

2 Program Management

This Chapter describes the organizational structures of the Township, the County and IEPA. It further discusses the roles and responsibilities of the various involved parties.

2.1 Implementation of this SMPP

The SMPP includes detailed discussions on the types of tasks that are required to meet the permit conditions under the NPDES II program and how to perform these tasks.

Appendix 5.10 includes related tracking forms. The tracking forms are broken out into three categories (based on the frequency of occurrence). There are three different tracking forms included: Annual, As-Needed and On-Going. These forms should be printed annually and the progress of all tasks tracked. At the end of the yearly reporting period (March 1 – February 28/29) the forms should be filed in a binder to document SMPP related activities to IEPA, or their authorized agent, in the case of an audit. It is anticipated that implementation of this SMPP constitutes compliance with the program. The SMPP must be posted on the Township website.

Annual Reports, Monitoring Data, NOI and Stormwater Management Plans shall be kept for a minimum of 5-years after the expiration of this permit (March 1, 2022).

2.2 Intra-Department Coordination

The Board of Trustees is the policy and budget setting authority for Antioch Township. The Highway Commission and the consulting engineer work together to implement this SMPP. The Stormwater Coordinator has primary responsibility for managing the overall program.

2.2.A Stormwater Coordinator

The Township Highway Commissioner is the Stormwater Coordinator and is responsible for the oversight and implementation of this SMPP. The Stormwater Coordinator has many different responsibilities, he/she:

- is the lead contact for coordination with the Lake County Stormwater Management Commission, the Illinois Environmental Protection Agency, contractors, the development community and other external regulatory agencies;
- understands the requirements of ILR40, ensures that the SMPP meets the requirements of the permit and that Antioch Township effectively implements the SMPP;

- ensures, or assists the Enforcement Officer in ensuring, that Antioch Township complies with all minimum Watershed Development Ordinance (WDO) provisions;
- ensures that the Facilities comply with all minimum ILR40 permit requirements;
- is aware when a Project is required to be authorized under the ILR10 permit. In these cases the Stormwater Coordinator should ensure that the NOI is received by IEPA at least 30 days prior to the start of construction;
- assists the development community in understanding when a ILR10 permit is required and whether construction sites comply with the general ILR10 and WDO permit conditions; and
- understands the role illicit discharges play in the overall NPDES II program. In general, an incidence of non-compliance must be filed with IEPA for illicit discharges exiting an MS4's outfall into a receiving water. Additionally, if the illicit discharge is generated by a construction site, it may be necessary for both the applicant and the MS4 to file the ION form with IEPA.

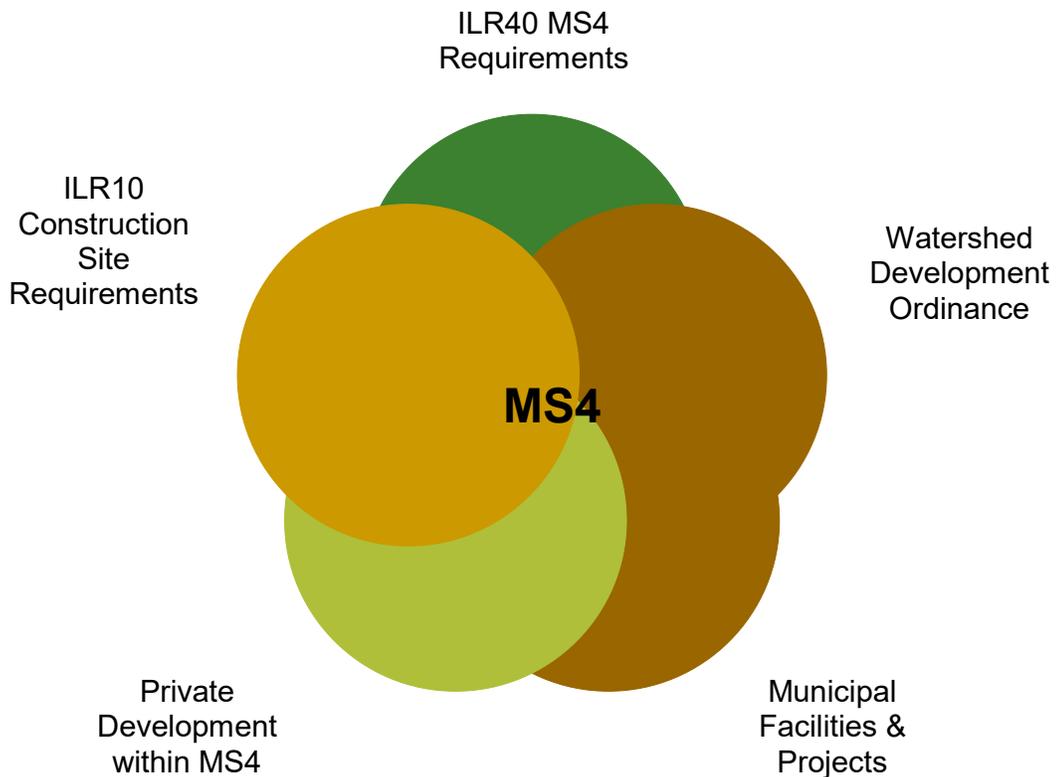


Figure 7: Roles of MS4
provided by Gewalt Hamilton Associates, Inc.

2.2.B Engineering Department

Engineering consultants support the Stormwater Coordinator in obtaining compliance with both the NDPEs and WDO programs.

The SMC Chief Engineer is the Enforcement Officer with respect to the administration and enforcement of the Lake County Watershed Development Ordinance (WDO). The Enforcement Officer has the responsibility to concur that projects meet WDO standards prior to the issuance of permits, and oversee site inspections during construction. Refer to Chapter 3.1.D, 3.1.E, 3.5 and 3.6 for additional information on this process.

2.2.C Highway Department

Infrastructure maintenance activities within the MS4 are carried out by Highway Department personnel. Highway Department personnel are designated as the primary entity responsible for performing the duties specified under Chapter 3.4 Illicit Discharge Detection and Elimination and Chapter 3.7 Pollution Prevention and Good Housekeeping.

2.3 Coordination with Lake County Stormwater Management Commission

Coordination between the MS4 and the Lake County Stormwater Management Commission (SMC) occurs through both participation in the SMC sponsored MAC forums and through the Certified Community Status under the Lake County Watershed Development Ordinance (WDO). The MS4's Stormwater Coordinator is the lead contact for participation in the MAC forums.

SMC is the primary entity responsible for meeting Public Education and Outreach and Public Participation and Involvement MCMs. Additionally, SMC has the lead responsibility for Construction Site Runoff Control and Post Construction Runoff Control MCMs in Non-Certified Communities. If the MS4 is a Certified Community, the MS4's Enforcement Officer has lead responsibility for Construction Site Runoff Control and Post Construction Runoff Control MCMs.

2.4 Watershed Work Groups

2.4.A.1 Fox River Study Group

The Fox River Study Group (FRSG) is a diverse coalition of stakeholders working together to assess water quality in the Fox River watershed. Participants include Friends of the Fox River, Sierra Club, Fox River Water Reclamation District (Elgin), Fox Metro Water Reclamation District (Aurora), Fox River Ecosystem Partnership, Illinois Environmental Protection Agency (IEPA) and Blackberry Creek Watershed Plan Implementation Council as well as representatives from Algonquin, Aurora, Batavia, Crystal Lake, Elgin, Geneva, Island Lake, Kane County, Lake in the Hills, St. Charles and Yorkville.

The FRSG began meeting in the summer of 2001 to plan how to prepare for the upcoming Total Maximum Daily Load (TMDL) study on the river. A TMDL study is required by federal law because three segments of the Fox River appeared on the Illinois Environmental Protection Agency's list of impaired waters (the 1998 303(d) list). These segments, which lie between Holiday Hills and North Aurora, were listed because results from at least one water sample suggest there are water quality concerns. The most common concerns include low dissolved oxygen levels or high concentrations of fecal coliform bacteria. The 303(d) listing was updated in 2002, and now includes the entire length of the Fox River from the Wisconsin state line to the river's mouth at Ottawa with the most numerous causes listed as flow alteration, habitat alteration, low dissolved oxygen, nutrients, organic enrichment, PCBs, siltation or suspended solids. The mission of the Fox River Study Group is to bring together a diverse coalition of stakeholders to work together to preserve and/or enhance water quality in the Fox River watershed.

The activities of the Fox River Study Group shall include, but are not limited to, the following:

- Participation in water quality monitoring efforts in the Fox River watershed;
- Development of a computer model of the Fox River watershed;
- Maintenance of the computer model as a management tool to promote efficient use of taxpayer and private money on watershed projects, assess the effect of various development options throughout the watershed, educate stakeholders, evaluate management priorities, identify sensitive regions within the watershed, develop continuing monitoring programs;
- Development of a plan to preserve and/or enhance the water quality of the Fox River; and
- Promotion, as needed, of the adoption of the watershed plan by appropriate entities who have the authority for its implementation.

Additional information and a copy of the Fox River Implementation Plan can be found at <http://www.foxriverstudygroup.org/index.htm>.

2.4.A.2 Des Plaines River Watershed Workgroup

The Des Plaines River Watershed Workgroup (DRWW) is a voluntary, dues paying organization with a mission to bring together a diverse coalition of stakeholders to work together to improve water quality in the Des Plaines River and its tributaries in a cost effective manner to meet IEPA requirements. Membership of the DRWW consists of communities, Publicly Owned Treatment Works (POTWs), and other interested parties. The Workgroup consists of Agency members represented by NPDES permit holders, Associate members which are non-permit holding organizations, and individual members. The DRWW will monitor water quality in the river and tributaries, prioritize and implement water quality improvement projects, and secure grant funding to offset the cost. Monitoring data will allow for a greater understanding of the water quality impairments, identify priority restoration activities, and track water quality improvements. The Workgroup is committed

to an approach for attaining water quality standards that focuses on stakeholder involvement, monitoring, and locally led decision-making based on sound science.

Additional information can be found at <http://www.drww.org>.

2.5 Coordination with Consultants

The MS4 may enlist the services of consultants to assist in the implementation of the WDO (including, but not limited to, plan review, site inspections and enforcement), and the design of MS4 projects.

2.6 Coordination of Contractors

The Township also has a responsibility to hire contractors who are knowledgeable of the applicable requirements of the ILR40 and ILR10 permits. Provide appropriate training, or require documentation that appropriate training has been attended, for all contractors responsible for municipal green infrastructures and ensure they are aware of good housekeeping/pollution prevention practices.

2.7 Coordination with the Public

Coordination with the Public occurs on several levels. In addition to the avenues described in this SMPP the Public has the opportunity to comment on proposed preliminary and final plats through the Plan Commission and Municipal Board process established in the Municipal Code.

2.8 Coordination with the IEPA

Antioch Township is required to complete annual reports which describes the status of compliance with the ILR40 permit conditions and other related information as presented on the annual report template provided by the QLP. The annual report must be posted on the Township website and submitted to the IEPA by the first day of June each year. Annual reporting to IEPA should consist of “implemented SMPP” for all tasks completed in accordance with this SMPP. Additional information should be provided for areas of enhancement or tasks not completed.

Records regarding the completion and progress of the SMPP commitments must be kept by the community. The tracking form, described in Chapter 2.1, should be updated throughout the year. The completed forms should be located in a binder with necessary supporting documentation. The binder must be available for inspection by both IEPA and the general public.

2.9 Coordination with the Development Community

Antioch Township has a responsibility to assist the development community in understanding when an ILR10 permit is required and whether construction sites comply

with the general ILR10 and WDO permit conditions. In general, an incidence of non-compliance must be filed with IEPA for illicit discharges exiting an MS4's outfall into a receiving water. Additionally, if the illicit discharge is generated by a construction site, it may be necessary for both the applicant and the MS4 to file the ION form with IEPA.

Furthermore, the municipality has a responsibility to inform the development community that they are required to hire contractors which meet the qualifications necessary under the program, refer to Chapter 3.5.B for additional information on qualified personnel.