

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

THE UNITED STATES OF AMERICA and)

THE STATE OF ILLINOIS)

Plaintiffs,)

v.)

THE CITY OF ROCKFORD, ILLINOIS,)

Defendant.)

Civil Action No. 3:15cv50250

**CONSENT DECREE
APPENDIX K**



**STORMWATER AND ENVIRONMENTAL
EDUCATION
STANDARD OPERATING PROCEDURE**

June 2015

City of Rockford

Stormwater and Environmental Education

1.0 General

The purpose of this standard operating procedure for the Stormwater & Environmental Education program is to comply with Part II, A.6.B AND Part II, A.10 of the City of Rockford's NPDES Stormwater Permit (ILS000001). The Engineering Operations Manager oversees the City's Stormwater Programs and the Stormwater and Environmental Program Manager manages the program. This document outlines how City staff and the public will be educated regarding the City's stormwater programs.

2.0 Staff Training

Within 90 days of their start date, all newly hired staff in the Public Works Engineering Division shall receive general training in the following areas regarding the stormwater program:

- 1) General overview of the stormwater program
- 2) Illicit Discharge Detection and Elimination
- 3) Erosion and Sediment Control Requirements
- 4) Job Site Safety

The Stormwater Program and Job Site Safety shall be provided by the Stormwater and Environmental Team.

All Public Works Engineering Division technical staff shall also attend additional training, both internally and externally, for any other stormwater related topics when necessary and as scheduling allows them to do so. Internal training may include supervisor meetings, contractor meetings, pre-construction meetings and informal reviews of stormwater program.

The City receives training notices from a variety of different sources. These include, but are not limited to: Illinois EPA, local soil and water conservation districts, USEPA (primarily webinars), Lorman, Illinois Association of Floodplain Managers and the American Public Works Association. Typically the Engineering Operation Manager or the Stormwater and Environmental Program Manager are notified of upcoming training who then forward the information to the Engineer Division staff. Other training opportunities will be reviewed as they become available.

Tracking: All training received by staff is recorded in the Stormwater Drive along with any certificates received (see section 4.0). All in-house training shall be saved in the same location. Sign-in sheets, instructor and topics discussed shall be included in the respective folders. Copies of certificates shall be given to the Engineering Operations Manager so they may be incorporated into the employees personnel file in the Human Resources Department.

In-depth in-house training shall be provided to designated staff in the City of Rockford Public Works Engineering Division for the following stormwater related topics:

2.1 Private Detention Basin Inspections (training every other year or prior to event inspections as described in the Standard Operating Procedures for Detention Basins – Section 4.2) – presented by the Stormwater Program Manager(s).

1. Public Works Engineering Division staff attendance shall include: Engineers, Managers, Technicians, and Coordinators.
2. Topics to include: review of Standard Operating Procedures Detention Basins and the detention basin maintenance guide, Identifying and locating detention basins, procedures for conducting inspections and recording and saving inspection reports and photos.

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2.2 Public and Priority Private Detention Basin Inspections (annual training)

1. Public Works Engineering Division staff attendance shall include: Engineering Operations Manager, Stormwater Program Manager(s), Stormwater Coordinator and designated Project Manager and Engineering Tech.
2. Topics to include: review of Standard Operating Procedures for public and high priority detention basins, list of basins, when to perform event inspections, procedures for conducting inspections and recording and saving inspection reports and photos.

2.3 Inlet & Storm Pipe Inspections (annual training)

1. Staff attendance shall include: Street Supervisors and designated street maintenance staff
2. Topics to include: Review of standard operating procedures, inspecting inlets and storm pipes, procedures for cleaning of inlets and disposal of material.

2.4 Creek Inspections (training to be held every other year)

1. Public Works Engineering Division staff attendance shall include: Engineering Operations Manager, Stormwater Program Manager(s), Stormwater Coordinator and designated Project Manager.
2. Topics to include: Identify eroding stream channels, review of creek inspection form, reporting and documenting inspections.

2.5 Erosion and Sediment Control on City Construction Projects (annual training) – presented by the Stormwater Program Manager(s).

1. Public Works Engineering Division staff attendance shall include: Engineers, Managers, Technicians, and Coordinators.
2. Topics to include: ILR10 general construction permit requirements, common BMP's from Illinois Urban Manual and the IDOT Manual, requirements and procedures for conducting inspections, record keeping on City of Rockford projects.

2.6 Erosion and Sediment Control on Non-City Construction Projects (annual training) – presented by the Stormwater & Environmental Program Manager and the Environmental & Stormwater Project Manager.

1. Public Works Engineering Division staff attendance shall include: Engineering Operations Manager, Stormwater Program Manager(s), Stormwater Coordinator and designated Project Manager and Engineering Tech.
2. Topics to include: ILR10 general construction permit requirements, common BMP's from Illinois Urban Manual and the IDOT Manual, requirements and procedures for conducting inspections, follow up and enforcement procedure and record keeping.

2.7 Street Sweeping (annual training) Presented by the Street Superintendent or their designee

1. Staff attendance shall include: Street Supervisors, designated street maintenance staff and designated contractor staff.
2. Topics for the training shall include but not be limited to: review of these standard operating procedures, disposing of street sweepings, review of contractor street sweeping procedures and locations of previous concerns and issues.

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- 2.8 Flood Control and Floodplain Management** (annual training) – presented by the City Floodplain Manager
1. Staff attendance shall include: Designated Managers, Coordinators & Technicians
 2. Topics to include: floodplain regulations, review of areas where nuisance flooding occurs, IDNR/ACOE regulations.
- 2.9 Pesticide, Herbicide & Fertilizer Applications** (annual training) – presented by Forestry Supervisor.
1. Staff attendance shall include: Designated street maintenance staff.
 2. Topics to include: review of standard operating procedures and the IEPA General NPDES Permit for Pesticide Application Point Source Discharges (ILG870147), status of certifications and training required to maintain, reporting and documenting applications, spill plan.
- 2.10 Illicit Discharge Detection and Elimination Program** (annual training) - presented by the Stormwater Program Manager(s).
1. Staff attendance shall include:
 - a. Public Works Engineering Division: Engineers, Managers, Technicians, Coordinators and street supervisors.
 - b. Community and Economic Development – inspectors, Enforcement Specialists
 2. Topics to include: IDDE program – allowable discharges, indicators of potential illicit discharges, process to report potential illicit discharges reporting and documenting observations.
- 2.11 Outfall Inspections** (training to be held every other year)
1. Public Works Engineering Division staff attendance shall include: Engineering Operations Manager, Stormwater Program Manager(s), Stormwater Coordinator and designated Project Manager and Engineering Tech.
 2. Topics to include: Review of Standard Operating Procedures for IDDE, procedures/protocols for Monitoring (including outfall screening and sampling) and outfall inspection sheet, reporting and documenting inspections.
- 2.12 Industrial High Risk Runoff Program** (annual training)
1. Public Works Engineering Division staff attendance shall include: Engineering Operations Manager, Stormwater Program Manager(s), Stormwater Coordinator and designated Project Manager and Engineering Tech.
 2. Topics to include: Review of Standard Operating Procedures for Industrial High Risk Runoff Program including procedures for conducting inspections, List of IHRRI facilities, reporting and documenting inspections.
- 2.13 Monitoring Program** (annual training)
1. Public Works Engineering Division staff attendance shall include: Engineering Operations Manager, Stormwater Program Manager(s), Stormwater Coordinator and designated Project Manager and Engineering Tech.
 2. Topics to include: Review of Standard operating procedures for Monitoring Program and IDDE, reporting and documenting samples review on operating equipment.

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3.0 Public Education

The City continues to review ways to increase public awareness on reducing contaminants in our stormwater to improve water quality. These activities adopted to date include:

3.1 Educational Brochures

Several brochures regarding a number of topics about improving our stormwater quality have been developed. These are all available for the public at City Hall and can also be found on the City's website at (<http://rockfordil.gov/public-works/engineering-cip/stormwater.aspx>). In addition, public works staff has placed brochures at locations throughout the City as an added effort to educate the public including but not limited to: Rockford Park District and Winnebago County Soil & Water Conservation District. Educational brochures and documents available include:

- Concrete Washout
- Erosion and Sediment Control
- Fertilizer and Pesticide Applications
- Hazardous Materials
- Illicit Discharge and Detection
- Pet Waste
- Water Friendly Landscaping
- Residential Deicing
- Recycling
- City's Stormwater Management Program
- Yard waste
- Citizens Guide to Pest Control & Pesticide Safety
- Rain Garden "How To" Manual
- Fats, Oil & Grease

The City will evaluate the need for additional education materials on an annual basis and will identify any new brochures or other materials in the City's annual reports.

3.2 Public Presentations/Meetings

When applicable, displays will be at public/private events. Presentations shall be made at neighborhood meetings, seminars, workshops as requested. A preliminary list of neighborhood meetings is included on the City of Rockford's SharePoint site under: Public Works, Engineering/Admin, Neighborhood Assoc. meetings. The City's annual reports will summarize the public presentations provided during the year.

3.3 Erosion and Sediment Control Seminar

The City shall host or co-sponsor annual erosion and sediment control training for developers, development engineers, construction site operators and other interested parties. These seminars may cover a variety of topics regarding erosion and sediment control on construction sites. Certificates of attendance will be provided to attendees.



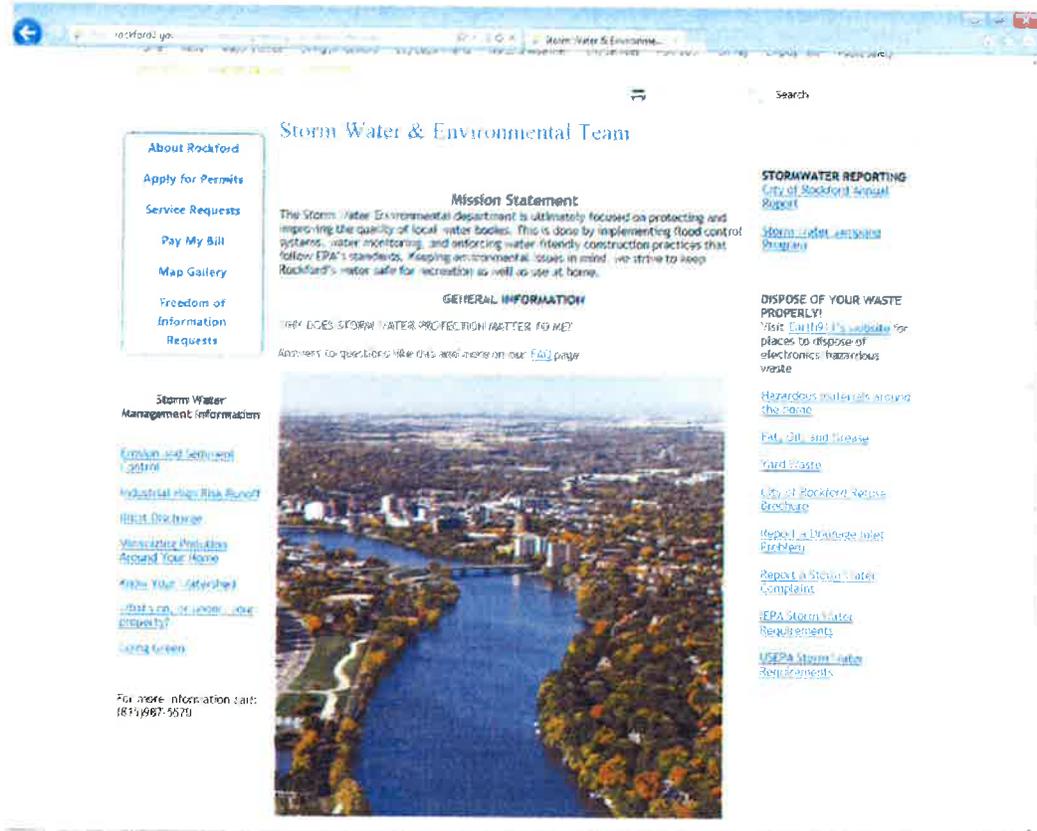
3.3 Public Reporting Tools

The public is encouraged to report any concerns about stormwater contaminants. The hotline (779-348-7300) and an online reporting tool (see web link in 3.4) are in place for the public to report a stormwater pollution concern.

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A Stormwater link has been included on the City of Rockford's website (<http://rockfordil.gov/public-works/engineering-cip/stormwater.aspx>). This link is designed to educate the public about our stormwater programs and other environmental topics and how they can help the City to improve the quality of water in the Rockford area.



4.0 Documentation and Record Management

All staff and public educations shall be saved in the Stormwater Drive.

These files shall be saved as follows:

- 1) Open the Stormwater Drive (note: this drive has limited access for people who perform duties directly related to the City's stormwater program),
- 2) Open the Education folder,
- 3) Open the folder for the current year,
- 4) Open folder for Community or staff education
- 5) Create a folder for the training, note: title of folder should show date and name of training (i.e. *2013.03.06 SWCD ESC Seminar*)
- 6) Data to be saved within folders may include: agenda, attendees (include certificate if received), correspondence

An excel spreadsheet for all inspections and education opportunities has also been created. This spreadsheet can be found in the Stormwater Drive in the folder entitled ***Inspection and Sampling Logs***. All spreadsheets saved by year for easy tracking. Data for education includes: date of event, type of public education/staff training, presenter/attendees, title of program, # in attendance and # and type of educational brochures handed out.