

DuPage River Salt Creek Workgroup
Meeting Agenda
Lombard Village Hall
August 26, 2015
9:00 – 11:00 AM

1. Approval of June 26, 2015 Meeting Minutes (Attachment 1)

2. Proposed MS4 Permit

Illinois EPA has been working on language for an updated MS4 permit. Since 1990 the NPDES Storm Water program has required medium and large municipal separate storm sewer systems (MS4s) to obtain NPDES coverage. Since then the program has expanded and now requires small MS4s in urbanized (a residential population of at least 50,000 people and an overall population density of at least 500 people per square miles areas) to obtain NPDES permits and implement six minimum control measures. The proposed language on the updated permit has additional requirements for monitoring of post storm flows, management of chloride stock piles and green infrastructure.

Presenter: Jeff Hutton, Environmental Protection Specialist, Illinois EPA
(Attachment 2, DRSCW comments on draft permit language)

3. Navigating Winter with the Illinois Tollway

The Illinois Tollway maintains and operates 2,172 lane miles. This vast system of ramps and high speed roadways requires careful consideration of materials, staff training and management and specialized policies to effectively navigate the winter. Over the last few years, the Tollway reviewed their chloride management policies and made strides to implement practices that will improve their efficiency with regard to the use of chlorides, potentially making huge positive impacts for area waterways.

Presenter: Scott Kapton, General Manager of Maintenance and Traffic,
Illinois Tollway

4. Assessments for NPDES Permit Special Conditions (New Business)

- Special Conditions Permit Language update.
- Expanding coverage of the special conditions.
- Project and Staffing Assessments.
- Dues invoicing schedule.

5. Funding update (SB2081) (Old Business)

- IGIG Program.

6. Projects Committee (New Business)

- Fawell Dam Update- Project has restarted and new scopes of work are being developed.
- Oak Meadows Update- Project is underway. Possible site visit in October.
- PAHs & Coal Tar Sealants (CTS) Update.
- Lower Salt Creek Watershed Plan – a workshop to collect detention basin location and meta data for the plan was held on the 7.23. 2015.
- Ammonia – N standards development (update).

7. Monitoring Committee (Old Business)

- Both the biological/habitat and the chemical surveys are underway for the 2015 West Branch survey.
- Both the biological/habitat and the chemical survey are underway at the three reference sites selected for 2015. Reference sites are located on Ferson and Otter Creeks.
- The East Branch POTW chloride monitoring will probably begin in late-summer. The need for this contract will be reviewed as new permits are likely to require chloride sampling at POTWs.
- Geodatabase Update.
- Resource Managers Guide to Aquatic Bioassessment Update.

8. Chloride Reduction Committee (New Business)

- Public roads deicing workshop on 9/24/15, parking lots & sidewalks on 10/8/2015. (Attachment 3)
- Chloride Offset Program with the Illinois Tollway update.
- CAWS and Des Plaines River Chloride Initiatives update.

9. Watershed Permitting Update (Old Business)

10. TMDL Development for the DuPage River/Salt Creek (New Business)

- Comments on DO have been supplied to Illinois EPA and Tetrattech.

11. Watershed Committee Updates – West Branch, East Branch and Salt Creek

- East Branch Resiliency Competition and Watershed Plan update.

12. Business Items (New Business)

- Membership dues update.
- Accounts Update (Attachment 4).
- Website Updates- the website was redesigned.
- Audit for FYE2015 is complete.
- Other Business.

13. DRSCW Calendar, Presentations and Press Coverage (Old Business)

- Presentation requested on September 3, 2015 in Addison at the IWEA NRR Annual Workshop on the DRSCW's watershed approach. Presenter - Nick Menninga (DGSD).
- WEFTEC 2015-application for track on "Stream Geomorphology and Restoration 101" Update.

14. Workgroup Meeting Schedule

- October 28, 2015 – possible visit to Oak Meadows dam removal and stream restoration
- December 9, 2015 – speaker "Sam," Sherri A. Mason, Ph. D., The State University of New York at Fredonia, plastic filaments and debris in wastewater.
- February 24, 2016 (Annual Meeting)
- April 27, 2016
- June 29, 2016

DuPage River Salt Creek Workgroup
Meeting Minutes
Lombard Village Hall
June 24, 2015
9:00 – 11:00 AM

1. Approval of April 29, 2015 Meeting Minutes (Attachment 1)

Nick Menninga made a motion to approve the April 29, 2015 meeting minutes as presented; motion seconded by Larry Cox; motion carried unanimously.

2. DuPage County Wetland Map Update

In 2012, DuPage County Stormwater Management received an \$118,369 Wetland Program Development grant from the U.S. Environmental Protection Agency to update the County's wetland map. The Wetland Map Initiative has been a three-year effort with a goal to provide residents, developers, and businesses with updated wetland information throughout the County. The map is a valuable planning tool for local government, developers, property owners and residents.

Presenter: Mary Beth Falsey, PWS, CPESC, CFM, Wetland Specialist, DuPage County Stormwater Management

Karen Daulton-Lange inquired about typical costs for a landowner to have property determined as a wetland. Mary Beth Falsey replied that a \$150.00 fees is typical and clarified that the fees is applicable for a determination - not to delineate a wetland.

Jim Knudsen asked whether DuPage County used GIS files for their investigation. Falsey responded affirmatively. They found evidence of ponds that were previously wetlands and some constructed wetlands. The process to determine whether they are wetlands is time intensive and includes studying plants and various aerial images.

Dave Gorman inquired whether the USGS hydraulic atlas should be submitted to demonstrate that a wetland had been constructed in a historically upland area and, thus, should not be considered regulatory. Falsey replied that it would be helpful to have all documentation submitted. There is much more involved work to be completed, which is why the project will not be completed by July 31st.

Larry Cox wanted to know how the use of infrared cameras worked out. Falsey stated that after a little time to get used to the cameras, some areas popped out. The infrared cameras made some wetland signatures easier to see later in the season. They used regular aerial imagery in spring and the infrared cameras later in the season.

Karen Daulton-Lange asked whether the presentation would be available on the website, highlighting the fact that the request for information was informational, not regulatory. Falsey responded that it is not but could be posted. She mentioned further that one public meeting regarding the project was held yesterday, and another is scheduled for tomorrow at 6:00PM.

Dan Lobbes inquired whether DuPage County had determined if the survey had increased or reduced the number of recognized wetlands. Falsey replied that they have not yet determined that but it may be informative to investigate. Some older maps show many were eliminated but that with development in the area, some were added.

Jessi DeMartini asked if the wetland image on the informational flyer was Churchill Woods. Falsey confirmed it was a Forest Preserve District property but could not confirm if it was Churchill or Spring Brook.

Stephen McCracken inquired whether the final map would be available in a shape file. Falsey confirmed the final map will be shared as part of their current file sharing agreements and would also be available in their web viewer, which is a separate application.

3. Oak Meadows Golf Course Rebuild and Ecological Restoration

Construction is due to start in July on the Oak Meadows Golf Course Rebuild and Ecological Restoration. Presentation will review the motivations behind the project and the work done by the diverse team of contractors who collaborated on a design to integrate the new course and river system. Project has both habitat and DO objectives for the DRSCW and would be the first recipient of funds from the DRSCW's draft permit condition.

Presenter: Erin Pande, PWS, CFM Ecological Services Director, Engineering Resource Associates, Inc.

Beth Wentzel of Inter-Fluve was in attendance to co-present on this project.

Larry Cox inquired about the map that indicates the current flooding and wanted to know how much reduction was necessary for playing area. Erin Pande responded that the future 10 year was obviously expanded in some (non-golf course) areas and reduced in others. It would be interesting to compare playability stats. Pande mentioned that all greens, tees, paths and bridges are elevated above the 10 year storm.

Dan Lobbes asked about downstream benefits for communities. Pande responded the project would not provide downstream benefits for 10 year or 100 year events but upstream elevations would fall about 5 inches during a 10 year event. There will be water quality improvements for downstream communities.

Larry Cox questioned when the A-Jacks and sheet pile were installed. Pande replied installation would have been around 2003; the sheet piles were already been in place and they may have been added as part of that update.

Larry Cox asked anticipated maintenance requirements to keep river the way we want it to be, noting we are already replacing technology that was installed less than 10 years ago. Beth Wentzel replied that the banks have a lot of clay and after they are vegetated expects it be stable; they do not anticipate much long term maintenance. The historical aerial photos indicate that river has not moved much through this reach. Also, due to the low gradient,

lower floodplain areas, low energy nature of this system the stream should be able to maintain itself.

Larry Cox asked when the woody debris would need to be replaced. Wentzel replied that wood installed under water takes a long time to break down. They plan to use material removed from the golf course. Erin Pande added that trees are still being pulled from the bottom of Lake Michigan. Wentzel continued that some elements (pool elements) may accumulate some debris and may require need periodic maintenance. While some debris provides great habitat, it is not appreciated by paddlers. The project was designed so paddlers could move over the debris; areas with woody debris closer to surface are not installed in primary flow areas.

Dave Gorman mentioned that all the bridges currently appeared high enough for paddlers to clear and asked whether that would still be possible after construction. Pande replied that the current plan is to raise all bridges except one.

Dennis Streicher questioned whether the tributary that is being moved is source or drainage. Pande replied drainage.

Holly Hudson asked what would happen if the IGIG grant is not released. Stephen McCracken replied that the grant was to provide \$2.25M. Should it not be released the DRSCW will proceed with funding the Oak Meadows project through its special assessment for the same amount. Should the grant funds be released later, it will be used to augment other projects identified in the special permit conditions.

Jim Knudsen inquired whether IGIG allows reimbursement for prior expenditures. Pande stated that typically, your agreement must be in place prior to making expenditures for which you seek reimbursement.

Karen Daulton-Lange asked about maintaining natural areas in out-of-bounds areas. Pande noted some natural areas will be in the playable course and general use areas and that tags will help delineate where the golf course ends and the natural areas begin.

Larry Cox asked how much the river restoration costs added to the overall costs. There was some discussion about this but it was generally concurred that the amount was in the range of \$4-6 M.

Larry Cox questioned current IBI scores and what we predict after the project is complete. Stephen McCracken responded that the original version of special conditions included these scores as objectives. Fish IBIs are not predicted to increase significantly because the major constraints on fish biodiversity are the Old Oak Brook and Fullersburg Woods dams. Neither of which will be improved by this project. However, we are predicting an improvement in gravel loving macro species at the site, but not enough to reach the state MIBI standard. For example there are 14 species of coarse substrate loving insects present in better quality areas of Salt Creek, of which only 6 were found at Oak Meadows. Post project we hope all 14 will be present at Oak Meadows. The restoration work includes improvements to pools,

riffles, banks, substrate, etc. The IPS analysis showed that the site was “impaired” in all habitat categories.

Rick Federighi asked if they planned to implement BMPs beyond regular stormwater requirements. Pande stated that sheet pile will be installed across the northern ends and they will use a bypass channel during construction, in addition to sediment and erosion control measures. They hope there are no big storm events during construction.

Matt York asked at what water levels would they become concerned. For example if the creek gets to 675 or 676 at Irving Park Road, would pumps be big enough to get that much water moving? Pande stated they are using an open system and are not concerned with that particular space. There is also a big corridor of wetlands to dig down so the river uses gravity flow there; it is 1/2 foot lower at Elizabeth.

Larry Cox asked about the bids for this project. Pande responded that RTM was awarded the contract after receiving only two estimates. The prequalification made it unusual and it is a big project.

Larry Cox thanked the Forest Preserve District of DuPage County for bringing this project forward and allowing the DRSCW input – they have been more than cooperative partners.

Stephen McCracken added that Jessi DeMartini, John “Ole” Oldenburg and Ed Stevenson had all been very influential in making this project happen. When asked if the river restoration had made the project more difficult to complete McCracken said it was his observation that it had actually been a selling point with the FPDDC. He asked Jessi DeMartini if this was an accurate assessment.

Jessi DeMartini explained that golf courses alone don’t seem to go with the FPDDC mission. The manager knew changes were needed to alleviate the golf course flooding damages and to keep the course open for recreation. DeMartini continued that combining recreation with preserving and protecting natural resources offered a new mission-driven focus. The Commissioners understood the concern was not about income from the golf course (it’s under water 3/4 of year due to flooding and maintenance) but about the potential for recreation and to preserve and protect. Now it becomes a preserve with trails, restored uplands, river, wetlands – all FPD priorities. The Commission was easily willing to give \$10M to do this project. It is unusual to mesh golf and natural area restoration.

Stephen McCracken noted that there are lots of golf courses in this area and now other golf courses (private) may start thinking about this. This is a great opportunity for the FPDDC to make a big splash. Also, thank Ed Stevenson, golf manager, and Martin Design.

Larry Cox asked whether monitoring will be conducted to determine nutrient reductions associated with the BMPs. Pande stated the monitoring plan does not include upstream or downstream. They could sample entry/exit but sheet flow is a large contributor. FPDDC already does an excellent job of analyzing needs before making any applications

(fungicide/herbicide/etc.) not just nutrients. Their management plan is included in the permit.

Holly Hudson asked whether the course is pursuing the Audubon certification. Pande replied that there are a number of certification levels for which the maintenance areas meet, but the fees are cost prohibitive. Hudson asked if the fees were more than \$10K and Pande replied that it was more like \$100K.

4. Assessments for NPDES Permit Special Conditions (New Business)

- Special Conditions Permit Language Update- as of the date of the
- Project and Staffing Assessments
- Dues Invoicing schedule

Stephen McCracken noted that several individual plants had revisited and validated the cost savings associated with the special conditions. These projects will have better biodiversity impacts on local streams.

Larry Cox said that of the eligible 19 POTW agencies, 14 have signed on. This is remarkable especially during a year of tight budgets, including potential cuts to state funding. The DRSCW is short of commitments of only 2 agencies to make this work with the minimum contributions to pay for conditions in the permit language. Thank you to all the agencies for stepping up to say “yes” to funding these projects. Hopefully, the last two commitments will be approved in the next couple of weeks, which will follow with executed agreements and (of course) invoices. This is an incredible approach that has not been seen anywhere else in the country.

Nick Menninga noted that the Downers Grove Sanitary District’s permit is supposed to go to public notice today. Other Agency members can view their permit on Illinois EPA’s website. It should be up today or tomorrow.

Shirley Burger of Bloomingdale stated they received their internal review copy on Monday and the listed deadline for comments is tomorrow. Burger stated they are concerned about the amount of monitoring that appears in the copy. There is no end date to the monitoring and Burger inquired whether they were expected to monitor for the duration of the permit. Phosphorus is to be monitored 1X/week and they thought it was 2X/month. The permit was also addressed incorrectly to a different agency.

Nick Menninga offered to revisit the notes from the conversation he had with Al Keller in late May and review them with Burger – some parameters were for a specific duration (3yr data for a study).

Abel Haile stated that comments on their permit can be sent via mail or email.

Burger stated that the public notice draft also listed them as domestic/industrial and wanted to know if that was common language. Nick Menninga suggested Burger talk to Al Keller, noting that there are a number of new permit writers. They are relying on

agencies to catch errors. Abel Haile noted that the domestic/industrial is just included in process and asked if Bloomingdale's comments were to be submitted to the permit writer or Amy Walkenbach herself.

Larry Cox stated that if Bloomingdale is uncomfortable with "industrial" to comment that they have no pretreatment program.

Stephen noted that other agencies have noted "errors" in the pre draft copy. Jim Knudsen stated that Carol Stream can share their comments with other agencies. The monitoring language was statewide.

Nick Menninga stated that Illinois EPA realizes the 10 day comment period is quick and that agencies can usually get extension, especially because the writers are busy drafting. DGSG had about a month.

Abel Haile stated that if Illinois EPA does not hear from you, they assume you're good, and encouraged Burger to call to ask for more time to review and comment on their draft.

Stephen McCracken noted that he and Nick Menninga asked for the chloride monitoring to be removed. Nick Menninga stated that the chloride TMDL is in progress and helps make our case to show point source control is not the issue.

Stephen McCracken stated the two outstanding agencies both expressed positive expectations for approval of the special conditions by mid July. There are definite short and mid term savings associated with accepting the special conditions. This will help free up capital flow to help finance projects like Oak Meadows. He also reminded MS4 communities about their portion of the staffing assessment which will be included in their dues.

5. Funding update (SB2081) (Old Business)

- IGIG grant program – update

6. Projects Committee (New Business)

- Fawell Dam Update- A new scope of work is being developed. Project is listed in the member agency Special Conditions.
DRSCW will develop new scopes for V3 Companies and Inter-Fluve as it appears that the special conditions will proceed. The proposal allows 3 years for the Fawell project to be completed so we need to set about design, engineering and permitting now.
- Oak Meadows Update- Project is due to start construction in July
Plans include a meeting at the site.
- PAHs & Coal Tar Sealants (CTS) Update none
- Lower Salt Creek Watershed Plan – Detention basin survey for plan area communities.

DuPage County has been working with Chicago Metropolitan Agency for Planning (CMAP) to secure grant monies to help create an approved watershed plan.

Holly Hudson, CMAP, stated they have a long history of creating approvable watershed plans. The existing implementation plan is not US and Illinois approved. CMAP has agreed to work with DuPage County and DRSCW to incorporate the 9 required elements into the Lower Salt Creek watershed plan. Certain criteria have already been completed, some beyond the requirements (i.e. water quality and habitat). Local field work is necessary (i.e. detention basin inventory) and Hudson will need assistance as their funding is less than typical for a basin of this size. Hudson must assess the types of basins in the watershed (wet/ wetland/dry) and look for retrofit opportunities (i.e. concrete to vegetated swale).

Stephen McCracken will schedule a meeting with agencies in plan area to review this item Holly Hudson created a "rapid assessment form" which is easy to use and collects essential information. The original plan the DRSCW developed, which focused on aquatic life, is different and did not make projects eligible for 319 funds.

Holly Hudson asked for other information agencies think might prove useful. Each basin will take about 20 minutes to document.

Stephen McCracken mentioned that Illinois EPA may have implemented the idea for basin assessments after a (small) community included it in their plan, and questioned the usefulness.

Larry Cox stated that the DRSCW has discussed detention/retention basin assessments and that it would be helpful to understand what each community wants to learn from the assessment and how that relates to the minimum requirements of the watershed plan.

Holly Hudson stated that a user guide will be sent to agencies to explain the rapid assessment form (acronyms/color codes).

Holly Hudson agreed that the watershed plan will be useful for communities, especially when implementing watershed wide BMPs (i.e. this neighborhood can implement XX raingardens and estimates show it would reduce Phosphorus loads by XX amount). By pointing out BMPs like the ones identified in the plan, projects become eligible for 319 applications.

Stephen McCracken mentioned there was initially some concern at Illinois EPA that there was a conflict with TMDL development and the watershed plan.

Abel Haile provided an update that the stage 3TMDL contract was signed May 15 with Tetrattech out of Cleveland, with a project manager in the St. Paul area. The timeline for completion is 18 months. The first 9 months to create a draft for review, which will be shared with DRSCW. At 12 months the public meeting will be held. In the meantime

contractors will share information with DRSCW. Concerns from the last process included that there was not enough time to comment and that local participation was lacking. There will be increased communication and between Illinois EPA and the contractor to help ensure the project is approvable by US EPA. If you have other comments, please forward them to Abel or Stephen McCracken to be addressed.

Larry Cox inquired to the parameters. Stephen McCracken noted they include DO, fecal, chloride, copper and others.

Abel Haile stated the process started in 2009 and now we must use updated water quality data from the 2014 Integrated Report. Tetrattech asked if they could use the draft stage 3 report from the previous contractor. Haile asked if the DRSCW had any comments about this, as using it may shorten the TMDL development timeline. Stephen McCracken will circulate the stage 1 draft for comments.

7. Monitoring Committee (Old Business)

- The contracts have been signed for West Branch Bioassessment (MBI) and chemical (SLI) basin surveys.
- The contract for the chemical survey at three reference sites from SLI has been signed. Reference sites are on Ferson and Otter Creeks.
- The East Branch POTW chloride monitoring will probably begin in late-summer. The need for this contract will be reviewed as new permits are likely to require chloride sampling at POTWs.
- Geodatabase Update
- Resource Managers Guide to Aquatic Bioassessment Update (being finalized this week)

8. Chloride Reduction Committee (New Business)

- Public roads workshop date 9/23/15, parking lots & sidewalks date 10/8/2015
- Chloride Offset Program with the Illinois Tollway -

9. Watershed Permitting Update (Old Business)

10. TMDL Development for the DuPage River/Salt Creek (Old Business)

11. Watershed Committee Updates – West Branch, East Branch and Salt Creek

- East Branch Resiliency Competition and Watershed Plan - update

12. Business Items (New Business)

- Membership Dues
- Accounts Update – (Attachment 2)
- Website Updates- the website was redesigned
- A draft of the Audit for FYE2015 is under review
- Agreement with The Conservation Foundation (Attachment 3)
Agreement with The Conservation Foundation for the provision of staffing services to the Workgroup will expire on June 30. The attached renewal agreement for the period from 07/01/15 through 06/30/16 has been approved by the Executive Board and is

recommended for approval by the Workgroup. The Workgroup is currently paying \$10,893.07 to TCF at the beginning of each month in personnel and overhead costs. The amount in the new contract will be \$11,210.82 per month, based on a 3% increase in personnel and a 2% in overhead costs.

The new agreement with TCF was included in the 2015 budget and is attached at predicted increases. Larry Cox added that the new contract does not include increase in staffing, as we have not received the minimum level of participation to finalize the special conditions. The agreement will be amended when and as necessary.

Larry Cox mad a motion to authorize president to execute the contract with TCF as presented, motion seconded by Dennis Streicher. All voted in favor, none opposed, one abstained (Dan Lobbes with TCF).

The new permit special conditions mention work on chlorides. This is to help determine whether our chloride reduction program will have a watershed wide influence on the amount of chlorides entering the waterways.

Dan Bounds stated that a model facilities BMP plan has been developed with policies for facilities (20 page plan) and hopes by the next meeting we'll have received comments and can make it available.

- Other Business

DRSCW was invited to participate in the Tollway's committee for their I290 project.

Stephen McCracken stated that contracts have been signed for the 2015 West Branch DuPage River assessment and reference sites. The Lower DuPage River Watershed Coalition is using the same reference reaches and will paying half of the costs. Stephen McCracken asked for approval to use the savings from this line item and give the Board authority to contract for assistance with the chloride offset program with the Tollway. We hope to have these costs reimbursed by the Tollway.

Nick Menninga made a motion to approve this request, seconded by Karen Daulton-Lange; motion carried unanimously.

13. DRSCW Calendar, Presentations and Press Coverage (Old Business)

- Presentation requested on September 3, 2015 in Addison at the IWEA NRR Annual Workshop on the DRSCW's watershed approach. Presenter - Nick Menninga (DGSD).
- Scheduled to co-present with ERA on June 18, 2015 in Aurora at the Central States Water Environment Association - Illinois Section Collections Systems Seminar on the Oak Meadows Project. Presenters – Stephen McCracken (DRSCW) and Erin Pande (ERA)
- WEFTEC 2015–application for track on “Stream Geomorphology and Restoration 101” Update

14. Workgroup Meeting Schedule

- August 26, 2015
- October 28, 2015
- December 9, 2015
- February 24, 2016 (Annual Meeting)
- April 27, 2016
- June 29, 2016

Meeting adjourned.



DuPage River Salt Creek Workgroup

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David Gorman
Village of Lombard

Vice President

Sue Baert
Wheaton Sanitary District

Secretary-Treasurer

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Metropolitan Water Reclamation
District of Greater Chicago

Monitoring

Committee Chairperson
Jennifer Hammer
The Conservation Foundation

Salt Creek

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East Branch DuPage River
Committee Chairperson

Larry Cox
Downers Grove Sanitary District

West Branch DuPage River
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Mitchell Patterson
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Tom Richardson
Sierra Club - Prairie River Group

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Robert Swanson
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Steven Zehner
Robinson Engineering, Ltd.

Ex-Officio

Kevin Buoy
DuPage County

Staff

Watershed Coordinator
Stephen McCracken
The Conservation Foundation

Water Resource Assistant

Tara Neff
The Conservation Foundation

July 7, 2014

Illinois Environmental Protection Agency
Division of Water Pollution Control
Permit Section, Mail Code #15
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Bureau Chief Willhite:

Thank you for the opportunity to comment on the new General NPDES Permit No. ILR40 (permit). The DRSCW has limited its comments to the sections on winter deicing compounds (IV 6), water quality monitoring (Part V A), and TMDL implementation (Part III special conditions C).

We suggest the following modification to the language in Part IV section 6 (c) (suggested language in underlined and in bold).

“Deicing material must be stored in a permanent impervious storage structure or ~~seasonal~~ at minimum tarping must be utilized. Storage structures or stockpiles shall be located and managed to minimize such that no storm water pollutant runoff is discharged from the stockpiles or loading/unloading areas of the stockpiles. Fertilizer, pesticides or other chemicals shall be stored indoors to prevent any discharge within ~~from~~ storm water runoff.”

Our next comments refer to Part V. Monitoring, Recordkeeping and Reporting; A. Monitoring. This Part from the draft permit is provided in bold below for reference.

PART V. MONITORING, RECORDKEEPING AND REPORTING: A. MONITORING

The permittee must evaluate program compliance, the appropriateness and effectiveness of its identified best management practices, and progress towards achieving the permittee’s identified measurable goals, which must include reducing the discharge of pollutants to the maximum extent practicable. Monitoring shall include, at a minimum, quarterly monitoring of receiving waters upstream and downstream of the MS4 discharges, use of indicators to gauge the effects of storm

water discharges on the physical/habitat-related aspects of the receiving waters, and/or monitoring of the effectiveness of BMPs.

At a minimum monitoring shall be performed once per calendar quarter. Monitoring shall be performed within 48 hours of a precipitation event greater than or equal to one quarter inch in a 24-hour period. Analysis shall include at least the following parameters: total suspended solids, total nitrogen, total phosphorous, fecal coliform, chlorides, oil and grease and any other pollutants for which the receiving water is considered impaired pursuant to the most recently approved list under Section 303(d) of the Clean Water Act. If there is no precipitation event greater than or equal to one quarter inch in a 24-hour period occur during a calendar quarter no monitoring is required for that quarter. For purposes of this permit condition, calendar quarters are defined as January through March, April through June, July through September and October through December.

The DRSCW would like the Agency to consider a number of caveats to this condition:

- Consideration should be given to circumstances where it may be more illuminating to monitor inside the MS4 itself rather than in the ambient condition. Ambient conditions may be driven by numerous sources both inside and outside the MS4 and if the goal is management feedback for the MS4 entity being able to tease out their influence would be critical. This also suggests that it would be efficient to allow agencies to adapt their monitoring protocol over time as data are accrued. The DRSCW realizes that there are not water quality standards for storm water but in order to track pollutants to source some flexibility in this matter would be helpful.
- Some materials, notably fecal coliform and organics, are relatively expensive and require specialized equipment to collect. Overall cost of the collection will be over \$1,000 per test (based on the minimum parameters set out in the condition).
- The implementation framework should have a provision that if a parameter is constantly below the detection limit (to be specified by the State) then the Permittee may discontinue sampling for that particular parameter permanently or seasonally.
- Issuing waivers for the use of proxies. For example the DRSCW has established a strong relationship between conductivity and chlorides in its program area. In-stream data sondes are used in the winter to collect continuous data on chlorides and provides more comprehensive data than grabs do. The DRSCW strongly suggests that the following language be added to the permit:

“The Permittee may implement the required monitoring via participation within an area-wide or watershed based monitoring program.” Such language is important for a number of reasons. It will allow agencies to pool resources and technical competence so making better uses of resources. Clearly under a number of instances, Permittees discharging to the same receiving stream will be sampling in very close proximity. An area-wide effort would eliminate such duplications again making better uses of resources. It will also allow Permittees to integrate any existing ambient or MS4 monitoring into meeting the permit condition. Finally, such a plan will allow data to be collected in a consistent manner as part of a coherent plan.

- Standardized reporting in electronic form would be of great assistance to both the State and local agencies (with standard detection limits, units and date time fields). Paper records in un-standardized format will greatly reduce the usefulness of the collected data. Illinois EPA’s monitoring staff already have excel based forms that would be suitable for this purpose.

Our next comments refer to Part III. Special Conditions; C. This Part from the draft permit is provided in bold below for reference.

PART III. SPECIAL CONDITIONS

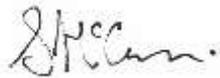
C. If a total maximum daily load (TMDL) allocation or watershed management plan is approved for any water body into which you discharge, you must review your storm water management program to determine whether the TMDL or watershed management plan includes requirements for control of storm water discharges. If you are not meeting the TMDL allocations, you must modify your storm water management program to implement the TMDL or watershed management plan within eighteen months of notification by the Agency of the TMDL or watershed management plan approval. Where a TMDL or watershed management plan is approved, you must:

(items 1-5 including if “it is found that your MS4 must implement specific WLA provisions of the TMDL”)

While the DO TMDLs for East Branch DuPage River and Salt Creek were based around 7Q10 conditions, high flows from winter storm conditions were the driver of exceedences of the chloride WQS identified in the chloride TMDLs. While a WLA was provided for chloride, individual WLA were not provided for each MS4 permit holder.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen McCracken".

Stephen McCracken, Watershed Coordinator
DuPage River Salt Creek Workgroup

SAVE THE DATE

2015 Public Agency Deicing Workshop

EQUIPMENT SHOW

HOT BUFFET BREAKFAST!



Less Salt, Less Money, Enough Said.

When:

Thursday, September 24, 2015

Time:

7:30 am – Noon

Location:

DuPage County Department of Transportation - Wheaton, IL

Cost

\$45 General Admission | \$35 DRSCW Members | \$50 Walk-In (space permitting)
\$150 Vendor Registration (\$100 for DRSCW Associate Members)
Includes display table and some microphone time.
Sponsorship opportunities available

Who Should Attend

Winter Operations Staff and Managers
City Managers and Program Administrators

Preliminary Agenda

Operators Round Table
– Lessons Learned from Last Year
Blades and Temperature Sensors
Event Preparedness / Checklists

Winter Program Policy & Regulatory Changes
Local Deicing Program Updates
DuPage River Salt Creek Workgroup Updates

Hosted By:



Contact **Tara Neff** at 1-630-428-4500 Ext. 123 or tneff@theconservationfoundation.org with any questions.
Visit <http://drscw.org/wp/chlorides-and-winter-management/> for more information.



Funding for this seminar is provided in part by the Illinois Environmental Protection Agency through Section 319 of the Clean Water Act.

SAVE THE DATE

2015 Parking Lot & Sidewalk Deicing Workshop



Less Salt, Less Money, Enough Said.

When:

Thursday, October 8, 2015

Time:

7:30 am – 12:30 pm

Location:

DuPage County Department of Transportation - Wheaton, IL

Cost:

\$25

\$20 for three or more | \$15 for five or more

**Sponsorship
Opportunities
Available**

Who Should Attend

- Facility Managers, Superintendents, and Staff
- Commercial Deicing Contractors, Business Managers, and Staff
- Municipal Code Enforcement Staff

Preliminary Agenda

- Overview of Current Regulatory and Facility Management Concerns
- Expert Training by  – Hamel, MN

Registration is required and information will be distributed soon.
Training certificates will be provided, 4 PDH's available.

Hosted By:



Contact Tara Neff at 1-630-428-4500 Ext. 123 or tneff@theconservationfoundation.org with any questions.
Visit <http://drscw.org/wp/chlorides-and-winter-management/> for more information.

**DRSCW Account Balances
August 20, 2015**

Certificate of Deposit Accounts	Amount	Term	Rate	Maturity
Synchrony Bank	\$ 102,382.01	12 M	1.22%	5/14/2016
EverBank	\$ 101,110.49	12 M	0.75%	7/25/2016
Total	\$ 203,492.50			
Itasca Checking Account	\$ 117,523.64			
Capital One 360 Savings Account	\$ 23,508.42			