

CITY OF BATAVIA

100 North Island Avenue, Batavia, Illinois 60510-1930

Phone: (630) 879-1424 Fax: (630) 879-0710

Website: www.cityofbatavia.net

JEFFERY D. SCHIELKE
Mayor

M. HANNAH VOLK
City Clerk



WILLIAM R. McGRATH
City Administrator

RANDALL R. RECKLAUS
Assistant City Administrator

JOHN S. NOBEL
City Attorney

April 08, 2003

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attn: Permit Section
P.O. Box 19276
Springfield, IL 62794-9276
(Via Registered Mail)

Subject: National Pollutant Discharge Elimination System, Phase II
City of Batavia Notice of Intent

Dear Sir or Madam,

Attached is the signed original copy of the Notice of Intent for the City of Batavia that is being submitted for compliance with the NPDES Phase II regulations.

Please call me at (630) 879-1424, ext. 414 or e-mail me at sscheffel@cityofbatavia.net if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven K. Scheffel". The signature is fluid and cursive, with the first name being the most prominent.

Steven K. Scheffel, P.E.
Assistant City Engineer

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
NOTICE OF INTENT
FOR GENERAL PERMIT FOR DISCHARGES FROM
SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS
(MS4s)**

Input forms in Word format are available
by via email.
marilyn.davenport@epa.state.il.us
or by calling the Permit Section at
217/782-0610
See address for mailing on page 4

For Office Use Only – Permit No. ILR40 _____

Part I. General Information

1. MS4 Operator Name: City of Batavia
2. MS4 Operator Mailing Address:
Street- 100 North Island Avenue City- Batavia
State- Illinois Zip Code- 60510-1930
3. Operator Type: City
4. Operator Status: Local
5. Name(s) of Governmental Entity(ies) in which MS4 is located: Kane and DuPage Counties
6. Area of land that drains to your MS4 (in square miles): Approximately 16
7. Latitude/Longitude at approximate geographical center of MS4 for which you are requesting authorization to discharge:

Latitude: 41 51 2.16 North Longitude: 88 18 1.512 West
 DEG. MIN. SEC. DEG. MIN SEC.

8. Name(s) of known receiving waters: *Attach additional sheets (Attachment 1) as necessary:*

1. <u>Fox River</u>	2. <u>Mahoney Creek (tributary of the Fox River)</u>
3. <u>Mill Creek (tributary of the Fox River)</u>	4. <u>Indian Creek (tributary of the Fox River)</u>
5. <u>McKee Road Tributary of Mill Creek</u>	6. <u>Mill Creek Tributary</u>
7. <u>Lake Run Tributary of Blackberry Creek</u>	8. <u>Fox River Tributary (in northeast Batavia)</u>
9. <u>Fox River Tributary (at Illinois Prairie Path)</u>	10. <u>Kress Creek (tributary of West Branch of the DuPage River)</u>

9. Persons Responsible for Implementation/Coordination of Storm Water Management Program:

<u>Name</u>	<u>Title</u>	<u>Telephone No.</u>	<u>Area of Responsibility</u>
Bill McGrath	City Administrator	(630) 879-1424 x102	Administrative Oversight
Ted Bergeson	City Engineer	(630) 879-1424 x400	Engineering design and design review of infrastructure improvements
Gary Larsen	Director of Public Works	(630) 879-1424 x309	Infrastructure operation and maintenance oversight
Scott Haines	Superintendent of Streets	(630) 879-1424 x329	Street, storm sewer , and detention facility maintenance
Steve Scheffel	Assistant City Engineer	(630) 879-1424 x414	Engineering design and design review of infrastructure improvements

Information required by this form must be provided to comply with 415 ILCS 5/39 (2000). Failure to do so may prevent this form from being processed and could result in your application being denied.

Part II. Best Management Practices (include shared responsibilities) Proposed to be Implemented in the MS4 Area

(Details of BMP implementation for each checked BMP number is required in Part IV of this NOL)

A. Public Education and Outreach

- A.1 Distributed Paper Material
- A.2 Speaking Engagement
- A.3 Public Service Announcement
- A.4 Community Event
- A.5 Classroom Education Material
- A.6 Other Public Education

B. Public Participation/Involvement

- B.1 Public Panel
- B.2 Educational Volunteer
- B.3 Stakeholder Meeting
- B.4 Public Hearing
- B.5 Volunteer Monitoring
- B.6 Program Coordination
- B.7 Other Public Involvement

C. Illicit Discharge Detection and Elimination

- C.1 Storm Sewer Map Preparation
- 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
- C.7 Visual Dry Weather Screening
- C.8 Pollutant Field Testing
- C.9 Public Notification
- C.10 Other Illicit Discharge Controls

D. Construction Site Runoff Control

- D.1 Regulatory Control Program
- D.2 Erosion and Sediment Control BMP's
- D.3 Other Waste Control Program
- D.4 Site Plan Review Procedures
- D.5 Public Information Handling Procedures
- D.6 Site Inspection/Enforcement Procedures
- D.7 Other Construction Site Runoff Controls

E. Post-Construction Runoff Control

- E.1 Community Control Strategy
- E.2 Regulatory Control Program
- E.3 Long Term O&M Procedures
- E.4 Pre-Const Review of BMP Designs
- E.5 Site Inspections During Construction
- E.6 Post-Construction Inspections
- E.7 Other Post-Const Runoff Controls

F. Pollution Prevention/Good Housekeeping

- F.1 Employee Training Program
- F.2 Inspection and Maintenance Program
- F.3 Municipal Operations Stormwater Control
- F.4 Municipal Operations Waste Disposal
- F.5 Flood Management/Assess Guidelines
- F.6 Other Municipal Operations Controls

Part III. Qualifying Local Programs

Attach additional sheets (Attachment 2) as necessary:

(Describe any qualifying local programs that you will implement in lieu of new permitting requirements.)

1. Public Education and Outreach:

The City of Batavia will utilize the existing and proposed public education and outreach programs that will be administered by the Kane County Department of Environmental Management as part of Kane County's NPDES Phase II NOI.

In addition, we will use the following existing City resources to inform and educate the public:

- a. City website (<http://www.cityofbatavia.net/>)
- b. Local cable access television station, BATV (<http://www.cityofbatavia.net/Community/batv43/index.htm>)
- c. City newsletter "Currents" (also posted on the City website)
- d. New homeowner handouts.

2. Public Participation/Involvement:

The City of Batavia will utilize the existing and proposed public involvement and participation programs that will be administered by the Kane County Department of Environmental Management as part of Kane County's NPDES Phase II NOI.

In addition, we will use the following existing City programs and procedures to encourage public involvement and participation:

- a. The City holds bi-weekly City Council meetings that are open to the public. Citizens can attend these meetings and are provided the opportunity to address the Council on stormwater management and pollution prevention issues. City Engineering and Public Works management staff attend these meetings and are available to answer questions from the public regarding specific City programs and procedures.
- b. The City of Batavia, in conjunction with environmental groups, and other governing bodies from the area, has combined to form the Fox River Study Group for the purpose of identifying existing and potential problems in the northern Illinois portion of the Fox River based on "good science" and "real models."

The first stage of the five-year study began on April 30, 2002, and involves water sample collections from seven different locations along the Fox River. Wastewater personnel and volunteers from environmental groups are collecting samples using means and methods in conformance with IEPA standards. In 2003, the sampling information gathered will be turned over to the Illinois State Water Survey. Phase 2 will consist of developing a watershed study plan using the Phase 1 results. The plan will evaluate modeling and data needs and the design of a watershed-modeling plan that will be a tool to perform predictive simulations of future conditions. Phase 3 of the project will include data collection, monitoring, model calibration and application.

- c. The City of Batavia routinely uses Citizens Advisory Committees to provide input to the City Council on significant issues that are before the community, including environmental issues. In 2002, an Advisory Committee was formed to provide input on the Illinois Department of Natural Resources' proposal to remove the north dam on the Fox River that is within the City's municipal boundaries. Batavia will advocate and call for Citizens Advisory Committees to help address other issues of this kind that impact local and regional stormwater quality.

3. Illicit Discharge Detection and Elimination:

Current City of Batavia requirements for use of the sanitary sewer system, the prevention of inflow/infiltration of the sanitary sewer system that could lead to overflows, and the prevention of sanitary wastes from being discharged to natural bodies of water. The City will continue monitoring and strict enforcement of these regulations.

- a. **City of Batavia Municipal Code 8-3-5, Ordinance 85-21, Adopted September 03, 1985**
Sanitary Sewerage Systems Mandatory: The owner of all houses, buildings or properties used for human occupancy, employment, recreation or other purpose situated within the City and abutting any public right of way in which there is now located a public sanitary sewer of the City within three hundred feet of the property, is hereby required, at his expense, to install suitable toilet facilities therein and to connect such facilities directly with the proper public sewer within ninety days after date of official notice and approval by City Council to do so.
- b. **City of Batavia Municipal Code 8-3-6, Ordinance 85-21, Adopted September 03, 1985**
Private Sewage Disposal Systems: It shall be unlawful to construct or repair any privy, privy vault, septic tank, cesspool or other facility intended or used for the disposal of sewage within the corporate limits.
- Temporary Private Sewage Disposal Systems: A permit from the City is required to site and erect a temporary sewage disposal systems or toilet facilities. A permitted temporary facility is not to be in use for longer than three days.
- c. **City of Batavia Municipal Code 8-3-7, Ordinance 85-21, Adopted September 03, 1985**
Separate Sewer Systems: No sewer that receives roof drainage, foundation drainage, surface water or groundwater, may be connected to a sanitary sewer. It is unlawful to construct combined sewers or other facilities intended to receive both storm runoff and sewage. The existing public combined sewer serving the area bounded by the Fox River on the east, Garfield Street on the south, Van Nortwick Avenue on the west and North Avenue on the north shall be limited to said area. Said combined sewers may be utilized for sanitary sewer extension or connection but under no circumstances for storm sewer outlet or extension.
- d. **City of Batavia Municipal Code 8-3-16, Ordinance 85-21, Adopted September 03, 1985**
Use of Existing Drainage and Sewer Systems: Drainage systems, and the building drains and building sewers connected therewith, and storm drains or storm sewers which exist as of this date, and which have as their outlet any public sewer or natural watercourse or natural outlet, may be used and operated, maintained and repaired. However, no such drainage systems and the building drains and building sewers connected therewith, and no such storm drains or storm sewers shall be used to discharge any sewage, material, or substance directly or into any public sewer or into any natural outlet.
- e. **City of Batavia Municipal Code 8-3-17, Ordinance 85-21, Adopted September 03, 1985**
Prohibited Acts: It is unlawful for any person to place, deposit or permit to be deposited in an unsanitary manner upon public or private property within the City, or in any area under the jurisdiction of said City, any human or animal excrement, garbage or other objectionable waste. It is unlawful to discharge to any natural outlet within the City, or in any area under the jurisdiction of said City, any sanitary sewage, industrial wastes or other polluted waters, except where suitable treatment has been provided.
- f. **Stormwater Management System Mapping**
The City of Batavia maintains both digital and hardcopy atlases of the existing stormwater management system that is based on available development plans and other records. These atlases include all storm sewers and appurtenant structures, detention facilities, and stream channels. The City is implementing a plan to update these atlases by completing physical surveys of the existing system and begin creating a database for each system component. The City plans to obtain Geographic Information System and Global Positioning System capabilities in the future to build upon the atlas and database information.

4. Construction Site Runoff Control:

Current City of Batavia regulations that preserve and protect open space areas that buffer streams, lakes and wetlands from development activities, and control erosion and sedimentation on sites suitable for development. The City will continue monitoring and strict enforcement of these regulations.

a. **Kane County Stormwater Management Ordinance**

The Kane County Board adopted the Kane County Stormwater Management Ordinance (KCSMO) on October 09, 2001. The City of Batavia adopted the KCSMO into the city municipal code (11-7-1) with city ordinance 01-36 on June 18, 2001. Article 3 of the KCSMO, entitled "Erosion and Sediment Control," includes requirements for construction site stormwater quantity and quality control. Article 4 of the KCSMO, entitled "Protection of Special Management Areas," includes requirements for buffer areas to protect streams, lakes and wetlands during and after construction.

b. **City of Batavia Municipal Code 10-6-1, Ordinance 92-105, Adopted December 21, 1992**

Planned Developments: Planned developments are a distinct category of special use with the flexibility that the City uses to achieve the following: the preservation and enhancement of desirable site characteristics, such as natural topography, vegetation and geologic features and the prevention of soil erosion; the preservation and beneficial use of open space; and an increase in the amount of open space over that which would result from the application of conventional subdivision and zoning regulations.

d. **City of Batavia Municipal Code 10-6-5, Ordinance 92-105, Adopted December 21, 1992**

Standards for Planned Development: An erosion control plan for the period during which construction will be taking place.

e. **City of Batavia Municipal Code 10-2D-6, Ordinance 98-05, Adopted April 06, 1998**

Open Space And Landscaping Design Standards: Maximize retention of open space and preserve scenic views. Configure open space to be usable, functional and appropriate to the development proposed. Address the functional aspects of landscaping such as drainage control, erosion prevention, conservation. Minimize tree, vegetation and soil removal. Existing mature trees of five inches or more in diameter and shrubs shall be maintained to the greatest extent practicable; if evidence supports removal of these, indicate the specific procedure, types and sizes for replacement.

Environmental Consideration Design Standards: Adequate provision shall be made to: minimize the impact on existing wetlands, floodplains, and hilltops; discourage the obstruction of natural watercourses, prevent pollution of surface and groundwater; minimize erosion and sedimentation; prevent changes in groundwater levels; minimize potential for flooding; design drainage to maximize groundwater recharge, not increase the rate of runoff at project boundaries, collect and dispose of all on- and off-site stormwater and natural water, control the slippage, shifting, erosion, accretion and subsidence of soil, clean, control and otherwise alleviate contamination or environmental hazards.

Preservation Design Standards: Adequate provision should be made to preserve unique architectural, cultural, environmental and historical resources. Development designs and treatments that respect such desirable resources on adjacent properties are encouraged.

f. **City of Batavia Municipal Code 11-5-11, Ordinance 00-151, Adopted December 04, 2000**

Site Grading: A site grading permit approved by the City Engineer shall be required for the grading of any lot or parcel of land within the city which is one-quarter of an acre or larger, and which has not previously been granted a building permit or approved development plan relating to the proposed site grading for the site. A topographic plat of the parcel showing the existing and proposed contours, existing utilities, foundation elevation of adjacent buildings, nearest storm sewer structure or culvert, and, where applicable, the 100-year flood elevation and wetlands delineation. An erosion control plan and, for parcels one acre or larger, an NPDES permit from IEPA shall also be required. Following the grading, the completed site shall be topsoiled, seeded and mulched.

5. Post-Construction Runoff Control:

Current City of Batavia regulations that control post-development peak runoff flow rates using stormwater detention, and retention, and that require Best Management Practices to promote the cleaning and infiltration of stormwater runoff. The City will continue monitoring and strict enforcement of these regulations.

- a. **Kane County Stormwater Management Ordinance**
Article 2 of the KCSMO, entitled "Requirements for Stormwater Management," includes provisions for stormwater quantity control using detention facilities. The KCSMO requires a retention component for each detention facility. Sufficient retention volume below the principle spillway is required to retain the runoff from 0.75 inches of rain on the hydraulically connected impervious areas of the site. Article 2, Section 201(f) of the KCSMO includes requirements for stormwater quality control using BMP's in both the site development design and into the design of the detention facilities.
- b. **City of Batavia Municipal Code 11-7-2, Ordinance 01-36, Adopted June 18, 2001**
Amends Article 2 of the KCSMO to reduce the allowable release rate for certain watersheds within the city's municipal boundaries from the 0.1 cubic feet per second maximum allowed by the KCSMO.

6. Pollution Prevention/Good Housekeeping:

Current City of Batavia regulations and practices that govern the release of pollutants into streams, lakes, and wetlands. The City will continue monitoring and strict enforcement of these regulations. Current municipal operations will continually be examined for efficiency and effectiveness.

- a. **City of Batavia Municipal Code 4-6-1, Ordinance 90.001 Adopted 1972**
Pollution Prohibited in General: It is unlawful to deposit in any manner in or upon the waters of the Fox River or public water or receiving basin within the jurisdiction of the City any kind of dirt, rubbish, waste, article, thing or substance whatsoever, whether liquid or solid. It is unlawful to deposit any of the aforementioned items anywhere within the jurisdiction of the City in such manner that it may be carried or deposited in whole or in part by the action of the sun, wind, rain or snow, into the Fox River or public watercourse. This Section shall not apply to the deposit of material under a permit authorized by the State or authorized by any ordinance of the City, nor shall the same apply to articles or things deposited in or conducted into the City sewer system through lawful drains and in accordance with the ordinances of the City relating thereto.
- b. **City of Batavia Municipal Code 4-6-3, Ordinance 90.010, 90.015, Adopted 1972**
Dumping of Waste Matter, Inflammables Prohibited: No one shall deposit or cause to be deposited any garbage, refuse, vegetable matter, filth, dung, dead animal, offal, putrid or unwholesome substance, or the contents of any privy, water closet, catch basin, cesspool or vault upon the margin or banks of the Fox River or other public watercourse within the City. No one shall deposit, into the Fox River or other public watercourse within the City, any gas, tar, benzene, naphtha, fuel oil, or other inflammable or explosive liquid, solid or gas or any water or waste which may contain more than one hundred parts per million, by weight, of fat, oil or grease, any cyanides, phenols or wastes containing a toxic or poisonous substance.
- c. **City of Batavia Municipal Code 7-1-8, Ordinance 95.065, 95.070, Adopted 1972**
Deposits on Streets or Sidewalks: It is unlawful to deposit on any street or public sidewalk any material which may be harmful to the pavement thereof, or any waste material, glass or other articles which may do injury to any person, animal or property.
- d. **City of Batavia Municipal Code 9-7-6, Ordinance 88-62, Adopted November 11, 1988**
Stream Preservation: Pursuant to 65 Illinois Compiled Statutes 5/7-4-4, the City has jurisdiction over all waters within or bordering the City to the extent of three miles beyond the corporate limits. Authorizes the Superintendent of the Street Department to remove obstructions from natural and other watercourses causing flooding of any part of the corporate area whether such obstructions are located inside or outside the corporate limits, and for that purpose, after written notice to the owner at least ten days prior thereto, may enter onto the lands or waters of any person, but subject to the responsibility for all damages which shall be occasioned thereby, to remove all from private property when the owner of such property, after reasonable notice, refuses or neglects to remove such. The City may secure a lien against such property to recover the cost of such removal. Dumping of garbage and/or litter, including yard waste and any other debris into natural or other watercourses is prohibited. Convicted violators shall be fined not more than five hundred dollars for each offense.

e. **City Fleet and Building Maintenance**

Routine repair and preventative maintenance work for all Public Works service trucks are completed in-house. Used motor oils, transmission fluids, coolant, batteries, tires, etc. are disposed of using approved recycling programs. The only underground storage tank that the City maintains is for dispensing fleet diesel and gasoline fuel at the Public Works facility. The Illinois State Fire Marshall issued the permit for the installation of this tank. It is inspected regularly as required by the permit.

f. **City Vehicle Cleaning**

The Public Works Department maintains a wash station within the Public Works Facility for all large city trucks and service vehicles. This station collects and pre-treats all wash station wastewater before discharging it to the sanitary sewer system. The City has an annual contract with a local commercial car wash facility wherein all city passenger cars and smaller trucks can be washed on an as needed basis. Wastewater from this establishment is discharged to the sanitary sewer system. The City Fire Department has two stations. All Fire Department vehicles are washed inside the stations and wastewater is pretreated before it is discharged to the sanitary sewer system.

g. **Public Street and Parking Lot Cleaning**

All City streets are cleaned with a street sweeper truck and cleaned monthly from April through November. Streets in the downtown are cleaned on a weekly basis. Municipal parking lots are cleaned as needed.

h. **Deicing Salt Storage and Application**

The City stores a portion of its deicing salt supply indoors. The outdoor stockpile is limited to the amount used on an average weekly basis during the winter season, since a seven-day advance is needed on salt delivery. The City has plans to construct a salt storage shed large enough to contain the amount of salt used in a typical season. This new facility will be designed to prevent salt contamination of ground and surface water. Salt spreaders are calibrated annually to industry standards prior to the start of the season. Currently, the City uses sodium chloride road salt with calcium chloride added as an accelerant. The City will change to using magnesium chloride as the accelerant in the near future. In addition to its other benefits, magnesium chloride is less harmful to the environment.

i. **Stormwater Management System Cleaning**

In general, storm sewers are cleaned on an as-needed basis; however, storm sewers are always cleaned for those City streets that are included in the annual road maintenance improvement program. All catch basins are cleaned annually. Grass mowing and trash removal of City-owned and City-maintained detention ponds/basins is completed monthly during the growing season. In addition, these detention facilities have a monthly inspection to verify that flow restrictors and outlets are operating as designed. Natural streams are cleared of debris as necessary. Bridges, culverts, and the stream channels are inspected following significant rainstorms to ensure that flood-borne debris does not accumulate or get flushed to areas downstream of the City.

The Public Works Department is responsible for these tasks. They are updating their methods of documenting these activities to improve efficiency and thoroughness.

Part IV. Measurable Goals (include shared responsibilities) Proposed to be Implemented by the MS4

Attach additional sheets (Attachment 3) as necessary

BMP No. should match that checked in Part II of this NOI. The applicant may repeat the same BMP No. where more than one BMP of similar type is to be implemented. Where necessary, attach additional sheets to provide more detail on each specific BMP.)

BMP No. A6

Brief Description of BMP: Public Education and Outreach: Other Public Education

The City of Batavia proposes to develop a database of all property owners that abut and include local streams. Best Management Practice information will be mailed and otherwise made available to these property owners to help them in preserving and maintaining the riparian areas along the streams. The City will offer assistance and educational programs toward this end also. The City's plan to acquire GIS capabilities will improve future implementation of this program.

Measurable Goal(s), including frequencies: Goals will include timelines for completion of the property owner database, mailings, and other educational programs.

Milestones:

- Year 1:** Complete property owner database.
- Year 2:** Complete initial contact and mailing.
- Year 3:** Hold an educational seminar for property owners. Have experts in riparian area management give presentations, etc.
- Year 4:** Complete GIS integration of property owner database.
- Year 5:**

BMP No. B6

Brief Description of BMP: Public Participation/Involvement: Program Coordination

The City of Batavia proposes to develop a program, in cooperation with the Batavia Park District, to assist and work with local citizens groups to organize stream clean ups and streambank stabilization and improvement projects for the Fox River and tributary streams within the City's jurisdiction.

Measurable Goal(s), including frequencies: Goals will be set in terms of annual number of stream miles cleaned and stabilized.

Milestones:

- Year 1:** Develop and coordinate program with Park District, and initiate contact with local citizens environmental groups.
- Year 2:** Organize and hold first stream clean-up event.
- Year 3:** Complete first stream restoration and stabilization project.
- Year 4:** Continue program with at least one annual project.
- Year 5:**

BMP No. F5

Brief Description of BMP: Pollution Prevention/Good Housekeeping: Flood Management/Assess Guidelines

The City of Batavia proposes to complete updated hydrologic and hydraulic studies for all perennial and intermittent streams within the municipal boundaries using current data and modeling methodology. In addition to accurately quantifying floodplains and flood risks, these studies will help identify and quantify riparian areas that are eligible for protection as special management areas under the Kane County Stormwater Management Ordinance.

Measurable Goal(s), including frequencies: Complete one study per year in accordance with funding availability. Start implement study recommendations in the first fiscal year after a study is complete.

Milestones:

- Year 1:** (as stated above)
- Year 2:**
- Year 3:**

BMP No. F6

Brief Description of BMP: Pollution Prevention/Good Housekeeping: Other Municipal Operations Controls

The City of Batavia proposes to retrofit existing storm sewer and stormwater detention facilities with BMP's as the need for significant repair of these facilities and/or replacements of facility components arise. BMP's will be implemented outside of the need for such maintenance, as funding will allow. The City will complete a study that will develop a comprehensive retrofitting plan and identify locations and priorities to maximize the water quality benefits as early in the program as possible.

Measurable Goal(s), including frequencies: Measurement will be in terms of number of storm sewer structures replaced with BMP structures and number of detention facilities retrofitted.

- Milestones:**
- Year 1:** Compile records and assess performance of current maintenance/replacement program.
 - Year 2:** Commission study for comprehensive BMP retrofitting and BMP priorities.
 - Year 3:** Begin BMP retrofitting implementation starting with high priority locations.
 - Year 4:** Complete BMP retrofitting on remaining priorities.
 - Year 5:** Full implementation of BMP retrofitting program with scheduled routine maintenance.

Part V. Certification

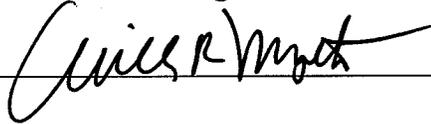
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment.

Authorized Representative Name and Title

Signature

Date

William R. McGrath, City Administrator



April 8, 2003

Mail completed form to:

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
ATTN: PERMIT SECTION
POST OFFICE BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276**