Annual Report

MS4 Phase II General Permit

National Pollutant Discharge Elimination System
MS4 Stormwater Discharge Permit

State of Oregon
Department of
Environmental
Quality

2020-2021
Monitoring Year

City of Keizer
October 28, 2021

#100032

1.0 Certification and Signature
1. Permit Registrant(s): **City of Keizer**
2. Legally Authorized Representative: **Bill Lawyer**
3. Title: **Public Works Director**
4. Email: **LawyerB@keizer.org**
5. Phone: **503-856-3555**
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations (40 CFR 122.22(d)). Signature:_____ Date: _____

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Instructions

At least once per year, the permit registrant must evaluate compliance with the requirements of the MS4 Phase II general permit using this Annual Report template. This self-evaluation includes assessment of progress made towards implementing the SWMP control measures in Schedule A, and implementation of actions to comply with any additional requirements identified pursuant to Schedule D.1 (Requirements for Discharges to Impaired Waterbodies).

For each SWMP control measure or activity listed below, please answer all the questions and in the comments field cite any relevant information and/or statistics that helps to illustrate implementation or compliance. If your answer is "No," in the comments field explain the reasons and outline the anticipated implementation timeline. If the requirement does not apply, explain why it is not applicable in the comments field.

No later than November 1 each year, beginning in 2020, the permit registrant must submit an Annual Report to DEQ. One signed copy and one electronic copy must be submitted to DEQ using the address provided in permit. DEQ can provide an FTP site for submittal of the electronic copy, upon request.

2.0 General Information

2.1 Registrant Information

6. Permit Registrant(s): City of Keizer		
7. Type(s): ☒ City / ☐ County / ☐ Special District / ☐ Other:		
8. Registrant Type: Existing Registrant: ☒ New Registrant: ☐		
9. Community Type: Large Community: ☒ Small Community: ☐		
10. DEQ Permit No: 100032		
11. EPA File No: ORS100032		
12. Physical Address: 930 Chemawa Rd NE		
City: Keizer	State: OR	Zip: 97303
13. Point of Contact: Keare Blaylock		
Title: Environmental-Technical Division Manager	Email: blaylockk@keizer.org	Phone: 503-856-3526
14. Mailing Address (*if different*):		
City:	State:	Zip:

2.2 Municipal Separate Storm Sewer System (MS4) Information

15. Estimate the area in square mileage served by the MS4: approximately 7.5 square miles

16. Estimate the population served by the MS4: 39,400

2.3 MS4 Stormwater Discharge Information

Identify the names of all known waters that receive a discharge from your MS4.

Receiving Waterbody	# of Outfalls	Impaired waterbody		Impairment(s)
		303d listed	TMDL issued	
a. Willamette River	17	Yes ☒ No ☐	Yes ☒ No ☐	Bacteria, Mercury, Temperature
b. Claggett Creek	44	Yes ☒ No ☐	Yes ☐ No ☒	Bacteria, Mercury, Temperature
c. Labish Ditch	25	Yes ☐ No ☒	Yes ☐ No ☒	
d.		Yes ☐ No ☐	Yes ☐ No ☐	
e.		Yes ☐ No ☐	Yes ☐ No ☐	
f.		Yes ☐ No ☐	Yes ☐ No ☐	
g.		Yes ☐ No ☐	Yes ☐ No ☐	
h.		Yes ☐ No ☐	Yes ☐ No ☐	
i.		Yes ☐ No ☐	Yes ☐ No ☐	
j.		Yes ☐ No ☐	Yes ☐ No ☐	

2.4 Coordination Among Registrants and Joint Agreements

Required for permit registrants relying on another entity to satisfy one or more of the requirements of the permit.

17. Is there a joint agreement in place for the implementation of one or more stormwater management program control measures? *Schedule A.2* Yes ☐ No ☒

18. If yes, has there been any change to the joint agreement(s) submitted previously? Yes ☐ No ☐
If yes, include, as an attachment, a summary of the changes.
NA

2.5 Stormwater Management Program Information

19. Discuss the status and overall progress of establishing legal authority to control pollutant discharges into and discharges from the MS4 and to implement and enforce the conditions of this permit. *Schedule A.2.c*

The City implements and enforces the conditions of its permit primarily through the following:

- Stormwater Utility Fee Ordinance (#2014-563) – establishes City policy to secure funding for implementation of stormwater management plans, programs, operations and maintenance.
- Stormwater Discharge Control Ordinance (#2009-585) – provides legal authority to prohibit non-stormwater discharges/connections to the storm drain system.
    - Status: evaluated for compliance; updates in progress; will be implemented on or before Feb. 28, 2022.
- Erosion Control Ordinance (#2014-711) – provides legal authority to control erosion and pollution from land disturbing activities including those related to development or redevelopment through a required permit process.
    - Status: evaluated for compliance with the new permit; updates will be completed as necessary on or before Feb. 28, 2023.
- Civil Infraction Ordinance (#86-063) – establishes the legal procedure for addressing violations of City ordinances as civil infractions.
    - Status: evaluated for efficacy; any updates will be completed on or before Feb. 28, 2023.
- City of Keizer Development Code Ordinance (#87-078) – establishes requirements for conforming land uses in the City including the use of all land, as well as the construction, reconstruction, enlargement, structural alteration, use, or occupation of any structure within the City of Keizer.
    - Status: development code will be evaluated for compliance with the post-construction minimum control measure requirements and updated as necessary on or before Feb. 28, 2023.
- Private Maintenance Agreements – legal contract between the City and a property owner that is filed with Marion County and recorded on the property deed. The agreement establishes maintenance requirements of private stormwater facilities to ensure proper, long-term operation.

2.6 Stormwater Management Program Information

20. Is an updated SWMP Document attached? *Schedule A.2.c*
Yes ☒ No ☐ *(must be submitted with the second Annual Report)*
If necessary, provide an explanation:
The SWMP Document is provided in hard copy; it's also available on the City's website (see #21 below)

21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*
If necessary, provide an explanation:
https://www.keizer.org/document-library

22. Does the SWMP Document include an implementation schedule for control measures that have yet to be or are partially implemented? *Schedule A.2.c*
Yes ☒ No ☐
If necessary, provide an explanation:

23. Describe the method used to gather, track, and use SWMP information to set priorities or assess compliance: *Schedule A.2.d*
The SWMP Document includes implementation schedules for each BMP within the six minimum control measures. Each BMP includes established goals and measureable objectives. A SWMP Document review template was created to track and measure progress for each goal and objective. Staff continues to track implementation using a variety of

methods such as digital files, paper records, geodatabases, spreadsheets, and report forms as appropriate to document compliance efforts. Tracking mechanisms are designed to align with the reporting requirements.
24. Have adequate finances, staff, equipment and other support capabilities been provided to implement the permit? *Schedule A.2.e* Yes ☒ No ☐ If necessary, provide an explanation: The Environmental & Technical Division (responsible for implementing programs) continued to experience staffing challenges during the report year. The Division operated at 50%-75% staffing levels over the entire report year. Shortages were due to a combination of factors including extended absences for personal/family emergencies, turnover, and recruitment challenges due to the pandemic.
25. During this monitoring year was compliance with the requirements of this permit evaluated? *Schedule B.1* Yes ☒ No ☐ If necessary, provide an explanation:
26. During this monitoring year was it determined or reported that discharge from the MS4 caused or contributed to an excursion of an applicable water quality standard? *Schedule A.1.a* Yes ☐ No ☒ If "Yes", complete section 3.7, Water Quality Standards of this template.

3.0 Stormwater Management Program Control Measures

3.1 Public Education and Outreach

27. Provide a brief summary of the ongoing public education and outreach program. Schedule A.3.a

PE-1 Implement a Public Education and Outreach Program

- The City continued to implement the Public Education and Outreach Program during the report year.
- The City exceeded the requirements outlined in Schedule A.3.a through implementation of the Public Education Plan (PEP), which outlines specific activities planned for each year of the permit, as well as target audiences, target messages and unique performance measures for each activity.
- The PEP was reviewed during the report year to assess program compliance, efficacy and progress.

The PEP includes educational activities to comply with the City's TMDL Implementation Plan and WPCF Class V Stormwater Permit.

PE-2 Offer Stormwater Education Activities

- Thirteen stormwater education activities were implemented, exceeding the requirement.
- All Year 2 activities performed were evaluated and the information has been applied to improve Year 3 activities and goal-setting.

PE-3 Deliver Target Topics to Target Audiences

- Education and Outreach activities addressed seven out of ten target topics.
- Staff provided stormwater education and outreach to all three target audiences during the report year.

PE-4 Provide Education to Construction Professionals

- The City co-hosted the 10th annual Erosion Control & Stormwater Management Summit with the Mid-Willamette Outreach Group to provide stormwater education to construction professionals and municipal stormwater staff.

28. Were the required components in place by the implementation date? *Schedule A.3.a.i*
    Yes ☒ No ☐ *(Implementation date: Feb. 28, 2020 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

29. Provide the number of education and outreach activities conducted: *Schedule A.3.a.iii*
    During this reporting year: 13

30. During the permit term: 23
    If necessary, provide an explanation:

Please refer to the Public Education Plan for descriptions of the Year 2 activities.

31. Indicate target audiences addressed during this reporting year: *Schedule A.3.a.iv*
    - ☒ General public, homeowners, homeowner association, schoolchildren, and businesses
    - ☒ Local elected officials, land use planners and engineers
    - ☒ Construction site operators

32. Have each target audience been addressed during the permit term? *Schedule A.3.a.iv*
    Yes ☒ No ☐

33. Indicate target topics addressed during this reporting year: *Schedule A.3.a.iv*
    - ☒ Impacts of illicit discharges on receiving waters and how to report them
    - ☒ Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts
    - ☒ BMPs for proper use, application and storage of pesticides and fertilizer
    - ☒ BMPs for litter and trash control
    - ☐ BMPs for recycling programs
    - ☐ BMPs for power washing, carpet cleaning and auto repair and maintenance
    - ☒ Low impact development/green infrastructure
    - ☐ Information pertaining to maintenance of septic systems
    - ☒ Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife
    - ☒ Other: TMDL criteria – temperature; WPCF criteria – UIC maintenance, infiltration and ground water protection

34. Describe the types of educational messages or activities distributed and/or offered during this reporting year. *Schedule A.3.a.iii*

Despite the challenges of conducting outreach during the pandemic, the City offered a variety of activities throughout the year including: a newsletter, a Consumer Confidence Report on Water Quality, Clean River Coalition projects, pet waste education stations, social media campaigns, and several virtual learning events including the Erosion Control Summit, the Water Festival, and an Earth Day virtually-guided hike.

35. Was outreach to construction site operators working within your community offered during this reporting year? *Schedule A.3.a.v*

Yes ☒ No ☐

36. Total number during the permit term: 2; this requirement has now been fulfilled.

37. Identify and describe the assessment/evaluation of, at least, one education and outreach activity that occurred during this reporting year. Include the assessment process or metric for evaluation, and why this activity was considered successful. *Schedule A.3.a.vi*

Environmental staff conducts an annual review and evaluation of the PEP, which involves scoring and evaluating the reach and effectiveness of each education and outreach activity performed that year. While the City evaluates each activity, the lowest and highest performing activities are evaluated with more scrutiny in order to improve overall effectiveness. Based on the performance metrics, Activity 6 (Erosion Control Summit) scored the highest during this report year due to audience reach and engagement as well as its efficient use of resources.

38. Will the assessment be used to inform future stormwater education and outreach efforts? *Schedule A.3.a.vi*

Yes ☒ No ☐

39. Provide an explanation:

Activity 6 (Erosion Control Summit) was deemed highly effective based on audience reach and engagement, as well as efficient use of resources, given that it was a virtual event. 101 attendees from across the state tuned in to the event, which was hosted on the Zoom platform. The number of participants was used to gage audience participation. Post-event surveys were reviewed to assess topics of interest for future events. Staff will continue to implement the Erosion Control Summit with the goal of including a hybrid or virtual option for attendees, as this increased our reach to audiences statewide and made the activity both highly efficient and effective for attendees and hosts.

3.2 Public Involvement and Participation

40. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.b*

The requirements were met through the implementation of public meetings, the City's website and stewardship opportunities.

PI-1 Implement a Public Involvement and Participation Program

- The City continued to implement the Public Involvement and Participation Program during the report year.
- The Stormwater Advisory Committee (SWAC) meetings provided an avenue for committee members and the public to comment on the development of the Stormwater Management Program.

The program includes activities that comply with the TMDL Implementation Plan and the WPCF permit.

PI-2 Maintain a Publicly Accessible Website

- The City's Environmental & Technical Division's webpages were periodically reviewed and updated.

PI-3 Offer a Stewardship Opportunity

- The City developed and implemented a new stewardship opportunity designed to garner public participation in protecting natural resources and waterways through a series of volunteer, litter clean-up events located near waterways or stormwater drainages.

41. Were the required components in place by the implementation date? *Schedule A.3.b.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2020 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

42. Is the SWMP Document posted on a publicly accessible website? *Schedule A.3.b.ii*

Yes ☒ No ☐

43. Was the publicly accessible website updated during this reporting year? *Schedule A.3.b.ii*

Yes ☒ No ☐

If necessary, provide an explanation:

Updates and additions: staff contact information, 2019-20 annual reports; SWMP Document sections, resource library content; stewardship and event pages; interactive map applications; SWAC meeting agendas and minutes.

44. Does the publicly accessible website include illicit discharge complaint/reporting information or procedures? *Schedule A.3.b.ii.A*

Yes ☒ No ☐

If necessary, provide an explanation: Online ID Report Tool

45. Does the publicly accessible website include draft documents issued for public comment, final reports, plans and other official SWMP policy documents? *Schedule A.3.b.ii.B*

Yes ☒ No ☐

If necessary, provide an explanation: Stormwater Regulation - Document Library

46. Does the publicly accessible website include links to all ordinances, policies and/or guidance documents related to the construction and post-construction stormwater management control programs, including education, training, licensing, and permitting? *Schedule A.3.b.ii.C*

Yes ☒ No ☐

If necessary, provide an explanation: Erosion Control Program

47. Does the publicly accessible website include contact information for relevant staff, including phone numbers, mailing addresses and email addresses? *Schedule A.3.b.ii.D*

Yes ☒ No ☐

If necessary, provide an explanation: Environmental Division Home Page - Point of Contact

48. During this reporting year, was a stewardship opportunity created or partnered with another entity? *Schedule A.3.b.iii*

Yes ☒ No ☐

If "Yes", summarize the stewardship opportunity(s).

The City developed and implemented a new stewardship opportunity designed to garner public participation in protecting waterways through a series of volunteer, litter clean-up events located near waterways or stormwater drainages. The program, called Trashy Tuesday, runs from June through September and consists of a series of litter clean-up events, which are held on the first Tuesday of the month. The inaugural event was held in June; 25 volunteers removed over 100

lbs. of trash from the Claggett Creek riparian area and park.

3.3 Illicit Discharge Detection and Elimination

49. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.c*

ID-1 Implement an Illicit Discharge Detection and Elimination Program

- The City continued to implement the Illicit Discharge Detection and Elimination Program during the report year.
- The IDDE Plan has been evaluated for compliance and revised to meet permit requirements; many components have been implemented, however full implementation is pending adoption of the revised ordinance.

The IDDE Plan includes activities that comply with the TMDL Implementation Plan and the WPCF permit.

ID-2 Maintain a Map and Digital Inventory of the MS4

- The City maintained a map and digital inventory of the MS4. Data collection is on-going.

ID-3 Prohibit Illicit Discharges by Ordinance

- The City prohibited illicit discharges through the Stormwater Discharge Control Ordinance (2009-585).
- The ordinance was reviewed during the report year; it's in the process of being revised to meet the requirements in Schedule A.3.c and is on schedule to be adopted and implemented before Feb. 28, 2022.

ID-4 Maintain Enforcement Procedures

- Staff followed an Enforcement Response Plan (ERP) to address violations through education, corrective actions, and enforcement.
- The ERP includes escalating enforcement and timelines for achieving compliance. Implementation of the revised ERP is pending adoption of the revised ordinance

ID-5 Conduct Dry-Weather Inspections of Outfalls

- Dry-weather inspections were performed for 91% of public outfalls, exceeding the permit requirements.
- Priority outfalls have been identified; all priority outfalls are inspected by staff annually.
- Field screening activities include Pollutant Parameter Action Levels and Laboratory Analysis procedures.

ID-6 Provide IDDE Training to Program Staff

- ID Detection and Response training was provided to all Public Works employees during the report year.
- Staff responsible for responding to complaints were trained to use a mobile GIS application (Survey123®) to accurately track the City's complaint response and field detected illicit discharges.

50. Were the required components in place by the implementation date? *Schedule A.3.c.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2022 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

The implementation deadline for existing registrants is Feb. 28, 2022.

51. Is the MS4 map(s) current? *Schedule A.3.c.ii.A*

Yes ☒ No ☐

52. Describe the MS4 map(s) format(s):

Keizer uses ESRI's ArcGIS software which supports shapefiles, feature classes, coverages, tables, databases and geodatabases.

53. Is the MS4 map(s) included as attachment? Yes ☐ No ☒

Or are the digital shapefiles available for electronic submittal? Yes ☐ No ☒

(Existing Registrants must submit their MS4 map with the third Annual Report; New Registrants must submit by Sept. 1, 2023)

If necessary, provide an explanation:

MS4 map will be submitted with the third Annual Report – Nov. 1, 2022, as required.

54. Is the digital inventory of all known outfalls, with the associated receiving waterbody current? *Schedule A.3.c.ii.A*

Yes ☒ No ☐

If necessary, provide an explanation:

55. Indicate if the following features are included on your MS4 map:

- ☒ Location of all known outfalls, including the requirements in *Schedule A.3.c.ii.B*
- ☒ Stormwater collection and conveyance system, including the requirements in *Schedule A.3.c.ii.C*
- ☒ Stormwater structural controls, including the requirements in *Schedule A.3.c.ii.C*
- ☒ Location of known chronic discharges *Schedule A.3.c.ii.D*

If necessary, provide an explanation:

56. Have non-stormwater discharges into the MS4 been prohibited through enforcement of an ordinance or other regulatory mechanism? *Schedule A.3.c.iii*

Yes ☒ No ☐

If necessary, provide an explanation:

The City prohibits non-stormwater discharges through the Stormwater Discharge Control Ordinance (2009-585); the ordinance is currently being revised. The revised ordinance is on schedule to be adopted and implemented prior to the permit deadline.

57. Indicate which of the following have an ordinance or other regulatory mechanism to prohibit discharge to the MS4: *Schedule A.3.c.iii*

- ☒ Septic, sewage, and dumping or disposal of liquids or materials other than stormwater into the MS4
- ☒ Discharges of washwater resulting from the hosing or cleaning of gas stations, auto repair garages, or other types of automotive services facilities
- ☒ Discharges resulting from the cleaning, repair, or maintenance of any type of equipment, machinery, or facility, including motor vehicles, cement-related equipment, and port-a-potty servicing, etc.
- ☒ Discharges of washwater from mobile operations, such as mobile automobile or truck washing, steam cleaning, power washing, and carpet cleaning, etc.
- ☒ Discharges of washwater from the cleaning or hosing of impervious surfaces in municipal, industrial, commercial, or residential areas (including parking lots, streets, sidewalks, driveways, patios, plazas, work yards and outdoor eating or drinking areas, etc.) where detergents are used and spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed)
- ☒ Discharges of runoff from material storage areas, which contain chemicals, fuels, grease, oil, or other hazardous materials from material storage areas
- ☒ Discharges of pool or fountain water containing chlorine, biocides, or other chemicals; discharges of pool or fountain filter backwash water
- ☒ Discharges of sediment, unhardened concrete, pet waste, vegetation clippings, or other landscape or construction-related wastes
- ☒ Discharges of trash, paints, stains, resins, or other household hazardous wastes
- ☒ Discharges of food-related wastes (grease, restaurant kitchen mat and trash bin washwater, etc.)

If necessary, provide an explanation:

The current Stormwater Discharge Control Ordinance (#2009-585) prohibits all of the above.

58. Is the written escalating enforcement and response procedure included as an attachment? *Schedule A.3.c.iv*

Yes ☐ No ☒

(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023)

If necessary, provide an explanation:

The Enforcement Response Plan will be submitted with the third Annual Report, Nov. 1, 2022, as required.

59. Is there a phone number, webpage, and/or other communication channel publicized for the public use to report illicit discharges? *Schedule A.3.c.v.A*

- ☒ Phone number(s)
- ☒ Webpage(s)
- ☒ Other communication channels

If necessary, provide an explanation:

Online ID Report Tool

60. Provide the number of complaints received during this reporting year. *Schedule A.3.c.v.D*

Number: 24

61. On average, how long did it take to respond to complaints? *Schedule A.3.c.v.B*

In working days: 1

62. Provide the number of complaints that included notification of the Oregon Emergency Response System during this reporting year. Schedule A.3.c.v.B

Number of notifications: 1

See **Exhibit A** for a detailed report of the incident.

63. Provide the number of complaints where staff performed an investigation during this reporting year. *Schedule A.3.c.v*
    Number: 2
64. On average, how long did it take to conduct an initial investigation? *Schedule A.3.c.v.B*
    In working days: 1

65. Provide the number of illicit discharges discovered and eliminated during this reporting year. *Schedule A.3.c.v*
    Number: 4
66. On average, how long did it take to eliminate an illicit discharge? *Schedule A.3.c.v.B*
    In working days: 4

67. Provide the number times escalating enforcement procedure was used to eliminate illicit discharge during this reporting year. *Schedule A.3.c.v.D*
    Number of times: 3
    The City issued two Verbal Warnings that included education and corrective actions and one written Notice of Violation with education and corrective actions. Most of the complaints did not constitute an illicit discharge but rather the potential for an illicit discharge. As such, most complaints were resolved without escalating enforcement.

Do any of the illicit discharges involve the repair or replacement of the wastewater and/or storm sewer conveyance systems? *Schedule A.3.c.v.B*
Yes ☐ No ☒ NA ☐
If necessary, provide an explanation:

68. Provide the number of illicit discharges that were referred to another entity during this reporting year. *Schedule A.3.c.v.C*
    Number: 1
69. On average, how long did it take to notify the entity(s)?
    In working days: 1
    If necessary, provide an explanation:
    Marion County investigated a sediment discharge that occurred on Labish Ditch, upstream (east) of the City.

70. Indicate which of the following are included in the complaints or reports tracking documentation: *Schedule A.3.c.v.D*
    - ☒ Date the complaint was received and, if available, the complainant's name and contact information
    - ☒ Name of staff responding to the complaint
    - ☒ Date the investigation was initiated
    - ☒ The outcome of the staff investigation
    - ☒ Corrective action(s) taken to eliminate the illicit discharge
    - ☒ The responsible party for the corrective action(s)
    - ☒ The status of enforcement procedure(s), when necessary
    - ☒ The date the corrective action(s) was completed and staff who evaluated final compliance

    If necessary, provide an explanation:

Complaint intake and response tracking are managed through a mobile GIS application. Both office and field staff can view, enter, and update incidents in real-time. When a new incident is created/entered, key program staff are automatically notified via email.

71. Provide percentage of outfalls inspected. *Schedule A.3.c.vi.A/B*
    Known outfalls screened this reporting year: 103 public outfalls (91%)
72. Known outfalls screened during the permit term: 224 (99.5% outfalls)
    If necessary, provide an explanation:

The City aims to inspect 100% of public outfalls annually, which exceeds the requirement. Stormwater Operations staff also inspect certain outlets and private outfalls as part of their annual routine. The City's outfall data was revised during the report period, to distinguish between outlets and outfalls, as defined in the General Permit.

73. Provide percentage of outfalls inspected as part of field screening of priority location. *Schedule A.3.c.vi.C*
    Priority location outfalls screened this reporting year: 100%
74. Priority location outfalls screened during the permit term: 100%

If necessary, provide an explanation:

75. Indicate which of the following dry-weather field screening activities have been performed in the last year: *Schedule A.3.c.vi*

☒ General observation
☐ Field Screening and Analysis
☐ Pollutant Parameter Action
☐ Laboratory Analysis

If necessary, provide an explanation:

76. If flow is observed and the source is unknown, provide a brief description of the field investigation and analysis process. *Schedule A.3.c.vi.D,E,G*

When flow is observed, Stormwater Operations staff notify Environmental Division staff and deploy temporary containment measures (e.g., sandbags, valves, berms, absorbents), as appropriate. Environmental staff take measurements such as, temperature, pH, turbidity, specific conductivity, total chlorine, etc. in order to characterize the flow. If illicit discharge is suspected, staff perform reconnaissance to determine the source. When a source is identified, corrective measures and/or enforcement actions are applied as appropriate to eliminate the discharge. When the source is not identified through field screening activities, Environmental staff collect a sample of the flow for laboratory analysis. The laboratory results are used to guide further reconnaissance, which may include TV inspections of storm lines and/or inspections of private property. Additional monitoring within the watershed may be performed to determine if a discharge has impacted a waterway.

77. Have pollutant parameter action levels been established and are they included as an attachment? *Schedule A.3.vi.F*

Yes ☒ No ☐

(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023)

If necessary, provide an explanation:

Pollutant Parameter Action Levels have been established and are included in the IDDE Plan. They will be submitted with the third annual report, as required.

78. Are all persons responsible for investigating and eliminating illicit discharges and illicit connections into the MS4 appropriately trained to conduct such activities? *Schedule A.3.c.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

All Public Works staff received annual Detection and Elimination training; Public Works staff are required to report and respond to illicit discharges and spills.

79. Are all new staff working to implement the IDDE program trained within 30 days of their assignment to this program*? Schedule A.3.c.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

Environmental staff provided training to employees responsible for implementing the program as part of the onboarding process.

3.4 Construction Site Runoff Control

80. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.d*

EC-1 Implement an Erosion and Sediment Control Program

- The City continued to implement the Erosion and Sediment Control Program during the report year.
- The development of an Erosion Control Manual is in progress.

The Erosion Control Program includes activities that comply with the TMDL Implementation Plan and the WPCF permit.

EC-2 Prohibit Construction Site Runoff by Ordinance

- The City required construction site operators to obtain a permit and submit an erosion-sediment control plan for projects disturbing 2,000 square feet or more through the Erosion Control Ordinance (2014-711). This threshold exceeds the permit requirement.

EC-3 Require NPDES Construction Permits for Large-Scale Projects

- The City maintained 1200-CN permit coverage (through Oregon DEQ), which conditionally authorizes Keizer to issue local permits for large projects between one and five acres.
- The City referred projects disturbing five or more acres (singly or cumulatively) to Oregon DEQ.
- The City referred projects impacting waterways/wetlands to the Dept. of State Lands, the Army Corp. of Engineers, Oregon DEQ, Oregon Dept. of Fish & Wildlife, and other agencies as appropriate.

EC-4 Develop Written Erosion Control Standards

- The City is in the process of developing Erosion Control Standard Details to provide guidance for proper installation and of erosion control measures. The standards will be implemented on or before Feb. 28, 2023.

EC-5 Review Erosion and Sediment Control Plans

- The City required an erosion-sediment control plan for all permitted projects.
- All ESCPs were reviewed using a checklist.

EC-6 Inspect Construction Sites for Compliance

- Public Works staff performed routine site inspections of all permitted projects.
- All staff responsible for performing construction site inspections maintained CESCL Certification.

EC-7 Maintain Enforcement Procedures

- Staff followed an Enforcement Response Plan (ERP) to apply corrective actions and enforcement.
- The revised plan will include escalating enforcement and timelines for achieving compliance. Implementation of the revised ERP will occur on or before Feb. 28, 2023.

EC-8 Provide Training to Program Staff

- Public Works staff received annual Erosion Prevention and Sediment Control training.
- All staff responsible for performing construction site inspections are CESCL Certified.
- Environmental staff provided training to employees that are directly responsible for implementing the program.

81. Were the required components in place by the implementation date? *Schedule A.3.d.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2023 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

The implementation deadline for existing registrants is Feb. 28, 2023.

82. Do ordinances or other regulatory mechanisms require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all qualifying construction projects? *Schedule A.3.d.ii*

Yes ☒ No ☐ NA ☐

If necessary, provide an explanation:

Erosion Control Ordinance 2014-711

83. Indicate the minimum land disturbance where construction site operators are required to complete and implement an Erosion and Sediment Control Plan (ESCP) for construction project sites: *Schedule A.3.d.ii*

In square feet or portion of an acre: 2,000 ft^2 ☒, acres ☐

If necessary, provide an explanation:

A permit is also required for projects that disturb 200 – 1,999 square feet if the site falls within 75' of the Willamette River or within 50' of any other waterway**.** All permitted projects must submit an ESCP; small project plans have fewer requirements than large project plans. Staff review all plans as part of the permit approval process.

84. For construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres), provide a brief description of how these project are referred to DEQ or the appropriate DEQ agent, to obtain a NPDES Construction Stormwater General Permit. *Schedule A.3.d.iii*

The City maintained 1200-CN permit coverage through Oregon DEQ, which conditionally authorizes Keizer to issue 1200-CN permits for large projects between one and five acres.
The City refers projects disturbing five or more acres (singly or cumulatively) to Oregon DEQ; no projects met the criteria during the report year.
The City referred projects impacting waterways/wetlands to the Dept. of State Lands, the Army Corp. of Engineers, Oregon DEQ, Oregon Dept. of Fish & Wildlife, and other agencies as appropriate.

85. Provide the written specifications that address the proper installation and maintenance of such controls during all phases of construction activity as an attachment *Schedule A.3.d.iv*

Attached: Yes ☐ No ☒

If necessary, provide an explanation:

The City referenced standards and specifications (Clean Water Services).

Erosion Control Standard Details are being developed and will be implemented on or before Feb. 28, 2023. Please refer to the current standards at the link below:

Erosion Prevention and Sediment Control Planning and Design Manual – Clean Water Services

86. Provide the Erosion and Sediment Control Plan template as an attachment. *Schedule A.3.d.iv.A*

    Attached: Yes ☐ No ☒

    If necessary, provide an explanation:

Please refer to the CSPPP project applications on our website for BMP tables, checklists, and plan requirements.

87. Indicate which of the following are required for qualifying construction projects: *Schedule A.3.d.iv*

    ☒ Site operator required to complete an ESCP template prior to beginning construction/land disturbance
    ☒ Site operator required to keep the ESCP on site
    ☒ Site operator required maintain and update the ESCP as site conditions change, or as needed.
    ☒ Site operator required to provide the ESCP to the permit registrant, DEQ, or another administrating entity

    If necessary, provide an explanation:

88. ESCP [from construction projects that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres)] are reviewed using a checklist or similar document to determine compliance. *Schedule A.3.d.v*

    Yes ☒ No ☐

89. Provide the ESCP review template as an attachment. *Schedule A.3.d.v*

    Attached: Yes ☒ No ☐

    Please refer to Exhibit B for the Plan Review Checklists

90. Indicate the minimum land disturbance where you require the ESCP to be reviewed, if different than one acre:

    2,000 ft^2 ☒, acres ☐

    If necessary, provide an explanation:

91. All construction projects [that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres)] are inspected or scheduled to be inspected at least once per permit term. *Schedule A.3.d.vi.A.1*

    Indicate the number of inspections completed to comply with this requirement during this reporting year: 43

    Indicate the number of inspections completed to comply with this requirement during the permit term: 56+

    If necessary, provide an explanation:

Public Works staff performs initial, routine, and final inspections for all permitted projects. Staff also perform inspections in response to complaints and storm events that generate runoff. The City had four 1200-CN permits open during the report year; 43 inspections were performed at these sites.

92. Are construction projects with visible sediment in stormwater/dewatering discharge or when a complaint is received inspected? *Schedule A.3.d.vi.A.2*

    Yes ☒ No ☐

93. Indicate number of projects that were inspected based on this inspection trigger: 0

    If necessary, provide an explanation:

No complaints of this nature were received

94. Indicate the total number of construction projects that were inspected this monitoring year: 28
95. Indicate the total number of construction projects that were inspected during the permit term: 67

96. Indicate which of the following are documented during an inspection: *Schedule A.3.d.vi.B*

    ☒ That the ESCP is reviewed to determine if the described
    ☒ Control measures were installed, implemented, and maintained appropriately
    ☒ Assessment of the site's compliance with the ordinances or requirements
    ☒ Visual observation of any existing or potential non-stormwater discharges, illicit connections, and/or discharge of pollutants from the site
    ☒ Recommendations to the construction site operator for follow-up
    ☒ Education or instruction provided to the site operator related to stormwater pollution prevention practices

If necessary, provide an explanation:

97. If available, provide a copy of the written or electronic inspection report form. *Schedule A.3.d.vi.B*
Attached: Yes ☒ No ☐

Please refer to Appendix C

98. For Existing Large Communities: Indicate the number of new construction projects inspected that disturb less one acre during this monitoring year. Is this number at least 25% of the qualifying new construction sites? *Schedule A.3.d.vi.C*

Total number of sites inspected that disturbed less than one acre: 24 (or 100%)

If necessary, provide an explanation:

99. Provide the written escalating enforcement and response procedure as an attachment. *Schedule A.3.d.vii*
Yes ☐ No ☒
(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023)
If necessary, provide an explanation:

The existing EC Enforcement Response Plan was submitted with the first annual report; the revised plan will be submitted with the third Annual Report, as required.

100. Was the escalating enforcement procedure used to achieve compliance at any construction projects? *Schedule A.3.d.vii*
Yes ☒ No ☐
Indicate number of times during this reporting year: 1

101. Indicate number of times during the permit term: 23
If necessary, provide an explanation:

There was only one instance in which the City used "escalating" enforcement – that is, enforcement beyond education/verbal warning with minor corrective actions. Last year's reported value included verbal warnings, which don't necessarily constitute an escalation of enforcement. To be clear, the EC Enforcement Response Plan does stipulate escalating enforcement actions, including timelines for gaining compliance.

102. Were all persons responsible for ESCP reviews, site inspections, and enforcement appropriately trained to conduct such activities? *Schedule A.3.d.viii*
Yes ☒ No ☐
If necessary, provide an explanation:

Environmental Technicians, who coordinate the Erosion Control Program, are required to obtain CESCL certification within 90 days of hire, or as soon as possible based on training availability. Environmental program staff provided EC training to all Public Works employees.

103. Were all new staff working to implement the construction site runoff control program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.d.viii*
Yes ☒ No ☐

3.5 Post-Construction Site Runoff for New Development and Redevelopment

104. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.e*

PC-1 Implement and Enforce a Post-Construction Stormwater Management Program

- The City continued to implement the Post-Construction Stormwater Management Program during the report year.
- Staff are in the process of developing the Stormwater Design Manual.

The Post-Construction Program includes activities that comply with the TMDL Implementation Plan and the WPCF permit.

PC-2 Maintain Legal Authority to Control Post-Construction Runoff

- The City required and enforced the use of stormwater controls on all qualifying sites through design standards.
- PW Staff began updating the stormwater design standards (SDS) and evaluating methods to fully enforce the requirements of Schedule A.3.e.

PC-3 Prioritize Low Impact Development

- Environmental staff continued to review ordinances, codes, and development standards.

- An interdisciplinary Review Team will be assembled to identify barriers to LID and create an action plan for eliminating or minimizing them.

PC-4 Update Stormwater Design Standards

- Environmental staff is working with the City Engineer to develop new Stormwater Design Standards; the new standards will be implemented on or before the permit deadline.

PC-5 Review Plans for Compliance with Stormwater Design Standards

- The City Engineer and Project Manager reviewed plans for compliance with the post-construction design standards.

PC-6 Implement a Long-Term PCSM Operations & Maintenance Program

- The City enforced long-term operation & maintenance requirements for stormwater controls through Private Maintenance Agreements.
- The Private Water Quality Facility Inventory and Inspection Program was only partially implemented due to staffing shortages. The inventory was updated however inspections were only performed on public stormwater facilities.

PC-7 Provide PCSM Training to Program Staff

- Program staff attended training on inspecting water quality facilities during the report year.

105. Were the required components in place by the implementation date? *Schedule A.3.e.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2023 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

The implementation deadline for existing registrants is Feb. 28, 2023.

106. For projects creating or replacing impervious area, indicate the area (or threshold) where the site is required to implement the post-construction site runoff program requirements: *Schedule A.3.e.ii*

In square feet: 5,000 ft^2

If necessary, provide an explanation:

107. Indicate which of the following are required at qualifying sites: *Schedule A.3.e.ii*

☒ The use of stormwater controls

☒ A site-specific stormwater management approach that targets natural surface or predevelopment hydrological function through the installation and long-term operation and maintenance of stormwater controls

☒ Long-term O&M of stormwater controls at project sites that are under the ownership of a private entity

If necessary, provide an explanation:

108. Were ordinance(s), code(s) and development standards reviewed to identify, minimize or eliminate barriers that inhibit design and implementation techniques intended to minimize impervious surfaces and reduce stormwater runoff? *Schedule A.3.e.iii*

Yes ☐ No ☒

109. If barriers were identified or if necessary, provide an explanation:

Environmental staff continued to review ordinances, codes, and development standards, however the process is ongoing.

110. Provide an explanation of the timeline for removal of barriers or if removal is outside your authority:

NA - The City will assemble an interdisciplinary Review Team to address barriers to LID; the resulting action plan will be implemented on or before Feb. 28, 2023.

111. Indicate which of the following technical standards are used to determine the retention requirement: *Schedule A.3.e.iv.A*

☐ Volume-based method

☒ Storm event percentile-based method

☐ Annual average runoff-based method

If necessary, provide an explanation:

112. For projects that are unable to meet the retention requirement, is the remainder of the rainfall/runoff treated prior to discharge with a structural stormwater control? *Schedule A.3.e.iv.B*

Yes ☒ No ☐

113. Was the stormwater structural control designed to remove, at minimum, 80 percent of the total suspended solids?

Yes ☒ No ☐

If necessary, provide an explanation:

Please refer to the City of Keizer Design Standards

114. Are the allowable structural stormwater controls and specifications available for review? *Schedule A.3.e.iv.C*

Yes ☒ No ☐

115. Indicate if they are attached or the location where they can be viewed:

Attached ☐

Location: Design Standards

If necessary, provide an explanation:

Specifications are provided/referenced in the design standards.

116. Have alternatives for projects complying with the retention requirement been approved? *Schedule A.3.e.iv.D*

Yes ☐ No ☒

117. If yes, are the written technical justifications evaluated? *Schedule A.3.e.iv.D*

Yes ☐ No ☐

NA

118. Provide a brief description of the factors of technical infeasibility or site constraints that prevented the on-site management of the runoff amount stipulated in the stormwater retention requirement or a portion thereof. *Schedule A.3.e.iv.D*

If necessary, provide an explanation:

NA – program development is in progress; program will be developed and implemented on or before Feb. 28, 2023.

119. Before the allowance of alternative compliance, were mitigation options established? *Schedule A.3.e.iv.E*

Yes ☐ No ☒

If necessary, provide an explanation:

NA- program development is in progress

120. If applicable, indicate which of the following mitigation options have been used and provide a narrative description of the implementation of the mitigation option? *Schedule A.3.e.iv.E*

☐ Off-Site Mitigation

NA

☐ Groundwater Replenishment Projects

NA

☐ Treatment Equivalent to the Retention Requirement

NA

If necessary, provide an explanation:

NA – to be developed and implemented on or before Feb. 28, 2023.

121. Was a procedure developed for the review and approval of structural stormwater control plans for new development and redevelopment projects? *Schedule A.3.e.v*

Yes ☒ No ☐

If necessary, provide an explanation:

The program is implemented at the discretion of the Public Works Director and the City Engineer. Stormwater controls/drainage plans are reviewed and approved by the Project Manager and the City Engineer.

122. Indicate the minimum land disturbance or creation of new impervious area where plans are required to be reviewed:

5,000 ft^2 ☒, acres ☐ of land disturbance ☐ creation of new impervious area ☒

The City currently reviews public or private developments, general improvements, or any work in the City of Keizer which in any way impacts, alters, destroys, changes, or modifies existing drainage conditions or facilities.

123. Are all sites that use alternative compliance to meet the retention requirement reviewed?

Yes ☒ No ☐

If necessary, provide an explanation:

Stormwater drainage plans are reviewed and approved by the Project Manager and the City Engineer.

124. Indicate if an inventory and implementation strategy is used to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv of the permit? *Schedule A.3.e.vi*

Yes ☒ No ☐

If necessary, provide an explanation:

A Private Water Quality Facility Inventory and Inspection Program was developed in 2015 to create an inventory of existing facilities and ascertain their condition and functionality. Inventories were updated during the report year, however inspections of private facilities were not performed due to staffing shortages.

125. Indicate which of the following strategies have been developed to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv.: *Schedule A.3.e.vi*

☒ Legal authority to inspect and require effective operation and maintenance of privately owned and operated stormwater controls

☒ Inspection procedures and an inspection schedule to ensure compliance with the O&M requirements of each stormwater control operated by the permit registrant and by other private entities

☒ A tracking mechanism for documenting inspections and the O&M requirements for each stormwater control

☒ Reporting requirements for privately owned and operated stormwater controls that document compliance with the O&M requirement in Schedule A.3.f.

If necessary, provide an explanation: Achieved through Private Maintenance Agreements (formal contracts that are recorded with Marion County Assessor's Office)

126. Are the location of all public and private stormwater controls installed during this permit term are documented on the MS4 Map? *Schedule A.3.e.vi*

Yes ☒ No ☐

If necessary, provide an explanation:

Ground-truthing and updating is ongoing

127. Were all persons responsible for performing post-construction runoff site plan reviews, administrating the alternative compliance program, or performing O&M practices or evaluating compliance with long-term O&M requirements appropriately trained to conduct such activities? *Schedule A.3.e.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

Program staff from the Environmental and Stormwater Operations Divisions attended training on water quality facility inspection. The City Engineer and Project Manager receive training through continuing education and professional development hours.

128. Were all new staff working to implement the post-construction site runoff for new development and redevelopment program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.e.vii*

Yes ☒ No ☐

3.6 Pollution Prevention and Good Housekeeping for Municipal Operations

129. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.f*

MPP-1 Implement a Municipal Pollution Prevention (MPP) Program

- The Municipal Pollution Prevention Program was implemented during the report year.
- The Good Housekeeping Manual was updated to address pesticides and fertilizers, litter controls, and waste disposal best practices.
- The O&M Manual was reviewed and implemented; no updates were necessary to meet the requirements.

MPP-2 Inspect and Clean Catch Basins

- The Inlet Inspection and Cleaning Program was implemented successfully.

MPP-3 Implement Integrated Pest/Vegetation Management Plans

- The Good Housekeeping Manual was updated to include best practices for pesticide and fertilizer application and storage.

MPP-4 Control Litter

- The Litter Control Program was implemented successfully.
- Street Sweeping was performed continuously throughout the reporting year.
- The Parks & Facilities Division continued to control litter at parks and City-owned facilities.

MPP-5 Develop and Implement a Materials Management Plan

- A Municipal Waste Management Plan was created to document the best practices for disposing of wastes generated by street sweeping, storm line cleaning, catch basin cleaning, etc. The plan is included in the Good Housekeeping Manual.

MPP-6 Provide MPP Training to Program Staff

- Public Works staff were trained on the updated Good Housekeeping Manual.

130. Were the required components in place by the implementation date? *Schedule A.3.f.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2022 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

The implementation deadline for existing registrants is Feb. 28, 2022.

131. Were O&M strategies for existing controls developed for both permit registrant-owned controls and controls owned and operated by another entity discharging to the MS4? *Schedule A.3.f.ii*

132. Yes ☒ No ☐ N/A ☐

If necessary, provide an explanation:

O&M strategies for public and private controls have been developed; O&M for private controls are required through Private Maintenance Agreements.

133. Indicate the percentage of catch basins inspected/cleaned: *Schedule A.3.f.iii*

Percentage inspected this reporting year: 92%

Percentage cleaned: 8%

134. If known, estimate of material removed: 20 yards

135. Percentage inspected during the permit term: 93% (two year average)

Percentage cleaned: 9.5% (two year average)

136. If known, estimate of material removed: 65 yards

If necessary, provide an explanation:

137. Indicate if a catch basin inspection prioritization system and/or an alternate inspection frequency has been established. *Schedule A.3.f.iii*

Yes ☒ No ☐

If necessary, provide an explanation:

The Stormwater Division implements the Inlet Inspection and Cleaning Program. All catch basins and or manholes equipped with stormwater controls (flow controls, sumps, etc.) are inspected annually and cleaned if sediment accumulation is greater than six-inches in depth.

138. During the permit term were existing procedures for inspection and maintenance schedules reviewed/updated to ensure pollution prevention and good housekeeping practices were conducted for the following activities? *Schedule A.3.f.iv*

- ☒ Pipe cleaning for stormwater and wastewater conveyance systems
- ☒ Cleaning of culverts conveying stormwater in roadside ditches
- ☒ Ditch maintenance
- ☒ Road and bridge maintenance
- ☒ Road repair and resurfacing including pavement grinding
- ☒ Dust control for roads and municipal construction sites
- ☒ Winter road maintenance, including salt or de-icing storage areas
- ☒ Fleet maintenance and vehicle washing
- ☒ Building and sidewalk maintenance including washing
- ☒ Solid waste transfer and disposal areas
- ☒ Municipal landscape maintenance

☒ Material storage and transfer areas, including fertilizer and pesticide, hazardous materials, used oil storage, and fuel

☐ Fire fighting training activities

☒ Maintenance of municipal facilities including public parks and open space, golf courses, airports, parking lots, swimming pools, marinas, etc.

If necessary, provide an explanation:

The Good Housekeeping Manual was reviewed and the activities with deficiencies were updated. The Manual has been updated and Public Works Staff have been made aware of the changes.

139. Do any permit registrant-owned facilities have coverage under DEQ's 1200-Z Industrial Stormwater Discharge Permit? *Schedule A.3.f.v*

Yes ☐ No ☒ NA ☐

If "Yes", provide DEQ File Number(s): NA

If necessary, provide an explanation:

NA

140. Are practices in place to reduce the discharge of pollutants to the MS4 associated with the application and storage of pesticides and fertilizers? *Schedule A.3.f.vi*

Yes ☒ No ☐

If necessary, provide an explanation:

The City uses licensed applicators for pesticide and fertilizer applications in public rights-of-way, parks, facilities, vegetative swales and landscaped areas. Public Works has two licensed applicators in the Parks and Facilities Division who follow all label requirements when applying pesticides and fertilizers. The Good Housekeeping Manual outlines BMPs for application and storage of pesticides/fertilizers.

141. Are methods/practices in place to reduce the discharge of litter within the jurisdiction? *Schedule A.3.f.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

142. Are practices in place to ensure that collected material or pollutants removed in the course of maintenance are managed and disposed of in a manner such as to prevent such pollutants from entering the waters of the state in accordance with state and federal rules? *Schedule A.3.f.viii*

Yes ☒ No ☐

If necessary, provide an explanation:

143. Were all persons responsible for evaluating O&M practices, evaluating compliance with long-term O&M requirements or ensuring pollution prevention at facilities and during operations appropriately trained to conduct such activities? *Schedule A.3.f.ix*

Yes ☒ No ☐

If necessary, provide an explanation:

Environmental Program staff provide training for Public Works staff specific to Good Housekeeping and O&M practices annually. Staff were provided training on the updated Good Housekeeping Manual.

144. Were all new staff working to implement the pollution prevention and good housekeeping for municipal operations program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.f.ix*

Yes ☒ No ☐

If necessary, provide an explanation:

4.0 Monitoring

If the requirement does not apply, mark "NA" and explain why it does not apply to you in the comments field.

145. Was municipal stormwater monitoring performed at outfall locations, in the receiving waterbody, or to demonstrate compliance with this permit? *Schedule B.3*

Yes ☐ No ☒

146. If "Yes" is the data included in the Annual Report?

Yes ☐ No ☐

If necessary, provide an explanation:

NA

4.1 Wood Village Monitoring Requirements

147. Provide a summary of the following to evaluate the control strategies established for the Lower Columbia Slough Phosphate, Lead, and Bacteria TMDLs: *Schedule D.1.b*

Phosphate:

NA

Lead:

NA

Bacteria:

NA

148. Indicate which of the following were completed:

☐ For phosphate, monitor influent and effluent dissolved orthophosphate concentrations and total phosphate concentrations at a representative site in Fairview Lake (Reach 4) and Fairview Creek (Reach 5)

☐ For lead, estimates of the effectiveness of controls to remove TSS

☐ For bacteria, measuring E. coli concentrations and its distribution over flows (for example, flow duration intervals) to demonstrate compliance with E. coli criteria

If necessary, provide an explanation:

NA

5.0 Water Quality Standards

149. During this monitoring year was it determined or reported that the MS4 discharge caused or contributed to an excursion of an applicable water quality standard? *Schedule A.1.b*
Yes ☐ No ☒
If necessary, provide an explanation:
NA

150. How and when did the excursion of an applicable water quality standard occur? *Schedule A.1.b*
If necessary, provide an explanation:
NA

151. Was the excursion self-reported or did DEQ send written notification? *Schedule A.1.b*
Self-reported: Yes ☐ No ☐
If necessary, provide an explanation:
NA

152. Within 48 hours was an investigation started into the cause of the water quality excursion? *Schedule A.1.b.i*
Yes ☐ No ☐
If necessary, provide an explanation:
NA

153. Within 30 days of becoming aware of the excursion, was DEQ notified in writing, if self-reporting? *Schedule A.1.b.ii*
Yes ☐ No ☐
If necessary, provide an explanation:
NA

154. Within 60 days of becoming aware of or being notified of the excursion, was a report submitted to DEQ that documents the following: *Schedule A.1.b.iii*
☐ The results of the investigation, including the date the excursion was discovered
☐ A brief description of the conditions that triggered the violation or the cause
☐ Corrective actions taken or planned, including the date corrective action was completed or is expected to be completed
If necessary, provide an explanation:
NA

155. Were the corrective actions implemented in accordance with the schedule approved by DEQ? *Schedule A.1.b*
Yes ☐ No ☐
If necessary, provide an explanation:
NA

156. Provide any additional comments or narrative description, if necessary:
NA