



Illinois Environmental Protection Agency

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Bureau of Water • 1021 North Grand Avenue East • 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, 2016 To March, 2017

Permit No. ILR40

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

Name: Village of Melrose Park

Mailing Address: 1000 N. 25th Avenue

County: Cook

City: Melrose Park

State: IL

Zip: 60160

Telephone: (708) 343-4000

Contact Person: Mike Carpanzano

Email Address: _____

(Person responsible for Annual Report)

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

Village of Melrose Park

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 ☐

4. Construction Site Runoff Control ☐

2. Public Participation/Involvement ☐

5. Post-Construction Runoff Control ☐

3. Illicit Discharge Detection & Elimination ☐

6. Pollution Prevention/Good Housekeeping ☐

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))

Mike Carpanzano
Owner Signature:

6-1-17
Date:

Mike Carpanzano

Superintendent of Sewer and Water

Printed Name:

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

IL 532 2585

WPC 691 Rev 6/10

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

SECTION A. CHANGES TO BEST MANAGEMENT PRACTICES

X Indicates BMPs performed as proposed

√ Indicates changes to BMPs

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

SECTION B.

STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

The status of BMPs and measureable goals from year 3 are described below in the following categories (A-F):

A: PUBLIC EDUCATION AND OUTREACH

A.1: Distributed Paper Material

The Goal for this program is to increase the awareness to impacts of stormwater discharges on water bodies and the actions the public can take to reduce discharge of pollutants, as well as discharge overall.

Goal for Year 3: Include information regarding storm water awareness.

Status: 3 Articles about storm water issues, recycling, water usage, pollution prevention, etc. were included in the Village's newsletter, entitled "The Rose." The newsletters also advertise Village-wide "Clean-ups, which includes river bank clean-up. The newsletter is mailed to all 23,000 residents and is also available at Village Hall for pickup. Green infrastructure strategies are being researched and will be included in future publications. The intent is to reach out to all residents of all ages.

A.6: Other Public Education

The Goal for this program is to increase the awareness of impacts of stormwater discharges on water bodies and the actions the public can take to reduce discharge of pollutants as well as discharge overall. Additionally, Green infrastructure awareness is to be provided.

Goal for Year 3: Design webpage and post information.

Status: The Village listed information about street sweeping and garbage collection on its website, as well as the Combined Sewer Overflow program.

The Village also included a link to SilverCreekWatershed.com which includes an elaborate watershed resource plan, an approved plant list, as well as other informative topics regarding Silver Creek.

The Village was unable to include a section entitled "Stormwater Information", but plans to do so as soon as funds are available to update the website. This section will contain background information regarding the NPDES Phase II Stormwater Program (MS4s) as well as a link to the EPA MS4 website: www.epa.gov/npdes/npdes-stormwater-program. This link will also include background information regarding Green Infrastructure strategies. It is planned to expand the "Stormwater Information" section in the upcoming period by including the Notice of Intent Permit and Annual Reports.

The website is maintained by the Village Manager's office. The intent is to reach out to all residents of all ages.

B: PUBLIC PARTICIPATION/INVOLVEMENT

B.3: Stakeholder Meeting

The Goal for this program is to facilitate resident participation and involvement, thereby increasing resident empowerment and responsibility. Through this partnership, the residents can be utilized as a resource in the Storm Water Program.

Goal for Year 3: No milestone goal established.

Status: The Village hosted a "Silver Creek Watershed Planning Meeting" to include upstream stakeholders as well as residents and officials of the Village. Approximately 20 people attended the meetings. Furthermore, the

Silver Creek Committee hosts a semiannual meeting each Spring and Fall, with the primary focus of its discussions regarding Water Quality.

B.5: Volunteer Monitoring

The Goal for this program is to facilitate resident participation and involvement, thereby increasing resident empowerment and responsibility. Through this partnership, the residents can be utilized as a resource in the Storm Water Program.

Goal for Year 3: Research various commitments and feasibility of a volunteer based annual clean up program.

Status: This reporting period, the Village sponsored the semiannual Silver Creek Cleanup. The event is advertised in the Village's publication "The Rose." Village forces participated in the cleanup together with the volunteers. The cleanup was held in both April and October, which included 40 people and a removal of 60 bags of debris!

B.7 Other Public Involvement

The Goal for this program is to facilitate resident participation and involvement, thereby increasing resident empowerment and responsibility. Through this partnership, the residents can be utilized as a resource in the Storm Water Program.

Goal for Year 3: Research various products associated with the stencil program, conduct outreach to determine volunteer pool.

Status: All lids installed on the Projects listed in section F of this report (approximately 50 in total) contained the labeling. The stencils are still pending purchase by Public Works, as soon as funds are available. With the labels in place, the public can more easily partner with the Village in monitoring any suspicious discharges into storm sewers.

C: ILLICIT DISCHARGE DETECTION AND ELIMINATION

C.1: Storm Sewer Map Preparation

The Goal for this program is to develop a map of storm sewers and their outfalls.

Goal for Year 3: Review existing atlas and confirm accuracy.

Status: The Storm Sewer map is continually updated each Construction season by Hancock Engineering. Any additional outfalls or revisions to existing outfalls are added to the map. The map has been revised this past winter. All discharges into the Des Plaines River within the Village Limits are shown on the map.

C.2: Illicit Discharge and Dumping Ordinances

The Goal for this program is to reduce and eliminate all illicit discharges and illegal dumping into the storm sewer system.

Goal for Year 3: Conduct in-depth review of existing Village illegal dumping ordinances.

Status: The Illicit Discharge and Illegal Dumping Ordinance with penalties remains in place, per Village Code Chapter 13.12. This was recently revised in accordance with Combined Sewer Overflow (CSO) requirements. The Village has also begun review of the recently effective Cook County Watershed Management Ordinance (WMO) which contains language and authority regarding this matter. If additional requirements or more stringent penalties are found within the WMO, they too will be adopted. The draft WMO contained language regarding enforceable requirements for the prompt reporting to the MS4 of all releases, spills and other unpermitted discharges to the separate storm sewer system. The final version will be reviewed to ensure similar content is included.

C.7: Visual Dry Weather Screening

The Goal for this program is to determine the amount of illegal discharges which are occurring within the Village.

Goal for Year 3: Inspect and document all storm sewer outfalls.

Status: The outfalls were inspected periodically by Public Works staff. No illicit discharges or extraordinary substances was discovered, nor fish kills or color changes, etc. A form has been created for use in the upcoming reporting period to record the inspections of all outfalls on an annual basis.

Based on the current Village inventory, currently there are approximately 900 industrial and commercial facilities. No violations were reported or inspected at these locations. Approximately 35 facilities were inspected amongst 14 available Village inspectors, on an annual basis.

C.9: Public Notification

The Goal for this program is to make the public aware of the penalties for illegal discharge and discourage illegal discharge.

Goal for Year 3: Update the website and newsletter with a schedule of monetary fines and penalties for illegal discharge.

Status: One (1) of the quarterly newsletters contained this information.

C.10: Other Discharge Controls

The Goal for this program is to ultimately reduce and eliminate all illicit discharges and illegal dumping into the storm sewer system.

Goal for Year 3: Create list of existing programs and review opportunities for expansion.

Status: The Village of Melrose Park has maintained its membership in the West Cook County Solid Waste Agency (WCCSWA). The WCCSWA offers many beneficial recycling programs to its members through funding by county grant monies, with no direct costs to the residents. The entire program including other member communities has yielded 230,000 lbs. of electronic waste in the past six months. Additionally, another opportunity to properly dispose of electronics is held at local area community college, Triton College twice yearly. Annual events hosted by the WCCSWA this year were Paint Recycling and Medication Waste Disposal. The Medication Waste Disposal yielded a quantity of 8-55 Gallon drums of waste! The Paint Recycling event was hosted in Oak Park, and data will be provided for next reporting period. In the past, an annual Household Hazardous Waste event was held, which received over 3,000 vehicles who deposited waste. Unfortunately, due to funding cutbacks, the County has no longer been able to provide funding for this program. We look forward to the reinstatement of this program. In the meantime, a long term Hazardous Waste collection program is available in Naperville for the surrounding areas.

An electronics drop off was initiated on January 1st of 2012 and continued to date. Approximately 50 loads have been collected and properly disposed of to date.

D: CONSTRUCTION SITE RUNOFF CONTROL

D.1: Regulatory Control Program

The Goal for this program is to submit erosion and sediment control plans for all developments greater than or equal to one acre in size to the IEPA.

Goal for Year 3: Identify all development plans that require a NOI for Construction Activities as part of the site plan review process, and perform review.

Status: Development plans that require a NOI for Construction Activities under NPDES permit No. ILR10 are identified by the Village Engineer as part of the site plan review process. The erosion and sediment control plans are reviewed by the Building Department and/or Hancock Engineering during the site plan review process. For IDOT projects, a Stormwater Pollution Prevention Plan is also required for developments of this size and the Contractor is also required to sign the Contractor's Certification Statement (IDOT BDE 2342), of which he will then assume the responsibility and release the Village from liability. During this reporting period, 6 development plans were reviewed, 4 of which were below 1 acre in size, thereby exempt from the requirements listed above. The 2 larger developments were reviewed for compliance of their erosion control plans and NOI permits. The economic slowdown has limited the amount of development and also decreased the size. Also, Village Code indicates erosion and sediment control requirements.

Also, within the erosion and sediment control plans, the type of inlet filters required on construction projects has been revised to reflect the recent update to the Illinois Urban Manual. The use of hay bales is considered obsolete, and the new method of reusable sediment trap filters is more effective and efficient. Hancock Engineering attended a detailed presentation on this matter by the Kane-Dupage Soil and Water Conservation District. The presentation provided further information regarding Green Infrastructure storm water management techniques. The use of the new inlet filters is considered to be a Green method. We look forward to including additional Green methods in the upcoming reporting periods.

D.2: Erosion and Sediment Control BMPs

The Goal for this program is to investigate and inspect the erosion and sediment control measures in public projects as part of developments greater than 1.0 acre.

Goal for Year 3: Perform and document inspections for erosion and sediment control measures as stated in "Measureable Goals".

Status: This reporting period, approximately 12 single family home projects were inspected by the building department or Hancock Engineering with respect to erosion and sediment control measures, however none of which were greater than 1 acre. All projects were found to be in compliance. For Public Projects, typically Hancock Engineering provides construction site inspection. There are approximately 9 inspectors in total between the Village and Hancock Engineering who perform erosion control inspections. Hancock Engineering attended an NPDES Compliance seminar led by CPESC speakers, in order to learn further about erosion and sediment control measures. This information obtained will be shared with the Village. Additionally, a Designated Erosion Control Inspector (DECI) was added to staff, in an effort to further improve the quality of Erosion Control inspection.

D.3: Other Waste Control Program

The Goal for this program is to ensure excavated materials are inspected, classified, and then delivered to the appropriate dumping facility based on the determined classification of waste.

Goal for Year 3: Review updates to IEPA rules regarding Clean Construction and Demolition Debris (CCDD).

Status: Effective August 2010, the IEPA has placed more stringent requirements regarding the excavation of soils from construction sites. In order for the Contractor to utilize Clean Construction and Demolition Debris (CCDD) landfills, the excavated material must be certified and tested by a Licensed Professional Engineer, as stated in EPA Form LPC 663. Furthermore, the IEPA is required to be notified by the landfill whenever material is delivered and discovered to not be acceptable CCDD fill and thereby rejected from the landfill. This process, including the established penalties in place, help ensure that the materials will then be delivered to an appropriate facility. For the next reporting period, it is anticipated that the mentioned requirement will be required by the Village Engineer to be provided as a General Note on all Construction Plans.

D.5: Public Information Handling Procedures

The Goal for this program is to track the number of complaints received and processed related to soil erosion and sediment control.

Goal for Year 3: Organize a filing system to track the erosion and sediment control complaints.

Status: The Village currently keeps record of all of the public works directed complaints. The department is attempting to assemble a filing system to better categorize the complaints. Once this system is implemented, the specific complaints to erosion and sediment control can be reviewed and the input provided can be of value. A form has been created in order to keep record of the complaints. The amount of complaints can then be tallied as well.

D.6: Site Inspection/Enforcement Procedures

The Goal for this program is to ensure 100% of all private construction sites are inspected for 100% of the required erosion and sediment control BMPs.

Goal for Year 3: Inspect all site work in the grading phase, building phase, and for a Final Inspection.

Status: Typically the Building Department is responsible for inspecting private projects in the Grading Phase, Building Phase, and for a Final Inspection. The inspections are performed upon notification of completion of the phase, by the Contractor. No violations or enforcement actions have been reported. Approximately 5 sites were inspected. A Certificate of Occupancy will not be granted unless the inspection is approved. 5 sites were approved without incident.

E: POST-CONSTRUCTION RUNOFF CONTROL

E.2: Regulatory Control Program

The Goal for this program is to enforce the Cook County Watershed Management Ordinance (WMO) and adopt any amendments.

Goal for Year 3: Implement Cook County WMO, coordinate and compare existing Village ordinances with the WMO.

Status: Public review concluded on December 31, 2009, and the WMO became effective on May 1, 2015. The WMO contains restrictions on the quality of water to be permitted to be discharged from developed sites. The Village will continue to review the new ordinance within the next reporting period.

E.3: Long Term O&M Procedures

The Goal for this program is to include Green measures in future developments.

Goal for Year 3: Research various Green construction methods and review feasibility.

Status: The Village is in the process of learning about Green construction methods and how they can be applied to the urban characteristics of the Village, with the intent of introducing requirements for such.

The Village is looking into the feasibility of certain Green BMP strategies and how to appropriately apply them to future Village projects. Upon developing a strategy (or various strategies), the Village can then move forward and implement them. This will be elaborated and discussed in further detail in the next reporting period. Various pilot programs in the neighboring communities can provide "lessons learned" which are valuable in order to save costs and eliminate issues in potential future projects.

Approximately 100 Trees were planted by the Village this reporting period, as the typical quantity.

E.6: Post Construction Inspection

The Goal for this program is to inspect construction sites periodically after final acceptance, to ensure that all BMPs contained in the plans are maintained in place. This will also entail inspection of Green construction methods in future developments.

Goal for Year 3: Inspect 50% of all sites on an annual basis, ensure that stormwater BMPs are working appropriately.

Status: The Village should inspect 100% of sites on an annual basis. This will be implemented in upcoming reporting periods, upon removal of budgetary restrictions. The Village would like to inspect the various aspects of storm water improvements and Green construction wherever within the Village jurisdiction, which were called for in the original construction plans. Currently, the Village has been performing Post Construction Inspection wherever complaints have been presented or an observed issue was noted. As a preventative measure, the Village should inspect sites which are not initially deemed to be a problem. For example, an inspection of a catch basin restrictor can provide information if the restrictor is in working order and providing the drainage as designed.

F.1: Employee Training Program

The Goal of this program is to identify current practices that contribute to stormwater pollution and implement programs and procedures for Public Works activities that reduce and eliminate the discharge of pollutants into storm sewer systems.

Goal for Year 3: Continue training program as well as incorporate Green/Sustainability education.

Status: Village employees have attended seminars and field training sessions. The Village's insurance carrier conducts annual seminars with video training for the entire Public Works Department for Trenching & Shoring, and Vactor Cleaning. A certificate of completion is issued and is kept on file. The Director of Public Works attended a Stormwater Training Seminar hosted by Lorman Technologies. A certificate is kept on file. 3 Public Works employees also attended a class regarding the proper procedures of plumbing and the effects of such on the Village sewer system.

F.2: Inspection and Maintenance Program

The Goal of this program is to directly reduce the amount of debris from entering storm sewer structures and entering the storm sewers.

Goal for Year 3: Continue street sweeping program and sewer cleaning / structure cleaning program.

Status: The Village acknowledges that the street sweeping and structure cleaning program improves the quality of the storm sewer discharge into the creek and river. This program utilizes the labor force of Public Works to maintain streets and drainage structures within the public right-of-way. Streets are swept daily with the exception of Wednesday, when maintenance is performed on the sweeper. For organizational purposes, the Village is divided into 8 zones. 4 zones are swept each week including alleys. This results in each curb line being swept every other week. The sweeping season is from April 1st to December 1st. Additional sweeping is performed between December 1st and April 1st when weather allows and per special request. Approximately 6 tons per day are removed for a total of nearly 1,000 Ton per year. Approximately 51 miles of curb line sweeping occurs over the course of a year. The sweeping is increased during the fall season, and strategically scheduled to follow behind the leaf machine so as to minimize the amount of spilled leaves. Additionally, targeted commercial areas that are known to have a greater amount of debris and litter are swept at a higher frequency. The leaf machine captures approximately 10 Cubic Yards per week during the fall season. The Village proudly serviced 600 drainage structures with their vactor truck last reporting period. The Village televised approximately 2,500' of sewer this reporting period.

Another relevant operation which was performed was the "Small Streams" debris removal program, as carried out by the MWRD. The purpose of this program is to remove as many obstructions as possible from our local waterways. This large scale operation of the MWRD removed approximately 200 Cubic Yards of debris from Silver Creek at an average cost of \$106.00 per Cubic Yard.

The MWRD typically cleans the Creek twice a year and for other special circumstances.

F.3: Municipal Operations Storm Water Control

The Goal of this program is to directly reduce the amount of contaminants entering the storm sewer system, as a result of municipal operations.

Goal for Year 3: Review existing program and develop strategy to implement additional relevant measures.

The Village of Melrose Park provides a storage facility for its salt. The salt is kept within controlled bins. The application of the salt to streets has been kept at a minimum and diluted with sand. Approximately 800 Ton of salt were applied to the streets this past year. Sand is used in emergency situations. Additionally, approximately 600 Gallons of Beet Juice were used when possible, primarily applied to the main thoroughfares.

The Village of Melrose Park also has a strict schedule of frequent maintenance on its fleet of Village vehicles through the use of its subcontractor, in order to reduce the amount of unnecessary discharge of automotive fluids. This program will be continued. Triple Basins in garage areas are continuously inspected and cleaned twice a year. The maintenance yard is inspected on an as-needed basis, with a thorough inspection of sewers twice yearly. Maintenance is performed accordingly.

30 gallons of pesticides and herbicides were applied throughout the Village by staff. The targeted locations are typically vacant lots and overgrown areas. The specified mix ratio of 1:10 is strictly followed. True Green is also contracted to perform additional work of this nature.

Assessment of Appropriateness of Identified BMPs (and Progress Towards a Reduction in Pollutants Discharged)

The BMPs listed below provided pertinent results with regard to their effectiveness in meeting their measureable goals and reducing pollutant discharge, within this reporting period. All other BMPs which are omitted either did not provide an affirmative result this period (either positive or negative), or need more time to be observed in order to fairly judge their effectiveness. An in depth analysis of all BMPs is scheduled for the end of the 5 year period.

A.1 Distributed Paper Material Resident input regarding the newsletters is taken into account, when received. It is difficult to attribute a decrease in pollutants directly to the newsletters, so the most appropriate way to determine the effectiveness of a newsletter article is from Resident input at Village Hall.

B.5 Volunteer Monitoring An unintended, positive result of trash removal was Public Education. In addition to the reduction of pollutants, many residents were able to become more knowledgeable about the Storm Water System and were able to pass this information along to their neighbors. This finding can be incorporated in the future as an Outreach Strategy.

B.7 Other Public Involvement Public Works employees and Village officials reported that an increase in resident discussion occurred regarding the stencils and lids. This supports the fact that stormwater awareness is on the rise, which leads to the ultimate goal of increasing resident involvement. The strategy is to incorporate as many residents as possible.

C.7 Dry Weather Screening The goal of the Illicit Discharge Detection and Elimination category is to reduce and eliminate all illegal discharges. There have been nearly zero illicit discharges reported or prosecuted in the Village. This may or may not be attributed to the effectiveness of the storm water program. In order to support this fact that the program is successful and to increase confidence that no illegal discharges actually occurred, further inspection should be performed. It is anticipated that most of the additional inspection will be performed by residents who have gained a greater awareness of the storm sewer system. They in turn will communicate directly and indirectly with Village staff. Village staff should also increase the amount of inspections, when possible. This relationship between the program and the amount of illegal discharges will be evaluated in depth at the end of the 5 year period.

C.10 Other Discharge Controls The goal of this BMP category is a reduction of contaminants. It is unknown whether the reduction would take place primarily at a landfill, within Village boundaries, or a location within transit. The primary source-point needs to be investigated further in order to effectively gauge the program. The electronics recycling is assumed to reduce the amount of mercury. At this time, the Village does not have funding to perform mercury detection tests as a program gauge, but try to obtain data from other testing entities.

D.1 Regulatory Control Program The goal of this BMP category is to reach 100% compliance for NOI submittal of development projects that are 1.0 acre or greater. Unfortunately, with the recent economic downturn there are not many developments being planned for. Also, due to the urban nature of the Village, most developments are on property that is less than 1.0 acre in size.

However, when this BMP is indeed applicable, we believe it will be quite effective by placing the responsibility on the Contractor (Contractor's Certification Statement), and should decrease the amount of erosion control/pollutant discharge deficiencies. The amount of penalties given to Contractors, if any, will be tabulated and evaluated at the end of the 5 year period, with the assumption of a decrease.

D.5 Public Information Handling Procedures

This BMP will require several years of data collection in order to establish a benchmark. At that time, this BMP will be useful in order to evaluate the Construction Site Runoff Control category. The input from residents can be reviewed to determine if positive and beneficial changes can be made to the program. Also, the amount of complaints received will be analyzed. Ideally, a correlation between the increase/decrease of the amount of complaints and the effectiveness of the program, will be able to be observed.

E.1: Community Control Strategy

This BMP will be analyzed in future reporting periods with respect to the volume of contamination which is mitigated, as well as the quantity of pollutants removed from the storm sewer system.

E.3: Long Term O&M Procedures

An apparent challenge for this BMP is being able to apply the Green Infrastructure strategies to an already developed urban area. The majority of foreseeable Green improvements would come by way of “retro-fit”, as opposed to the ease of installation in a new development. Some of the retro-fit options we have been identified at this point are permeable pavers, tree-box biofilters, stand alone biofilters, rain gardens, rain barrels, and bioswales. At this point, the costs need to be fully evaluated, as well as an implementation schedule and associated requirements. The aesthetic concerns of a retro-fit are also to be reviewed. Another challenge is that when using a new technology, unfortunately there is a risk involved. Therefore, other pilot programs and case studies in the area need to be reviewed, while drawing as much pertinent data from them as possible.

E.6: Post Construction Inspection

This BMP will include strict inspection of Green construction methods in upcoming reporting cycles. Currently, Hancock Engineering is sharing basic information with the Village regarding Green methods. Over time, the Village inspectors should become more knowledgeable and experienced in this type of inspection. Another desired outcome of Post Construction Inspection is that word will spread amongst property owners to keep their storm systems working as designed, due to the fact that the Village will be performing future inspections and keeping tabs on the condition of the proposed improvements over time.

SECTION C. INFORMATION AND DATA COLLECTION

The Village relies on rain gauge information taken from the nearest rain gauge of the MWRD. The MWRD Rain Gauge No. 5 is located in nearby Cicero, IL. The rain gauge data is provided on the MWRD website at <http://www.mwrdd.org/irj/portal/anonymous/overview> and can be reviewed by clicking on the link entitled "Rain Data History."

Water quality testing is performed by the MWRD along the Des Plaines River on an annual basis. The MWRD generates a Water Quality Report, which is made available to the public on its website. The link to the website is: <http://www.mwrdd.org/irj/portal/anonymous/WQM>

The report contains a wide range of testing as well as a detailed analysis. The relevant data from the immediate vicinity of the Village of Melrose Park includes a quantity of approximately 12 samples which were taken at a location both upstream and downstream from the Village of Melrose Park's outfalls on the Des Plaines River.

SECTION D. NEXT REPORTING CYCLE - SUMMARY OF ACTIVITIES TO BE UNDERTAKEN

The Village of Melrose Park intends to pursue the milestones outlined for Year 4 in the 2014 Notice of Intent (NOI) Permit Renewal, with the exception of those discussed in "Assessment of Appropriateness of Identified BMPs (and Progress Towards a Reduction in Pollutants Discharged)", which are to be revised as such.

SECTION E. NOTICE OF RELIANCE UPON OTHER GOVERNMENTAL ENTITIES

The Village of Melrose Park relied upon the MWRD in conjunction with the newly effective Cook County Watershed Management Ordinance (WMO). The District's Board of Commissioners adopted the Watershed Management Ordinance (WMO) on October 3, 2013, and became effective on May 1, 2014. The WMO addresses numerous MS4 Permitting BMP requirements and acts as an additional regulatory mechanism to keep the MS4 program on track. Specific BMPs which are relied upon from the WMO will be discussed in future reporting.

SECTION F.

CONSTRUCTION PROJECTS PERFORMED DURING THE REPORTING PERIOD

[illegible]