

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

CITY OF URBANA, ILLINOIS  
NPDES Permit No. ILR 400462

**REPORTING PERIOD:**

April 1, 2022 through March 31, 2023

**MS4 OPERATOR INFORMATION:**

City of Urbana, Illinois  
706 Glover Avenue  
Urbana, Illinois 61802  
(217) 384-2342  
Tim A. Cowan, Director of Public Works

**GOVERNMENTAL ENTITY IN WHICH MS4 IS LOCATED:**

Urbana, Illinois

**INTRODUCTION/BACKGROUND:**

The 1987 amendments to the Clean Water Act required the United States Environmental Protection Agency (USEPA) to address stormwater runoff in two phases. Phase I of the National Pollution Discharge Elimination System (NPDES) Stormwater Program became effective in 1990. Phase I of the NPDES Stormwater Program applies to large and medium Municipal Separate Storm Sewer System (MS4) communities and eleven industrial categories including construction sites disturbing 5 or more acres of land. Phase II of the NPDES Stormwater Program became effective March 10, 2003 and applies to small MS4's and construction sites disturbing between 1 and 5 acres of land. Phase II also expands the industrial "no exposure" exemption from Phase I. The Illinois Environmental Protection Agency (IEPA) is responsible for implementing both phases of the NPDES Stormwater Program.

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

The six minimum control measures are:

1. Public Education and Outreach
2. Public Participation and Involvement
3. Illicit Discharge Detection and Elimination

4. Construction Site Runoff Control
5. Post-construction Runoff Control
6. Pollution Prevention and Good Housekeeping

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

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

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

The third NOI was submitted to IEPA on September 25, 2013. The City received its 2016-2021 ILR40 NPDES permit on February 10, 2016. The City continues to document and record all compliance efforts and report progress annually to IEPA. This document serves as the report for the activities in Year 7 of this permit.

#### **PERMIT COMPLIANCE ASSESSMENT:**

The City proposed forty-five (45) BMPs during Year 7 of its third MS4 permit to address the required minimum control measures. Not surprisingly, the COVID-19 Pandemic impacted the City's stormwater program. As a result, forty-two of the forty-five BMPs were fully implemented and three were only partially implemented.

For details regarding the implementation of BMPs for Year 7 of its third MS4 permit, please refer to **Attachment A – 2022 NPDES Stormwater Activity**.

#### **INFORMATION COLLECTED AND ANALYZED:**

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

#### **STORMWATER ACTIVITIES FOR YEAR 8 OF CURRENT PERMIT:**

For details regarding the City's proposed stormwater activities for Year 8 of the current permit cycle (April 1, 2023 to March 31, 2024), please refer to **Attachment B – 2023 Proposed NPDES Stormwater Activity**.

The City has engaged a consultant, Crawford, Murphy & Tilly, to create a Stormwater Master Plan. Work began in Year 4 and should be completed in Year 8 of the current permit cycle. The Stormwater Master Plan will focus on asset management and planning of future stormwater infrastructure, best management practices, and Stormwater Utility Fee programs. A technical advisory committee was formed to allow for input from public and private stakeholders.

**OTHER GOVERNMENTAL ENTITY RELIANCE:**

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

**YEAR 5 CONSTRUCTION PROJECTS & ADDITIONAL ACTIVITIES:**

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

- Bituminous Surface Treatment Maintenance Program
- Cedar Street Sanitary Sewer
- Pavement Patching 2022
- Sidewalk Improvements 2023
- Miscellaneous Sewer Repairs Project

Additional Activities

- Adopt Urbana Program – This program was temporarily suspended in 2022 due to the COVID pandemic, so 0 lbs. of trash were collected.

Respectfully submitted,



Tim A. Cowan, P. E.  
Director of Public Works  
Date: 5/31/2022

## ATTACHMENT A - 2022 NPDES STORMWATER ACTIVITY

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 7 MILESTONE	DESCRIPTION OF YEAR 7 ACTIVITIES
1.1	Public Education and Outreach	Distributed Paper Material	Distribute written materials which discuss proper disposal practices for household hazardous waste and stormwater pollution prevention efforts. The educational materials shall include information on the potential impacts and effects on storm water discharge due to climate change.	Distribute material via City website and have a brochure on stormwater pollution prevention available to the public at the Public Works facility.	Distribute written materials to the public. Update the City website as needed.	Maintained inventories of printed materials that discuss household hazardous waste and stormwater pollution prevention. Printed materials were available to the public at the Public Works Department Office and posted on the City website.
1.2	Public Education and Outreach	Speaking Engagement	Be available for speaking engagements to business groups, service clubs, developers, engineers/architects, contractors, and neighborhood groups about stormwater management, green infrastructure, and water pollution prevention measures.	Speak at group engagements when requested.	Be available to speak at group engagements when requested.	No speaking requests were received.
1.3	Public Education and Outreach	Public Service Announcement	Broadcast Public Service Announcement regarding sustainable stormwater, green infrastructure, or water pollution prevention measures. PSA or videos will be broadcast on public television or on local radio stations.	Broadcast at least one Public Service Announcement annually.	Broadcast at least one Public Service Announcement (PSA).	"After the Storm," a video about water quality, was shown at least one time on Urbana's public access television channel. Stormwater management tips were presented in the biannual "Better Homes and Gutters" newsletter.
1.4	Public Education and Outreach	Community Event	Hazardous material drop-off day for recycling hazardous household waste.	Apply for funding when grant rounds are announced by the IEPA and if successful conduct drop-off days.	Apply for funding if grant is announced and if successful conduct drop-off days.	A household hazardous waste event was held on Saturday April 9, 2022.
1.5	Public Education and Outreach	Community Event	Provide information on City website regarding how to safely and securely dispose of expired or no longer needed prescription medication.	Operate medication take back program annually.	Operate medication take back program annually.	Provided information on City website regarding how to safely and securely dispose of expired or no longer needed prescription medication.
1.6	Public Education and Outreach	Classroom Education Material	Be available to schools for tours / demonstrations of facilities and equipment to provide students an opportunity to become familiar with Urbana's efforts to prevent stormwater pollution and promote sustainable stormwater management.	Be available to speak to classes when requested.	Be available to speak to classes when requested.	No speaking engagements were requested during the reporting period.
1.7	Public Education and Outreach	Classroom Education Material	City will provide credits on stormwater utility fees to educational institutions on an annual basis at a rate of \$5 per student for providing instruction in stormwater management, green infrastructure, or water pollution prevention in accordance with an approved curriculum by the City.	Offer stormwater education credit annually	Offer stormwater education credit annually.	Stormwater education credits are currently included in the credit and incentive program. The Urbana School District has not participated in the program to date.
1.8	Public Education and Outreach	Other Public Education	Maintain and update City stormwater website highlighting sustainable stormwater, green infrastructure, and water pollution prevention measures.	Maintain website and update annually	Update City website as needed.	The City website has been updated with the latest information on sustainability, green infrastructure, water quality and climate change.
1.9	Public Education and Outreach	Other Public Education	Improve communications between Urbana staff and residents adjacent to City projects to keep residents informed of project progress. Publicize and staff a phone line for residents to report sewer problems and follow up with resident reports.	Contact all residents adjacent to projects at the beginning and end of projects. Follow up a minimum of once after sewer problems have been reported. BMP will be implemented on an as-needed basis.	Initiate residential communications during projects. Record and follow-up on sewer complaints.	Communicated project progress to residents are included in any ongoing projects. Projects were posted on City website.
2.1	Public Participation & Involvement	Public Panel	Form a Sustainability Advisory Commission to assist the mayor and city council in identifying the highest priorities for city government and citizens to achieve sustainable management of natural resources (water and energy in particular) and recommend goals to achieve a workable means to reach these goals.	Hold monthly meetings	Hold monthly meetings.	The Sustainability Advisory Commission met 9 times during the reporting period. A list of the meeting dates and agenda items are posted on the City's website.
2.2	Public Participation & Involvement	Stakeholder Meeting	Participate in Salt Fork Watershed Implementation Committee.	Attend committee meetings.	Attend committee meetings.	The City attended three of the four meetings held during the reporting period.
2.3	Public Participation & Involvement	Program Involvement	On-going committee meetings of the Cooperating MS4s (City of Urbana, City of Champaign, Village of Savoy, Champaign County, and University of Illinois) to discuss NPDES Phase II requirements. The group identifies as the Champaign County Stormwater Partnership (CCSWP) and maintains a website, www.ccstormwater.org.	Participate in quarterly CCSWP meetings.	Participate in quarterly CCSWP meetings.	The City participated in the quarterly CCSWP meetings. Agendas and Minutes are on file at Public Works Engineering Division.
2.4	Public Participation & Involvement	Other Public Involvement	Sponsor and promote a community creek clean-up event.	Sponsor one community creek clean-up event annually.	Sponsor one community creek clean-up event.	The 2022 annual community-wide Boneyard Creek Community Day was held on April 9th, 2022.
2.5	Public Participation & Involvement	Other Public Involvement	Provide a minimum of one public meeting annually for the public to provide input as to the adequacy of the City's program.	Hold annual meeting for public input.	Hold meeting.	A Technical Advisory Committee was assembled for the Stormwater Asset Management Plan, and a meeting was held on March 16, 2023
2.6	Public Participation & Involvement	Other Public Involvement	Identify environmental justice areas within the City and provide information to the public.	Provide information on City website and discuss at Stormwater Public Meeting.	Post information on website and discuss at annual meeting.	Environmental Justice Areas have been identified and posted on the City Website. No discussion occurred.
3.1	Illicit Discharge Detection & Elimination	Sewer Map Preparation	Update storm sewer system map annually.	Review and update map annually.	Update storm sewer map.	City storm sewer maps were regularly updated with information reported by the Operations Division, Engineering field crews and through various projects.
3.2	Illicit Discharge Detection & Elimination	Regulatory Control Program	Enforce illegal discharge and illegal dumping ordinances.	Enforce illegal discharge and illegal dumping ordinances.	Enforce illegal discharge and illegal dumping ordinances.	City illegal discharge and illegal dumping ordinances were enforced.

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 7 MILESTONE	DESCRIPTION OF YEAR 7 ACTIVITIES
3.3	Illicit Discharge Detection & Elimination	Detection/Elimination Prioritization Plan	Investigate public and sewer operations staff reports of illicit discharges.	Staff phone line for residents to call and report complaints. Respond, investigate and document each report.	Staff phone line/monitor website complaint form and document any reported illegal discharges or connections.	Administrative/operations/engineering staff were available to record and respond to reports of illicit discharges. Seven illicit discharge inquiries were investigated.
3.4	Illicit Discharge Detection & Elimination	Illicit Discharge Tracing Procedures	Utilize field investigations including sewer televising and dye testing to investigate any illegal discharges reported by the public.	Investigate all illegal discharges reported by the public and sewer operations staff utilizing sewer televising and dye testing to determine if an illegal discharge has occurred or an illegal connection exists.	Investigate all reported illegal discharges or connections.	City Staff investigated seven illicit discharge reports.
3.5	Illicit Discharge Detection & Elimination	Illicit Source Removal Procedures	Facilitate the disconnection of illegal connections from City owned storm sewers.	Facilitate the disconnection of illegal connections from City owned storm sewers, on an as-needed basis.	Disconnect all identified illegal connections from the storm sewer system.	No illegal connections to the storm sewer system were identified.
3.6	Illicit Discharge Detection & Elimination	Program Evaluation and Assessment	Form an internal Phase 2 committee to meet and review NPDES Phase 2 illicit discharge program, and implement changes if needed.	Meet annually to review program, and recommend and implement changes if necessary.	Conduct annual meeting.	<b>A smaller subset of the committee met regularly during the reporting period due to staffing issues and the COVID-19 pandemic.</b>
3.7	Illicit Discharge Detection & Elimination	Program Evaluation and Assessment	Prepare an Annual Sewer Activity Report for the Urbana-Champaign Sanitary District documenting all sanitary sewer activity and Phase 2 activities.	Submit annual report to the Urbana-Champaign Sanitary District	Submit annual report.	The Annual Sewer Activity report was completed and submitted to the Sanitary District.
3.8	Illicit Discharge Detection & Elimination	Visual Dry Weather Screening	Visual inspection of outfalls during dry weather. If needed, perform water quality sampling on suspicious discharges at outfalls.	Inspect storm outfalls once per year during dry weather periods. Perform water quality sampling on suspicious discharges on as-needed basis.	Visually inspect storm outfalls discharging to state waterways.	<b>Due to the weather conditions and staffing reductions, we were unable to float the Saline Branch. Staff was able to walk the Boneyard Creek, as well as inspect the St Joseph Drainage Ditch and the McCullough Creek outfall.</b>
3.9	Illicit Discharge Detection & Elimination	Public Notification	Develop, publicize, and staff a hotline for residents to report illegal discharges.	Daily staffing of existing illegal discharge hotline.	Staff illegal discharge hotline.	Administrative/operations/engineering staff were available to record and respond to resident complaints. Publicizing efforts are ongoing.
3.10	Illicit Discharge Detection & Elimination	Other Illicit Discharge Controls	Inspect each new development to inspect for illegal connections.	Inspect each development. Number of inspections dependent on number of developments.	Inspect each new development as warranted.	The Building Safety Division of Community Development and the Engineering Division of Public Works inspected building and site construction activities for single-family residential, multi-family residential, commercial, industrial, and institutional development during the reporting period.
4.1	Construction Site Runoff Control	Regulatory Control Program	Enforce erosion and sediment control ordinance.	Enforce erosion and sediment control ordinance.	Enforce erosion and sediment control ordinance.	The City's erosion and sediment control ordinance was enforced during reporting period.
4.2	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Distribute and update Erosion/Sediment Control Standard Practice Manual.	Distribute and update Erosion/Sediment Control Manual of Practice.	Distribute and update Erosion/Sediment Control Manual of Practice as needed.	The most recent Erosion/Sediment Control Manual of Practice is posted on the City website for public access.
4.3	Construction Site Runoff Control	Other Waste Control Programs	Enforce construction site waste regulations in erosion and sediment control ordinance.	Enforce construction site waste regulations in erosion and sediment control ordinance.	Enforce construction site waste regulations.	Construction site waste regulations were enforced as part of the erosion control permit program.
4.4	Construction Site Runoff Control	Site Plan Review Procedures	Review erosion control plans submitted by developers for each project.	Complete review of each soil erosion and sediment control plan, on as-needed basis. Perform field inspection.	Review EC plan of each project submitted.	The Engineering Division conducted reviews of all erosion control plans submitted. The Engineering Division also performed field inspections of all erosion control devices installed. Eight Class 1 and 77 Class 2 erosion control permits were issued in the reporting period.
4.5	Construction Site Runoff Control	Public Information Handling Procedures	Publicize and staff a hotline for residents to report soil erosion/sediment non-compliance. Follow through with resident complaints and take appropriate action against contractors, as needed.	Publicize and staff a hotline. Investigate complaints and take appropriate action on as-needed basis.	Staff a hotline, investigate complaints and take action as required.	Administrative/operational/engineering staff were available to record and respond to all soil erosion/sediment complaints. Appropriate actions were taken in accordance with the City's erosion and sediment control ordinance.
4.6	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Conduct construction site inspections.	Inspect all construction sites weekly or after rain events > 0.5 inches.	Conduct inspections weekly or after rain events > 0.5-inches.	Site inspections were conducted for all sites on a weekly basis or after a significant rainfall event.
5.1	Post-Construction Runoff Control	Community Control Strategy	Implement credit and incentive program utilizing stormwater fee funds to encourage sustainable on-site stormwater management and green infrastructure.	Provide credits and incentives to property owners to manage stormwater on-site utilizing green infrastructure and best management practices identified by the City's Stormwater Credit and Incentive Manual.	Budget \$15,000 for funding incentives.	Funds were budgeted for the incentives program. The City provided information on the incentives for rain barrels and rain gardens, but no applications were returned.
5.2	Post-Construction Runoff Control	Regulatory Control Program	Waiting for State guidance on regulatory control program. State is considering including volumetric standards as part of ILR-10 and ILR-40 permits.	City will monitor state progress on regulatory requirements and will comply with any regulatory requirements that the State adopts.	Monitor State progress on regulatory controls. Enforce storm water management requirements on new development and redevelopment.	The City continued to monitor State progress on regulatory controls. City has storm water management requirements in its Land Development and Subdivision Code.
5.3	Post-Construction Runoff Control	Long Term O&M Procedures	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual.	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual.	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual. Continue to require operation and maintenance agreements for new detention basins.	The City distributed materials regarding maintenance of items listed in the Credit and Incentive Manual. The Credit and Incentive Manual is also available on the City website for public access. City requires maintenance agreement for all new stormwater holding facilities. Agreement contains operation and maintenance procedures for stormwater holding facilities.

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 7 MILESTONE	DESCRIPTION OF YEAR 7 ACTIVITIES
5.4	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Review submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual regarding green infrastructure and post-construction BMPs.	Review all submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual.	Review all submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual on an as-needed basis. Review all storm water management plans for new development and redevelopment.	No incentive applications for green infrastructure were received in Year 7 of the current permit cycle. The Engineering Division reviews and approves all storm water management plans for new development. The City Public Works department proposed a Green Infrastructure Grant Program to the City Council for ARPA funds. It was not selected but other funding sources are being considered.
5.5	Post-Construction Runoff Control	Site Inspections During Construction	Inspect construction of green infrastructure and post-construction BMPs to verify proper installation in accordance with stormwater utility fee credit and incentive program.	Inspect the installation of all new green infrastructure and post construction BMPs as part of the credit and incentive program.	Inspect the installation of all new green infrastructure and post construction BMPs as part of the credit and incentive program on an as-needed basis. Inspect all new detention basins.	Engineering Division inspected detention basins during construction.
5.6	Post-Construction Runoff Control	Post-Construction Inspections	Inspect green infrastructure and post construction BMPs to ensure they are operating properly as part of the stormwater utility fee credit and incentive program.	Annual inspection of green infrastructure and post construction BMPs in order to qualify for credit on stormwater utility fee.	Inspect existing green infrastructure and stormwater BMPs. Inspect all existing detention basins on a 10 year cycle.	The City has begun inspection of existing detention basins and green infrastructure. Engineering Division completed 6 detention basin inspections in the reporting period and plans to inspect all detention basins (now numbering 178) on a five to seven year cycle or more often if needed.
6.1	Pollution Prevention & Good Housekeeping	Employee Training Program	Salt and calcium application training for snow plow applicators.	Conduct training annually for all snow plow operators.	Complete training session.	Due to the COVID pandemic, the annual snow training was completed in small groups periodically in September-October 2022. This replaced the traditional one-day large group training event.
6.2	Pollution Prevention & Good Housekeeping	Employee Training Program	Training for the abatement and containment of hazardous material spills.	Conduct annual training for 100% of firefighters.	Complete training session.	<b>Restrictions enacted due to the COVID pandemic prevented the City of Urbana Fire Department from conducting their annual Haz-Mat training for the abatement and containment of hazardous material spills.</b>
6.3	Pollution Prevention & Good Housekeeping	Inspection and Maintenance Program	Storm sewer cleaning.	Perform routine maintenance and cleaning of storm sewer system and catch basins on a systematic basis.	Clean 35,000 feet of storm sewer pipe and spend 100 hours cleaning inlets or manholes. Inspect 30,000 feet of storm sewer pipe and 75 manholes.	Money was budgeted in FY19-20, FY20-21, FY21-22, and FY22-23 will be combined with FY23-24 budget for a project involving the cleaning and inspection of larger diameter storm sewers.
6.4	Pollution Prevention & Good Housekeeping	Inspection and Maintenance Program	Street Sweeping.	Sweep central business district 20 times per year and residential and arterial streets 5 times per year, weather permitting.	Complete street sweeping.	Street sweeping occurred as scheduled. Approximately 4720 lane miles of streets and parking lots were swept. Leaves and other organic matter were sent to the Landscape Recycling Center for composting and trash was transported to an approved disposal facility.
6.5	Pollution Prevention & Good Housekeeping	Municipal Operations Waste Disposal	Control vehicle and equipment washing by performing all washes in enclosed washing bay that drains directly to sanitary sewer.	Wash public works vehicles and equipment as needed in enclosed bays which drain directly to sanitary sewer.	Use enclosed bay to wash all vehicles.	In accordance with City policy, all automobiles, vans, and trucks were washed in local commercial facilities where size allows. Larger trucks and equipment were washed inside the Public Works garages, which are equipped with oil and grease separators that discharge to the sanitary sewer or washed outside in the waste collection pit area, which drains to the sanitary sewer.
6.6	Pollution Prevention & Good Housekeeping	Municipal Operations Waste Disposal	Oil and fluid disposal program to recycle or dispose of oils and fuels by a licensed recycler or waste hauler.	Dispose of wastes via a licensed recycle or waste hauler.	Recycle or dispose of properly of oils and other motor vehicle fluids.	All fleet waste products were picked up and disposed of by Heritage-Crystal Clean. Manifests, invoices, and purchase orders are on file in the Fleet office at Public Works.
6.7	Pollution Prevention & Good Housekeeping	Other Municipal Operations Controls	Maintain "Snow & Ice Control Plan" procedure manual and update to document all procedures required for compliance with NPDES Phase 2.	Annual review and update of manual.	Complete review and update of manual.	The annual "Snow & Ice Control Plan" review was completed prior to the Sep-Oct 2022 small group training sessions, with only minor map route changes.
6.8	Pollution Prevention & Good Housekeeping	Other Municipal Operations Controls	Maintain fire departments hazardous spill response plan and update to comply with NPDES Phase 2.	Annual review and update of manual.	Complete review and update of manual.	Fire Department Haz-mat Response Plan was reviewed and updated as needed.

Note: In the "DESCRIPTION OF YEAR 7 ACTIVITIES" column, **bolded** items were only partially implemented.

## ATTACHMENT B - 2023 PROPOSED NPDES STORMWATER ACTIVITY

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 8 MILESTONE
1.1	Public Education and Outreach	Distributed Paper Material	Distribute written materials which discuss proper disposal practices for household hazardous waste and stormwater pollution prevention efforts. The educational materials shall include information on the potential impacts and effects on storm water discharge due to climate change.	Distribute material via City website and have a brochure on stormwater pollution prevention available to the public at the Public Works facility.	Distribute written materials to the public. Update the City website.
1.2	Public Education and Outreach	Speaking Engagement	Be available for speaking engagements to business groups, service clubs, developers, engineers/architects, contractors, and neighborhood groups about stormwater management, green infrastructure, and water pollution prevention measures.	Speak at group engagements when requested.	Be available to speak at group engagements when requested.
1.3	Public Education and Outreach	Public Service Announcement	Broadcast Public Service Announcement regarding sustainable stormwater, green infrastructure, or water pollution prevention measures. PSA or videos will be broadcast on public television, on local radio stations, through email newsletter, or presented through social media.	Broadcast one Public Service Announcement annually.	Broadcast one Public Service Announcement.
1.4	Public Education and Outreach	Community Event	Hazardous material drop-off day for recycling hazardous household waste.	Apply for funding when grant rounds are announced by the IEPA and if successful conduct drop-off days.	Apply for funding if grant is announced and if successful conduct drop-off days.
*1.5	Public Education and Outreach	Community Event	Provide information on how to safely and securely dispose of prescription medication.	Post information on how to locate prescription drug disposal sites in the Urbana-Champaign community on the City website.	Post information on how to locate prescription drug disposal sites in the Urbana-Champaign community on the City website.
1.6	Public Education and Outreach	Classroom Education Material	Be available to schools for tours / demonstrations of facilities and equipment to provide students an opportunity to become familiar with Urbana's efforts to prevent stormwater pollution and promote sustainable stormwater management.	Be available to speak to classes when requested.	Be available to speak to classes when requested.
1.7	Public Education and Outreach	Classroom Education Material	City will provide credits on stormwater utility fees to educational institutions on an annual basis at a rate of \$5 per student for providing instruction in stormwater management, green infrastructure, or water pollution prevention in accordance with an approved curriculum by the City.	Contact Urbana School District 116 regarding their utility fee and attempt to add stormwater management to their curriculum to qualify for the credit. Offer stormwater education credit annually.	Offer stormwater education credit annually.
1.8	Public Education and Outreach	Other Public Education	Maintain and update City stormwater website highlighting sustainable stormwater, green infrastructure, and water pollution prevention measures.	Maintain website and update annually.	Update City website.
1.9	Public Education and Outreach	Other Public Education	Improve communications between Urbana staff and residents adjacent to projects to keep residents informed of project progress. Publicize and staff a phone line for residents to report sewer problems and follow up with resident reports.	Contact all residents adjacent to projects at the beginning and end of projects. Follow up a minimum of once after sewer problems have been reported. BMP will be implemented on an as-needed basis.	Maintain residential communications during projects. Record and follow-up on sewer complaints.
2.1	Public Participation & Involvement	Public Panel	Have a sustainability advisory commission assist the mayor and city council in identifying the highest priorities for city government and citizens to achieve sustainable management of natural resources (water and energy in particular) and shall recommend goals to achieve a workable means to reach these goals.	Hold monthly meetings.	Hold monthly meetings.
2.2	Public Participation & Involvement	Stakeholder Meeting	Participate in Salt Fork Watershed Implementation Committee.	Attend committee meetings.	Attend committee meetings.

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 8 MILESTONE
2.3	Public Participation & Involvement	Program Involvement	On-going committee meetings of the Cooperating MS4s (City of Urbana, City of Champaign, Village of Savoy, Champaign County, and University of Illinois) to discuss NPDES Phase II requirements.	Participate in quarterly meetings.	Participate in committee meetings.
2.4	Public Participation & Involvement	Other Public Involvement	Community creek clean-up event.	Sponsor one community creek clean-up event annually.	Sponsor one community creek clean-up event.
2.5	Public Participation & Involvement	Other Public Involvement	Provide a minimum of one public meeting annually for the public to provide input as to the adequacy of the City's program.	Hold annual meeting/open house for public input.	Hold meeting/open house.
2.6	Public Participation & Involvement	Other Public Involvement	Identify environmental justice areas within the City and provide information to the public.	Provide information on City website and discuss at Stormwater Public Meeting.	Update information on website as needed and discuss at meeting.
3.1	Illicit Discharge Detection & Elimination	Sewer Map Preparation	Update storm sewer system map annually.	Review and update map annually.	Update storm sewer map.
3.2	Illicit Discharge Detection & Elimination	Regulatory Control Program	Enforce illegal discharge and illegal dumping ordinances.	Enforce illegal discharge and illegal dumping ordinances.	Enforce illegal discharge and illegal dumping ordinances.
3.3	Illicit Discharge Detection & Elimination	Detection/Elimination Prioritization Plan	Investigate public and sewer operations staff reports of illicit discharges.	Continue staffing phone line for residents to call and report complaints. Respond and investigate each report per plan.	Staff hotline, investigate illicit discharge reports and respond per plan.
3.4	Illicit Discharge Detection & Elimination	Illicit Discharge Tracing Procedures	Utilize field investigations including sewer televising and dye testing to investigate any illegal discharges reported by the public.	Investigate all illegal discharges reported by the public and sewer operations staff utilizing sewer televising and dye testing to determine if an illegal discharge has occurred or an illegal connection exists.	Investigate all reported illegal discharges or connections.
3.5	Illicit Discharge Detection & Elimination	Illicit Source Removal Procedures	Facilitate the disconnection of illegal connections from City owned storm sewers.	Facilitate the disconnection of illegal connections from City owned storm sewers, on an as-needed basis.	Disconnect all identified illegal connections from the storm sewer system
3.6	Illicit Discharge Detection & Elimination	Program Evaluation & Assessment	Internal Phase 2 committee to meet and review NPDES Phase 2 illicit discharge program, and implement changes if needed.	Meet annually to review program, and recommend and implement changes if necessary.	Conduct annual meeting.
3.7	Illicit Discharge Detection & Elimination	Program Evaluation & Assessment	Annual report to the Urbana-Champaign Sanitary District documenting all sanitary sewer activity and Phase 2 activities.	Submit annual report to the Urbana-Champaign Sanitary District.	Submit annual report.
3.8	Illicit Discharge Detection & Elimination	Visual Dry Weather Screening	Visual inspection of outfalls during dry weather. If needed, perform water quality sampling on suspicious discharges at outfalls.	Inspect storm outfalls once per year during dry weather periods. Perform water quality sampling on suspicious discharges on as-needed basis.	Visually inspect storm outfalls discharging to state waterways.
3.9	Illicit Discharge Detection & Elimination	Public Notification	Develop, publicize, and staff a hotline for residents to report illegal discharges.	Daily staffing of existing hotline.	Continue staffing of hotline.
3.10	Illicit Discharge Detection & Elimination	Other Illicit Discharge Controls	Inspect each new development to inspect for illegal connections.	Inspect each development. Number of inspections dependent on number of developments.	Inspect each development.
4.1	Construction Site Runoff Control	Regulatory Control Program	Enforce erosion and sediment control ordinance.	Enforce erosion and sediment control ordinance.	Enforce erosion and sediment control ordinance.
4.2	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Distribute and update erosion/sediment control BMP Standard Practice Manual.	Distribute and update BMP Standard Practice Manual.	Distribute and update BMP Standard Practice Manual.
4.3	Construction Site Runoff Control	Other Waste Control Programs	Enforce construction site waste regulations in erosion and sediment control ordinance.	Enforce construction site waste regulations in erosion and sediment control ordinance.	Enforce construction site waste regulations.
4.4	Construction Site Runoff Control	Site Plan Review Procedures	Review erosion control plans submitted by developers for each project.	Complete review of each soil erosion and sediment control plan, on as-needed basis. Perform field inspection.	Review each project submitted.
4.5	Construction Site Runoff Control	Public Information Handling Procedures	Publicize and staff a hotline for residents to report soil erosion/sediment non-compliance. Follow through with resident complaints and take appropriate action against contractors, as needed.	Publicize and staff a hotline. Investigate complaints and take appropriate action on as-needed basis.	Staff a hotline, investigate complaints and take action as required.



BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 8 MILESTONE
4.6	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Conduct construction site inspections.	Inspect all construction sites weekly or after rain events > 0.5 inches.	Conduct inspections weekly or after rain events > 0.5-inches.
5.1	Post-Construction Runoff Control	Community Control Strategy	Implement credit and incentive program utilizing stormwater fee funds to encourage sustainable on-site stormwater management and green infrastructure.	Provide credits and incentives to property owners to manage stormwater on-site utilizing green infrastructure and best management practices identified by the City's Stormwater Credit and Incentive Manual.	Budget \$15,000 for funding incentives. Revise credits and incentives manual to provide more motivation to property owners to install green infrastructure and other BMPs for stormwater management.
5.2	Post-Construction Runoff Control	Regulatory Control Program	Waiting for State guidance on regulatory control program. State is considering including volumetric standards as part of ILR-10 and ILR-40 permits.	City will monitor state progress on regulatory requirements and will comply with any regulatory requirements that the State adopts.	Monitor State progress on regulatory controls. Enforce stormwater management requirements on new development and redevelopment.
5.3	Post-Construction Runoff Control	Long Term O&M Procedures	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual.	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual. Review Green Infrastructure Standards from neighboring communities and evaluate if similar standards should be implemented in the City.	Distribute and update long term operation and maintenance procedures for green infrastructure and BMPs in the Credit and Incentive Manual. Continue to require operation and maintenance agreements for new detention basins. Review and evaluate Green Infrastructure Standards from neighboring communities.
5.4	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Review submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual regarding green infrastructure and post-construction BMPs.	Review all submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual.	Review all submitted credit and incentive applications and plans for compliance with the Credit and Incentive Manual on an as-needed basis. Review all stormwater management plans for new development and redevelopment.
5.5	Post-Construction Runoff Control	Site Inspections During Construction	Inspect construction of green infrastructure and post-construction BMPs to verify proper installation in accordance with stormwater utility fee credit and incentive program.	Inspect the installation of all new green infrastructure and post construction BMPs as part of the credit and incentive program.	Inspect the installation of all new green infrastructure and post construction BMPs as part of the credit and incentive program on an as-needed basis. Inspect all new detention basins.
*5.6	Post-Construction Runoff Control	Post-Construction Inspections	Inspect green infrastructure and post construction BMPs to ensure they are operating properly as part of the stormwater utility fee credit and incentive program.	Annual inspection of green infrastructure and post construction BMPs in order to qualify for credit on stormwater utility fee.	Inspect all existing green infrastructure and detention basins on a 10-year cycle.
6.1	Pollution Prevention & Good Housekeeping	Employee Training Program	Salt and calcium application training for snow plow applicators.	Conduct training annually for all snow plow operators.	Complete training session.
6.2	Pollution Prevention & Good Housekeeping	Employee Training Program	Training for the abatement and containment of hazardous material spills.	Conduct annual training for 100% of firefighters.	Complete training session.
6.3	Pollution Prevention & Good Housekeeping	Inspection and Maintenance Program	Storm sewer cleaning.	Perform routine maintenance and cleaning of storm sewer system and catch basins on a systematic basis.	Clean 35,000 feet of storm sewer pipe and spend 100 hours cleaning inlets or manholes. Inspect 30,000 feet of storm sewer pipe and 75 manholes.
6.4	Pollution Prevention & Good Housekeeping	Inspection and Maintenance Program	Street Sweeping.	Sweep central business district 20 times per year and residential and arterial streets 5 times per year, weather permitting.	Complete street sweeping.

BMP ID	BMP CATEGORY	BMP SUBCATEGORY	BMP DESCRIPTION	MEASURABLE GOAL	YEAR 8 MILESTONE
6.5	Pollution Prevention & Good Housekeeping	Municipal Operations Waste Disposal	Control vehicle and equipment washing by performing all washes in enclosed washing bay which drains directly to sanitary sewer.	Wash public works vehicles and equipment as needed in enclosed bays which drain directly to sanitary sewer.	Use enclosed bay to wash all vehicles.
6.6	Pollution Prevention & Good Housekeeping	Municipal Operations Waste Disposal	Oil and fluid disposal program to recycle or dispose of oils and fuels by a licensed recycler or waste hauler.	Disposal of wastes by a licensed recycle or waste hauler.	Recycle or dispose properly of oils and other motor vehicle fluids.
6.7	Pollution Prevention & Good Housekeeping	Other Municipal Operations Controls	Maintain "Snow & Ice Control Plan" procedure manual and update to document all procedures required for compliance with NPDES Phase 2.	Annual review and update of manual.	Complete review and update of manual.
6.8	Pollution Prevention & Good Housekeeping	Other Municipal Operations Controls	Maintain fire departments hazardous spill response plan and update to comply with NPDES Phase 2.	Annual review and update of manual.	Complete review and update of manual.

Note: In the "BMP ID" column, **\*bolded** items indicate a change has occurred in the BMP.