



STORMWATER MANAGEMENT COMMISSION

MEMORANDUM

TO: Stormwater Management Commission
FROM: Anna Niedzinski, Stormwater Coordinator
Kurt Woolford, Executive Director
DATE: March 26, 2026
SUBJECT: NPDES PERMIT ILR40 MS4 2026 Stormwater Management Program Plan (SMPP)
QLP Template

The Illinois Environmental Protection Agency released the updated General National Pollutant Discharge Elimination System (NPDES) Permit No. ILR40 for Municipal Separate Storm Sewer Systems (MS4) which went into effect August 1, 2025. MS4 programs within Lake County must revised their Stormwater Management Program Plan (SMPP) to comply with the Illinois Environmental Protection Agency's (IL EPA) and begin implementing new program requirements 12 months from the coverage letter.

SMC has revised their SMPP template in order to comply with IL EPA's General NPDES MS4 permit. The SMPP template includes substantial changes from the previous template. If an MS4 community previously created a SMPP, it may be most effective to revise the new SMPP template to coincide with MS4 specific changes rather than updating existing SMPPs. This SMPP template was created to help streamline the update process for MS4s that have already have a functional MS4 program and uses resources provided by the QLP. This template is developed and for use by MS4 Programs located within Lake County, IL.

- 1) Carefully review and update, utilizing track changes, all fields and text highlighted and be sure to delete text where it does not apply to your MS4.
- 2) Margin comments provide useful information and helpful tips for completing your SMPP.
- 3) **Do not modify anything in Qualified Local Program (Chapter 3.1).** This section describes the QLP program.
- 4) Ensure that the SMPP addresses all minimum requirements (as noted in the margin comments) or provides an alternative best management practice (BMP). Optional BMPs can be enhanced or omitted
- 5) Review **ALL** "Measurable Goals" described in Chapters 3.2-3.7 and the Chapter 4 commitments. Revise as necessary. Failure to do so will result in may lead to unintentional commitments for your stormwater program
- 6) Figures and tables should be updated, as noted, to reflect the community.
- 7) Update the table of contents including Tables and Figures references, after the update is complete. Chapter references within the document text should be updated as necessary.
- 8) Margin comments should be deleted prior to posting the SMPP to the MS4 community website. Please note that failure to review the information in the margin comments may lead to errors and/or unintentional commitments for your stormwater management program
- 9) Contact SMC with any technical inquires. A brief overview will be provided at the April MAC meeting, in addition to any amendments to the template.



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A countywide approach has been taken toward the implementation of IL EPA's NPDES Municipal Stormwater Program. Consistent with this comprehensive, countywide approach to stormwater management, SMC serves as a Qualifying Local Program QLP for MS4s in Lake County. As a QLP, SMC has been working since the early 2000's, when the IL EPA began the process of expanding its NPDES Stormwater Program to include small MS4s, to assist Lake County MS4s in developing and implementing efficient and effective stormwater management programs.

In 2002, SMC proactively formed the Municipal Advisory Committee (MAC) to provide a forum for representatives of local MS4s, which include municipalities, townships, and drainage districts, to discuss, among other topics, the implementation of IEPA's NPDES Stormwater Program. At that time, it was agreed that each Lake County MS4 would be responsible for obtaining coverage under IEPA's General NPDES Permit No. ILR40, through the submittal of a "Notice of Intent" to be covered under the permit, and for developing its own local stormwater management program, but that each MS4 could and should take credit for the stormwater management activities conducted by SMC.

Although SMC is not itself an MS4, as it does not own or operate a separate storm sewer system, it does perform activities related to each of the six minimum control measures (MCMs) described in IL EPA's General NPDES Permit No. ILR40. In addition, SMC also provides, upon request, no-cost "consultant-level" technical assistance to Lake County MS4s in developing and implementing their stormwater management programs and provides them with a variety of resources to assist them in meeting the requirements of IEPA's General NPDES Permit No. ILR40. These resources include:

- Stormwater Management Program Plan templates;
- Annual Report templates;
- Notice of Intent templates;
- Annual "State of Lake County's Waters" reports;
- An Illicit Discharge Detection and Elimination guidance manual;
- Model and example illicit discharge ordinances that prohibit all non-stormwater discharges, including illegal dumping, to the storm sewer system;
- GIS and mapping data, including a countywide receiving waters map; and
- The Lake County Watershed Development Ordinance, which establishes the minimum stormwater management requirements for development in Lake County, including requirements for construction site and post-construction runoff control.

As IEPA's Stormwater Program continues to evolve, SMC is committed to providing continued and ongoing support to Lake County MS4s as they continue to develop and implement their stormwater management programs