Illinois Environmental Protection Agency

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 _____

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

Name: Village of Broadview

Mailing Address: 2350 S. 25th Ave. County: Cook

City: Broadview State: IL Zip: 60155 Telephone: 708-681-3600

Contact Person: Matthew Ames 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 Broadview

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 ☐
2. Public Participation/Involvement ☐
3. Illicit Discharge Detection & Elimination ☐
4. Construction Site Runoff Control ☐
5. Post-Construction Runoff Control ☐
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))

Owner Signature: _____ Date: 6/7/16

Matthew Ames
Printed Name:

Director of Public Works
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

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

SECTION A.
CHANGES TO BEST MANAGEMENT PRACTICES

X Indicates BMPs performed as proposed
√ Indicates changes to BMPs

Year 2	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
	A.3 Public Service Announcement
	A.4 Community Event
	A.5 Classroom Education Material
X	A.6 Other Public Education
B. Public Participation/Involvement	
	B.1 Public Panel
	B.2 Educational Volunteer
	B.3 Stakeholder Meeting
X	B.4 Public Hearing
X	B.5 Volunteer Monitoring
	B.6 Program Coordination
X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination	
X	C.1 Storm Sewer Map Preparation
X	C.2 Regulatory Control Program
	C.3 Detection/Elimination Prioritization Plan
	C.4 Illicit Discharge Tracing Procedures
	C.5 Illicit Source Removal Procedures
	C.6 Program Evaluation and Assessment
X	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
X	C.9 Public Notification
X	C.10 Other Illicit Discharge Controls

Year 2	
D. Construction Site Runoff Control	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
X	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
X	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
X	E.1 Community Control Strategy
X	E.2 Regulatory Control Program
X	E.3 Long Term O&M Procedures
	E.4 Pre-Const Review of BMP Designs
	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
	E.7 Other Post-Const Runoff Controls
F. Pollution Prevention/Good Housekeeping	
X	F.1 Employee Training Program
X	F.2 Inspection and Maintenance Program
X	F.3 Municipal Operations Storm Water Control
	F.4 Municipal Operations Waste Disposal
	F.5 Flood Management/Assess Guidelines
X	F.6 Other Municipal Operations Controls

SECTION B.
STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

The status of BMPs and measureable goals from year 2 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 the newsletter regarding storm water awareness.

Status: This reporting period, no articles were included in the newsletter. Articles discussing the effects of pollution on our waterways are scheduled to be featured in upcoming quarterly newsletters. The newsletter is mailed to all 8,500 residents and is also available on the Village's website. 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 webpage and post initial information.

Status:. The Village has improved the website over this reporting period. The public works page has incorporated a section entitled Drainage Information which contains pertinent information regarding storm water.

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 Director of Public Works. 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 clean up program.

Status: The Community Garden Program was created in 2011 through a Model Community Grant. To date, 30 garden plots have been constructed. 5 are in use at the Beverly Center, and 25 are in use at the Schroeder location. The program has been found to be quite popular amongst residents, and the Village is looking to accommodate the demand. The community gardens program is essential components in helping families and individuals save money, have access to affordable and nutritious food, and learn valuable skills.

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 stencil program, conduct outreach to determine volunteer pool.

Status: All newly installed lids on Capital Improvement Projects (approximately 15 Each) contained the labeling, "No Dumping, Drains to Waterways". This has been determined to be the most feasible method of providing identification to storm sewers, and will fulfill the intention of the stencil program while minimizing the cost.

Additional clean-up work was performed through the Sheriff's Work Alternate Program (SWAP), a program directed by Cook County. The Village of Broadview 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.

The Village held its annual clean-up date in May of 2015. This is a day where residents are allowed an unlimited amount of disposal of household and construction debris such as furniture, fixture and carpeting. Notice of the clean-up day is placed in the newsletter and on the Village website.

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 Illicit Discharge and Illegal Dumping Ordinance was reviewed and resulted in no recommended updates at this time.

The Cook County Watershed Management Ordinance (WMO) was officially adopted by the MWRD during the previous reporting period with an implementation date of May 1, 2014. Developments will now be reviewed in context with this new ordinance as well as the Village's existing requirements. The more restrictive of the requirements will be applied to developments.

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 a quarterly basis at a minimum. The Village inventory includes 150 industrial facilities and 300 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: At least one of the quarterly newsletters typically addresses this matter. This will be addressed in the next reporting period.

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 Broadview 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. The Village was able to provide drop-off locations at the Public Works Department, Fire Department, Beverly Center, and Schroeder Park in a joint venture with Vintage Tech Recyclers, Inc., as well as the WCCSWA.

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.

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, eight (8) development plans were reviewed, all of which were below 1 acre in size, thereby exempt from the requirements listed above. However, the plans are still reviewed with respect to erosion and sediment control measures. The Village and Hancock Engineering provide the applicable requirements to the developer.

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 "Measureable Goals".

Status: This reporting period, 3 Public Projects and 1 Private Projects were inspected by the building department or Hancock Engineering with respect to erosion and sediment control measures. The Public Projects are listed in section F of this report. 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 the 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.

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. Typically, if complaints do arise, they are 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. A total of 1 private developments were constructed this reporting period, due to the recent economic slowdown. 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 is in association with the MWRD's Rain Barrel Program. The Rain Barrels may be purchased directly from the MWRD at a discounted price. 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: The WMO became effective within the previous reporting period, with an implementation date of May 1, 2014. The WMO contain restrictions on the quality and quantity of water to be permitted to be discharged from developed sites.

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 has applied for funding through the Cook County Development Grant Program that would utilize green construction practices to reduce stormwater runoff and pollutants.

The MWRD is currently in the design stage of streambank improvements to Addison Creek. The construction is anticipated to begin in 2016. The stabilization of the streambank will result in the reduction of long term maintenance along the creek and improve the quality of the waterway.

Additionally, the village is scheduled to design and install alleys through the CDBG Program. The alleys will utilize the new design incorporated by Hancock Engineering for Green Alleys. The Green Alleys eliminate or reduce the use of sewer and rely on infiltration to the maximum extent practicable.

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: Employees receive training when budget constraints allow for such. Public Works employees receive training to operate the equipment with respect to their own safety as well as in the safest manner possible for the environment. It is acknowledged that adequate training will reduce the discharge of pollutants into the Village sewer system.

F.2: Inspection and Maintenance Program
The Goal of this program is to directly reduce the amount of debris from entering storm sewer structures and entering the storm sewers.

Goal for Year 2: Continue street sweeping program and sewer cleaning/structure cleaning program.

Status: The Street sweeping schedule and information are posted on the website. The information is listed as follows:

"Street sweeping operations run between spring and fall. The Village is swept in sections on a rotating basis, during both day and night hours. In residential sections of the Village with few side drives, most sweeping is done at night when autos are of the street (in accordance with Village parking ordinances).

Residents are asked to occasionally "clean sweep" the gutters in front of their properties, resulting in cleaner streets and prevents the clogging of sewers.

Street Sweeping Schedule
Zone 1: (North of Roosevelt Road to Eisenhower Expressway, East of 17th Avenue to 13th Avenue)— Thursday nights; also Roosevelt Road and off-street parking north and south of Roosevelt Road

Zone 2: (North of Roosevelt Road to Harvard Street, East of 25th Avenue to 17th Avenue)—Thursday nights; also Roosevelt Road and off-street parking north and south of Roosevelt Road

Zone 3: (North of railroad tracks to Roosevelt Road, East of 17th Avenue and 9th Avenue)—Mondays

Zone 4: (North of railroad tracks to Roosevelt Road, east of 25th Avenue to 17th Avenue)—Tuesdays

Zone 5: (North of Cermak Road to Railroad tracks, east of 17th Avenue to 9th Avenue)—Wednesdays

Zone 5A: (North of Terry Lane West to Cermak Road, east of 25th Avenue to Terry Lane)—Wednesdays

Zone 6-1: (North of 23rd Place to Cermak Road, East of Gardner Road to 25th Avenue)—Wednesday nights

Zone 6-2: (North of Cermak Road to railroad tracks, east of Gardner Road to 17th Avenue)—Wednesday nights

Zone 6-3: (North of railroad tracks to Indian Joe Drive, east of Gardner Road to 25th Avenue)—Wednesday nights

All Alleys North and South of Roosevelt Road: Last Thursday of every month

Due to night sweeping on Thursday, no sweeping will be done on Friday. Friday will be reserved for sweeper maintenance. Broadview sweeps 21.5 miles of Broadview streets and 4.62 miles of state highway for a total of 26.12 miles times 2 (curbing) for a grand total of 52.24 miles.

Large scale sewer cleaning work is typically performed on a bi-annual basis. The next round of sewer cleaning is scheduled for 2016. This reporting period, sewer cleaning was performed on an as-needed basis. Approximately 2000' of sewer was cleaned within the Village.

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 evelop strategy to implement additional relevant measures.

The Village of Broadview constructed a new salt storage facility on the site of its elevated tank. It was completed in November of 2014. The capacity is 1,800 tons. 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. Approximately 1,200 Ton was placed this reporting period. The Village is currently utilizing the additive "Geomelt." The additive "Geomelt" reduces 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 of Broadview 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. The Village is reviewing a record keeping system.

Triple Basins in garage areas are continuously inspected and cleaned on a regular basis. The maintenance yard is inspected throughout the year. 0 gallons of herbicides and pesticides were applied to the Right-of-Way.

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

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

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

B.5 Volunteer Monitoring An unintended, positive result of trash removal was Public Education. In addition to the reduction of pollutants, many residents were able to become more knowledgeable about the 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 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 occured, 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 relies on rain gauge information taken from the nearest rain gauge of the MWRD. The MWRD Rain Gauge No. 5 is located in nearby Cicero, IL. The rain gauge data is provided on the MWRD website at http://www.mwrd.org/irj/portal/anonymous/overview and can be reviewed by clicking on the link entitled "Rain Data History."

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

The Village of Broadview 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 Broadview relied upon the implementation of the Cook County Watershed Management Ordinance (WMO). The District's Board of Commissioners adopted the Watershed Management Ordinance (WMO) on October 3, 2013, which became effective on May 1, 2014. The WMO addresses many of the MS4 Permitting BMP requirements. Any BMPs which are relied upon from the WMO will be discussed in future reporting.

SECTION F.
CONSTRUCTION PROJECTS PERFORMED DURING THE REPORTING PERIOD

Project Name	Type	Project Size (acres)	Construction Start Date	Construction End Date
2016 Roadway Improvements Project	Resurfacing	3.4	Summer 2016	Fall 2016
2016 CDBG Improvements Project	Resurfacing	0.8	Summer 2016	Fall 2016