



# Illinois Environmental Protection Agency

Bureau of Water • 1021 N. Grand Avenue E. • 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, 2023 To March, 2024

Permit No. ILR40 0468

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

Name: Village of Westchester Mailing Address 1: 10300 Roosevelt Road  
Mailing Address 2: \_\_\_\_\_ County: Cook  
City: Westchester State: IL Zip: 60154 Telephone: 708-345-0020  
Contact Person: Barry Krumstok Email Address: bkrumstok@westchester-il.gov  
(Person responsible for Annual Report)

#### Name(s) of governmental entity(ies) in which MS4 is located: (As it appears on the current permit)

Proviso Township Cook County

#### 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             | <input type="checkbox"/> | 4. Construction Site Runoff Control       | <input type="checkbox"/> |
| 2. Public Participation/Involvement          | <input type="checkbox"/> | 5. Post-Construction Runoff Control       | <input type="checkbox"/> |
| 3. Illicit Discharge Detection & Elimination | <input type="checkbox"/> | 6. Pollution Prevention/Good Housekeeping | <input type="checkbox"/> |

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:

Barry Krumstok

Printed Name:

June 4, 2024  
Date:

Village Manager

Title:

EMAIL COMPLETED FORM TO: [epa.ms4annualinsp@illinois.gov](mailto: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

**Illinois Environmental Protection Agency  
Annual Facility Inspection Report  
for General Permit for Discharges from Small MS4s**

**Village of Westchester  
Permit No. ILR400468  
Permit Year 21: March 1, 2023 to March 1, 2024**

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## Part A. Changes to Best Management Practices

**Note:** X indicates BMPs performed that were proposed in your NPDES permit  
 ✓ indicates changes to BMPs proposed in your NPDES permit

Year 17	Year 18	Year 19	Year 20	Year 21	
<b>MS4</b>					
<b>A. Public Education and Outreach</b>					
X	X	X	X	X	A.1 Distributed Paper Material
					A.2 Speaking Engagement
					A.3 Public Service Announcement
X	X	X	X	X	A.4 Community Event
					A.5 Classroom Education Material
X	X	X	X	X	A.6 Other Public Education
<b>B. Public Participation/Involvement</b>					
					B.1 Public Panel
					B.2 Educational Volunteer
					B.3 Stakeholder Meeting
					B.4 Public Hearing
X	X	X	X	X	B.5 Volunteer Monitoring
					B.6 Program Coordination
X	X	X	X	X	B.7 Other Public Involvement
<b>C. Illicit Discharge Detection and Elimination</b>					
X	X	X	X	X	C.1 Storm Sewer Map Preparation
X	X	X	X	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
					C.7 Visual Dry Weather Screening
X	X	X	X	X	C.8 Pollutant Field Testing
X	X	X	X	X	C.9 Public Notification
X	X	X	X	X	C.10 Other Illicit Discharge Controls

Year 17	Year 18	Year 19	Year 20	Year 21	
<b>MS4</b>					
<b>D. Construction Site Runoff Control</b>					
					D.1 Regulatory Control Program
X	X	X	X	X	D.2 Erosion and Sediment Control BMPs
					D.3 Other Waste Control Program
X	X	X	X	X	D.4 Site Plan Review Procedures
					D.5 Public Information Handling Procedures
X	X	X	X	X	D.6 Site Inspection/Enforcement Procedures
					D.7 Other Construction Site Runoff Controls
<b>E. Post-Construction Runoff Control</b>					
					E.1 Community Control Strategy
					E.2 Regulatory Control Program
					E.3 Long Term O&M Procedures
					E.4 Pre-Construction Review of BMP Designs
X	X	X	X	X	E.5 Site Inspections During Construction
X	X	X	X	X	E.6 Post-Construction Inspections
					E.7 Other Post-Const Runoff Controls
<b>F. Pollution Prevention/Good Housekeeping</b>					
X	X	X	X	X	F.1 Employee Training Program
X	X	X	X	X	F.2 Inspection and Maintenance Program
X	X	X	X	X	F.3 Municipal Operations Storm Water Control
					F.4 Municipal Operations Waste Disposal
					F.5 Flood Management/Assess Guidelines
					F.6 Other Municipal Operations Controls

## **Part B. Status of Compliance with Permit Conditions**

The status of Best Management Practices (BMPs) and measurable goals performed in Year 21 are described below.

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

The Village of Westchester (Village) committed to conduct Public Education and Outreach as part of its permit. Public Education and Outreach requires implementation of a program to distribute educational material to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants to stormwater runoff. The Village committed to the implementation of BMPs related to A.1, A.4, and A.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

#### **A.1: Distributed Paper Material**

*Measurable Goals: The Village will continue to include information in the Village newsletter on a variety of stormwater topics. Village newsletters can be found at <https://issuu.com/westchester-il>.*

**The Village has obtained informational brochures related to informing the public about stormwater and water quality issues and will continue to produce relevant information in the monthly Village newsletter.**

#### **A.4: Community Event**

*Measurable Goals: The Village will periodically hold community events to educate and inform citizens on the purpose, methodology, and status of the MS4 program.*

**In previous permit years, the Village held an event at a local high school to inform the public about stormwater regulations and MS4 permitting.**

#### **A.6: Other Public Education**

*Measurable Goals: The Village will continue to include information in the Village website to promote green infrastructure relative to stormwater.*

**The Village has included information on the website related to rain barrels and additional promotion of green infrastructure through information from the Center for Neighborhood Technology. Additionally, in previous permit years, the Village attached MS4 notices outlining allowed and prohibited practices to their annual contractor renewal license applications. The Village also initiated a curb stenciling program.**

### **2. Public Participation/Involvement**

The Village committed to performing activities and services related to the Public Participation/Involvement minimum control measure under BMP numbers B.5 and B.7. The status or progress for the measurable goals related to this BMP is presented below.

#### **B.5: Volunteer Monitoring**

*Measurable Goals: The Village will join groups to monitor MS4 flows and receiving waters.*

**The Village joined the DuPage River Salt Creek Workgroup (DRSCW), which monitors TMDLs in the DuPage River and Salt Creek. The DRSCW NPDES Activities can be found at the website provided in Part C of this report for reference.**

#### **B.7: Other Public Involvement**

*Measurable Goals: The Village will continue to appear at the local high school to provide information about stormwater management and BMPs.*

**The Village will continue to work on ways to provide information about stormwater management and BMPs to residents and interested parties.**

### **3. Illicit Discharge Detection and Elimination**

The Village committed to perform some activities related to the Illicit Discharge Detection and Elimination minimum control under BMP numbers C.1, C.2, C.8, C.9, and C.10. The status or progress for each of the measurable goals related to these BMPs is presented below.

#### **C.1: Storm Sewer Map Preparation**

*Measurable Goals: The Village will continue to update the storm sewer map based on new development and redevelopment.*

**The Village has and will continue to update the Village storm sewer map to reflect new development and redevelopment within the Village.**

#### **C.2: Regulatory Control Program**

*Measurable Goals: The Village will review its Code of Ordinances related to illicit discharge and dumping and update it on a yearly basis to prohibit illegal connections and discharges to the Village storm sewer system.*

**The Metropolitan Water Reclamation District of Greater Chicago (MWRD) Sewage and Waste Control Ordinance (SWCO) prohibits the discharge of wastes of any kind to the waters of the state under the jurisdiction of the MWRD and the Village. The Village will work with the MWRD to enforce the SWCO.**

#### **C.8: Pollutant Field Testing**

*Measurable Goals: The Village will test and study possible sources of pollutants in its MS4 system and receiving waters.*

**The Village joined a chlorine toxicity study group organized by Huff & Huff, Inc.**

### **C.9: Public Notification**

*Measurable Goals: The Village will publish Ordinance changes and potential penalties on the Village website on a monthly basis.*

**The Village has published information related to changes in the Ordinance on the website.**

### **C.10: Other Illicit Discharge Controls**

*Measurable Goals: The Village will perform annual monitoring of the receiving waters upstream and downstream of all MS4 discharge points.*

**The Village has performed monitoring of the receiving waters upstream and downstream of the MS4 discharges to determine the effectiveness of the program and selected BMPs.**

## **4. Construction Site Runoff Control**

The Village committed to performing activities and services related to the Construction Site Runoff Control minimum control measure under BMP numbers D.2, D.4, and D.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

### **D.2: Erosion and Sediment Control BMPs and D.4: Site Plan Review Procedures**

*Measurable Goal: The Village will continue the current program to review sediment and erosion measures and BMPs.*

**The Village has implemented the sediment and erosion control procedures for all projects in the Village.**

### **D.6: Site Inspection/Enforcement Procedures**

*Measurable Goal: The Village will inspect sediment and erosion control measures on all construction sites.*

**The Village has implemented the sediment and erosion control procedures for all projects in the Village and will continue to inspect and enforce the program. Specifically, the Village has contracted with a consultant for onsite soil erosion and sediment control inspections.**

## **5. Post-Construction Runoff Control**

The Village committed to performing activities and services related to the Post-Construction Site Runoff Control minimum control measure under BMP numbers E.5 and E.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

### **E.5: Site Inspections During Construction and E.6: Post Construction Inspection**

*Measurable Goal: The Village will inspect all permitted construction for BMP compliance.*

**The Village performs intermittent inspection of private construction sites for required compliance for all projects in the Village.**

## **6. Pollution Prevention/Good Housekeeping**

This minimum control measure involves the development and implementation of an operation and maintenance program to reduce the discharge of pollutants from municipal operations. This program must include a training program for municipal employees. The Village committed to perform activities for BMP numbers F.1, F.2, and F.3. The status or progress of the measurable goal related to this BMP is presented below.

### **F.1: Employee Training Program**

*Measurable Goals: The Village will develop a program to train employees regarding MS4 permitting and upkeep.*

**The Village provides staff training.**

### **F.2: Inspection and Maintenance Program**

*Measurable Goals: The Village will develop a program to directly reduce the amount of debris -entering storm sewer structures and entering the storm sewers.*

**The Village performs activities to reduce the introduction of pollutants to the storm sewer system and will continue the storm system inspection program. The Village cleans and televises 5% of the storm sewers annually or as budget allows.**

### **F.3: Municipal Operations Storm Water Control**

*Measurable Goals: The Village will install practices and measures to prevent the discharge of contaminated stormwater into the MS4.*

**In previous permit years, the Village installed sediment traps in three (3) Public Works Department yard catch basins. Additionally, the Village replaced an existing basin in the Public Works Department garage with a triple basin to collect debris, grease, and hydrocarbons. As part of the project, the Village also cleaned all lines connected to the old basin utilizing a licensed waste hauler (with manifest 169-BLS-C6). The Village also moved the waste oil storage from outside the Public Works Department garage to inside and placed it within a new double-walled container to reduce the potential for spillage into the MS4. The Village also added containment and runoff control for salt storage. The Village utilizes licensed haulers such as (Safety-Kleen) to remove old waste oil drums.**



## **Part C. Information and Data Collection Results**

Information and/or data collected by the Village or their partners can be found at the following website: <https://drscw.org/activities/>

## Part D. Summary of Year 22 Stormwater Activities

The table shown below summarizes the BMPs committed to for the next NPDES permitting cycle. Specific BMPs and measurable goals for future development activities are presented in the sections following the table.

**Note: X indicates BMPs committed to for Year 22.**

Year 22	
MS4	
<b>A. Public Education and Outreach</b>	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
X	A.3 Public Service Announcement
	A.4 Community Event
	A.5 Classroom Education Material
X	A.6 Other Public Education
<b>B. Public Participation/Involvement</b>	
	B.1 Public Panel
X	B.2 Educational Volunteer
	B.3 Stakeholder Meeting
	B.4 Public Hearing
X	B.5 Volunteer Monitoring
X	B.6 Program Coordination
X	B.7 Other Public Involvement
<b>C. Illicit Discharge Detection and Elimination</b>	
X	C.1 Storm Sewer Map Preparation
X	C.2 Regulatory Control Program
X	C.3 Detection/Elimination Prioritization Plan
X	C.4 Illicit Discharge Tracing Procedures
X	C.5 Illicit Source Removal Procedures
X	C.6 Program Evaluation and Assessment
	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
	C.9 Public Notification
X	C.10 Other Illicit Discharge Controls

Year 22	
MS4	
<b>D. Construction Site Runoff Control</b>	
X	D.1 Regulatory Control Program
X	D.2 Erosion and Sediment Control BMPs
	D.3 Other Waste Control Program
X	D.4 Site Plan Review Procedures
	D.5 Public Information Handling Procedures
X	D.6 Site Inspection/Enforcement Procedures
	D.7 Other Construction Site Runoff Controls
<b>E. Post-Construction Runoff Control</b>	
	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
X	E.5 Site Inspections During Construction
X	E.6 Post-Construction Inspections
	E.7 Other Post-Const Runoff Controls
<b>F. Pollution Prevention/Good Housekeeping</b>	
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
	F.6 Other Municipal Operations Controls

## 1. Public Education and Outreach

The Village is committing to conduct Public Education and Outreach as part of its permit. Public Education and Outreach requires implementation of a program to distribute educational material to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants to stormwater runoff. The Village commits to implementation of BMPs related to A.1, A.3, and A.6 as described below.

### **A.1: Distributed Paper Material, A.3: Public Service Announcement**

The Village will make available informational brochures to the public to increase awareness of impacts of stormwater discharges on water bodies and steps the public can take to reduce pollutants in stormwater runoff.

*Measurable Goals: The Village will continue to include information in the Village newsletter on a variety of storm water topics. Village newsletters can be found at <https://issuu.com/westchester-il>.*

### **A.6: Other Public Education**

The Village will monitor the links on the Village website that were posted to increase public awareness of impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff. The Village will also post their Notice of Intent (NOI) on the Village website.

*Measurable Goals: The Village will continue to include information in the Village website to promote green infrastructure relative to stormwater.*

## 2. Public Participation/Involvement

The Village will perform activities and services related to the Public Participation/Involvement minimum control measure. BMPs will be implemented under BMP numbers B.2, B.5, B.6, and B.7 as described below.

### **B.2: Educational Volunteer, B.5: Volunteer Monitoring and B.6: Program Coordination**

The Village will continue to provide coordination and support to local schools, businesses, or civic groups for water quality and/or stream enhancement activities.

*Measurable Goals: The Village will continue to participate in the DuPage River Salt Creek Workgroup.*

### **B.7: Other Public Involvement**

*Measurable Goals: The Village will continue to appear at the local high school to provide information about stormwater management and BMPs.*

### **3. Illicit Discharge Detection and Elimination**

The Village commits to performing some activities related to the Illicit Discharge Detection and Elimination minimum control. BMPs will be implemented under BMP numbers C.1, C.2, C.3, C.4, C.5, C.6, and C.10 as described below.

#### **C.1: Storm Sewer Map Preparation**

*Measurable Goals: The Village will continue to update the storm sewer map based on new development and redevelopment.*

#### **C.2: Regulatory Control Program**

The Metropolitan Water Reclamation District of Greater Chicago (MWRD) Sewage and Waste Control Ordinance (SWCO) prohibits the discharge of wastes of any kind to the waters of the state under the jurisdiction of the MWRD and the Village.

*Measurable Goals: The MWRD and the Public Works Department will continue to enforce the current regulations to prevent illicit discharges to the storm sewer system.*

#### **C.3: Detection/Elimination Prioritization Plan, C.4: Illicit Discharge Tracing Procedures, and C.5: Illicit Source Removal Procedures**

The Public Works Department has procedures for handling the report of a possible illicit discharge to storm sewer systems and procedures for tracking reports of illicit discharges. The enforcement guidelines in the Village Code require the elimination of illicit discharges once they are discovered, tracked, and investigated.

*Measurable Goals: The Public Works Department will continue investigating and enforcing code guidelines for eliminating illicit discharges once they are reported and investigated.*

#### **C.6: Program Evaluation and Assessment**

The Village will perform yearly program compliance monitoring and evaluation to determine the effectiveness of the overall program and the BMPs selected.

#### **C.10: Other Illicit Discharge Controls**

The Village will perform annual monitoring of the receiving waters upstream and downstream of the MS4 discharges.

*Measurable Goals: The Village perform annual monitoring of the receiving waters upstream and downstream of all MS4 discharge points.*

### **4. Construction Site Runoff Control**

The Village will perform activities and services related to the Construction Site Runoff Control minimum control measure. BMPs will be implemented under BMP numbers D.1, D.2, D.4, and D.6 as described below.

**D.1: Regulatory Control Program, D.2: Erosion and Sediment Control, D.4: Site Plan Review Procedures, and Site Inspection/Enforcement Procedures**

The Village has a regulatory control program that requires sediment and erosion control measures for all developments over one (1) acre within the Village. The Village requires that these measures be submitted to the Village during the Site Plan Review Procedures and provides resources on sediment and erosion control BMPs. The Village also performs inspections on development sites during construction to verify compliance with the development plans and local codes and procedures. In addition, the Village will continue to update the Code of Ordinances and Public Works procedures to meet the NPDES requirements.

*Measurable Goal: The Public Works Department will continue to require the review of sediment and soil erosion control measures during site review and perform inspections for development sites in the Village.*

**5. Post-Construction Runoff Control**

The Village will perform activities and services related to the Post-Construction Site Runoff Control minimum control measure. BMPs will be implemented under BMP numbers E.5 and E.6 as described below.

**E.5: Site Inspections During Construction and E.6: Post Construction Inspection**

*Measurable Goal: The Village will inspect all permitted construction for BMP compliance.*

**The Village performs intermittent inspection of private construction sites for required compliance for all projects in the Village.**

**6. Pollution Prevention/Good Housekeeping**

This minimum control measure involves the development and implementation of an operation and maintenance program to reduce the discharge of pollutants from municipal operations. This program must include a training program for municipal employees. The Village will perform BMPs under BMP numbers F.1, F.2, and F.3 as described below.

**F.1: Employee Training Program and F.3: Municipal Operations Storm Water Control**

The Village will hand out literature and/or provide in-house presentations that provide guidance and procedures for employees to reduce or eliminate the discharge of pollutants from Village owned facilities to the storm sewer system. The goal of this BMP will be to educate Village employees of current practices that contribute to stormwater pollution and/or to develop new procedures and make revisions to existing procedures that will curtail the discharge of pollutants to storm sewer systems by Village employees.

*Measurable Goals: The Village will continue in-house training that will curtail discharge of pollutants to storm sewer systems by Village employees.*

**F.2: Inspection and Maintenance Program**

The Public Works Department procedures require routine inspections of ponds, stream channels, and storm sewer outfalls by Public Works staff.

## **Part E. Notice of Qualifying Local Program**

The Village of Westchester Municipal Code (Code), Metropolitan Water Reclamation District of Greater Chicago (MWRD) ordinances and Village of Westchester Public Works Department activities are considered Qualifying Local Programs (QLPs) that count towards satisfying the requirements of the six minimum control measures. The Village also partners with the Des Plaines River Salt Creek Workgroup as a QLP for various activities and their Annual Report detailing the activities and programs is attached.

Listed below is a summary of the activities performed by the QLPs during Year 21. In general, all activities performed by the QLPs during Year 21 will be continued in subsequent years.

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

The Village does not currently have a QLP for public education and outreach.

### **2. Public Participation/Involvement:**

The Village coordinates with the Cook County Sheriff's Department to utilize the Sheriff's Work Alternate Program (SWAP) to perform clean up activities. This program relates to BMP B.5.

### **3. Illicit Discharge Detection and Elimination:**

The Metropolitan Water Reclamation District of Greater Chicago (MWRD) Sewage and Waste Control Ordinance (SWCO) prohibits the discharge of wastes of any kind to the waters of the state under the jurisdiction of the MWRD. The Village is also a member of the West Cook County Solid Waste Agency. These programs relate to BMPs C.2 and C.10.

### **4. Construction Site Runoff Control:**

The Village Engineer currently reviews engineering plans for all proposed developments and inspects development sites during construction in accordance with MWRD Watershed Management Ordinance (WMO) requirements. This program relates to BMP numbers D.4 and D.6.

### **5. Post-Construction Runoff Control:**

The Village requires a permit from MWRD under the WMO for all new construction. The MWRD requires post construction BMPs for volume control. The WMO provides permit and design requirements for stormwater detention facilities and requires owners to maintain stormwater facilities to prevent the degradation of local water quality. This relates to BMP numbers E.2 and E.3. The Village Engineer also inspects construction sites during construction and upon completion of construction. This relates to BMP numbers E.5 and E.6.

### **6. Pollution Prevention/Good Housekeeping:**

The Public Works Department coordinates with the MWRD Small Streams to utilize their debris removal program from the local waterways. These activities relate to BMP F.2. The Department of Public Works has a covered salt storage structure. This program relates to BMP F.3.

**Part F. Construction Projects Conducted During Year 21**

Project Name	Project Size (acres)	Construction Start Date	Construction End Date
2023 Street Reconstruction and Water Main Improvements Program	1.75 acres	4/2023	11/2023