Annual Report

MS4 Phase II General Permit

National Pollutant Discharge Elimination System
MS4 Stormwater Discharge Permit

State of Oregon
Department of
Environmental
Quality

2022-2023
Monitoring Year

City of Keizer
October, 2023

#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: Bill Lawyer Date: 10/17/23

Created by M. Riedel-Bash
Date: 12/27/2018

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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*): PO BOX 21000		
City: Keizer	State: OR	Zip: 97307-1000

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	14	Yes ☒ No ☐	Yes ☒ No ☐	Bacteria, Mercury, Temperature
b. Claggett Creek	33	Yes ☒ No ☐	Yes ☐ No ☒	Bacteria, Mercury, Temperature
c. Labish Ditch	24	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 (#2022-582) – provides legal authority to prohibit non-stormwater discharges/connections to the storm drain system.
- 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.
- Civil Infraction Ordinance (#86-063) – establishes the legal procedure for addressing violations of City ordinances as civil infractions.
- 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.
- 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 was submitted with the 2020-2021 annual report.

21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*
https://www.keizer.org/environmental-reports
If necessary, provide an explanation:
See "Stormwater Management Program Plan"
https://www.keizer.org/media/Departments/Public%20Works/Environmental%20and%20Technical/Permit%20Documents/SWMP%20Document%20Final_v2021.pdf

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 measurable objectives. An annual review of these measurable goals allows

our staff to assess compliance and set strategies for achieving goals. 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 actions. 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:

    - Funding is provided through stormwater utility fees.
    - The Public Works Director is responsible for the development, oversight and administration of staff, programs, plans, and projects designed to comply with stormwater regulations.
    - The Environmental & Technical Division is responsible for managing environmental compliance across Divisions and Departments, including program development, implementation, tracking, evaluation, and reporting.
    - The Stormwater Operations Division is responsible for operation and maintenance of the City's stormwater infrastructure including vegetated stormwater facilities, catch basin cleaning, dry-weather outfall screening, and street-sweeping.
    - The Project Manager is responsible for review and oversight of public and private development including capital projects, plan review, erosion control inspections, and enforcement of design standards. The Project Manager works closely with the City Engineer to review development projects.
    - The Parks & Facilities Division is responsible for operation and maintenance of the City's parks and publicly owned facilities including vegetation management.
    - All Public Works staff are responsible for detection and elimination of illicit discharges including spill response.

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

    Below is an update on the progress towards BMPs stated in our SWMP doc:

    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 Public Education Plan (PEP) outlines specific activities planned for each year of the permit, as well as target audiences, target messages and unique performance measures for each activity. It includes educational activities to comply with the City's TMDL Implementation Plan and WPCF Class V Stormwater Permit.

    PE-2 Offer Stormwater Education Activities

    - Thirty-six stormwater education activities were implemented during the permit year.

    PE-3 Deliver Target Topics to Target Audiences

    - The City provided stormwater education and outreach to all three target audiences during the report year.

- General public messages included lawn care best management practices (home owners), watershed awareness (all ages), pollution prevention, impacts of stormwater runoff (all ages), and LID/green infrastructure (leadership, planners, engineers). Messages and events were circulated to our non-English speaking community, as well.
- Additionally, the City developed new educational programming designed to build public value in our local water resources. Messages and events targeted audiences (general public) with limited experience and/or access to water recreation such as kayaking, fishing, and nature hikes/tours.

PE-4 Provide Education to Construction Professionals

- The City co-hosted the 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: 36

30. During the permit term: 78
If necessary, provide an explanation:

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: stream health – invasive species prevention and in-stream temperature (TMDL); UIC maintenance, infiltration best practices, and ground water protection (WPCF); water resource conservation, water recreation skill building, and waste reduction/recycling and proper disposal of household hazardous waste.

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

The City offered a variety of educational messages and activities throughout the year. Here is a sample of some of the activities and their associated messaging:

- Consumer Confidence Report – OHA report is sent to all Keizer residents – highlighting drinking water quality, watershed awareness and pollution prevention best management practices.
- Streamside Plant Program – providing education to landowners about the importance of native plants and riparian buffers to watershed health
- Our River – Offering several water recreation access programs such as Learn to Kayak and Learn to Fish, targeting individuals with limited access to water recreation

- World Water Day Raindrop Scavenger Hunt at local parks – highlighting watershed awareness facts
- Social Media Campaigns – highlighting pollution prevention & lawn care, pesticide & fertilizer BMPs
- Trashy Tuesday Litter Cleanups – highlighting pollution prevention, litter control BMPs & watershed awareness
- Outdoor School & Salmon Watch – teaching water quality sampling, riparian habitat, watershed awareness & salmon lifecycles to students
- Community Earth Day – highlighting watershed awareness, pollution prevention & litter control BMPs
- Public Works Day Booth – Offering watershed educational activities to more than 3000 attendees at Public Works Day
- Erosion Control Summit – teaching erosion control BMPs and applications of low-impact development and green infrastructure to construction site operators, engineers, and municipal operations staff.

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: 5

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 conduct an annual evaluation of the Public Education Plan (PEP), which involves scoring and evaluating the effectiveness of each education and outreach activity performed that year. The scoring includes audience reach, time and/or financial cost and overall behavior change.

    While the City evaluates each activity, the lowest performing activities are evaluated with more scrutiny in order to improve overall program effectiveness. Based on the performance metrics, for the second year in a row, the activity that scored the highest was utilizing social media campaigns and Keizer's website as an educational tool. This is mainly due to social media's ability to reach a large audience base through the use of limited resources. This year the City made a concerted effort to develop targeted social media campaigns to increase in Facebook and Instagram followers and overall engagement. The City also participated in the Clean River Coalition's Follow the Water digital campaign promoting sustainable lawn care practices across the state. The City will continue to utilize the website and social media platforms to share education and outreach materials and stormwater messaging.

    The City's Our River campaign was another activity that was shown to be highly successful. The campaign (launched during this report year) paired water quality messaging with water recreation programs, such as Learn to Kayak and Learn to Fish. While this program saw smaller audiences (15-50 people) it provided highly impactful learning opportunities to audiences that have had little engagement with water recreation. These two activities will continue to be utilized in future years.

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:

    The annual evaluation of the PEP provides a ranking for all of the completed activities, highlighting which activities were successful and what made them successful. This evaluation also provides an analysis on what to improve with each activity that ranked low. The evaluation is used during the annual PEP development and budgeting, to determine which activities should be continued, altered or discontinued.

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 City offers serval opportunities for public involvement and participation, mainly through stewardship opportunities, seeking public input through surveys and through our Stormwater Advisory Committee (SWAC). Here are some examples of the public involvement opportunities provided this year:

- Public Stormwater Advisory Committee (SWAC) meetings – Public meetings allowing public comment on upcoming stormwater related policies and programs
- Publicly accessible website with contact information and all related documents posted
- Trashy Tuesday Litter Cleanup Stewardship events (offered once a month through summer).
- Adopt-a-Street with ongoing litter clean ups along major arterial roadways
- Great Willamette Cleanup / Community Earth Day Cleanup offering water-based litter clean up events
- Streamside Plant Program a volunteer riparian native planting program to bolster vegetation and stream health.
- Public survey soliciting feedback about native plants for vegetated stormwater facilities within rights-of-way

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:

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:
See the Online ID Report Tool on our website.

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:
Additional permitting information found here: 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 continued to implement a stewardship opportunity designed to garner public participation in protecting waterways through a series of litter clean-up events located near waterways or stormwater drainages. Trashy Tuesday,

the City's summer litter cleanup program, hosted 68 volunteers and removed 300 pounds of litter from roadways and riparian areas. The City also hosted several other litter clean up events and programs such as Adopt-a-Street, the Willamette Riverkeeper River Cleanup, and the Community Earth Day litter clean up on the Willamette River.

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 updated IDDE Ordinance (#2022-842) was adopted prior to February 28th, 2022.
- The IDDE Plan was updated to comply with the new requirements.

ID-2 Maintain a Map and Digital Inventory of the MS4
- The City maintained the stormwater registry (map and digital inventory) for the MS4, including collection of new public and private stormwater assets.

ID-3 Prohibit Illicit Discharges by Ordinance
- The City prohibited illicit discharges through the Stormwater Discharge Control Ordinance (2022-842).

ID-4 Maintain Enforcement Procedures
- Staff updated and 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.

ID-5 Conduct Dry-Weather Inspections of Outfalls
- Dry-weather inspections of public outfalls were completed.
- All priority outfalls were inspected during the report year.
- 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 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)*

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:
The MS4 map was submitted with the third Annual Report.

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:
The City uses GIS to track and manage the outfall inventory.

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:

All known chronic discharges have been eliminated through past efforts, however, the City utilizes the CCTV Inspection Program detect, document, and eliminate cross connections should they occur.

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 (2022-842).

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 (#2022-842) 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 City's Enforcement Response Plan was submitted with the third Annual Report.

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: 29
61. On average, how long did it take to respond to complaints? *Schedule A.3.c.v.B*
    In working days: 1 (same day)

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: 0

63. Provide the number of complaints where staff performed an investigation during this reporting year. *Schedule A.3.c.v*
    Number: 29
64. On average, how long did it take to conduct an initial investigation? *Schedule A.3.c.v.B*
    In working days: 1 day

65. Provide the number of illicit discharges discovered and eliminated during this reporting year. *Schedule A.3.c.v*
    Number: 8 (total number of confirmed illicit discharges – all of which were eliminated.)
66. On average, how long did it take to eliminate an illicit discharge? *Schedule A.3.c.v.B*
    In working days: 5.4 days

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: 0
    None were repeat offenders, all were addressed through notices within the specified timeframe.

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: 0
69. On average, how long did it take to notify the entity(s)?
    In working days: NA
    If necessary, provide an explanation:

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: 84 outfalls (100%)
72. Known outfalls screened during the permit term: 84
    If necessary, provide an explanation:
    Over the course of the permit term, several Keizer-owned outfalls have been inspected and determined to either be non-active outfalls or determined to be an outlet, which are defined differently than an outfall. These outfalls were inspected in previous years, but as of 2021, they are no longer considered to be outfalls according to the General Permit, thus are no longer inspected annually. As of June 30, 2023, the City has a total of 84 active, Keizer-owned outfalls.

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:
    There are 24 outfalls out of 84 that were determined to be priority outfalls. Each of those 24 are inspected annually.

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:
    The City has established dry-weather monitoring procedures that include field screening analysis, pollutant parameter actions levels, and laboratory analysis procedures. During the report period, there were no flows that required field screening analysis or further actions.

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 deploy temporary containment measures (e.g., sandbags, valves, berms, absorbents), as appropriate, and notify Environmental Division staff. 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 documented in the City's IDDE Plan. These were submitted during the third Annual Report and therefore, are not included in this report.

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*

Below is an update on the progress towards Construction Site Runoff BMPs stated in our SWMP doc:

EC-1 Implement an Erosion and Sediment Control Program

- The City continued to implement the Erosion and Sediment Control Program, permitting and inspections during the report year.
  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).

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 has completed and published written Erosion Control Standards for Erosion Control BMPs.

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.

EC-7 Maintain Enforcement Procedures

- Staff followed an Enforcement Response Plan (ERP) to apply corrective actions and enforcement.
- The ERP outlines escalating enforcement actions including specified timelines, stop work orders, and fines.

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 50' of any 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 projects 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. This is a part of our project review checklist. 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:

These were submitted during the third Annual Report.

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:

The ESCP Template is not attached, but is available to view on our website. Please see the documents:

- ESCP Small Project Plan Example
- Small EC Permit Application Example
- Large EC Permit Application Example
- Submittal Navigation & Permit Application Checklist

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 ☒
    These were submitted during the third Annual Report.
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: 27 inspections
    Indicate the number of inspections completed to comply with this requirement during the permit term: 110 inspections
    If necessary, provide an explanation:
    The City had 9 sites over 1 acre during this permit year and at least 3 inspections were completed at each site.

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: 3
    If necessary, provide an explanation:

94. Indicate the total number of construction projects that were inspected this monitoring year: 28 projects
95. Indicate the total number of construction projects that were inspected during the permit term: 127 projects

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 ☒
    These were submitted during the third Annual Report.

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: 47 sites (100% were inspected)
    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 City's Escalating Enforcement Response Plan was submitted during the third Annual Report.

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: 4

101. Indicate number of times during the permit term: 34
If necessary, provide an explanation:

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:
All staff responsible for implementing the Erosion Control Program, are required to obtain CESCL certification within 90 days of hire. Environmental program staff provided EC training to program staff and 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*

Below is an update on the Post Construction BMPs stated in our SWMP doc:

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, with our newly adopted Post-Construction Standards.

PC-2 Maintain Legal Authority to Control Post-Construction Runoff
- The City maintains legal authority to enforce the Post Construction requirements through the Stormwater Development Code which was revised and then adopted by City Council in February, 2023.

PC-3 Prioritize Low Impact Development
- An interdisciplinary Review Team was assembled, which identified barriers to LID. The LID Code Review Team is in the process of creating an action plan for eliminating or minimizing these barriers.

PC-4 Update Stormwater Design Standards
- Staff have developed and implemented new Stormwater Design Standards as of February, 2023.

PC-5 Review Plans for Compliance with Stormwater Design Standards
- The City Engineer and Project Manager review 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 Water Quality Facility Inventory and Inspection Program was implemented with inspections performed on all public vegetated 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:

During the review, there were no ordinances or codes that explicitly did not allow LID. In fact, the revised Development Code (2023) requires new and redevelopment to infiltrate stormwater to the maximum extent feasible, utilizing GSI. However, through the review it was determined that there are opportunities to better facilitate the application and implementation of LID and GSI through explicit inclusion of these practices in codes, policies, and processes. For example:

- Permeable pavements are allowed, but not typically used. Adding a standard detail to the design standards may encourage its use.
- The City's codes and ordinances have limited protections for natural resources. Staff will pursue code changes and/or ordinances to establish better tree, wetland, and riparian protections.
- Leaders, planners, and engineers support LID and GSI, but requested additional technical resources on the cost effectiveness and applications of structural LID. Environmental staff will initiate an internal educational plan to support program decision-makers.

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

The City plans to address each of these barriers within the next three years. Specific dates and management plans will be laid out in our future SWMP document. Here are our priorities:

1. Add a Permeable Pavement Standard Detail to the City's Stormwater Design Standards
2. Pursue the implementation of a Wetland/Riparian Protection ordinance.
3. Develop and implement a targeted education plan for City staff on the benefits of LID and GSI.

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 (Chapter 4)

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 (Chapter 4)

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:

Design Standards [see Section 400.2. F.]

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

Yes ☐ No ☒

If necessary, provide an explanation:

The City did not develop a program to allow for alternative compliance. To date, there have been no projects that could not meet the standards. Licensed engineers may submit a proposal for alternative compliance if the retention and treatment standards cannot be met on-site. All proposals for alternative compliance must provide equivalent water quality benefits – as determined by the City Engineer and approved by the Public Works Director.

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:

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:

Stormwater drainage plans are reviewed the Project Manager and the City Engineer against the design standards and development code.

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 and 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; alternatives shall provide equivalent water quality benefits.

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:

The 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.

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:

Private Maintenance Agreements (formal contracts that are recorded with Marion County Assessor's Office) are used to ensure long-term functionality. PMA's outline the stormwater controls on site and stipulate inspection frequency and maintenance requirements.

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:

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 inspections. 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*

Below is an update on the progress towards BMPs stated in our SWMP doc:

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

- The Municipal Pollution Prevention Program and Operation's O&M practices are an on-going program that was implemented during the report year.

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 in 2022.

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.
- Staff updated the Adopt-A-Street program for roadside litter clean ups
- Staff implemented several litter clean up stewardship events

MPP-5 Develop and Implement a Materials Management Plan

- The material's management plan is described in the O&M 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)*

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: 81% of all public MS4 inlets were inspected.

Percentage cleaned: 9%

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

135. Percentage inspected during the permit term: 91%

Percentage cleaned: 42%

136. If known, estimate of material removed: 85 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
☐ Firefighting 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:

Fire-fighting services are provided by the Keizer Fire District and Marion County Fire District; these services are not in-house.

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):

If necessary, provide an explanation:

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:

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 staff provide annual BMP training to the Department.

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:

Public Works Division Managers provide BMP training during the onboarding of new staff.

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