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May 22, 2025

Illinois Environmental Protection Agency, DWPC  
Compliance Assurance Section #19  
2520 W Iles Ave  
Post Office Box 19276  
Springfield, Illinois 62794-9276

Re: City of Plano, NPDES Phase II Annual Update (2024/2025)  
IEPA Permit No. ILR40-0714  
HR Green Job No. 2502365

To Whom It May Concern:

Enclosed please find the NPDES Phase II Year 22 (2024/2025) Annual Update for the City of Plano. As the representative of the City of Plano, HR Green, Inc. coordinated with the City in the completion of the enclosed Annual Facility Inspection Report for continued coverage under the General Permit ILR40, issued by the Illinois EPA.

If you have any questions, please contact me at 815-759-8370.

Sincerely,

**HR GREEN, INC.**

A handwritten signature in black ink, appearing to read 'Logan Gilbertsen'.

**Logan Gilbertsen, P.E., CFM**  
Regional Manager - Associate

Enclosure: Annual update – City of Plano

cc: Karl Tisberger – Streets Department Supervisor  
Martin Shanahan – City Administrator  
Tony Simmons – HR Green, Inc.

file://hrgmhnas/data/Exceptions/Municipalities/Plano/NPDES/Year\_22-2024\_25/tr-year22-submittal-iepa.docx



# 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, 2024 To March, 2025

Permit No. ILR40 0714

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

Name: City of Plano Mailing Address 1: 17 E Main Street  
Mailing Address 2: County: Kendall  
City: Plano State: IL Zip: 60545 Telephone: 630-669-0315  
Contact Person: Karl Tisberger Email Address: KTisberger@cityofplanoil.org  
(Person responsible for Annual Report)

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

City of Plano

#### THE FOLLOWING ITEMS MUST BE ADDRESSED.

A. Changes to best management practices (check appropriate BMP change(s) and attach information regarding change(s) to BMP and measurable goals.)

- 1. Public Education and Outreach
- 2. Public Participation/Involvement
- 3. Illicit Discharge Detection & Elimination
- 4. Construction Site Runoff Control
- 5. Post-Construction Runoff Control
- 6. Pollution Prevention/Good Housekeeping

B. Attach the status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, and your identified measurable goals for each of the minimum control measures.

C. Attach results of information collected and analyzed, including monitoring data, if any during the reporting period.

D. Attach a summary of the storm water activities you plan to undertake during the next reporting cycle ( including an implementation schedule.)

E. Attach notice that you are relying on another government entity to satisfy some of your permit obligations (if applicable).

F. Attach a list of construction projects that your entity has paid for during the reporting period.

**Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))**

*Karl Tisberger*  
Owner Signature:  
Karl Tisberger  
Printed Name:

5-6-25  
Date:  
Street Superintendent  
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

IL 532 2585  
WPC 691 Rev 6/10  
This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42) and may also prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

**NPDES Phase II – Year 22 (March 2024- March 2025) Annual Update**  
**City of Plano, Kendall County**  
**IEPA Permit No. ILR40-0714**

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## **Part A. Changes to Best Management Practices**

There were no changes in Year 22 to the Best Management Practices (BMPs) that were outlined in the NOI submitted to the IEPA in May 2021.

The City has reviewed the Illinois Environmental Protection Agency's (IEPA) website for information regarding approved or ongoing Total Maximum Daily Load (TMDL) limits on Lower Fox River watershed and the tributary streams which the Municipal Separate Storm Sewer System (MS4) is tributary to. There are currently no TMDLs approved or ongoing, therefore no changes to the existing BMP's will be required to comply with a TMDL at this time.

The City has reviewed the EPA's Environmental Justice mapper reports, which show that approximately 27% of the City is considered low income and 21% is considered linguistically isolated. The low-income residents will be taken into account while moving forward with the program. However, at this time no changes are required to tailor communication with residents.

## Part B. Status of Compliance with Permit Conditions

The status of BMPs and measurable goals performed in Year 22 (2024/2025) are described below.

### 1. Public Education and Outreach

#### A.1 - Distributed Paper Material

**Measurable Goals:** Post at least one educational material related to impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. Include NPDES Phase II information and informational brochures on the City's website. This will include information regarding climate change and stormwater pollutant impacts on water bodies.

**Status:** The City maintains information on the City's website that provides information about stormwater and protecting water quality. The website includes an EPA brochure titled "Protecting Water Quality from Urban Runoff". The website also has "The Green Neighbor Guide" from the Metropolitan Water Reclamation District of Greater Chicago, which includes information about rain barrels, rain gardens, bioswales, permeable pavement, and drywells. The City's Stormwater Management Plan is also available on the website. The recent NPDES Phase II Annual Reports and the 2021 NOI are accessible. The websites are provided at the links below:

<https://www.cityofplanoil.com/361/Stormwater-Protection>

<https://www.cityofplanoil.com/360/NPDES-Phase-II-Report>

#### A.4 - Community Event

**Measurable Goals:** The City will pick up leaves and brush during the Spring/Summer/Fall seasons annually. The residents can drop off all prescription drugs at the Plano Police Department at all times of the year to prevent them from being flushed or dumped and potentially contaminating water bodies.

**Status:** The City continues to operate its Fall leaf pickup and Spring/Summer brush pickup programs for residents. In Year 22, approximately 1,000 cubic yards of leaves and yard waste were collected by the City. This yard waste was composted with biosolids, used for landscaping projects, and given to a local planter for starting potted plants.

Additionally, the City continues to partner with Kendall County's "Prescription Drug Take Back Program." Residents can drop off all prescription drugs at the Plano Police Department. This program is regularly utilized by residents and offers a safe method of disposing of medications that could potentially be flushed down drains and end up in local waterways.

#### Public Education and Outreach Evaluation –

The City feels that this program is effective with the new updates. The City's website includes educational material on stormwater management, pollution prevention, and NPDES Phase II. Additionally, the leaf/brush pick up and prescription drug drop off have been effective at preventing contamination of water bodies.

## 2. Public Participation/Involvement

### B.3 – Stakeholder Meeting

**Measurable Goals:** Participate in a local watershed group meeting or host a local watershed group meeting in a municipal facility at least once annually. The City will research, support, promote or participate in available watershed groups.

**Status:** In Year 22, the City made a donation and is a local government member of the Fox River Study Group. In the past year, the City's consultant participated in approximately 4 meetings with the Fox River Study Group meetings via GoTo Meeting. The study group is a diverse coalition of stakeholders that uses science to guide the region toward a cleaner, safer and more beautiful Fox River. The group uses research, data and collaboration to support sustainable policies and development across the Fox River watershed.  
<https://www.foxriverstudygroup.org/about>

### B.4 – Public Hearing

**Measurable Goals:** Present Municipal NPDES Phase II presentation to the City Board. Present a summary of the ongoing program implementation at least once annually at a public meeting or board meeting.

**Status:** An NPDES Phase II presentation occurred on June 24, 2024. The program was presented by Logan Gilbertsen from HR Green. The presentation provided an overview of the NPDES program with special focus on the City's BMPs.

### B.5 – Volunteer Monitoring

**Measurable Goals:** Together the City and HOAs will perform annual inspections of the stormwater detention basins. HOAs will have the basins cleaned by removing debris and waste which impedes the functions of the basins and reduces water quality. The City shall inspect basins annually to ensure debris and waste have been removed and that the basins are functioning correctly.

**Status:** The City continues to work with multiple Homeowners Association (HOA) regarding stormwater detention basin maintenance and cleanup. Together the City and HOAs performs annual inspections of the basins. No major issues were identified during the inspections. The HOAs are responsible for maintenance of the basins. The basins were cleaned by removing trash and debris that impeded the function of the basins and reduced water quality..

Many of the retention basins within the City were stabilized along the shoreline through the installation of stone toe protection. In Year 22, six catch basins. were repaired through a contractor and three were repaired in-house.

### B.6 – Program Involvement

**Measurable Goals:** The City provides a representative to attend the Kendall County Stormwater Management Planning Committee meetings. The City continues to enforce their ordinances. The City will continue to strive for stormwater projects by matching projects with available funding sources.

**Status:** The City provides a representative to attend the Kendall County Stormwater Management Planning Committee meetings when they occur. The City also continues to enforce their ordinances which model after the Kendall County-wide Ordinance. Additionally, the City continues to strive for stormwater projects by matching projects with available funding sources. In Year 21, the City jetted and cleaned, lined, and televised small areas of storm sewer. There

was a major in-house repair of approximately 40 feet of storm sewer that included offset pipe joints, root intrusion, and concrete collar.

The storm sewer on South Hale Street had been cleaned and jetted twice.

**Public Participation/Involvement –**

The City feels that this program is effective. The City actively participates in the Fox River Study Group, educates the public on NPDES, and continues to work with HOAs to keep the detention basins clear of manmade debris.

**3. Illicit Discharge Detection and Elimination**

**C.1 Storm Sewer Map Preparation**

**Measurable Goals:** The City has begun a City-wide effort to map all its infrastructure, including their storm sewers. The work includes mapping of outfalls to creeks. Nearly all outfalls have been completed and are reflected in the City's GIS. As new outfalls are constructed or located, they will be added to the mapping annually. The City should continue to maintain and update their digital storm sewer map and incorporate newly constructed or located storm sewers to the map.

**Status:** The City has begun a City-wide effort to map all its infrastructure, including their storm sewers. The work has included the mapping of outfalls to creeks. Most of the outfalls have been completed and are reflected in the City's GIS. In Year 18, all storm sewers and structures within newer parts of town have been mapped. The City has purchased their own GPS units and focused on mapping the downtown historical area in the summer of 2022.

In Year 19, the City contracted HR Green to develop a GIS format Outfall Map. HR Green developed the Storm Sewer Outfall Maps and approximately 134 outfalls were identified and labeled. An outfall labeling system has been developed for the Outfall Map using its location within the Public Land Survey System (PLSS) grid. The outfall labeling assists with identifying each outfall location based on its Quarter and Section. The Outfall Maps will serve as an effective tool to quickly locate outfalls and to track illicit discharges more efficiently. The Outfall Map will be updated annually with new outfall information obtained during the annual inspections.

In Year 20 and 21, mapping of the historic part of town was completed. An issue with the data transfer resulted in some data being temporarily unavailable. In Year 22, the City and their consultant recovered this data and incorporated it into the City's storm sewer atlas. The City is currently working to map the Lakewood Springs subdivision. This will result in a complete atlas of the City's sewer system.

**C.2 Regulatory Control Program**

**Measurable Goals:** The City will continue to enforce the County Wide Stormwater Management Ordinance (SMO) or similar code to prohibit non-storm water discharges into the MS4. The Municipal code will be updated on an as-needed basis.

**Status:** The City has been enforcing the SMO to prohibit non-storm water discharges into the MS4. The Municipal code will be updated as needed. There is a potential update in progress and the City will adopt accordingly.

### **C.3 Detection/Elimination Prioritization Plan**

**Measurable Goals:** The City will develop a prioritization plan to determine which MS4 outfalls are at the highest risk of producing an illicit discharge. The prioritization plan will be used to determine which MS4 outfalls require more frequent inspections. Once the prioritization plan is in place, it should be implemented and updated as needed.

**Status:** The City contracted HR Green to develop an inspection program for outfalls on a scheduled basis. In Year 22, HR Green visited approximately 37 outfalls. No illicit discharges were identified. No high new priority outfalls were identified in Year 22, as the areas visited consisted primarily of residential subdivisions. As more outfalls are visited annually, high priority outfalls will be identified when found and marked for annual investigation.

To date, two high-priority outfalls have been identified. One is discharged into a Lakewood retention pond and the second is adjacent to the Route 34 bridge. The Lakewood Retention Pond outfall was visited in November 2022 and in May 2023. The Route 34 bridge outfall is regularly visually monitored by City Staff and formal outfall inspections were completed in June 2024.

### **C.4 Illicit Discharge Tracing Procedures**

**Measurable Goals:** The City will develop tracing procedures. The City's Tracing Procedures will include a member of City's staff responding to notification of a potential discharge. If a potential illicit discharge is found, the flow will be followed upstream within the system until the source is located. City staff may potentially use the City's digital storm sewer map to search for the source more efficiently. The City should develop and continue to implement the Tracing Procedures and update/modify as necessary.

**Status:** The City's Tracing Procedures are in progress. The new GIS Outfall map will assist the City with searching for illicit discharge sources. Two illicit discharges were found in Year 22. One was determined to be food truck owners dumping cooking grease down a storm drain during a festival. The City will include educational language in the vendor application permits for the next festival. A second was found to be a resident dumping chlorinated water into the storm sewer. In both instances the City took action and spoke with those responsible. In the event of the food truck cooking oils, the City cleaned the catch basin.

### **C.5 Illicit Source Removal Procedures**

**Measurable Goals:** The City will develop and implement the Source Removal Procedures. The City will work with property owners to help with any required permitting required to get the illicit connection removed as quickly as possible. If the property owner is not willing to work with the City to remove the source, then the City will enforce the Kendall County SMO. The City shall implement the Removal Procedures and update as necessary.

**Status:** The City works with property owners to get illicit connections removed as quickly as possible. If the property owner is not willing to work with the City to remove the source, then the City enforces the Kendall County SMO. The City has been and will continue to inspect the Removal Procedures.

### **C.7 Visual Dry Weather Screening**

**Measurable Goals:** The City will create a scheduled program to periodically inspect outfalls on a routine basis. All high priority outfalls will be visited annually and 20% of the

remaining outfalls will be visited annually with all outfalls being visited at least one time every five years. The high priority outfalls will be identified and visited along with 20% of the remaining outfalls. The City will maintain a record of outfall inspection forms.

**Status:** HR Green conducted outfall inspections on June 24, 2024 for 37 outfalls, meeting the 20% minimum requirement. The outfall inspection included a photograph of the outfall, marking the outfall with a marker or chalk and completing an outfall reconnaissance inspection (ORI) form. The inspection forms have been scanned for record keeping. No illicit discharges were found.

#### **Illicit Discharge Detection and Elimination –**

The City feels that this program has made great progress this year. By hiring a consultant, the City was able to develop Outfall Maps with an effective outfall labeling system and develop an official program for annual outfall inspections. Over 20% of the outfalls were inspected in Year 22.

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

### **D.1 & D.2 Development Ordinances / Erosion and Sediment Control BMPs**

**Measurable Goals:** The City continues to enforce its Erosion and Sediment Control ordinance on construction projects which disturb land above the IEPA threshold. This is accomplished by a thorough permit review process and inspection phase. The City shall update and enforce the SMO and Ordinance 2009-3 as required.

**Status:** The City continues to enforce its Erosion and Sediment Control measures listed in the Kendall County SMO on construction projects. This is accomplished by a thorough permit review process and inspections during the building process. Building permits are not issued unless erosion control measures are included on the plans. During construction, all sites including single family homes are required to have silt fences up for the entirety of construction.

In Year 22, the City completed regular inspections of permitted construction sites. No violations were issued.

### **D.4 Site Plan Review Procedures**

**Measurable Goals:** The City has developed standard forms for plan reviews. The City reviews if a new development is within a special flood hazard area and enforces the SMO as needed. The City shall utilize and update the plan review checklists as required.

**Status:** The City continues to use its standard forms for plan reviews, which include checking for erosion control and new development within a special flood hazard area. No building permits were issued within or near the SFHA. The SMO is enforced as needed.

### **D.5 Public Information Handling Procedures**

**Measurable Goals:** The City has a process for addressing comments that are brought to its attention. The process has been in place at the City and allows for residents to report issues or request services. The City shall maintain the Public Information Handling Procedures through the online RequestTracker.

**Status:** The online RequestTracker is still in place and regularly monitored by the City. In Year 22, there were no stormwater or pollution related issues identified by residents through the RequestTracker.

**Construction Site Runoff Evaluation –**

The City feels that this program is effective and does not plan on making any changes to the program at this time. The City will continue to adopt updates to the Kendall County SMO.

## 5. Post-Construction Runoff Control

### E.2 Regulatory Control Program

**Measurable Goals:** The City will continue to enforce the SMO, participate in the SMO revision process and adopt amendments

**Status:** The City continues to enforce the SMO and will make updates on an as needed basis.

### E.3 Long Term O&M Procedures

**Measurable Goals:** The City engages with multiple Home Owners Associations (HOA) regarding stormwater detention basin maintenance and cleanup. Together the City and HOAs will perform annual inspections of the basins. HOAs will have the basins cleaned by removing manmade waste which impedes the function of the basins and reduces water quality. The City shall perform annual inspections and remove manmade waste to improve basin functionality.

**Status:** The City engages with multiple Home Owners Associations (HOA) regarding stormwater detention/retention basin maintenance and cleanup. Together the City and HOAs will perform annual inspections of the basins. HOAs and the City work to have the basins cleaned by removing debris and waste which impedes the function of the basins and reduces water quality. The City continues to map all the basins within the corporate limits and continues inspections of all the detention basins.

In Year 22, the City worked with HOAs to complete shoreline stabilization using stone toe protection on multiple wet retention basins.

The Kendall County SMO also has standards for long term maintenance of stormwater facilities. The City enforces the ordinance.

In addition to basin maintenance, the City utilizes the Vactor truck to clean and inspect catch basins through the City. This is typically done as staffing permits but the City has made substantial progress towards cleaning the City's catch basins. Before and after storms, City staff often cleans storm grates and monitors if catch basins require additional cleaning.

### E.4 Pre-Construction Review of BMP Designs

**Measurable Goals:** The City staff and/or their engineer review development plans, including proposed temporary and permanent best management practices, prior to issuing a permit for construction.

Status: The City has a thorough permit review process for development plans, including verification that temporary and permanent best management practices are being proposed. The use of silt fence is required for all construction projects.

#### **Post-Construction Runoff Control Evaluation**

The City feels that this program is effective and does not plan on making any changes to the program at this time.

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

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

Measurable Goals: The City will research the availability of programs for municipal employees that deal with the effects that municipal operations can have on stormwater and maintaining stormwater quality through the implementation of BMPs. The program may be based on existing training programs that the City currently conducts or a modification of an existing program. Any new training materials will be developed based on guidance and materials that are widely available. Training materials may be handouts, videos, etc. The training program may be updated and expanded as the City implements its stormwater management program. The City shall provide training to City staff who manage or are directly involved in routine maintenance, repair, or replacement of public surfaces, in current green infrastructure techniques, or to implement or utilize stormwater BMPs.

Status: The City's staff attended Municipal Stormwater Pollution Prevention training on June 24<sup>th</sup>, 2024, which was presented by Logan Gilbertsen from HR Green, Inc. The training included an overview of the NPDES Phase II program with special focus on illicit discharge detection and elimination. It was noted that the training received helped City staff to identify the illicit discharge that was reported to the IEPA.

Additionally, the City staff regularly watches training videos on YouTube and some of these training videos pertain to stormwater pollution. The City internally tracks which staff watched the training videos.

In Year 22, City staff attended a webinar regarding salt application for snow removal. They learn how to correctly store salt, and the amount of salt used is logged.

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

Measurable Goals: City continues catch basin cleaning program. Staff routinely reviews manhole/inlet functionality during rain events to determine cleaning needs. While a "worst is first" criteria has worked, the City plans to expand their mapping effort to map all manholes/inlets to assist with routine inspections of the structures. The City shall inspect manholes/inlets for functionality and improve mapping efforts.

Status: Public works has continued to perform street sweeping throughout the year to reduce the amount of sediment and debris entering the MS4. In Year 22 catch basins were cleaned on an as needed basis.

Staff routinely reviews manhole/inlet functionality during rain events to determine cleaning needs. While a "worst is first" criteria has worked, the City plans to expand their mapping effort to map all manholes/inlets to assist with

routine inspections of the structures. The City purchased GPS units and has used them to map the manholes and inlets.

#### **F.5 Flood Management/Assess Guidelines**

**Measurable Goals:** The SMO contains language restricting development in recognized floodplains. The Ordinances also require developments to provide stormwater detention to reduce and prevent flood damages. Additional or updated Ordinances may be proposed and adopted to further preserve existing floodplains. As part of the development review process, the City and/or their engineering consultant review hydrologic and hydraulic documentation for both the existing and proposed conditions in or near floodplains. The City and/or their engineering consultant review the Federal Flood Insurance Rate Maps (FIRM) for proposed development. Any revisions to the FIRM require the developer to obtain a Letter of Map Revision (LOMR) or Amendment (LOMA). The City staff and/or their engineer shall continue to review and enforce the SMO requirements for developments in or near existing floodplains.

**Status:** As part of the development review process, the City reviews hydrologic and hydraulic documentation for both existing and proposed conditions in or near floodplains. Federal Flood Insurance Rate Maps (FIRM) are reviewed and any revisions to the FIRM require a Letter of Map Revision (LOMR) or Amendment (LOMA). The City has been reviewing and enforcing the SMO requirements in or near existing floodplains. In Year 22, there were no permits within or adjacent to the floodplain.

#### **Pollution Prevention/Good Housekeeping Evaluation –**

The City feels that this program has improved with the help of a consultant which has preformed in-house training for its staff. The training offered beneficial information on the NPDES program and illicit discharges and was well attended. The City also feels that its inspection and maintenance program is effective and that flood management protocols are followed to meet SMO requirements.

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

Two illicit discharges were found in Year 22. One was determined to be a food truck owner dumping cooking grease down a storm drain during a festival. The City will include educational language in the vendor application permits for the next festival. A second was found to be a resident dumping chlorinated water into the storm sewer.

In both instances the City took action and notified the party responsible. In the cooking grease instance, the catch basin was cleaned by City Staff.

## Part D. Summary of Proposed Year 23 Stormwater Activities

The City of Plano submitted a new NOI for coverage under the General NPDES Permit No.: ILR40 which became effective on March 1, 2021. This NOI was submitted to the IEPA in May of 2021.

Below are listed the various BMPs which have milestones to be completed in Year 23, as outlined in the NOI as part of the current NPDES permit. The specific milestone to be completed for each BMP is shown.

- A.1 – Include NPDES Phase II information on the City's website. This information will include information regarding climate change and stormwater pollutants impacts on water bodies.
- A.4 – Conduct leaf and brush pickup as needed during the Spring/Summer/Fall seasons. Maintain prescription drug recycling program.
- B.3 - Participate in or promote a local watershed group meeting or host a local watershed group meeting in a municipal facility at least once annually.
- B.4 - Present ongoing program summary at least once annually at a public meeting or a selected City Board meeting.
- B.5 - Inspect basins annually to ensure debris and waste has been removed and that basins are functioning correctly.
- B.6 – Continue to strive for stormwater projects by matching projects with available funding sources.
- C.1 – Continue to maintain and update their digital storm sewer map. Incorporate newly constructed or located storm sewers to the storm sewer map.
- C.2 – Continue to enforce the SMO or similar code to prohibit non-storm water discharges into the MS4.
- C.3 – Implement the prioritization plan and update/modify, as needed.
- C.4 – Continue to implement Tracing Procedures and update/modify as necessary.
- C.5 – Implement Removal Procedures and update/modify as necessary.
- C.7 – Visit all high priority outfalls and 20% of remaining outfalls. Maintain a record of outfall inspection forms.
- D.1&D.2 – Update and enforce the SMO and Ordinance 2009-3 as required.
- D.4 – Utilize and update plan review checklists as required.
- D.5 - Maintain Public Information Handling Procedures through the online RequestTracker.
- E.2 – Enforce the SMO, participate in the SMO revision process and adopt amendments.
- E.3 – Perform annual inspections and remove manmade waste to improve basin functionality.
- E.4 – City staff and/or their engineer will continue to review proposed best management practices prior to construction.
- F.1 – Provide training to City staff who manage or are directly involved in the routine maintenance, repair or replacement of public surfaces in current green infrastructure techniques or to implement or utilize stormwater BMPs.
- F.2 – Inspect manholes/inlets for functionality and improve mapping efforts. Clean and maintain as necessary.
- F.5 – City Staff and/or their engineer to continue to review and enforce the SMO requirements for developments in or near existing floodplains.

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

There are currently no Qualifying Local Programs that the City wishes to rely on to meet the NPDES Phase II requirements.

## Part F: Construction Projects Conducted During Year 22

In Year 22, there was one project initiated by the City which disturbed more than one acre:

Project Name: Hale Street Rehabilitation Project  
Project Owner: City of Plano  
Permit Number: ILR10ZFGU  
Status: In Progress

file:///C:/Users/psd/OneDrive/Desktop/Plano%20Annual%20Facility%20Inspection%20Report%20-%202024-2025%20-%20Final%20Update%20-%202024.docx