departments in the County where citizens can dispose of expired or unwanted medication year round properly rather than flushing down the drain or dumping into landfills. In addition, Madison County also sponsored Drug Take Back Days in April and September 2014 which collected approximately 325 pounds of medication total. See Attached Exhibit B.7-A</p> <p>Madison County sponsored a hazardous waste collection in May 2014 where residents could bring household wastes such as paint, oils, fluorescent bulbs and household cleaners for free disposal. Approximately 260 55-gallon drums of waste was collected during this event. See Attached Exhibit B.7-B.</p> <p>Madison County managed a Christmas Tree recycling program in conjunction with area public works and township highway departments from late December 2014 to mid January 2015. There were 32 locations open to the public that collected 1,007 trees. The trees were chipped for mulch in and used by public works departments for parks or in ponds for fish bedding. See Exhibit B.7-C for additional details.</p> <p>Madison County was a sponsor of the I-LEAD Leadership conference on August 4, 2014. More than 150 conference participants cleared brush, cleaned up trails and removed exotic invasive species to help restore prairie, wetland and woodland habitats at the Willoughby Heritage Farm & Conservation Reserve in Collinsville, IL and Arlington Wetlands in Pontoon Beach, IL. See Attached Exhibit B.7-D</p>
BMP B.7	<p>Other Public Involvement</p> <p>Madison County is starting to implement watershed plans to reduce flooding and improve water quality throughout the County. Major components of the plan and process include watershed resource inventories of existing conditions, watershed based plans for improvements, and public/stakeholder involvement. The first watershed plan in development is Upper Silver Creek. See attached Exhibit B.7-E for more details.</p>
BMP B.7/C.5	<p>Review of Annual Stream Cleanup Day & River Cleanup</p> <p>This event was not held in 2012, however several other cleanup days were held throughout the County. See attached Exhibits B.7/C.5 A&B.</p>

ADDITIONAL COMMUNITY ACTIVITIES

Community Name: City of Troy

Permit #: ILR400461

List any additional community-sponsored activities performed between March 2014 and March 2015 not listed in *Notice of Intent (NOI)* submittal, but which addresses one of the six minimum control measures:

- The City of Troy collected Christmas Trees for recycling from January 2 through January 27, 2015. A total of 225 trees were collected.
- Nine police departments in the County, including the City of Troy, participate in the pharmaceutical drop-off program where citizens can dispose of expired or unwanted medication year round properly rather than flushing down the drain or dumping into landfills. In addition, Madison County also sponsored Drug Take Back Days in April and October 2014 which collected approximately 325 pounds of medication total.
- Madison County and the IEPA sponsored a tire collection for municipalities and townships on May 15th and 16th, 2014 where 141.3 tons of tires were collected. The tire collection allowed for municipalities and townships to dispose of the tires collected throughout the year.
- Madison County, IEPA, and Phillips 66 sponsored a hazardous waste collection at the Wood River Refinery on May 31, 2014. Approximately 261 55-gallon drums of hazardous waste were collected for proper disposal.
- The City cleaned multiple creeks on June 14, 2014:
 - Tributary to Wendell Creek: Two dumptruck loads of brush and trash.
 - Troy Creek: One and a half dumptruck loads of brush and trash.
- The City cleaned and graded ditches along Kimberlin Street, Elmer Street, Franklin Street, and Weston Street.
- The City cleaned 250 miles of roadway, disposing of the material in a landfill.
- The City cleaned 40 catch basins during the permit year.
- The City maintains a 40 cubic yard dumpster at 416 East Center which was emptied 3 times during the permit year.

Circle which minimum control measure addressed:

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

E. Reliance on Government Entities for Permit Obligations

The City of Troy is part of the Madison County MS4 co-permittee group.

F. List of Construction Projects during the Current Reporting Year

<u>Permit #</u>	<u>Project</u>	<u>Status</u>
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None