

## TABLE OF CONTENTS

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Introduction.....	1
A. Changes to Best Management Practices .....	1
B. Status of Compliance with Permit Conditions .....	2
C. Information and Data Collection Results .....	4
D. Summary of Next Reporting Period Stormwater Activities.....	4
E. Notice of Qualifying Local Program.....	7
F. Construction Project Conducted During Reporting Period .....	7
Appendices .....	7

## INTRODUCTION

Federal regulations through the United States Environmental Protection Agency (USEPA) require that all Municipal Separate Storm Sewer Systems (MS4s), partially or fully in urbanized areas based on the 2000 census, obtain storm water permits for their discharges into receiving waters. Illinois Environmental Protection Agency (IEPA) issued a new version of its MS4 Permit that became effective on March 1, 2016. Troy Township reviewed the MS4 Permit and developed a Stormwater Management Program Plan (SMPP), which was submitted in September 2018. The purpose of the SMPP is to meet the minimum standards required by the USEPA under the National Pollutant Discharge Elimination System (NPDES) Phase II program.

The attached Annual Facility Inspection Report is for the reporting period of March 2021 to March 2022; therefore, all previous NPDES Permit information, including drafts and unsubmitted material, was reviewed to cover the March 2020 to March 2021 time period with the knowledge that the March 2021 to March 2022 Annual Facility Inspection Report will be updated with the new Best Management Practices (BMPs) and measurable goals listed in Troy Township's SMPP updated in February 2021.

## A. CHANGES TO BEST MANAGEMENT PRACTICES

Due to the uncertainty of materials submitted to the IEPA, below is a summary of the known BMPs and the changes during the reporting period of March 2020 to March 2021.

### 1. Public Education and Outreach

- Current BMP: Troy Township will utilize the existing and proposed public education and outreach programs that will be administered by Will County as part of Will County's NPDES Phase II Notice of Intent (NOI). Troy Township will also utilize the existing and proposed public education and outreach programs that will be administered by Will County Stormwater Management Planning Committee (WCSMPC).
- Change: None during the reporting period of March 2020 to March 2021.

### 2. Public Participation/Involvement

- Current BMP: Troy Township will utilize the existing and proposed public involvement and participation programs that will be administered by Will County as part of Will County's NPDES Phase II NOI. In addition, Troy Township holds monthly meetings of the Township Board, which is open to the public. Citizens can attend this meeting and have an opportunity to address the Board on issues relating to storm water management and pollution prevention. Township Staff is present to answer questions regarding specific Township programs and procedures and provide guidance to the Township Board, who makes the final decision on Township administered policies and programs.
- Change: None during the reporting period of March 2020 to March 2021.

### 3. Illicit Discharge Detection & Elimination

- Current BMP: Troy Township proposed to develop a road network drainage system, and to perform dry weather visual monitoring of outfalls to determine if the system is receiving any non-storm discharges. If any flow is found during dry weather, the source will be investigated and stopped.
- Change: None during the reporting period of March 2020 to March 2021.

4. Construction Site Runoff Control
  - Current BMP: Troy Township proposed to continue to require a storm water pollution prevention plan (SWPPP) for new construction projects that exceed the allowable acreage under the NPDES permit. The construction plans along with the SWPPP are reviewed by the Township Highway Commissioner, or a representative working for the Township Highway Commissioner.
  - Change: None during the reporting period of March 2020 to March 2021.
5. Post-Construction Runoff Control
  - Current BMP: Troy Township proposed to continue to follow the most current Illinois Urban Manual for Post-Construction sites.
  - Change: None during the reporting period of March 2020 to March 2021.
6. Pollution Prevention/Good Housekeeping
  - Current BMP: Troy Township proposed to train its maintenance crew to use pollution prevention techniques whenever possible. Techniques such as picking up trash from maintenance facility areas, using less salt on the parking lots in winter, and keeping dumpster lids closed.
  - Change: None during the reporting period of March 2020 to March 2021.

## **B. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS**

The IEPA update the MS4 Permit standards required by the United States Environmental Protection Agency (USEPA) under the National Pollutant Discharge Elimination System (NPDES) Phase II program. In doing so, Troy Township reviewed the new version of the MS4 Permit and determined that the Township's BMPs were appropriate, but revisions and additions were needed. Troy Township developed a SMPP, which was submitted in December 2018, during the reporting period of this Annual Facility Inspection Report of March 2018 to March 2019. The purpose of the SMPP is to meet the minimum standards required by the USEPA under the NPDES Phase II program.

Troy Township reduced and continues to reduce its salt usage during winter with equipment calibration and experience. Troy Township continues to collect trash within its right-of-way through the means of manual collection. Additionally, Troy Township uses a street sweeper to reduce sediment build up along roadways, which reduces sediments received by the Illinois and Michigan Canal, DuPage River, and Rock Run.

The following describes the status of progress toward achieving identified measurable goals for each of the measures stated in Section A.

### **1. Public Education and Outreach**

Troy Township will utilize the existing and proposed public education and outreach programs that will be administered by Will County as part of Will County's NPDES Phase II Notice of Intent (NOI).

The goal of this program was to make Will County information available to the public to increase awareness of stormwater discharge impacts on water bodies and steps the public can take to reduce pollutants in stormwater runoff.

Troy Township did provide Will County's information to residents during public meetings or on the Township website during the March 2020 to March 2021 reporting period. This information would also be mentioned at the Board meeting or sent to residents after the meeting by the Township Board and staff if brought up by residents during Township Board meetings.

## 2. Public Participation/Involvement

Troy Township will utilize the existing and proposed public involvement and participation programs that will be administered by Will County as part of Will County's NPDES Phase II NOI. In addition, Troy Township holds monthly meetings of the Township Board, which is open to the public. Citizens can attend this meeting and have an opportunity to address the Board on issues relating to storm water management and pollution prevention. Township Staff is present to answer questions regarding specific Township programs and procedures and provide guidance to the Township Board, who makes the final decision on Township administered policies and programs.

The goal of this program was to allow residents to share and address issues relating to storm water management and pollution prevention.

The monthly meetings of the Township Board were convened, and they were open to the public. The meetings did offer the opportunity for public comment. The Township Highway Commissioner did answer questions to allow the Township Board to make informed decisions on the Township administered policies and programs.

## 3. Illicit Discharge Detection & Elimination

Troy Township proposed to develop a map of the existing storm sewer and drainage ditch system, and to perform dry weather visual monitoring of outfalls to determine if the system is receiving any non-storm discharges. If any flow is found during dry weather, the source will be investigated and stopped.

The goal of this program was to generate a storm sewer and drainage ditch system baseline and better understand possible impacts to the system. Additionally, the goal of this program was to deter and mitigate non-storm discharges.

A storm sewer/drainage ditch system map is in the making. Map updates were added when additional information was found.

No recorded non-storm discharges were found during this reporting period.

## 4. Construction Site Runoff Control

Troy Township proposed to continue to require a storm water pollution prevention plan (SWPPP) for new construction projects that exceed the allowable acreage under the NPDES permit. The construction plans along with the SWPPP are reviewed by the Township Highway Commissioner, or a representative working for the Township Highway Commissioner.

The goal of this program was to reduce pollution caused by construction projects within the Township's jurisdiction.

All new construction projects that exceed the allowable acreage under the NPDES permit were reviewed and required to submit a SWPPP.

## 5. Post-Construction Runoff Control

Troy Township proposed to continue to follow the current version of the Illinois Urban Manual for Post-Construction sites.

The goal of this program was to reduce pollution after construction concluded on roadway, structural, and property improvements.

The Will County Land Use Department (Department) reviews site plans in the Township areas that are not within municipal boundaries. The Department reviews the Stormwater Pollution Prevention Plan and Erosion Control Plans to ensure water quality and erosion are consistent with pre-construction conditions, and the current version of the Illinois Urban Manual. The Department coordinates with the Township on their review of roadway access and drainage outfalls into Township roadway drainage ditches.

#### 6. Pollution Prevention/Good Housekeeping

Troy Township proposed to train its maintenance crew to use pollution prevention techniques whenever possible. Techniques such as picking up trash from maintenance areas, using less salt on the parking lots in winter, and keeping dumpster lids closed.

The goal of this program is to identify current practices that contribute to stormwater pollution and implement programs and procedures for Township activity that reduce or eliminate pollutant discharges into the storm sewer system.

Troy Township disseminated information to employees that helped protect water quality through proper hazardous waste disposal, material storage, storm sewer structure cleaning, roadside ditch maintenance, and vehicle washing.

### **C. INFORMATION AND DATA COLLECTION RESULTS**

No monitoring data was collected during the reporting period of March 2020 to March 2021.

### **D. SUMMARY OF NEXT REPORTING PERIOD STORMWATER ACTIVITIES**

See the attached Stormwater Management Plan for the BMPs committed for the next NPDES permitting cycle. Specific BMPs and measurable goals for future development activities are provided below.

#### 1. Public Education and Outreach

Troy Township will include educational articles in the Troy Township semi-annual newsletter regarding the water quality. The Township will also contact Will County Stormwater Management Planning Committee (WCSMPC), Will-South Cook Soil and Water Conservation District (WCSWCD), Will County Green, IEPA, and USEPA to contribute articles on similar topics. Hard copies of the semi-annual newsletter are mailed to residential homes in the township and will be available at the Troy Township Local Government Office in Shorewood, Illinois. The newsletters with water quality articles are to be distributed in the 2021-2022 reporting period and to continue beyond the 2021-2022 reporting period.

Troy Township will provide links to the following organization websites or contact information so that public meeting schedules and locations will be available to Township residents: WCSMPC, WCSWCD, Lower Des Plaines River Ecosystem Partnership, DuPage River Salt Creek Workgroup, and Lower DuPage River Watershed Coalition. Troy Township will provide the links in the 2020-2021 reporting period and will continue providing the links beyond the 2021-2022 reporting period.

Troy Township will provide links to WCSMPC, Will County Green, Illinois Environmental Protection Agency (IEPA), United States Environmental Protection Agency (US EPA), Chicago Metropolitan Agency for Planning (CMAP), Center for Watershed Protection, and University of Wisconsin Extension Conservation Foundation on their website and provide brochures at the Troy Township Local Government Office.

The Township will be a resource for agricultural property owners concerning how to manage animal manures to minimize losses to surface water and ground water; reduce soil erosion and nutrient loss by using appropriate conservation practice systems and other applicable best management practices; use planned grazing systems on pasture and rangeland; dispose of pesticides, containers, and tank rinse in an approved manner; and work with conservation partners locally including WSCDWCD to understand local strategies.

## 2. Public Participation/Involvement

Troy Township will announce all public involvement and participation programs complying with State public notice requirements in the 2021-2022 reporting period and to continue beyond the 2021-2022 reporting period.

Troy Township will provide links to the following organization websites or contact information so that public meeting schedules and locations will be available to Township residents: Will County Stormwater Management Planning Committee (WCSMPC), Will-South Cook Soil and Water Conservation District (WCSWCD), Lower Des Plaines River Ecosystem Partnership, DuPage River Salt Creek Workgroup, Lower DuPage River Watershed Coalition, and Will County Green. Troy Township will provide the links in the 2021-2022 reporting period and will continue providing the links beyond the 2021-2022 reporting period.

Troy Township will begin to identify environmental justice areas within the watershed planning jurisdictions in the 2021-2022 reporting period through a surveying process that sections the Township into four sections. The entire Township is to be reviewed by the 2022-2023 reporting period. Updates and revisions will be ongoing through the process to ensure prioritization of efforts regarding public involvement and participation initiatives.

## 3. Illicit Discharge Detection & Elimination

Troy Township will continue developing a map of the existing storm sewer and drainage ditch system starting in the 2021-2022 reporting period and continually update it beyond the 2021-2022 reporting period.

Troy Township will inspect the sewer and drainage ditch system for evidence of illicit discharges while performing routine operation and maintenance activities and will log all reported illicit discharges in the 2021-2022 reporting period and to continue beyond the 2021-2022 reporting period.

Troy Township will receive calls of pollution or suspected pollution instances and will log all reported illicit discharges in the 2021-2022 reporting period and to continue beyond the 2021-2022 reporting period. The phone hotline will be provided on the Township website and brochures available at the Troy Township Local Government Office.

Troy Township will review the 2021-2022 Indirect Illicit Discharge Tracking Forms and establish a prioritization plan for inspection of outfalls, placing priority on outfalls with the greatest potential for non-storm water discharges. Each reporting period will be reviewed, and the Prioritization Plan will be updated accordingly.

#### 4. Construction Site Runoff Control

Troy Township will continue to require a SWPPP for new construction projects that exceed the allowable acreage under the NPDES permit in the 2021-2022 reporting period and to continue beyond the 2021-2022 reporting period. Additionally, the construction plans along with the SWPPP are reviewed by the Will County Land Use Department in conjunction with the Township Highway Commissioner, or a representative working for the Township Highway Commissioner.

#### 5. Post-Construction Runoff Control

Troy Township will conduct an inventory of residential, commercial, and industrial sites that have on-site detention basins in four separate sections. The entire Township is to be reviewed by the 2022-2023 reporting period. Updates and revisions will be ongoing through the process to ensure prioritization of efforts regarding public involvement and participation initiatives. Additionally, after reviewing inventory results, the Township will develop and implement projects that minimize the volume of storm water runoff and pollutants from public construction projects using BMPs.

Troy Township will review the construction plans to ensure water quality are consistent or better than pre-construction conditions in the 2021-2022 reporting period and to continue beyond the 2021-2022 reporting period.

#### 6. Pollution Prevention/Good Housekeeping

Troy Township will maintain inspection documentation for construction projects within the Township limits requiring soil erosion prevention measures and permits.

Troy Township will continue training its maintenance crew to use pollution prevention techniques in the 2021-2022 reporting period and to continue beyond the 2021-2022 reporting period.

Troy Township will continue its street sweeping program in the 2021-2022 reporting period and to continue beyond the 2021-2022 reporting period.

Troy Township will clean storm sewer piping and remove debris from manholes, catch basins, and inlets in the 2020-2021 reporting period and to continue beyond the 2020-2021 reporting period.

Troy Township will inventory its material storage in the 2021-2022 reporting period and plan to update material storage to the NDPEs requirements listed in succeeding reporting periods.

Troy Township will use landscapers that are trained and licensed applicators to apply pesticides and herbicides to Township property in the 2021-2022 reporting period and to continue beyond the 2021-2022 reporting period.

Troy Township will review how maintenance and cleaning activities are performed at the Highway Department facility in the 2021-2022 reporting period and plan to update material storage to the NDPEs requirements listed in succeeding reporting periods.

The term of the Troy Township's General Permit from the IEPA is five years. At the end of each permit term, the Township will submit a NOI to comply with the conditions of the General Permit to the IEPA. This NOI describes the practices Troy Township intends to implement to meet the conditions of the General Permit.

Each year the Township will submit a report to the IEPA documenting its status of compliance with the conditions of the General Permit. The report will include an annual evaluation of public education and outreach BMPs, public involvement and participation BMPs, illicit discharge detection and elimination BMPs, construction site storm water control BMPs, post-construction storm water management BMPs, pollution prevention and good housekeeping for Township operations, and measurable goals.

#### **E. NOTICE OF QUALIFYING LOCAL PROGRAM**

Troy Township relies on Will County to satisfy some of Troy Township's permit obligations. The Township staff will work with the County to ensure that requirements of the Township's NDPES permit are met.

#### **F. CONSTRUCTION PROJECT CONDUCTED DURING REPORTING PERIOD**

For the period of reporting period of March 2020 - March 2021, the Township will pay for the following construction projects:

- 2020 General Maintenance Roadway Project consisting of tar and chip overlay of Ingolsby Road, grind and an HMA overlay of Frank Drive, Schock Drive, Bailey Drive, S. Canterbury Street, Jensen Street, Leominster Avenue, and Raymond Street.

#### **APPENDICES**

Stormwater Management Program Plan