



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 0335

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

Name: City of Evanston Mailing Address 1: 2100 Ridge Ave.

Mailing Address 2: _____ County: _____

City: Evanston State: IL Zip: 60201 Telephone: 847-448-8198

Contact Person: Darrell A. King Email Address: dking@cityofevanston.org
(Person responsible for Annual Report)

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

City of Evanston

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

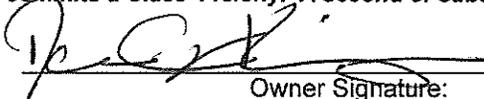
C. Attach results of information collected and analyzed, including monitoring data, if any during the reporting period.

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))


Owner Signature:

Darrell A. King

Printed Name:

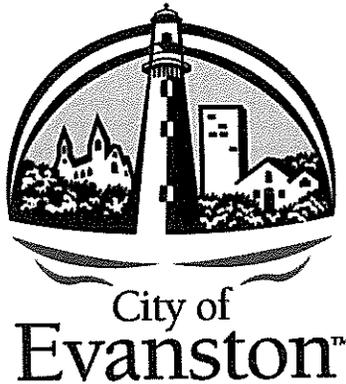
5/28/20
Date:

Water Production Bureau Chief

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



City of Evanston

ANNUAL FACILITY INSPECTION REPORT

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

March 1, 2019 – February 29, 2020

May 14, 2020

City of Evanston
ANNUAL FACILITY INSPECTION REPORT
March 1, 2019 – February 29, 2020

1. INTRODUCTION

The City of Evanston received a General National Pollutant Discharge Elimination System (NPDES) Permit for Discharges from Municipal Separate Storm Sewer Systems (MS4) in order to operate a separate storm sewer system. The permit renewal was effective March 1, 2016. As a condition of the permit, the City must complete an annual facility inspection report. This report is for the reporting period of March 1, 2019 – February 29, 2020.

During this reporting period, the City continued promoting the use of Best Management Practices (BMPs) in order to protect the storm sewer system and the receiving waters of the North Branch of the Chicago River and Lake Michigan. The City's BMPs were outlined in the original Notice of Intent submitted in 2013. This report includes an update of compliance with those BMPs. It also includes a look-ahead of BMPs to be implemented during the next reporting period.

Overall, the City has been successful in implementing a comprehensive program of storm water BMPs during the reporting period across all six of the minimum compliance areas. The City will continue to build on these successes as it moves forward into the next reporting period.

2. CHANGES TO BEST MANAGEMENT PRACTICES

During the reporting period of March 1, 2019 – February 29, 2020, changes to the Best Management Practices were implemented. These are outlined in Section 5 – Key Storm Water Activities for 2019 – 2020.

3. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

The City of Evanston has implemented numerous Best Management Practices in compliance with the goals outlined in the City's 2013 Notice of Intent. A status summary for each of the goals in the six minimum compliance areas is included as Exhibit A.

4. SUMMARY OF COLLECTED INFORMATION

The City of Evanston has collected information and monitoring data as part of the City's Annual Dry Weather Inspection, implemented under Minimum Compliance Area 3 – Illicit Discharge Detection Program. The City has 18 storm sewer outfalls, and these outfalls are inspected annually to determine if there is dry weather flow occurring. Dry weather flow can be indicative of an illicit discharge into the storm sewer. All storm sewers in the City discharge to the North Branch of the Chicago River unless otherwise noted. The 2018 annual inspection information is summarized in Table 4.1.

Table 4.1 Annual Dry Weather Flow Summary						
Inspector: Gordon Campbell				End Date of Last Rain: 7/6/19		
Inspection Date: 7/11/19				Weather: Dry		
Outfall No.	Location	Outfall Flowing		Floatables		Notes
		Yes	No	Yes	No	
S01	Isabella St – East (60")	X			X	
S02	Isabella St – West (12")		X		X	Under water
S03	Central St – West (24")		X		X	
S04	Lincoln St – East (12")		X		X	
S05	Lincoln St – West (42")		X		X	
S06	Bryant Ave – East (42")		X		X	
S07	Jackson Ave – West (36")	X			X	
S08	Poplar Ave – West (48")	X			X	
S09	Dodge Ave – West (36")	X			X	
S10	Bridge St – West (54")	X			X	
S11	Bridge St – East (54")		X		X	Under water
S12	Simpson St – West (30")	X			X	
S13	Martha Ln – West (24")		X		X	
S14	Greenleaf St – East (30")		X		X	Under water
S15	Cleveland St – East (60")	X			X	
S16	Roslyn Pl @Lake Mich. (15")		X		X	Under water
S17	Milburn St @ Lake Mich. (27")		X		X	Under water
S18	Lincoln St @ Lake Mich. (12")		X		X	

An analysis of the data indicates that no illicit discharges were occurring at the time of the inspection. Flow in the storm system consisted of clear water only and could be indicative of any or a combination of the following: water usage by a resident such as vehicle washing, lawn irrigation, hydrant flushing and/or previously undetected water leak.

5. KEY STORM WATER ACTIVITIES FOR 2018– 2019

The City of Evanston is proposing several Best Management Practices (BMPs) for the 2019 – 2020 reporting period in compliance with our 2013 MS4 Notice of Intent Permit Application. These activities and the schedule for implementation are listed in Table 5.1.

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Develop information for public on effective pollution prevention to minimize discharge of pollutants from private property, including: A. Fuels and oils (including vehicles leaks) B. Soaps, solvents or detergents used in outdoor washing of vehicles and other property C. Paint D. Lawn and garden care E. Winter de-icing materials (storage and use)	1.1.a	Develop educational information on effective pollution prevention to minimize discharge of pollutants from private property.	9/30/18	Develop flyer with educational information.	10/3/2018
	1.1b	Provide information on City website.	9/30/18	Review and update annually.	7/16/2018
	1.1.c	Provide information as press release through eNews system.	9/30/18	Provide one press release annually.	11/15/18
	1.1d	Provide printed materials available to public at Evanston Ecology Center.	9/30/19	Review and update biannually.	10/16/2019

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Develop information for public about green infrastructure strategies such as green roofs, rain gardens, etc. that mimic natural processes and direct storm water to where it can be infiltrated, evaporated or reused.	1.2a	Develop educational information on green infrastructure strategies for managing stormwater.	12/31/19	Develop flyer with educational information.	1/30/2020
	1.2b	Provide information on City website.	12/31/19	Review and update annually.	1/30/2020

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
	1.2.c	Provide educational displays on example City projects that incorporate green infrastructure.	9/30/18	Implement on one project annually.	The Civic Center has 3 informational displays that were installed in 2015. One was replaced last year - 2019. We also have an informational display by the rain garden at James Park by the new field that was constructed on the north side by the recycling center. That was installed in 2017. There is also a sign at Lot #32 - 825 Hinman Ave. that was installed in 2016.
Provide and report on annual evaluation of BMPs and measurable goals	1.3a	Provide annual evaluation of compliance with BMPs.	6/1/18	Implement annually.	5/30/2020
	1.3b	Post annual evaluation report on City website.	6/1/18	Implement annually.	5/30/2020
	1.3.c	Provide information as press release through eNews system.	6/1/18	Implement annually.	5/30/2020

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Hold a public hearing regarding initial plan. Provide 15 day public comment period following the hearing. Advertise 10 days in advance.	2.1.a	Schedule public hearing at Environment Board meeting.	5/31/18	Hold hearing.	4/12/2018
	2.1.b	Provide information as press release through eNews system.	5/31/18	Provide one press release.	3/28/2018
	2.1.c	Advertise hearing in local newspaper at least 10 days in advance.	5/20/18	Provide one newspaper advertisement.	(Advertised in the Evanston Roundtable Chicago Tribune) – 3/31/2018, 4/5/2018, 4/12/2018, 4/19/2018
Hold one public meeting annually for the public to provide comment on the Annual Evaluation.	2.2.a	Schedule public hearing at Environment Board.	9/30/18	Hold hearing.	10/10/2019
	2.2.b	Provide information as press release through eNews system.	9/15/18	Provide one press release.	9/18/2019
	2.2.c	Advertise hearing in local newspaper at least 10 days in advance.	9/15/18	Provide one newspaper advertisement.	(Advertised in the Chicago Tribune and Evanston Round Table) – Run dates 9/26/2019, 10/03/2019, 10/10/2019, 9/19/2019, 10/03/2019

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Identify Environmental Justice Areas and receive comment.	2.3.a	Develop Environmental Justice Area Report.	12/31/19	Develop report.	Not yet completed In late 2019 and early 2020 the City's Environment Board, Utilities Commission and Equity and Empowerment Commission jointly drafted an Environmental Justice Resolution based on community feedback and leadership from Citizens' Greener Evanston's Environmental Justice Evanston Committee. This resolution received strong positive feedback from all parties involved and was set to be introduced to City Council in late Q1 of 2020 but has been postponed given the current State of Emergency. Once public boards are able to meet again this resolution will be introduced to City Council for consideration.
	2.3.b	Hold public hearing on Environmental Justice Area Report.	2/28/20	Hold public hearing on report.	Not yet completed
	2.3.c	Provide information as press release through eNews System.	2/18/20	Provide one press release.	Not yet completed
	2.3.d	Advertise hearing in local newspaper at least 10 days in advance.	2/18/20	Provide one newspaper advertisement.	Not yet completed

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Develop, implement and enforce a program to detect and eliminate illicit connections or discharges into the permittee's small MS4.	3.1.a	Review existing illicit discharge detection and elimination program for compliance with new 2016-2021 MS4 permit requirements.	5/31/18	Complete program review.	11/26/2018
Update storm sewer map to include any modifications to the sewer system map.	3.2.a	Review recent construction projects and update City's GIS system with any changes to storm sewer system.	5/31/18	Complete GIS updates.	Modifications made during February 2020
	3.2.b	Publish City's storm sewer map on City website.	5/31/18	Post updated map on City website.	11/12/2018
Through regulatory mechanism, prohibit non-storm discharges into City's storm sewer system and implement appropriate enforcement procedures and actions, including enforceable requirements for the prompt reporting of all releases, spills and other unpermitted discharges such reports in a timely manner.	3.3.a	Review and update existing City ordinances for compliance with new 2016-2021 MS4 permit requirements.	12/31/18	Complete review and update City ordinances as required.	Not yet completed
	3.3.b	Develop procedure for reporting and tracking illicit discharge complaints in the 311 system.	12/31/18	Create new service request type in 311.	12/6/2018
	3.3.c	Review and update written procedures for responding to illicit discharge complaints for compliance with new 2016-2021 MS4 permit requirements.	5/31/19	Review and update written illicit discharge response procedures.	Not yet completed

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping to the system.	3.4.a	Review and update written procedures for annual dry weather flow inspection for compliance with new 2016-2021 MS4 permit requirements.	6/30/18	Review and update annual dry weather flow inspection procedures.	11/26/2018
	3.4.b	On an annual basis, complete dry weather flow inspection of all storm sewer outfalls.	9/15/18	Complete and document annual inspection.	7/11/2019
Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, and the requirements for reporting such mechanisms.	3.5.a	Develop educational information on hazards of improper disposal of waste and requirements for reporting.	9/30/19	Develop flyer with educational information.	Not yet completed
	3.5.b	Provide annual training to all employees of Public Works, Community Development and Property Standards inspectors	12/31/19	Provide information and/or training annually.	Not yet completed
	3.6.c	Provide information on City website.	9/30/19	Review and update annually.	Not yet completed
	3.6.d	Provide information as press release through eNews system.	9/30/19	Provide one press release annually.	Not yet completed.

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Develop an ordinance or regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance.	4.1.a	Review and update Erosion and Sediment Control Policy.	12/31/18	Review and update policy.	1/18/2019
	4.1.b	Provide information on City website.	12/31/18	Review and update annually.	1/18/2019
	4.1.c	Incorporate Erosion and Sediment Control Policy into City ordinances.	12/31/20	Revised ordinance approved by City Council.	43-O-19 adopted 5/13/2019
Require construction site operators to control or prohibit non-storm water discharges.	4.2.a	Incorporate requirements into Erosion and Sediment Control Policy.	12/31/18	Review and update policy.	1/18/2019
Require all regulated construction sites to have a storm water pollution prevention plan that meets the requirements of Part IV of the NPDES permit No. ILR10.	4.3.a	Incorporate requirements into Erosion and Sediment Control Policy.	12/31/18	Review and update policy.	1/18/2019
Require procedures for site plan reviews which incorporate consideration of potential water quality impacts and site plan review of individual pre-construction site plans by the permittee to ensure compliance with sediment and erosion control requirements.	4.4.a	Review and update procedures for site plan review for compliance with new 2016-2021 MS4 permit requirements.	12/31/18	Review and update policy.	3/12/18

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Require procedures for receipt and consideration of information submitted by the public.	4.5.a	Develop procedure for reporting and tracking illicit discharge complaints in the 311 system.	12/31/18	Create new service request type in 311.	12/6/2018
Require site inspections and enforcement of ordinance provisions.	4.6.a	Continue program of site inspections.	Ongoing	Review and update annually.	Ongoing

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Develop, implement and enforce a program to address and minimize storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre.	5.1.a	Enforce existing Evanston Storm water Control Ordinance	Ongoing	Review and update annually.	3/12/2018
Develop and implement a program to minimize the volume of storm water runoff and pollutants from public highways, streets, roads, parking lots and sidewalks. Include training for all MS4 employees and contractors who main repair or replace public surfaces or green infrastructure.	5.3.a	Review and update City's Complete and Green Streets Policy.	06/30/18	Update policy, adopted and approved by City Council.	1/18/2019
	5.3.b	Develop a checklist for evaluating street and other public right-of-way projects for compliance with the City's Complete and Green Streets Policy.	5/31/18	Finalized Complete and Green Streets Checklist (CGSC).	1/18/2019

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
	5.3.c	Review City capital improvement projects using CGSC	6/30/19	Annual report.	5/1/2019
	5.3.d	Provide annual training on good MS4 practices to all Public Works Agency employees.	12/31/17	Annual training completed for Public Works employees verified by sign-in sheets	12/20/2018
Develop and implement a program to minimize the volume of storm water runoff and pollutants from existing privately owned developed property.	5.4.a	Implement a regular street cleaning program.	4/30/18	Completed Street Cleaning Operation Schedule	On going
	5.4.b	Implement a fall leaf pick-up plan to divert leaves from entering the sewer system.	9/30/18	Completed Fall Leaf Pick-up Plan	On going

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
Develop and implement an O&M program that includes an annual training component for municipal staff and contractors to prevent and reduce the discharge of pollutants to the maximum extent practicable.	6.1.a	Develop O&M Manual for Municipal Storage Yard Practices.	12/31/20	Completed O&M Manual.	Not yet completed
Implement measures to minimize the discharge of pollutants from equipment and vehicle washing. Wash waters must be treated in a sediment basin at a minimum.	6.2.a	Conduct annual training on vehicle washout practices.	6/30/19	Conduct 1 training per year.	03/12/2019 02/27/2020
Minimize the exposure of building materials, products, construction waste, trash, landscape materials, fertilizers, pesticides, herbicides, chemical storage tanks, deicing material storage facilities and temporary stockpiles, detergents, sanitary waste and other materials to precipitation and to stormwater.	6.3.a	Do not store materials in areas served by storm sewer. All runoff will be directed to the combined sewer system.	12/31/18	Conduct 1 inspection of storage areas per year.	05/06/2019
Minimize the discharge of pollutants from spills and leaks. Implement chemical spill and leak prevention and response procedures.	6.4.a	Provide annual training on chemical spill response.	12/31/18	Conduct 1 training annually.	3/26/2019
	6.4.b	Provide chemical spill response kits at each municipal storage area.	12/31/18	Conduct annually inspection of chemical spill response kits.	5/1/2019

Goal Description	Goal No.	Action	Initial Target Date	Measurable Goal	Date Completed
<p>Using training material available from USEPA, State of Illinois or other organizations, provide annual employee training to prevent and reduce storm water pollution from:</p> <ul style="list-style-type: none"> -park and open space maintenance -fleet and building maintenance -operation of storage yards -snow disposal -deicing material storage handling and use on roadways -new construction and land disturbance -storm water system maintenance procedures for proper disposal of street cleaning debris and catch basin materials. <p>Training should include how flood management projects impact water quality, non-point source pollution control, green infrastructure controls and aquatic habitat.</p>	6.5.a	Conduct annual training on storm water pollution reduction practices.	12/31/19	Conduct 1 training annually.	3/26/2019, 02/27/2020

6. NOTICE OF COORDINATION WITH OTHER GOVERNMENT ENTITIES

The City of Evanston works with the Metropolitan Water Reclamation of Greater Chicago (MWRD) as part of the Illicit Discharge Detection and Removal Ordinance. The City does not rely on other government entities to otherwise meet the MS4 permit obligations.

7. STORM WATER IMPROVEMENT PROJECTS DURING 2019 – 2020

The City of Evanston has no storm water improvement projects during the 2019-2020 reporting period.

7.1 Storm Water Construction Projects for March 1, 2019 – February 29, 2020			
Project	Storm Water Improvements	Completion Date	Storm Water Improvement Funding
Parking Lot 51	Permeable Pavers	2019	\$410,500
Civic Center Parking Lot	Restore Permeable Pavers	2019	\$12,000

Exhibit A
Compliance with Permit Requirements
March 1, 2019 – February 29, 2020

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2019 – February 29, 2020
A. PUBLIC EDUCATION AND OUTREACH

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
A.1 Other Public Education	Develop information for public on effective pollution prevention to minimize discharge of pollutants from private property, including: A. Fuels and oils (including vehicles leaks) B. Soaps, solvents or detergents used in outdoor washing of vehicles and other property C. Paint D. Lawn and garden care E. Winter de-icing materials (storage and use)	Develop educational information on effective pollution prevention to minimize discharge of pollutants from private property.	Develop flyer with educational information.	10/3/2018
		Provide information on City website.	Review and update annually.	7/16/2018
		Provide information as press release through eNews system.	Provide one press release annually.	11/15/2018
		Provide printed materials available to public at Evanston Ecology Center.	Review and update biannually.	10/16/2019
A.2 Other Public Education	Develop information for public about green infrastructure strategies such as green roofs, rain gardens, etc. that mimic natural processes and direct stormwater to where it can be infiltrated, evaporated or reused.	Develop educational information on green infrastructure strategies for managing stormwater.	Develop flyer with educational information.	1/30/2020

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
		Provide information on City website.	Review and update annually.	1/30/2020
		Provide educational displays on example City projects that incorporate green infrastructure.	Implement on one project annually.	Completed 2015 – 2019 various locations
A.3 Other Public Education	Provide and report on annual evaluation of BMPs and measurable goals	Provide annual evaluation of compliance with BMPs.	Implement annually.	5/30/2020
		Post annual evaluation report on City website.	Implement annually.	5/30/2020
		Provide information as press release through eNews system.	Implement annually.	5/30/2020

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2019 – February 29, 2020
B.PUBLIC INVOLVEMENT/PARTICIPATION

BMP Program	BMP.	Detailed Practice	Measurable Goal	2019 Update
B.1 Public Involvement/Participation	Hold a public hearing regarding initial plan. Provide 15 day public comment period following the hearing. Advertise 10 days in advance.	Schedule public hearing at Environment Board meeting.	Hold hearing.	4/12/2018
		Provide information as press release through eNews system.	Provide one press release.	3/28/2018
		Advertise hearing in local newspaper at least 10 days in advance.	Provide one newspaper advertisement.	(Advertised in the Evanston Roundtable & Chicago Tribune) – Run dates 3/31/2018, 4/5/2018, 4/12/2018, 4/19/2018
B.2 Public Involvement/Participation	Hold one public meeting annually for the public to provide comment on the Annual Evaluation.	Schedule public hearing at Environment Board.	Hold hearing.	10/10/2019
		Provide information as press release through eNews system.	Provide one press release.	9/18/2019

BMP Program	BMP.	Detailed Practice	Measurable Goal	2019 Update
		Advertise hearing in local newspaper at least 10 days in advance.	Provide one newspaper advertisement.	(Advertised in the Chicago Tribune and Evanston Round Table) – Run dates 9/26/2019, 10/03/2019, 10/10/2019, 9/19/2019, 10/03/2019
B.3 Public Involvement/Participation	Identify Environmental Justice Areas and receive comment.	Develop Environmental Justice Area Report.	Develop report.	<p>Not yet completed</p> <p>In late 2019 and early 2020 the City's Environment Board, Utilities Commission and Equity and Empowerment Commission jointly drafted an Environmental Justice Resolution based on community feedback and leadership from Citizens' Greener Evanston's Environmental Justice Evanston Committee. This resolution received strong positive feedback from all parties involved and was set to be introduced to City Council in late Q1 of 2020 but has been postponed given the current State of Emergency. Once public boards are able to meet again this resolution will be introduced to City Council for consideration.</p>
		Hold public hearing on Environmental Justice Area Report.	Hold public hearing on report.	Not yet completed

BMP Program	BMP.	Detailed Practice	Measurable Goal	2019 Update
		Provide information as press release through eNews System.	Provide one press release.	Not yet completed
		Advertise hearing in local newspaper at least 10 days in advance.	Provide one newspaper advertisement.	Not yet completed

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2019 – February 29, 2020
C. ILLICIT DISCHARGE DETECTION AND ELIMINATION

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
C.1 Illicit Discharge Detection and Elimination	Develop, implement and enforce a program to detect and eliminate illicit connections or discharges into the permittee's small MS4.	Review existing illicit discharge detection and elimination program for compliance with new 2016-2021 MS4 permit requirements.	Complete program review.	11/26/2018

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
C.2 Illicit Discharge Detection and Elimination	Update storm sewer map to include any modifications to the sewer system map.	Review recent construction projects and update City's GIS system with any changes to storm sewer system.	Complete GIS updates.	Modifications made during February 2020
		Publish City's storm sewer map on City website.	Post updated map on City website.	11/12/2018
		Review and update existing City ordinances for compliance with new 2016-2021 MS4 permit requirements.	Complete review and update City ordinances as required.	12/31/2018
		Develop procedure for reporting and tracking illicit discharge complaints in the 311 system.	Create new service request type in 311.	12/6/2018
		Review and update written procedures for responding to illicit discharge complaints for compliance with new 2016-2021 MS4 permit requirements.	Review and update written illicit discharge response procedures.	Not yet completed
C.3. Illicit Discharge Detection and Elimination	Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping to the system.	Review and update written procedures for annual dry weather flow inspection for compliance with new 2016-2021 MS4 permit requirements.	Review and update annual dry weather flow inspection procedures.	11/26/2018
		On an annual basis, complete dry weather flow inspection of all storm sewer outfalls.	Complete and document annual inspection.	7/11/2019
C.4 Outreach	Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, and the requirements for reporting such mechanisms.	Develop educational information on hazards of improper disposal of waste and requirements for reporting.	Develop flyer with educational information.	Not yet completed

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
		Provide annual training to all employees of Public Works, Community Development and Property Standards inspectors	Provide information and/or training annually.	Not yet completed
		Provide information on City website.	Review and update annually.	Not yet completed
		Provide information as press release through eNews system.	Provide one press release annually.	Not yet completed

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2019 – February 29, 2020
D.CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
D.1 Construction Site Storm Water Run-off Control	Develop an ordinance or regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance.	Review and update Erosion and Sediment Control Policy.	Review and update policy.	1/18/2019
		Provide information on City website.	Review and update annually.	1/18/2019

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
		Incorporate Erosion and Sediment Control Policy into City ordinances.	Revised ordinance approved by City Council.	43-O-19 adopted 5/13/2019
D.2 Construction Site Storm Water Run-off Control	Require construction site operators to control or prohibit non-storm water discharges.	Incorporate requirements into Erosion and Sediment Control Policy.	Review and update policy.	1/18/2019
D.3 Construction Site Storm Water Run-off Control	Require all regulated construction sites to have a storm water pollution prevention plan that meets the requirements of Part IV of the NPDES permit No. ILR10.	Incorporate requirements into Erosion and Sediment Control Policy.	Review and update policy.	1/18/2019
D.4 Construction Site Storm Water Run-off Control	Require procedures for site plan reviews which incorporate consideration of potential water quality impacts and site plan review of individual pre-construction site plans by the permittee to ensure compliance with sediment and erosion control requirements.	Review and update procedures for site plan review for compliance with new 2016-2021 MS4 permit requirements.	Review and update policy.	3/12/18
D.5 Construction Site Storm Water Run-off Control	Require procedures for receipt and consideration of information submitted by the public.	Develop procedure for reporting and tracking illicit discharge complaints in the 311 system.	Create new service request type in 311.	12/6/2018
D.6 Construction Site Storm Water Run-off Control	Require site inspections and enforcement of ordinance provisions.	Continue program of site inspections.	Review and update annually.	Ongoing

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E. Post Construction Runoff Control

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
E.1 Construction Site Storm Water Run-off Control	Develop, implement and enforce a program to address and minimize stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre.	Enforce existing Evanston Stormwater Control Ordinance	Review and update annually.	3/12/2018
E.2 Construction Site Storm Water Run-off Control	Develop and implement a program to minimize the volume of storm water runoff and pollutants from public highways, streets, roads, parking lots and sidewalks. Include training for all MS4 employees and contractors who main repair or replace public surfaces or green infrastructure.	Review and update City's Complete and Green Streets Policy.	Update policy, adopted and approved by City Council.	1/18/2019
		Develop a checklist for evaluating street and other public right-of-way projects for compliance with the City's Complete and Green Streets Policy.	Finalized Complete and Green Streets Checklist (CGSC).	1/18/2019
		Review City capital improvement projects using CGSC	Annual report.	5/1/2019
		Provide annual training on good MS4 practices to all Public Works Agency employees.	Annual training completed for Public Works employees verified by sign-in sheets	12/20/2018
E.3 Construction Site Storm Water Run-off Control	Develop and implement a program to minimize the volume of storm water runoff and pollutants from existing privately owned developed property.	Implement a regular street cleaning program.	Completed Street Cleaning Operation Schedule	On-going
		Implement a fall leaf pick-up plan to divert leaves from entering the sewer system.	Completed Fall Leaf Pick-up Plan	On-going

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F. Pollution Prevention/Good Housekeeping

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
F.1 Other Municipal Operations Controls	Develop and implement an O&M program that includes an annual training component for municipal staff and contractors to prevent and reduce the discharge of pollutants to the maximum extent practicable.	Develop O&M Manual for Municipal Storage Yard Practices.	Completed O&M Manual.	Not yet completed
F.2 Inspection and Maintenance Program	Implement measures to minimize the discharge of pollutants from equipment and vehicle washing. Wash waters must be treated in a sediment basin at a minimum.	Conduct annual training on vehicle washout practices.	Conduct 1 training per year.	3/12/2019, 02/27/2020
F.3 Municipal Operations Storm Water Control	Minimize the exposure of building materials, products, construction waste, trash, landscape materials, fertilizers, pesticides, herbicides, chemical storage tanks, deicing material storage facilities and temporary stockpiles, detergents, sanitary waste and other materials to precipitation and to stormwater.	Do not store materials in areas served by storm sewer. All runoff will be directed to the combined sewer system.	Conduct 1 inspection of storage areas per year.	5/6/2019
F.4 Municipal Operations Waste Disposal	Minimize the discharge of pollutants from spills and leaks. Implement chemical spill and leak prevention and response procedures.	Provide annual training on chemical spill response.	Conduct 1 training annually.	3/26/2019
		Provide chemical spill response kits at each municipal storage area.	Conduct annually inspection of chemical spill response kits.	5/1/2019

BMP Program	BMP	Detailed Practice	Measurable Goal	2019 Update
F.5 Employee Training Program.	<p>Using training material available from USEPA, State of Illinois or other organizations, provide annual employee training to prevent and reduce storm water pollution from:</p> <ul style="list-style-type: none"> -park and open space maintenance -fleet and building maintenance -operation of storage yards -snow disposal -deicing material storage handling and use on roadways -new construction and land disturbance -storm water system maintenance procedures for proper disposal of street cleaning debris and catch basin materials. <p>Training should include how flood management projects impact water quality, non-point source pollution control, green infrastructure controls and aquatic habitat.</p>	Conduct annual training on storm water pollution reduction practices.	Conduct 1 training annually.	3/26/2019 02/27/2020