



City of Evanston

ANNUAL FACILITY INSPECTION REPORT

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

March 1, 2024 – February 28, 2025

May 30, 2025

City of Evanston

ANNUAL FACILITY INSPECTION REPORT March 1, 2024 – February 28, 2025

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) to operate a separate storm sewer system. The permit renewal was effective March 1, 2021. 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, 2024 – February 28, 2025.

During this reporting period, the city continued promoting the use of Best Management Practices (BMPs) 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 Notice of Intent submitted in 2021. 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, 2024 – February 28, 2025, changes to the Best Management Practices were implemented. These are outlined in Section 5 – Key Storm Water Activities for 2024 – 2025.

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 2021 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 2024/2025 annual inspection information is summarized in Table 4.1.

Table 4.1 Annual Dry Weather Flow Summary

SSO INSPECTION REPORT																		
City of Evanston																		
Form #: <u>9</u>		<input type="checkbox"/> .2 inches Regular Inspection <input checked="" type="checkbox"/> Dry Weather Inspection																
Inspector's Name: <u>Joseph Wilks, Miguel Perez</u>		End Date of Last Rain: <u>8/30/2024</u> <u>.05"</u>																
Inspection Date: <u>9/17/2024</u>		Weather: <u>Dry/sunny</u>																
Outfall #	Location	Outfall Flowing?		Oil Sheen?		Suspended Solids?		Settled Solids?		Floating Solids?		Foam?		Odor?		Clarity?		Color?
		YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	Clear	Dirty	
S01	Isabella St (East side) - 60" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S02	Isabella St (West side) - 12" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S03	Central St (West side) - 24" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S04	Lincoln St (East side) - 12" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S05	Lincoln St (West side) - 42" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S06	225' S. of Lincoln St (East side) or Bryant Ave - 42" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S07	1000' S. of Lincoln St (West side) or Jackson Ave - 36" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S08	Poplar Ave (West side) - 48" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
OUTFALL #																		
LIST OTHER OBVIOUS INDICATORS OF STORM WATER POLLUTION																		

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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 community

Outfall #	Location	Outfall Flowing?		Oil Sheen?		Suspended Solids?		Settled Solids?		Floating Solids?		Foam?		Odor?		Clarity?		Color?
		YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	Clear	Dirty	
S09	1100' S. of Greenbay Rd (West side) or Dodge Ave - 36" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S10	Bridge St (West side) - 54" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S11	Bridge St (East side) - 54" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S12	1000' S. of Bridge St (West side) or Simpson St - 30" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S13	2000' S. of Bridge St (West side) or Martha Ln - 24" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S15	1300' S. of Main St (East side) or Cleveland St - 60" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S16	Roslyn Pl @ Lake Michigan - 15" storm sewer.		✓		✓		✓		✓		✓		✓		✓	✓		
S17	Milburn St @ Lake Michigan - 27" storm sewer.		✓		✓		✓		✓		✓		✓		✓			
S18	Lincoln St @ Lake Michigan - 12" storm sewer.		✓		✓		✓		✓		✓		✓		✓			
OUTFALL #																		
LIST OTHER OBVIOUS INDICATORS OF STORM WATER POLLUTION																		

member such as vehicle washing, lawn irrigation, hydrant flushing and/or previously undetected water leak.

5. KEY STORM WATER ACTIVITIES FOR 2024– 2025

The City of Evanston is proposing several Best Management Practices (BMPs) for the 2024 – 2025 reporting period in compliance with our 2021 MS4 Notice of Intent Permit Application. These activities and the schedule for implementation are listed in Table 5.1.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
<p>Develop information for public on effective pollution prevention to minimize discharge of pollutants from private property, including:</p> <p>A. Fuels and oils (including vehicles leaks)</p> <p>B. Soaps, solvents or detergents used in outdoor washing of vehicles and other property.</p> <p>C. Paint</p> <p>D. Lawn and garden care</p> <p>E. Winter de-icing materials (storage and use)</p>	A.1	Develop a flyer with educational information, review, and update annually.	Review and/or update digital or print materials for distribution.	10/3/2018, ongoing, reviewed on 2/3/25

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Host tours for third grade classes throughout the city in conjunction with the "Pipes and Precipitation" program.	A.2	Describe what MS4 means and ways to minimize discharge of pollutants from private property. Occurs several times annually.	Provide tours to five school's third grade classes during the fall and spring seasons.	Northwestern University (NU) student tour and City Summer Workers on 8/2/2024 & 12/8/2024

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Provide information regarding effective pollution prevention as a press release through eNews system and on City's website.	A.3	Provide one press release.	On message annually.	Message included on the March and September 2024 water bills.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Host community member public tours.	A.4	Describe what MS4 means and ways to minimize discharge of pollutants from private property and provide information regarding green infrastructure. Public Tours occur twice per year.	Two presentations per year.	Northwestern University (NU) student tour and City Summer Workers on 8/2/2024 & 12/8/2024

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Partner with schools throughout Evanston on storm water management and water quality education.	A.5	Number of schools targeted with outreach programs per year.	Five schools annually.	Not yet completed.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Develop information for the 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.	A.6	Develop flyer with educational information, review and update annually.	Review and/or update digital or print materials for distribution.	Completed , ongoing, reviewed on 12/23/24

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Hold one public meeting annually for the public to provide comments on the Annual Evaluation.	B.3	Hold meeting annually	Schedule public meeting at Environment Board.	Completed December 12 2024.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
<p>Identify Environmental Justice Areas and receive comment.</p>	<p>B.6</p>	<p>Develop a resolution for City Council approval that will establish a definition for Environmental Justice that departments will use in program and policy review and implementation. Incorporate Environmental Justice into City ordinances, codes, policies, and processes in consultation with the stakeholders list above and new stakeholders. Create a meaningful public engagement policy and decision-making process in direct consultation with the Equity and Empowerment Commission. Develop and maintain an active GIS-based inventory of environmental justice areas in Evanston.</p>	<p>Incorporate Environmental Justice into City ordinances, codes, policies and processes in consultation with the stakeholders. Create a meaningful public engagement policy and decision-making process in direct consultation with the Equity and Empowerment Commission. Develop and maintain an active GIS-based inventory of environmental justice areas in Evanston.</p>	<p>Staff created a public facing EJ Screen map that is available on the City's website.</p>

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Update storm sewer map to include any modifications to the sewer system map.	C.1	Complete GIS updates.	Update GIS annually	Ongoing

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
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.	C.2	Complete review and update City ordinances as required.	Complete review and update City ordinances as required (2022)	Included in the City Code Chapter 13 – City Sewer System: 17-13-8 (Use of Public Sewer), reviewed on 2/3/25

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping to the system.	C.3	Review and update annual dry weather flow inspection procedures.	Perform annually	Staff are working on separating the SSO from the CSO detection program.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Visual Dry Weather Screening. Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping to the system.	C.7	On an annual basis, complete dry weather flow inspection of all storm sewer outfalls. Complete and document annual inspection.	Perform annually	9/17/2024

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
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.	C.9	Provide one press release annually through the eNews system.	Perform annually	Message included on the March and September 2024 water bills.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Inform public employees, businesses, and the public of hazards associated with illegal discharges and improper disposal of waste, and the requirements for reporting such mechanisms.	C.10	Develop flyer with educational information.	Develop flyer with educational information by 2023.	Employees were informed at employee training in October 2024. Flyer not yet developed.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Develop an ordinance or regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance.	D.1	Review and update annually.	Review and update annually.	43-O-19 adopted 5/13/2019, ongoing

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Require construction site operators to control or prohibit non-storm water discharges.	D.2	Review and update policy triennially.	Review and update policy triennially (2023).	1/18/2019, ongoing

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
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.	D.3	Review and update policy triennially.	Review and update policy triennially (2023).	1/18/2019, ongoing

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
<p>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.</p>	D.4	Review and update policy.	Review and update policy triennially (2022 & 2023).	3/12/2018, On going.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Require procedures for receipt and consideration of information submitted by the public.	D.5	Create a new service request type in 311.	Create a new service request type in 311.	12/6/2018, ongoing.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Require site inspections and enforcement of ordinance provisions.	D.6	Review and update annually.	Review and update annually.	Ongoing Inspections performed by consulting agency

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Develop and implement a program to minimize the volume of storm water runoff and pollutants from existing privately owned developed property.	E.1	Complete Street Cleaning Operation Schedule and Complete Fall Leaf Pick-up Plan annually.	Complete Street Cleaning Operation Schedule and Complete Fall Leaf Pick-up Plan annually.	Ongoing.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
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.	E.2	Review and update annually.	Review and update annually.	3/12/2018, Ongoing, Reviewed 2/25/25

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
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 repair or replace public surfaces or green infrastructure.	E.3	Update policy, adopted and approved by City Council Triennially.	Update policy, adopted and approved by City Council Triennially.	January 10-12, 2022, Ongoing.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
<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 <p>procedures for proper disposal of street cleaning debris and catch basin materials.</p>	F.1	Conduct 1 training annually.	Conduct 1 training annually.	Training video shown to staff on 3/28/2024.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
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 storm water.	F.3	Conduct 1 inspection of storage areas per year.	Conduct 1 inspection of storage areas per year.	5/19/2020, 6/14/2021, 7/19/2022, 6/14/2024 On-going

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
Minimize the discharge of pollutants from spills and leaks. Implement chemical spill and leak prevention and response procedures.	F.4	Conduct 1 training annually. Conduct annual inspection of chemical spill response kits.	Conduct 1 training annually. Conduct annual inspection of chemical spill response kits.	2/27/2020, January 10-12, 2022, Training video shown to staff on 3/28/2024.

Goal Description	Goal No.	Measurable Goal & Frequency	Milestones	Date
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.	F.6	Complete O&M Manual.	Complete O&M Manual 2022.	Draft version completed during 2021, staff is currently finalizing the manual. On going.

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. Evanston is a member of the Chicago Area Waterways Chloride Workgroup. The workgroup’s primary efforts are to work together to address chlorides in our local waterways and improve the water quality by reducing chloride discharges.

7. STORM WATER IMPROVEMENT PROJECTS DURING 2024 – 2025

Project Name	Project Location	Project Completion Date	Total Project Cost
2024 Alley Improvements (Storm Sewer Extension)	Alley North of Leonard Place, East of Greenbay Road - new storm sewer with connection to existing relief sewer Alley North of Colfax Street, East of Bryant Avenue - new storm sewer with connection to existing storm sewer Alley North of Simpson Street, East of Ashland Avenue - new storm sewer with relief sewer extension on Payne Street. Alley North of Lake Street, East of Darrow Avenue - new storm sewer with connection to existing relief sewer	November 22,2024	\$1, 601,426

Exhibit A
Compliance with Permit Requirements
March 1, 2024 – February 28, 2025

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2024 – February 28, 2025
A. PUBLIC EDUCATION AND OUTREACH

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
A.1 Distributed Paper Material	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 a flyer with educational information, review and update annually.	Review and/or update digital or print materials for distribution.	2/3/2025, ongoing.
	1.1a	Develop educational information on effective pollution prevention to minimize discharge of pollutants from private property.	Review and/or update digital or print materials for distribution.	2/3/2025, ongoing.
	1.1b	Provide information on City website.	Review and update annually.	Ongoing
	1.1c	Provide information as press release through eNews system.	Provide one press release annually.	message included on the March and September 2024 water bill

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
	1.1d	Provide printed materials available to public at Evanston Ecology Center.	Review and update biannually.	Ecology Center is under renovation
A.2 Speaking Engagement	Host tours for third grade classes throughout the city in conjunction with "Pipes and Precipitation" program.	Describe what MS4 means and ways to minimize discharge of pollutants from private property. Occurs several times annually.	Provide tours to five school's third grade classes during the fall and spring seasons.	Northwestern University student tour 12/8/2024 & City Summer Workers tour 8/2/2024

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
A.3 Public Service Announcement	Provide information regarding effective pollution prevention as a press release through eNews system and on City's website.	Provide one press release annually.	One message	Message included on the March & September 2024 water bill.
A.4 Community Event	Host community member public tours.	Describe what MS4 means and ways to minimize discharge of pollutants from private property and provide information regarding green infrastructure. Public Tours occur twice per year.	Two presentations per year.	Northwestern University student tour 12/8/2024 & City Summer Workers tour 8/2/2024
A.5 Classroom Education Material	Partner with schools throughout Evanston on storm water management and water quality education.	Number of schools targeted with outreach programs per year.	Five schools	Not yet completed
A.6 Other Public Education	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.	Develop flyer with educational information, review and update annually.	Review and/or update digital or print materials for distribution.	December 2024, ongoing.
	1.2a Develop educational information on green infrastructure strategies for managing storm water.			December 2024
	1.2b Provide information on City website.			November 2021
	1.2c Provide educational displays on example City projects that incorporate green infrastructure.			Completed 2015 – 2019 various locations
	1.3a Provide annual evaluation of compliance with BMPs.			5/28/2025

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
	1.3b Post annual evaluation report on City website			To be completed by September 2025
	1.3c Provide information as press release through eNews system			Agenda placed on the city website for the Environment Board Meeting 12/12/24.

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2024 – February 28, 2025
B. Public Participation/Involvement

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
B.3 Stakeholder Meeting	Hold one public meeting annually for the public to provide comment on the Annual Evaluation.	Hold meeting annually	Schedule public meeting at Environment Board.	Completed Environment Board Meeting 12/12/24
A.2 Speaking Engagement	Host tours for third grade classes throughout the city in conjunction with "Pipes and Precipitation" program.	Describe what MS4 means and ways to minimize discharge of pollutants from private property. Occurs several times annually.	Provide tours to five school's third grade classes during the fall and spring seasons.	Northwestern University student tour 12/8/2024 & City Summer Workers tour 8/2/2024
	2.2a Schedule public hearing at Environment Board.			Completed Environment Board Meeting 12/12/24

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
	2.2b Provide information as a press release through the eNews system.			Meeting advertised on City's website prior to the Environment Board Meeting De 12/12/24, public meeting.
	2.2c Advertise hearing in local newspapers at least 10 days in advance.			Advertised as part of the city advertisement of the environment board meetings.

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
B.6 Program Involvement	Identify Environmental Justice Areas and receive comment.	Develop resolution for City Council approval that will establish a definition for Environmental Justice that departments will use in program and policy review and implementation. Incorporate Environmental Justice into City ordinances, codes, policies, and processes in consultation with the stakeholders list above and new stakeholders. Create a meaningful public engagement policy and decision-making process in direct consultation with the Equity and Empowerment Commission. Develop and maintain an active GIS-based inventory of environmental justice areas in Evanston.	Incorporate Environmental Justice into City ordinances, codes, policies, and processes in consultation with the stakeholders. Create a meaningful public engagement policy and decision-making process in direct consultation with the Equity and Empowerment Commission. Develop and maintain an active GIS-based inventory of environmental justice areas in Evanston.	Staff created an EJ area map that is available to the public on the City's website.

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2024 – February 28, 2025
C. Illicit Discharge Detection and Elimination

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
C.1 Sewer Map Preparation	Update storm sewer map to include any modifications to the sewer system map.	Complete GIS updates.	Update GIS annually	Ongoing
	3.2a Review recent construction projects and update City's GIS system with any changes to storm sewer system.			Ongoing
	3.2b Publish City's storm sewer map on City website.			Ongoing
C.2 Regulatory Control Program	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.	Complete review and update City ordinances as required.	Complete review and update City ordinances as required.	Included in the City Code Chapter 13 – City Sewer System: 17-13-8 (Use of Public Sewer), reviewed on 2/3/25
	3.3a Review and update existing City ordinances for compliance with new 2016-2021 MS4 permit requirements.			Ongoing

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
	3.3b Develop procedure for reporting and tracking illicit discharge complaints in the 311 system.			12/6/2018
	3.3c Review and update written procedures for responding to illicit discharge complaints for compliance with new MS4 permit requirements.			Ongoing
C.3 Detection/Elimination Prioritization Plan	Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping to the system.	Review and update annual dry weather flow inspection procedures.	Perform annually	Staff is working on separating the SSO from the CSO detection program.
	3.4a Review and update written procedures for annual dry weather flow inspection for compliance with new MS4 permit requirements.			Ongoing
C.7 Visual Dry Weather Screening	Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping to the system.	On an annual basis, complete dry weather flow inspection of all storm sewer outfalls. Complete and document annual inspection.	Perform annually	9/17/2024
C.9 Public Notification	Inform public employees, businesses, and the public of hazards associated with illegal discharges and improper disposal of waste, and the requirements for reporting such mechanisms.	Provide one press release annually through eNews system.	Provide one press release annually.	Employees informed on October 2024. Message appeared on March and September 2024 water bill.

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
C.10 Other Illicit Discharge Controls	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 flyer with educational information by 2023.	Develop flyer with educational information.	Not yet completed.

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2024 – February 28, 2025
D. Construction Site Runoff Control

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
D.1 Regulatory Control Program	Develop an ordinance or regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance.	Review and update annually.	Review and update annually.	Ongoing
D.2 Erosion and Sediment Control BMPs	Require construction site operators to control or prohibit non-storm water discharges.	Review and update policy triennially (2023).	Review and update policy	Ongoing
	4.2a Incorporate requirements into Erosion and Sediment Control Policy.			Ongoing

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
D.3 Other Waste Control Program	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.	Review and update policy triennially (2023).	Review and update policy	Ongoing
	4.3a Incorporate requirements into Erosion and Sediment Control Policy.			Ongoing
D.4 Site Plan Review Procedures	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 policy (2022 & 2024)	Review and update policy.	Ongoing
D.5 Public Information Handling Procedures	Require procedures for receipt and consideration of information submitted by the public.	Create new service request type in 311.	Create new service request type in 311.	12/6/2018
D.6 Site Inspection/Enforcement Procedures	Require site inspections and enforcement of ordinance provisions.	Review and update annually.	Review and update annually.	Ongoing
	4.6a Continue program of site inspections.			Ongoing

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2024 – February 28, 2025
E. Post-Construction Runoff Control

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
E.1 Community Control Strategy	Develop and implement a program to minimize the volume of storm water runoff and pollutants from existing privately owned developed property.	Complete Street Cleaning Operation Schedule and Complete Fall Leaf Pick-up Plan annually.	Complete Street Cleaning Operation Schedule and Complete Fall Leaf Pick-up Plan annually.	Ongoing
	5.4a Implement a regular street cleaning program.			Ongoing
	5.4b Implement a fall leaf pick-up plan to divert leaves from entering the sewer system.			Ongoing
E.2 Regulatory Control Program	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.	Review and update annually.	Review and update annually.	Ongoing
	5.1a Enforce existing Evanston Storm water Control Ordinance			Ongoing

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
E.3 Long Term O & M Procedures	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.	Complete Street Cleaning Operation Schedule and Complete Fall Leaf Pick-up Plan annually.	Complete Street Cleaning Operation Schedule and Complete Fall Leaf Pick-up Plan annually.	Ongoing

EXHIBIT A
City of Evanston
MS4 Permit Best Management Annual Update
March 1, 2024 – February 28, 2025
F. Pollution Prevention/Good Housekeeping

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
F.1 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 1 training annually.	Conduct 1 training annually.	Training video shown to staff on 3/28/2024.

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
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 storm water.	Conduct 1 inspection of storage areas per year.	Conduct 1 inspection of storage areas per year.	6/14/2024
	6.3a Conduct annual training on storm water pollution reduction practices.	Conduct 1 training annually. Conduct annually inspection of chemical spill response kits.	Conduct 1 training annually. Conduct annually inspection of chemical spill response kits.	Training video shown to staff on 3/28/2024.
F.4 Municipal Operations Waste Disposal	Minimize the discharge of pollutants from spills and leaks. Implement chemical spill and leak prevention and response procedures.	Review and update annually.	Review and update annually.	Ongoing
	6.4a Provide annual training on chemical spill response.			3/28/2024
	6.4b Provide chemical spill response kits at each municipal storage area.			3/28/2024

BMP Program	BMP	Measurable Goals, Including Frequencies	Milestones	2024 Update
F.6 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.	Complete O&M Manual.	Complete O&M Manual.	Draft O&M manual completed during 2021, staff working on finalizing.
	6.1a Develop O&M Manual for Municipal Storage Yard Practices.			Draft O&M manual completed, staff working on finalizing.
	6.2a 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.			Draft O&M manual completed, staff working on finalizing.