



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, 2015 To March, 2016

Permit No. ILR40 0440

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

Name: Village of River Grove

Mailing Address: 2621 Thatcher Avenue

County: Cook

City: Village of River Grove

State: IL

Zip: 60171

Telephone: 708-453-8000

Contact Person: Mr. John Bjorvik

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 River Grove

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))

John Bjorvik
Owner Signature:

Mr. John Bjorvik

Printed Name:

5/26/16
Date:

Superintendent of Sewer and Water

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

SECTION A. CHANGES TO BEST MANAGEMENT PRACTICES

X Indicates BMPs performed as proposed

√ Indicates changes to BMPs

Year 2		Year 2	
	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	X	E.1 Community Control Strategy
	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 1 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 2: Include information in Newsletter regarding storm water awareness.

Status: 3 Articles regarding “Oil Dumping” and “Pollutant Discharge” were included in the Village’s quarterly newsletter. Other articles discussing street sweeping, yard waste disposal, garbage pick-up, and mitigation of storm water were also included in the Village’s newsletter. The newsletter is published on the Village’s website, and is also included in the Water Billings which are mailed to all residents. 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. Copies of the newsletter are kept on file.

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.

Goal for Year 2: Design web page and post initial information.

Status: The Village plans to launch a section on the Village website entitled “Stormwater Information”. 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/stormwater. This link also provides background information regarding Green Infrastructure strategies. Further information has been included regarding Combined Sewer Overflows and a link to the MWRD CSO website. It is planned to expand the “Stormwater Information” section in the upcoming period by including the NOI and Annual Reports.

Furthermore, the Village website continued to include information regarding street sweeping, yard waste disposal, and garbage pick-up as it has done in years past. The website is maintained by the Village Manager’s office. The intention is to reach out to all residents of all ages.

B: PUBLIC PARTICIPATION/INVOLVEMENT

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 2: Research various commitments and feasibility of a volunteer based annual cleanup program.

Status: The Village is currently organizing an event to clean up the Des Plaines River banks entitled “River Clean-Up Day” with the local Boy Scout troop, for next season. However, community volunteer efforts were made by sand-bagging during recent flood events.

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 2: Research various products associated with a stenciling program, conduct outreach to determine volunteer pool.

Status: All newly installed lids on Capital Improvement Projects (approximately 40 each) contained the labeling, "No Dumping, Drains to Waterways". The Public Works department is currently considering purchase of Stencils to be used in the upcoming reporting period.

Additional clean up work was performed through the Sheriff's Work Alternate Program (SWAP), a program directed by Cook County. The Village of River Grove has a partnership with Cook County and utilizes this program on a monthly basis for 2 days a month, within Village boundaries. Relevant work to improve the storm sewer system includes parkway cleaning of trash and debris as well as curb cleaning of similar nature. An attempt to quantify the amount of debris removal will be made in the next reporting period with a reported quantity.

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 2: 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.

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 2: Conduct in-depth review of existing Village illegal dumping ordinances.

Status: The Village's Illicit Discharge and Illegal Dumping Ordinance with penalties remains in place. 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 2: Inspect and document all storm sewer outfalls.

Status: Outfalls were inspected periodically on an as needed basis. Zero illegal discharges were observed, fish kills, color changes, or detection of any unknown substances. An inspection form has been created to document the inspections for the next reporting period. The outfalls will be inspected on an annual basis at a minimum. The Village inventory includes approximately 20 industrial facilities and 195 commercial facilities. No violations were reported or found at these locations.

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

Status: Typically, at least one of the quarterly newsletters addresses this matter, as reflected in this reporting period. A copy of the newsletter is kept on file.

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 2: Create list of existing programs and review opportunities for expansion.

Status: The Village of River Grove has maintained its membership in the West Cook County Solid Waste Agency (WCCSWA). The WCCSWA offers many beneficial recycling programs to its members, 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 each 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.

The Village began a program in partnership with the American Legion Recreation Center and the Arcoa Company to offer free recycling of electronic items to residents. The program has been a success to date. On average, one 10 cuyd container per month has been collected and recycled, for a total of 120 cuyd over the course of the reporting period.

Additionally, the Leyden Credit Union located in neighboring Franklin Park, offered electronics recycling to all residents of River Grove. The Village is currently looking into their own electronics recycling program for the next reporting period.

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 2: 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 Federally funded projects or projects involving IDOT, 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, several development plans were reviewed, which were all below 1 acre in size,

thereby exempt from the requirements listed above. Due to the highly urbanized environment of the Village, typically the developments are less than 1 acre or even 0.5 acres.

Furthermore, 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 2: Perform and document inspections for erosion and sediment control measures as stated in "Measurable Goals".

Status: This reporting period, 2 Public Projects and numerous Private Projects were inspected by the building department or Hancock Engineering with respect to erosion and sediment control measures. The Public Projects are listed at the end of this report. The Private Project was a Subway restaurant at Grand Avenue and River Road. All Projects were found to be in compliance. For Public Projects, typically Hancock Engineering provides construction site inspection. There are approximately 3 inspectors in total who perform erosion control inspections. Hancock Engineering attended an NPDES Compliance seminar led by Certified Professional Erosion and Soil Control (CPESC) speakers, in order to learn further about erosion and sediment control measures.

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 2: 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. To date, the mentioned requirement has been 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 2: 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. The amount of complaints can then be tallied as well. At this time the form has been created and is ready for use. There were no complaints received during the past reporting period directly with regard to erosion control. A

few complaints were received due to clogged storm sewer laterals, which turned out to be a result of excessive leaves in the system, not from erosion control methods.

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 2: 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. No violations or enforcement actions have been reported. Several private developments were constructed this reporting period. A Certificate of Occupancy will not be granted unless the inspection is approved. All sites were approved without incident.

E: POST-CONSTRUCTION RUNOFF CONTROL

E.1: Community Control Strategy

The Goal for this program is to reach out to the community as a means of reducing sources of post-construction control.

Goal for Year 2: Evaluate feasibility of proposed rain barrel program.

Status: The Village performed a pilot Rain Barrel Program over the course of previous reporting periods. The program has been temporarily suspended for the time being.

Previously, the Village aided residents by obtaining rain barrels from a third party at a discounted price, and passed the savings along to the residents. A decorating contest was promoted by the Village, in an effort to generate excitement and awareness of the rain barrel program. An intention of the decorating contest was also to encourage residents to explore the numerous benefits of rain barrel use. Pictures of the contest are kept on file. A total of 20 rain barrels were distributed to residents.

The Village will continue to pursue various rain barrel purchasing options as they become available. An active pursuit of the programs is necessary as they are often only offered for a limited time.

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 2: 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 2: 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 discussed in further detail in the next reporting period.

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 Green construction methods in future developments.

Goal for Year 2: Inspect 50% of all sites on an annual basis, ensure that stormwater BMPs are working appropriately.

Status: The Village should inspect 50% of sites on an annual basis. This will be implemented in upcoming reporting periods. 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 Building Department 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.

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 2: Continue training program as well as incorporate Green/Sustainability education.

Status: The Village continues the training program by educating and field training the employees in topics applicable to storm water management. Street Sweeper training was attended by employees. Employees who work with pesticides are required to complete a pesticides training course and obtain a license, which is required to be renewed on an annual basis. The licensed Water Operator for the Village attended training regarding water losses and infiltration.

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 2: 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. The Village acknowledges that the street sweeping and structure cleaning program improves the quality of the storm sewer discharge into the creek, and continues its program. Street Sweeping is performed from April 1st through December 1st, each day Monday through Friday. Over the course of the week, the entire Village is swept. Typically, 3.5 Cubic Yards of debris are removed each day. An exception to this is during a 6 week period in the fall season, when approximately 50 Cubic Yards of debris are removed per day. Approximately 1,500 Cubic Yards of debris are removed over the course of the year, and prevented from entering the storm system.

The Village also continues its year round branch removal program. This work is done every Monday, and averages 1 ½ truckloads of removal, or 15 Cubic Yards. Approximately 1,000 Cubic Yards are removed over the course of one year, which includes all additional and special removal.

Sewer Cleaning and Televising was performed over the last reporting period by the local contractor CTR, which included over 4,000' of storm and sanitary sewer cleaning and televising. Additional sewer cleaning and televising as well as catch basin cleaning will continue as soon as the budget allows for such.

The Village of River Grove continues to participate in the Tree City USA program, and has continually maintained its status as a member. 15 trees were placed in this reporting period, in conjunction with the Lions Club. Typically more trees are planted, but due to budgetary restrictions the amount was lowered. Fortunately, the budget is slated to allow for more trees to be planted in the upcoming reporting period.

The Illinois Department of Transportation (IDOT) maintains the waters beneath the Grand Avenue bridge, by performing clean up operations on an annual basis. Various types of debris such as branches, litter, and displaced plants are removed and disposed of by IDOT.

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 2: Review existing program and develop strategy to implement additional relevant measures.

The Village of River Grove provides a storage facility for its salt. The salt is kept on a concrete pad and covered on top. The application of the salt to streets has been kept at a minimum, using only what is necessary to ensure safety for vehicles and pedestrians. The quantity of salt applied was approximately 800 Ton without any additives. The Village is currently looking into the additive "Geomelt." The additive "Geomelt" is said to reduce the amount of salt necessary in order to obtain a desired temperature or reduction of ice. This in turn reduces the amount of salt that enters the waterways. The Village recently used a non-toxic additive on a trial basis. The additive is similar to "Beet-Juice." The Village monitored the use of this additive and positive results were not apparent. Due to the increased cost of use and lack of positive results, the Village does not plan to continue using this additive, but rather to explore the trial use of other additives.

The Village of River Grove also has a schedule of frequent maintenance on its fleet of Village vehicles by providing a weekly vehicle inspection to reduce the unnecessary discharge of automotive fluids. A consultant has been contacted who assists in the preparation of computerized record systems, in order to aid in scheduling and record keeping of vehicular maintenance. The record keeping system may be in place as early as next reporting period.

Triple Basins in garage areas are continuously inspected and cleaned on a regular basis. The maintenance yard is inspected throughout the year. Approximately 15 gallons of herbicides and pesticides were applied to the Right-of-Way, kept at a minimum.

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 measurable 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 Stormwater System and pass this information along to their neighbors. This 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 economic downturn there are not many developments being planned. 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 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, because the Village will perform future inspections.

SECTION C. INFORMATION AND DATA COLLECTION

The Village has purchased a weather gauge and it is currently located at Rhodes Elementary School. Additional local rainfall data is found on the MWRD website. The MWRD has 12 monitoring stations measured daily to the nearest hundredth of an inch. The closest station in proximity to the Village of River Grove is located in the Village of Glenview.

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

The Village of River Grove intends to pursue the milestones outlined for Year 3 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 River Grove 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.

[illegible]