



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, 2025 To March, 2026

Permit No. ILR40 0103

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

Name: Orland Township Highway Department Mailing Address 1: 16125 Wolf Road
Mailing Address 2: _____ County: Cook
City: Orland Park State: IL Zip: 60462 Telephone: (708) 403-5148
Contact Person: Bill Brennan Email Address: highway@orlandroaddistrict.org
(Person responsible for Annual Report)

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

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))

Bill Brennan Owner Signature: _____ Date: 6-9-26
Bill Brennan Printed Name: _____ Highway Commissioner Title: _____

EMAIL COMPLETED FORM TO: 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.

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

**Orland Township
Permit No. ILR400103
Permit Year 23: March 1, 2025 to March 1, 2026**

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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 19	Year 20	Year 21	Year 22	Year 23	
MS4					
A. Public Education and Outreach					
X	X	X	X	X	A.1 Distributed Paper Material
					A.2 Speaking Engagement
					A.3 Public Service Announcement
					A.4 Community Event
					A.5 Classroom Education Material
					A.6 Other Public Education
B. Public Participation/Involvement					
					B.1 Public Panel
					B.2 Educational Volunteer
					B.3 Stakeholder Meeting
X	X	X	X	X	B.4 Public Hearing
					B.5 Volunteer Monitoring
					B.6 Program Coordination
✓	X	X	X	X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination					
X	X	X	X	X	C.1 Storm Sewer Map Preparation
					C.2 Regulatory Control Program
					C.3 Detection/Elimination Prioritization Plan
X	X	X	X	X	C.4 Illicit Discharge Tracing Procedures
					C.5 Illicit Source Removal Procedures
					C.6 Program Evaluation and Assessment
					C.7 Visual Dry Weather Screening
					C.8 Pollutant Field Testing
					C.9 Public Notification
					C.10 Other Illicit Discharge Controls

Year 19	Year 20	Year 21	Year 22	Year 23	
MS4					
D. Construction Site Runoff Control					
X	X	X	X	X	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
					D.6 Site Inspection/Enforcement Procedures
					D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control					
					E.1 Community Control Strategy
					E.2 Regulatory Control Program
					E.3 Long Term O&M Procedures
X	X	X	X	X	E.4 Pre-Const 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
F. Pollution Prevention/Good Housekeeping					
					F.1 Employee Training Program
					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 23 are described below.

1. Public Education and Outreach

Orland Township (Township) 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 Township committed to implementation of BMPs related to A.1. The status or progress for each of the measurable goals related to this BMP is presented below.

A.1: Distributed Paper Material

Measurable Goals: The Township compiles information related to the Stormwater Management Plan, green construction, climate change, and other stormwater quality topics to be posted on the Township website. The Township continued to publish Township newsletters and Focus newspaper. Published material was reviewed and updated as needed.

Information regarding stormwater quality is periodically included in the Township newsletter. Information regarding the Stormwater Management Plan, stormwater quality, green construction, and climate change is posted on the Township website. A link to the Township website is provided here: <https://orlandtownship.org/>.

The Township Highway Department also provides a quarterly Focus newspaper which is mailed to the residents and highlights illegal dumping, stormwater discharge into public right-of-way, and pet waste management. Copies of the Focus newspaper from this past reporting year are attached.

2. Public Participation/Involvement

The Township committed to performing activities and services related to the Public Participation/Involvement minimum control measure under BMP numbers B.4 and B.7. The status or progress for each of the measurable goals related to this BMP is presented below.

B.4: Public Hearing

Measurable Goals: The Township hosts public meetings where the public can voice their concerns. The Township plans to develop a schedule for public meetings specifically concerning topics related to stormwater quality.

The Township holds public meetings that the public is welcome to attend. The public

is welcome to bring up any concerns at these meetings.

B.7: Other Public Involvement

Measurable Goals: The Township partners with the Metropolitan Water Reclamation District of Greater Chicago (MWRD) on tree planting initiatives and to promote composting and rain barrels.

The Township partners with the MWRD to plant trees throughout the Township, promotes a biosolid compost program for Township parks, and makes rain barrels available to the public.

3. Illicit Discharge Detection and Elimination

The Township committed to perform some activities related to the Illicit Discharge Detection and Elimination minimum control under BMP numbers C.1 and C.4. 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 Township has a storm sewer atlas that it continues to update with information about key discharge points and development or redevelopment that has occurred.

The Township has developed a storm sewer atlas. This atlas includes storm sewer information including key discharge points within the Township. The Township gathers field information to update the atlas as needed.

C.4: Illicit Discharge Tracing Procedures

Measurable Goals: The Township continues to report illicit discharges and provides a way for the public to report any suspected illicit discharges. The Township plans on increasing inspections for illicit discharges.

The Township reports any observed illicit discharge locations to Cook County (County) for further action. Additionally, the Township issues citations for septic violations and other types of violations reported directly to the Township.

4. Construction Site Runoff Control

The Township committed to performing activities and services related to the Construction Site Runoff Control minimum control measure under BMP numbers D.1, D.2, and D.4. The status or progress for each of the measurable goals related to these BMPs is presented below.

D.1: Regulatory Control Program

Measurable Goal: The Township continues to issue permits and perform inspections for projects within their public right-of-way. The Township plans on increasing the frequency of inspections.

The Township issues permits to install driveways and culverts within the public right-of-way and requires erosion control measures to be included in the scope of work. Inspections are included as part of the permitting program. The Township collaborates with the County and MWRD, who issue permits and monitor construction that takes place outside the Township public right-of-way.

D.2: Erosion and Sediment Control BMPs

Measurable Goal: The Township continues to review plans for compliance with erosion and sediment control requirements and plans on increasing the frequency of construction inspections.

The Township requires erosion control to be implemented for all projects within the public right-of-way.

D.4: Site Plan Review Procedures

Measurable Goal: The Township continues to review plans for compliance with erosion and sediment control requirements for projects within the public right-of-way.

The Township issues permits for driveway and culvert installation within the public right-of-way and will continue performing reviews and inspections for those projects.

5. Post-Construction Runoff Control

The Township committed to performing activities and services related to the Post-Construction Site Runoff Control minimum control measure under BMP numbers E.4, E.5, and E.6. The status or progress for each of the measurable goals related to these BMPs is presented below.

E.4: Pre-Construction Review of BMP Designs

Measurable Goal: The Township continues to review plans for compliance with erosion and sediment control requirements for projects within the public right-of-way.

The Township reviews plans for work within the public right-of-way to ensure that they meet erosion and sediment control requirements.

E.5: Site Inspections During Construction

Measurable Goal: The Township continues to perform inspections during construction of projects within the public right-of-way to ensure that erosion and sediment control measures are installed and functioning properly.

The Township performs site inspections for work completed within the public right-of-way.

E.6: Post-Construction Inspections

Measurable Goal: The Township continues to perform post-construction inspections for work within the public right-of-way so that projects can be approved for final restoration.

The Township performs post-construction site inspections for work completed within the public right-of-way. Information regarding how to report any violations is provided on the Township website.

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 Township employees. The Township committed to perform activities for BMP number F.3. The status or progress for each of the measurable goals related to this BMP is presented below.

F.3: Municipal Operations Storm Water Control

Measurable Goals: The Township continues to perform storm sewer and detention basin maintenance and enforces the pet waste ordinance. Televising will be performed to determine potential issues with the storm sewer system, and these issues will be addressed on an as-needed basis.

The Township performs regular maintenance of storm sewers and stormwater detention facilities within the public right-of-way. There is ongoing storm sewer televising occurring to determine areas of potential problems in the Township storm sewer system. Where issues are found, storm sewer jetting, storm sewer/structure replacement, and/or creek cleaning will occur as necessary. The Township developed a pet waste ordinance which is in place and enforced.

Part C. Information and Data Collection Results

Results of collected and analyzed information can be obtained at the Orland Township Highway Department Office located at 16125 Wolf Road, Orland Park, Illinois 60462.

Part D. Summary of Year 24 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 24

Year 24	
MS4	
A. Public Education and Outreach	
X	A.1 Distributed Paper Material
	A.2 Speaking Engagement
	A.3 Public Service Announcement
	A.4 Community Event
	A.5 Classroom Education Material
	A.6 Other Public Education
B. Public Participation/Involvement	
	B.1 Public Panel
	B.2 Educational Volunteer
	B.3 Stakeholder Meeting
X	B.4 Public Hearing
	B.5 Volunteer Monitoring
	B.6 Program Coordination
X	B.7 Other Public Involvement
C. Illicit Discharge Detection and Elimination	
X	C.1 Storm Sewer Map Preparation
	C.2 Regulatory Control Program
	C.3 Detection/Elimination Prioritization Plan
X	C.4 Illicit Discharge Tracing Procedures
	C.5 Illicit Source Removal Procedures
	C.6 Program Evaluation and Assessment
	C.7 Visual Dry Weather Screening
	C.8 Pollutant Field Testing
	C.9 Public Notification
	C.10 Other Illicit Discharge Controls

Year 24	
MS4	
D. Construction Site Runoff Control	
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
	D.6 Site Inspection/Enforcement Procedures
	D.7 Other Construction Site Runoff Controls
E. Post-Construction Runoff Control	
	E.1 Community Control Strategy
	E.2 Regulatory Control Program
	E.3 Long Term O&M Procedures
X	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
F. Pollution Prevention/Good Housekeeping	
	F.1 Employee Training Program
	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 Township 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 Township commits to implementation of BMPs related to A.1 as described below.

A.1: Distributed Paper Material

The Township will continue to include information regarding stormwater quality in their newsletter and quarterly Focus paper. They will also continue to post information regarding the Stormwater Management Plan, stormwater quality, green construction, and climate change to their website.

Measurable Goals: The Township will continue to publish information related to the Stormwater Management Plan, green construction, climate change, and other stormwater quality topics on their website and in their newsletters and Focus newspaper.

2. Public Participation/Involvement

The Township will perform activities and services related to the Public Participation/Involvement minimum control measure. BMPs will be implemented under BMP numbers B.4 and B.7 as described below.

B.4: Public Hearing

The Township will continue to hold public meetings and welcome public concerns.

Measurable Goals: The Township will continue to host public meetings where the public can voice their concerns. The Township will develop a schedule for public meetings specifically concerning topics related to stormwater quality.

B.7: Other Public Involvement

The Township will continue to partner with the MWRD to plant trees throughout the Township. They will also promote their biosolid compost program and make rain barrels available to the public.

Measurable Goals: The Township will partner with the MWRD on tree planting initiatives. They will continue to promote composting and rain barrels.

3. Illicit Discharge Detection and Elimination

The Township commits to performing some activities related to the Illicit Discharge Detection and Elimination minimum control. BMPs will be implemented under BMP numbers C.1 and C.4 as described below.

C.1: Storm Sewer Map Preparation

The Township will continue to gather field information and update the atlas as needed.

Measurable Goals: The Township has a storm sewer atlas that it will continue to update with information about key discharge points and development or redevelopment that has occurred.

C.4: Illicit Discharge Tracing Procedures

The Township will continue to report observed illicit discharge locations to the County. They will also continue to issue citations for septic violations and other types of violations reported directly to the Township.

Measurable Goals: The Township will report illicit discharges and provide a way for the public to report any suspected illicit discharges. The Township will increase inspections for illicit discharges.

4. Construction Site Runoff Control

The Township 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, and D.4 as described below.

D.1: Regulatory Control Program

The Township will continue to issue permits to install driveways and culverts within the public right-of-way and perform inspections during project construction. Erosion control measures will be required to be included in the scope of work. The Township will also continue to cooperate with the County and MWRD, who issue permits and monitor construction that takes place outside the Township public right-of-way.

Measurable Goal: The Township will continue to issue permits and perform inspections for projects within their public right-of-way. The Township will increase the frequency of inspections.

D.2: Erosion and Sediment Control BMPs

The Township will continue to require erosion control to be implemented for all projects within the public right-of-way.

Measurable Goal: The Township will continue to review plans for compliance with erosion and sediment control requirements. They will increase the frequency of construction inspections.

D.4: Site Plan Review Procedures

The Township will continue to issue permits for driveway and culvert installation within the public right-of-way and will continue performing reviews and inspections for those projects.

Measurable Goal: The Township will continue to review plans for compliance with erosion and sediment control requirements for projects within the public right-of-way.

5. Post-Construction Runoff Control

The Township will perform activities and services related to the Post-Construction Site Runoff Control minimum control measure. BMPs will be implemented under BMP numbers E.4, E.5, and E.6 as described below.

E.4: Pre-Construction Review of BMP Designs

The Township will continue to review plans for work within the public right-of-way to ensure that they meet erosion and sediment control requirements.

Measurable Goals: The Township will continue to review plans for compliance with erosion and sediment control requirements for projects within the public right-of-way.

E.5: Site Inspections During Construction

The Township will continue to perform site inspections for work completed within the public right-of-way.

Measurable Goals: The Township will continue to perform inspections during construction of projects within the public right-of-way to ensure that erosion and sediment control measures are installed and functioning properly.

E.6: Post-Construction Inspections

The Township will continue to perform post-construction site inspections for work completed within the public right-of-way.

Measurable Goals: The Township will continue to perform post-construction inspections for work within the public right-of-way so that projects can be approved for final restoration.

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 Township employees. The Township will perform BMPs under BMP number F.3 as described below.

F.3: Municipal Operations Storm Water Control

The Township will continue to perform regular maintenance of storm sewers and stormwater detention facilities within the public right-of-way and will continue with storm sewer television inspections to determine areas of potential problems. Where issues are found, storm sewer jetting, storm sewer/structure replacement, and/or creek cleaning will occur as necessary. The Township will also continue to enforce the pet waste ordinance.

Measurable Goals: The Township will continue to perform storm sewer and detention basin maintenance and to administer the pet waste ordinance. Televisioning will be performed to determine potential issues with the storm sewer system, and these issues will be addressed on an as-needed basis.

Part E. Notice of Qualifying Local Program

The Township Stormwater Management Plan, MWRD ordinances, and Township Highway Department projects are considered Qualifying Local Programs (QLPs) that count towards satisfying the requirements of the six minimum control measures. Listed below is a summary of the activities performed by the QLPs during Year 23. In general, all activities performed by the QLPs during Year 23 will be continued in subsequent years.

1. Public Education and Outreach:

A link is provided to the Township website which provides information on the Stormwater Management Plan and other topics related to stormwater quality (<https://orlandtownship.org/>).

2. Public Participation/Involvement:

The Township partners with the MWRD to plant trees throughout the Township.

3. Illicit Discharge Detection and Elimination:

The MWRD Sewage and Waste Control Ordinance prohibits the discharge of wastes of any kind to the waters of the state under the jurisdiction of the MWRD. The Township also has a storm sewer atlas and procedures for reporting illicit discharges and issuing citations.

4. Construction Site Runoff Control:

The County and MWRD issue permits and monitor construction that takes place outside the Township public right-of-way. The Township issues permits to install driveways and culverts within the public right-of-way and requires erosion control measures to be included in those projects.

5. Post-Construction Runoff Control:

The Township performs post-construction inspections for projects constructed in the public right-of-way, and information to report violations is provided on the Township website.

6. Pollution Prevention/Good Housekeeping:

The Township performs regular maintenance of the storm sewer system and detention facilities within the public right-of-way. They also have a pet waste ordinance in effect which is actively enforced.

