

CITY OF CHICAGO



ANNUAL FACILITY INSPECTION REPORT

GENERAL PERMIT FOR DISCHARGES FROM MUNICIPAL SEPARATE STORM SEWER SYSTEMS

Year 22 March 2024 – March 2025

Submitted to:
Illinois Environmental Protection Agency

By:
City of Chicago
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A. Changes to Best Management Practices

The City of Chicago (City) continues its efforts to effectively manage stormwater runoff and protect the quality of area waters. This includes citywide implementation and modification of stormwater and pollution control Best Management Practices (BMPs) to reduce the negative impacts of stormwater runoff; illicit discharge investigations and enforcement to ensure only stormwater is conveyed; and public education and participation efforts intended to increase the awareness of stormwater and water quality management issues.

Due to changes in operations because of the COVID-19 pandemic, the Department of Buildings (DOB) and Department of Water Management (DWM) have adjusted their in-person education strategies. DWM has also focused on other forms of communication, including social media posts and coordination with Aldermen regarding stormwater management and recommendations to reduce neighborhood flooding.

B. Status of Compliance with Permit Conditions

See Table 1 for progress on each of the established City BMPs for the six minimum controls.

Additionally, the City is continuing to examine the existing stormwater management program in regards to the approved Total Maximum Daily Loads (TMDLs) for Lake Michigan Nearshore, Lake Michigan Beaches, Higgins Creek, and the North Branch Chicago River to see if additional efforts are needed. In Year 22, the City continued thorough inspections along North Branch Chicago River to verify the stormwater drainage extents relative to the combined sewer system; investigated implementing a sampling plan for Higgins Creek in order to evaluate whether the City's existing BMPs are adequately meeting the waste load allocation required by these TMDL reports; and continued reviewing the stormwater drainage areas to Lake Michigan and within the Lake Michigan Beach Protection Areas.

C. Information and Data Collection Results

In Year 22, DWM conducted visual observations of outfalls and their adjacent waterbodies for 45 storm outfall locations, while documenting color, odor, clarity, solids, foam, oil sheen, and other indicators of stormwater pollution in the waterbody. DWM continued to use its mobile application to efficiently log and track inspection metrics as well as facilitate investigations for any location identified from inspections as having a water quality issue.

D. Summary of Year 22 Stormwater Activities

See Table 1, referenced in Section B and D, for a listing of the stormwater activities planned to be undertaken during the next reporting cycle (i.e., Year 23) per each established City BMP.

E. Notice of Reliance upon Other Governmental Entities

The City of Chicago does not currently rely on other government entities for the City's MS4 program.

F. Construction Projects during Year 22

See Table 2 for documentation of the construction projects located in MS4 areas for Year 22.

Table 1
Sections B and D
BMP Progress and Goals

Public Education and Outreach

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
A.2	Speaking Engagement	Develop, organize, and run technical seminars for engineers, architects, and the public on Stormwater Ordinance requirements.	Taught a UIC Infrastructure and Culture class to provide additional information on City stormwater management. Developed and presented “Introduction to the Chicago Stormwater Ordinance” for the river ecology and governance taskforce. Presented “Introduction to Chicago stormwater design” for DWM technical staff.	Develop and present at least 1 seminar.
A.3	Public Service Announcement	Disseminate information to Alders to educate residents on stormwater management. Promote water conservation efforts through transit advertising and conservation kits.	Provided Alders with statement to share with constituents, via a newsletter or other format, regarding stormwater management and frozen pipe prevention tips in January 2025. Created 82 posts on DWM’s social media accounts about stormwater management tips, water conservation and pollution prevention.	Distribute educational information to Alders for dissemination. Continue posting stormwater management and flood prevention tips on social media throughout the year.
A.5	Classroom Education Material	Provide stormwater management education materials to schools. As part of the Space to Grow Program that was initiated in 2014, provide financial support for schools where green infrastructure has been or will be installed to help provide educational resources for the students.	Space to grow is announcing Bradwell Elementary, Farmer Elementary, Mollison Elementary, Ryder Elementary, and Till Elementary will have green infrastructure installed in 2025. Continue to work with the existing Space to Grow schools.	Plan to support additional schools that will have green infrastructure installed as part of the Space to Grow Program, continue to work with the existing schools, and distribute Chicago Department of Water Management educational coloring book.

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
A.6	Other Public Education	Provide educational resources online about stormwater management.	Created 82 posts on DWM's social media accounts about stormwater management tips, water conservation, and pollution prevention. Updated website to include the Year 22 Annual Report.	Continually update website with any new or revised information including the Year 23 Annual Report.

Table 1, Continued
Sections B and D
BMP Progress and Goals

Public Involvement and Participation

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
B.3	Stakeholder Meeting	Attend public events to inform the public about the Stormwater Management Program.	Provided Alders with statement to share with constituents, via a newsletter or other format, regarding stormwater management and frozen pipe prevention tips in November 2023. DWM participated in 157 various public outreach events within 38 of the Wards across the City.	Attend public meetings and educate the public about stormwater management.
B.6	Program Involvement	Provide stormwater management education materials, tools, and support as part of community workshops. As part of the Space to Grow program that was initiated in 2014, provide financial support for schools where green infrastructure has been or will be installed to help provide educational information and resource support for community workshops that promote rain barrels and rain gardens.	Space to grow is announcing Bradwell Elementary, Farmer Elementary, Mollison Elementary, Ryder Elementary, and Till Elementary will have green infrastructure installed in 2025. Continue to work with the existing Space to Grow schools.	Plan to support additional schools that will have green infrastructure installed as part of the Space to Grow Program and continue to work with the existing schools.
B.7	Other Public Involvement	Work with residents to promote stormwater management BMPs on a community-wide level through neighborhood programs.	Coordinated reports of basement flooding issues from concerned residents via the Citywide 311 system.	Coordinate reports of basement flooding issues from concerned residents via the Citywide 311 system. Promote stormwater management BMPs with identified communities.

Table 1, Continued
Sections B and D
BMP Progress and Goals

Illicit Discharge Detection and Elimination

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
C.1	Sewer Map Preparation	Accurately represent the MS4 sewer system in geographic information system mapping (GIS).	Maintained GIS outfall feature class, and updated outfalls per recently supplied record information. The total number of storm sewer outfalls is now 163. Performed desktop analysis of the GIS mapping of outfalls and connecting sewers with the Atlas Pages. Continued coordination with the Chicago Department of Aviation (CDA) to remove abandoned MS4 outfall locations on O'Hare property in master database.	Maintain GIS outfall feature class and add new outfalls when additional information becomes available. Update GIS to reflect the estimated locations, connectivity, and attributes of the MS4 outfalls and their corresponding upstream pipes. Continue coordination with CDA to complete update of MS4 outfall locations on O'Hare property in master database.
C.2	Regulatory Control Program	Investigate and enforce regulations that prohibit illegal dumping and illicit discharges.	Issued citations for illegal dumping or illicit discharges, and brought six cases to hearings.	Issue citations for illegal dumping and illicit discharges.
C.6	Program Evaluation and Assessment	Institute an inspection frequency to evaluate the condition of all MS4 outfalls.	Inspected 45 of the 163 currently mapped MS4s from June of 2024 to May of 2025. All MS4 outfalls have been inspected during this permit cycle from March 2021 to March 2025.	Perform inspections for next 25% of outfalls.
C.7	Visual Dry Weather Screening	Institute an inspection frequency to ensure there are no dry weather flows.	Inspected 45 of the 163 currently mapped MS4s from June of 2024 to May of 2025. All MS4 outfalls have been inspected during this permit cycle from March 2021 to March 2025.	Perform inspections for next 25% of outfalls.

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
C.9	Public Notification	Identify catch basins upstream of MS4 outfalls as stormwater only.	Installed “No Dumping” lids for storm sewer catch basins that are rehabilitated or installed in capital projects.	Continue to install “No Dumping” lids for storm sewer catch basins that are rehabilitated or installed in capital projects. ‘Install "No Dumping" lids for storm sewer catch basins that are rehabilitated or installed in capital projects.
C.10	Other Illicit Discharge Controls	Develop an MS4 outfall inspection database and create a centralized location for MS4 information from all departments.	Continued to utilize MS4 outfall inspection database using inspection data collected this year.	Continue to add additional inspection information to centralized outfall database.

Table 1, Continued
Sections B and D
BMP Progress and Goals

Construction Site Runoff Control

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
D.1	Regulatory Control Program	Ensure all regulated construction projects (over 15,000 square feet of land area or 7,500 square feet of paved area) are in compliance with the Stormwater Ordinance. Issue permits for projects that are in compliance with Municipal Code Chapter 11-18.	Reviewed 216 regulated development projects for Stormwater Ordinance compliance.	Review plans and when applicable, issue permits for regulated construction projects.
D.1	Regulatory Control Program	Ensure all projects at O'Hare obtain coverage under General Permit ILR10.	Website is continuously updated posting each Notice of Intent (NOI), Stormwater Pollution Prevention Plan (SWPPP), and Notice of Coverage (NOC). http://www.flychicago.com/community/environment/NPDES/pages/default.aspx	Obtain ILR10 coverage for projects on O'Hare property. Continuously update MS4 Compliance website with relevant information.
D.2	Erosion and Sediment Control BMPs	Ensure correct erosion and sediment control BMP's are being regulated through review of stormwater management documents.	Drafted revisions of the Regulations and Manual and waiting for final approval. From a stormwater standpoint, the major revision is the transition from Bulletin 70 to Bulletin 75 rainfall data, which is mandatory as of February 1st, 2025.	Finalize new update of the Stormwater Regulations and Manual.
D.2	Erosion and Sediment Control BMPs	Ensure reviewed and finalized Sediment and Erosion plans are followed during construction for regulated developments.	Required permittees to sign soil erosion and sediment control affidavit for all regulated developments. Affidavits kept on file.	Require permittees sign affidavit.

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
D.2	Erosion and Sediment Control BMPs	Prevent spreading of sediment and debris from construction sites.	Issued 127 citations for construction site cleanliness during the 2024 calendar year.	Perform inspections and issue citations as needed.
D.3	Other Waste Control Program	Encourage planned developments to exceed sustainable development guidelines. Require planned developments that are applying for additional benefits like Tax Increment Financing (TIF) assistance or city land write-downs, to provide a holistic approach to sustainable development that exceeds minimum requirements.	65 projects incorporated stormwater strategies into their developments as part of the Sustainable Development Policy.	Enforce planned developments applying for the specific programs to exceed sustainable development guidelines to receive benefits.
D.4	Site Plan Review Procedures	Review site plans for Stormwater Ordinance compliance. Ensure site plans that require a stormwater management review get reviewed and approved before construction begins.	Reviewed applicable site plans for Stormwater Ordinance compliance.	Review regulated construction site plans.
D.6	Site Inspection / Enforcement Procedures	For projects at O'Hare, complete inspections on a weekly basis and following precipitation events greater than 0.5 inches for regulated construction.	Inspections conducted weekly and after precipitation events greater than 0.5 inches	Perform inspections weekly and after rain events greater than 0.5 inches.
D.7	Other Construction Site Runoff Controls	Prevent unnecessary debris from entering the system through catch basins during construction. When identified, require contractors to install debris covers on catch basins adjacent to construction sites.	Required contractors to cover catch basins adjacent to construction sites to prevent debris from entering the sewer system.	Require contractors to cover catch basins adjacent to construction sites.

Table 1, Continued
Sections B and D
BMP Progress and Goals

Post-Construction Stormwater Management

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
E.1	Community Control Strategy	Collect and retain stormwater through the installation of green infrastructure on City property. Install green infrastructure as part of various projects including road reconstruction work, streetscape and traffic calming projects, schoolyard reconstruction, parking lot transformations, and sewer and water replacement projects.	Completed 33 projects incorporating green infrastructure, including schoolyard reconstruction, bioinfiltration areas, permeable pavement/pavers, and bioswales.	Install green infrastructure as part of public projects.
E.2	Regulatory Control Program	Ensure correct post-construction runoff controls are being properly regulated through review of stormwater management documents.	2024 Stormwater Management Ordinance Manual has been updated and uploaded to DWM website. From a stormwater standpoint, the major revision is the transition from Bulletin 70 to Bulletin 75 rainfall data, which is mandatory as of February 1st, 2025.	Finalize and publish new update of the Stormwater Regulations and Manual.
E.3	Long Term Operations and Maintenance (O&M) Procedures	Enforce development and implementation of O&M plans for regulated projects. Verify developments have an approved O&M plan in place prior to construction.	Reviewed applicable O&M plans for Stormwater Ordinance compliance.	Review O&M plans.
E.4	Pre-Construction Review of BMP Designs	Review site plans for BMP design compliance with Stormwater Ordinance.	Reviewed applicable site plans for Stormwater Ordinance compliance.	Review regulated construction site plans and their corresponding BMP designs.

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
E.6	Post-Construction Inspections	Ensure that post-construction runoff controls on all regulated construction projects are in compliance. Perform post-construction final inspection by licensed professional engineer on regulated projects to confirm that the site is in compliance with the Stormwater Ordinance, plans, approvals, and permit conditions.	Inspected approximately 205 project sites for Stormwater Ordinance compliance.	Inspect constructed projects for compliance for post-construction runoff controls.

Table 1, Continued
Sections B and D
BMP Progress and Goals

Pollution Prevention and Good Housekeeping

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
F.1	Employee Training Program	Educate employees about stormwater management and pollution prevention BMPs. For the various departments in the City of Chicago, provide specific trainings and seminars that are applicable to the department and the employee's role.	<p>AIS: Fleet and Facility Operations employees completed training on pollution prevention BMPs, and new hires completed training as part of the Sustainable Operations Plan onboarding process.</p> <p>CDA: Regular training offered at O'Hare on spill reporting and prevention. During the permit year, 87 City employees and contractors received this specific training.</p> <p>CDOT: Staff completed training on construction site stormwater runoff controls.</p> <p>DOB: Provided annual DWM Mason Inspectors Training regarding inspection of stormwater restrictors and stormwater BMPs.</p> <p>DWM: Construction Manager completed training on construction site runoff controls.</p>	Train employees on stormwater management and pollution prevention BMPs.

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
F.1	Employee Training Program	Educate employees about green infrastructure. For the various departments in the City of Chicago, provide specific trainings and seminars that are applicable to the department and the employee's role.	<p>AIS: Fleet and Facility Operations employees completed training on green infrastructure BMPs.</p> <p>CDOT: Staff completed training on the MS4 program including green infrastructure utilized as runoff control.</p> <p>DOB: Provided annual DWM Mason Inspectors Training regarding inspection of stormwater restrictors and stormwater BMPs.</p> <p>DSS: Completed street sweeper driver training for all drivers and included Green Alley SOP.</p> <p>DWM: Planning, design, and construction project managers completed training on permeable pavement, rain garden, detention, bioswale, and runoff BMPs design and maintenance.</p>	Train employees about green infrastructure design, installation, maintenance, and repairs.
F.2	Inspection and Maintenance Program	Maintain and rehabilitate the sewer system through cleaning, lining and replacement.	Cleaned 18,308 structures, lined 17.12 miles of sewers and 1,150 structures, and replaced 2.6 miles of sewers during the 2024 calendar year.	Clean 15,000 structures, line 12 miles of sewers, line 500 structures, and replace 9 miles of sewers for the 2025 calendar year, contingent upon funding.
F.3	Municipal Operations Stormwater Control	Prevent unnecessary debris from entering the system through catch basins. For catch basins that are part of CIP projects or are rehabbed/replaced, install new catch basin lids with small slots per the Americans with Disabilities Act (ADA lids) to prevent debris from entering system.	Installed narrow slot lids for catch basins that were addressed as part of CIP projects or rehabilitation work	Install narrow slot lids.

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
F.4	Municipal Operations Waste Disposal	Institute a robust street sweeping protocol to prevent debris before entering the MS4 system. Deploy a street sweeper each day for every ward (50 wards) during sweeping season (April through November).	Swept 92,605 miles of streets, 135,802 curb miles, and 6,118 miles of alleys, and collected 44,249.5 cubic yards of debris for the 2024 calendar year.	Sweep over 200,000 miles of streets and over 2,000 alleys for the 2025 calendar year.
F.4	Municipal Operations Waste Disposal	Utilize a trash collecting skimmer boat along the Riverwalk during the warmer months. The Riverwalk has significant pedestrian traffic and allows direct access to the water, which increases the likelihood of pollution and thus the need for additional attention.	Deployed 1 or 2 skimmer boats 7 days a week, weather permitting, along the Riverwalk from March through November 2024	Deploy skimmer boat during warm weather months
F.4	Municipal Operations Waste Disposal	On O'Hare property, remove and dispose of excess waste from pavement before entering the MS4 system. When needed, use a waste collection contractor to collect municipal operations waste and take off-site to a municipal landfill. Collect litter from airfield pavement.	Collected waste and litter from airport grounds as needed.	Collect waste and litter from airport grounds.
F.5	Floodplain Management / Assess Guidelines	Ensure proper floodplain controls are performed. Perform floodplain reviews for regulated projects within and adjacent to the mapped floodplain.	Reviewed 56 regulated development within floodplains to confirm compliance with the City's Flood Control Ordinance.	Review regulated projects within floodplains.

BMP No.	BMP Category	Brief Description of BMP	Year 22 Measurable Goal Progress	Year 23 Measurable Goals
F.6	Other Municipal Operations Controls	Follow specific department policies that involve pollution prevention.	<p>AIS: Followed documented BMPs for both fleet operations and facility operations, including specific pollution prevention BMPs.</p> <p>CDA: Followed O'Hare site wide SWPPP. ILR10 site specific SWPPPs are continuously reviewed and approved based on project scope.</p> <p>CDOT: Continued enforcement of environmental terms and conditions. For Webster Ave Bascule Bridge over the North Branch of the Chicago River, permitted through United States Army Corps of Engineers (USACE), Illinois Department of Natural Resources (IDNR), and the United States Coast Guard (USCG), and followed applicable water quality and pollution prevention measures.</p> <p>DSS: Salt spreaders are calibrated annually. Vehicles also have spreader controls that limit the amount of salt spread per lane mile. 95th Street Salt Pile is tarped when not in use, and facility follows specific BMPs.</p> <p>DWM: Followed documented BMPs for purification plant operations, including specific pollution prevention BMPs.</p>	Follow department specific processes.

Table 2
Section F
Year 22 ILR10 Construction Projects

Project Name	NPDES ILR10 Permit #	NOI	NOC	NOT
Central Detention Basin Elimination Volume 1	ILR10ZDAA	11/5/2024	11/21/2024	TBD
Stockpile 54	ILR10ZESC	9/26/2024	10/21/2024	TBD
Snow Equipment Staging Area Reconfiguration	ILR10ZEO3	8/27/2024	9/26/2024	TBD
AA Concourse L 3-gate Expansion Package 5	ILR10ZENT	8/23/2024	9/22/2024	TBD
OGT-S1 Siphon	ILR10ZEGE	7/8/2024	8/7/2024	TBD
East Taxiways Improvements	ILR10ZAHB	6/3/2024	7/3/2024	TBD
Terminal 3 Improvements	ILR10ZDZW	3/26/2024	4/25/2024	TBD
Rental Car Service Center Sites Stormwater	ILR10ZD2M	6/26/2023	7/21/2023	TBD
South Conveyance Storm Sewer	ILR10ZD0K	6/8/2023	7/8/2023	TBD
O'Hare South Detention Basin Expansion Phase 2	ILR10ZCW6	5/4/2023	6/3/2023	TBD
TAP Advanced Utilities East West Water Main	ILR10ZCW5	5/4/2023	6/3/2023	TBD

Taxiway A & B Phase 2 and East Shore Taxiway	ILR10ZCT4	4/13/2023	5/13/2023	TBD
Stockpile SP-2	ILR10ZCIF	2/3/2023	3/5/2023	TBD
O'Hare South Detention Basin Expansion Phase 1	ILR10ZCC5	12/5/2022	1/4/2023	TBD
Taxiway K&L Grade Separation and Grade Separated Service Roadway	ILR10ZC6Y	9/26/2022	10/26/2022	TBD
Terminal 5 Landside Parking Garage	ILR10AP57	10/15/2021	11/14/2021	TBD
Stockpile 98N	ILR10ZAHB	4/14/2021	5/14/2021	TBD
Fuel System Improvement Program - Tank Farm Improvements	ILR10BJ44	4/10/2020	5/13/2020	TBD
Lower Concourse C Extension Site Civil and Utilities	ILR10ZCIG	2/3/2023	3/5/2023	1/13/2025
Northeast Cargo Taxilane NN Completion Phase 3	ILR10ZBNZ	4/19/2022	5/19/2022	11/12/2024
O'Hare Building 464 Demolition	ILR10ZDZS	3/26/2024	4/25/2024	11/6/2024
FSIP - Taxiway LL Phase 2	ILR10ZE2Q	4/11/2024	5/11/2024	10/17/2024
Runway 9R-27L Extension - East	ILR10BF12	1/8/2020	2/14/2020	7/15/2024
North ORD SMR Facility	ILR10AJ21	9/6/2018	9/24/2018	4/1/2024
American Airlines O'Hare Concourse L 3-Gate Expansion	ILR10ZC21	8/1/2022	9/9/2022	1/17/2024