City of Keizer, Oregon

ANNUAL REPORT

PERMIT YEAR 2017 / 2018
STORMWATER NPDES PERMIT #102904

October 30, 2018

Prepared by:
Environmental and Technical Division Staff
City of Keizer, Public Works Department
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.

Bill Lawyer  
Public Works Director  
City of Keizer  
930 Chemawa Rd NE  
P.O. Box 21000  
Keizer, OR 97307-1000
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ACRONYMS AND ABBREVIATIONS

ACWA  Association of Clean Water Agencies
BMPs  Best Management Practices
CCR  Consumer Confidence Report
CFR  Code of Federal Regulations
City  City of Keizer, Oregon
CS  Construction Site Standards
CWA  Clean Water Act
DEQ  Oregon Department of Environmental Quality
DLCD  Department of Land Conservation and Development
DSL  Oregon Department of State Lands
DS  Development Standards
DWPA  Drinking Water Protection Areas
EFU  Exclusive Farm Use
EPSC  Erosion Prevention Sediment Control
EPA  Environmental Protection Agency
ESU  Equivalent Service Unit
Section 1 - Introduction

1.1 Background

The federal Clean Water Act (CWA) was amended in 1987 to include the requirement that stormwater be regulated as a point source discharge under the NPDES program. In 1990, the EPA developed regulations for stormwater discharges that were applicable to entities that own and operate MS4s. The program was employed in two phases with Phase I regulations first being applied to large MS4s with populations of 100,000 or more. Phase II regulations were adopted in 1999 for small MS4s. In Oregon, DEQ has been delegated authority from the EPA for the NPDES program.

As a result of the NPDES Phase II requirements, the City of Keizer established a citizen’s Stormwater Task Force to assist in the development of a stormwater management strategy that would meet state and federal regulations, and was suitable for the City of Keizer. The original Stormwater Task Force worked with staff and a consultant to establish the original Stormwater Management Plan (SWMP) and a stormwater utility fee. The initial stormwater fee of $2.70 per month has been increased several times and the City is currently following a long range financial plan. The fee stands at $6.82 per month for 1 Equivalent Service Unit (ESU).

After filing an application for an Individual NPDES Permit, the City of Keizer was notified in a letter dated March 12, 2007, that the public review process for the MS4 Phase II individual permit for the City had been completed by the DEQ. NPDES Permit No. 102904 (DEQ File No. 100032) was issued to the City of Keizer, Oregon. The Permit authorizes the discharge of stormwater from all municipal separate storm sewer system outfalls owned and operated by the City. In August 2011 the City of Keizer applied for a permit renewal. The original permit expired on February 28, 2012. A general permit draft has been completed, the public comment period has closed, and Keizer expects the permit to be issued on or before January 1, 2019.

1.2 Annual Report Requirements

In accordance with Schedule B(2) of the Permit, the City of Keizer as the permittee must submit an annual report to DEQ by November 1 of each year for the time period of July 1 through June 30. The annual report must contain:

1. The status of compliance with permit conditions, an assessment of the appropriateness of the identified BMPs, progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP), and the measurable goals for each of the minimum control measures;
2. Results of information collected and analyzed, if any, during the reporting period, including evaluation criteria used to assess the success of the program at reducing the discharge of pollutants to the MEP;

3. A summary of the stormwater activities the permittee plans to undertake during the next reporting cycle, including a schedule for implementation;

4. A description of changes made to the SWMP, including changes to BMPs or measurable goals identified in the SWMP;

5. Information on all new additions or removals of annexed areas that result in an expansion or contraction of the MS4’s boundaries;

6. Notice that the permittee is relying on another government entity to satisfy some of the permittee’s permit obligations (if applicable); and

7. Number and nature of enforcement actions taken.

This document serves as the Annual Report for year 2017/2018 for the City of Keizer.

The City of Keizer does not rely on other government entities to satisfy any of the permit obligations. While Keizer owns the sanitary sewer system within the City’s UGB, the City of Salem provides maintenance and repair of that system through an Inter-governmental Agreement (IGA). The City of Keizer would also utilize outside agencies in the event of an emergency beyond the City’s response capacity. A large scale spill or accident might require a response from the Keizer Fire District, the City of Salem Fire Department or the Salem Public Works Environmental Services group, or the Marion County Fire District. The City also has the option to utilize the State of Oregon Spill Response Contractor. The City of Keizer is a member of the Oregon Water/Wastewater Agency Response Network (ORWARN), and has an Inter-governmental Agreement (IGA) with the Oregon Department of Transportation (ODOT); a Public Works Cooperative Assistance Agreement.

1.3 Organizational Structure and Primary Contacts

The City’s operational structure is a City Manager / City Council configuration with Department Directors in Finance, Community Development, Human Resources, City Recorder, Police, and Public Works. The implementation of the Phase II permit is carried out primarily by the Environmental and Technical Division with some annual inspections and repair work being conducted by the Stormwater Operations Division. These groups are under the management of the Public Works Director and respective Division Managers.
### 1.3 Responsible Personnel

**Table 1.3 – Responsible Personnel**

<table>
<thead>
<tr>
<th>Key Personnel</th>
<th>Area of Responsibility</th>
</tr>
</thead>
</table>
| **Bill Lawyer**, Public Works Director | Department Director  
| | Stormwater Budget  
| | Inter-Agency Lead  
| | Citywide Communication  |
| P.O. Box 21000  
| Keizer, OR 97307  
| (503)390-3700  
| lawyerb@keizer.org |  
| **Elizabeth Sagmiller**, Environmental & Technical Division Manager | Management of Permitted Stormwater Programs  
| | Annual Reporting/Regulatory Reporting  
| | Operational Plan Development  
| | Maintenance/Repair Policy Development  
| | Recordkeeping Policy Development  
| | Education and Outreach  
| | GIS Management  
| | Inter-Agency Coordination  
| | Post-Construction in New and Re-development  
| | UIC Installation Policy  
| | UIC Decommission/Retrofits Policy  |
| P.O. Box 21000  
| Keizer, OR 97307  
| (503)856-3563  
| sagmillere@keizer.org |  
| **Kat LaFever**, Senior Environmental Program Technician | Regulatory Support  
| | Systemwide Assessment  
| | Monitoring Plan  
| | Data Analysis/Recordkeeping  |
| P.O. Box 21000  
| Keizer, OR 97307  
| (503)856-3526  
| lafever@keizer.org |  
| • This individual has resigned from the City of Keizer.  
| **Billy Johnson**, Environmental Program Technician | Stormwater GIS Management/Maintenance  
| | Erosion Control  
| | Post-Construction  
| | New Development Plan Review  |
| P.O. Box 21000  
| Keizer, OR 97307  
| (503)856-3424  
| johnsonb@keizer.org |  
| **Mike Griffin**, Stormwater Operations & Streets Division Manager | Implementation of UIC Operations and Maintenance Plan  
| | Implementation of Good Housekeeping Plan  
| | Implementation of Spill Response Field Manual  
| | Implementation of Illicit Discharge and Detection Plan  
| | Stormwater System Repairs and Recordkeeping  
| | Field Investigation and Response (IDDE, Spills)  
| | UIC Maintenance  |
| P.O. Box 21000  
| Keizer, OR 97307  
| (503)856-3551  
| griffinm@keizer.org |  
| **Matt Reyes**, Public Works Project Manager | Project Management for Large Scale Development  |
| P.O. Box 21000  
| Keizer, OR 97307  
| (503)856-3558  
| reyesm@keizer.org |
1.4 Contents

Sections 2 through 7 of this report will cover the individual progress and specifications of adherence to the six minimum control measures required through the SWMP, including the Schedule B(2) permit requirements. The referenced control measures are as follows:

1. Public Education and Outreach
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention in Municipal Operations

Each of the referenced sections will include reporting on the City’s suite of BMPs for the overall stormwater program.

Section 8 of the document covers the record-keeping and reporting efforts undertaken by staff for 2017/2018. Section 9 covers 2017/2018 annexations and expansion of the MS4.
Section 2 – *Public Education / Outreach*

2.1 BMPs

PE-1 Develop a Public Education Plan that addresses regional stormwater issues. Utilize the Mid-Willamette Outreach Group (MWOG) to develop products.

PE-2 Utilize a statistical method to assess public awareness of stormwater issues

PE-3 Utilize the annual consumer confidence report (CCR) to inform the public about stormwater related issues

PE-4 Update the City’s website

PE-5 Provide support to the Claggett Creek Watershed Council

Table 2.1 – BMP Overview

<table>
<thead>
<tr>
<th>BMP</th>
<th>Activity</th>
<th>Action</th>
<th>Measureable Goal Met Y/N</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>PE-1*</td>
<td>1. Develop a Public Education Plan that addresses regional stormwater issues.</td>
<td>Develop a plan that refines the focus for outreach on specific audiences with key messages</td>
<td>Partial</td>
<td>Some minor activity has occurred on this BMP. The Clean Rivers Coalition is a group we hope to partner with to meet the needs of the new permit</td>
</tr>
<tr>
<td></td>
<td>2. Utilize MWOG to develop outreach products</td>
<td>Participate in at least 8 meetings and host 2 events</td>
<td>Y</td>
<td>The Erosion Control Summit was held on 1/30/18. It continues to be a success. MWOG hosted the Water Festival on 5/15/18 with 200 students from Mary Eyre Elementary School</td>
</tr>
<tr>
<td>PE-2</td>
<td>Utilize a statistical method to assess public awareness of stormwater issues</td>
<td>This BMP was added to the first revision of the SWMP with the permit renewal package.</td>
<td>N</td>
<td>No action has occurred on this activity.</td>
</tr>
<tr>
<td>PE-3</td>
<td>Utilize the annual consumer confidence report (CCR) to inform the public about stormwater related issues</td>
<td></td>
<td>Y</td>
<td>An insert was added to the annual CCR and sent to residents in March 2018</td>
</tr>
</tbody>
</table>
PE-4  Update the City’s website  

Y  2016/2017 Annual Report was added to the City’s website. Staff also began utilizing the website ticker for outreach messages such as healthy lawn care tip, car washing tips, pet waste messaging, and beavers in the watershed

PE-5  Provide support to the Claggett Creek Watershed Council  

Attend meetings and activities  

Y  Staff regularly attends watershed council meetings and has provided significant support for engaging the members. It appears that the group is close to dissolving

* Adaptive Management was applied to this BMP, and approved by DEQ in 2014/2015

2.2 Activities for Report Year 2017/2018

Water Festival

The MWOG group joined together to host the second regional Water Festival this year. The event was held at the Keizer Civic Center and nearby Claggett Creek Park. This year MWOG hosted students from Mary Eyre Elementary School. 14 activity station for the students included fish dissection from ODFW, a turtle station, wastewater bingo, salmon life cycle and tour of Claudia Chinook, water quality testing, a riparian corridor and plant station, and a vactor truck demonstration. The feedback from this event has been highly positive. We hope to see this event become an annual program, and are planning for the 2019 event.

Mid-Willamette Outreach Group (MWOG)

The Mid-Willamette Outreach Group first began meeting in 2011. MWOG is composed from the City of Salem, City of Keizer, Marion County, the Marion Soil and Water Conservation District, the City of Albany, and the City of Corvallis. The group meets on a regular basis and continues to expand activities within the region. The group holds monthly meetings and partnership activities are noted throughout this Section of the report.

Erosion Control Summit – The Erosion Control Summit was held on January 30, 2018. This was the 7th annual event hosted by MWOG and held at the Keizer Civic Center. There were approximately 125 attendees and feedback from the event shows that participants view the
summit as a valuable experience. Speakers included staff from DEQ, the City of Keizer, the City of Salem, Nathan Hardebeck from Northwest Environmental Training Center, and a representative from ACF West. The 2019 event is scheduled for January 29, 2019.

**General Education Activities**

Environmental staff has provided a great deal of significant education and outreach during the past year. The following 2017/2018 activities are compiled in chronological order:

July 1st, 2017 Website -The Ponds of Keizer Rapids park, An ARCGIS storymap project was posted up on the website ticker, The message is focused on mercury pollution in the Willamette River and adjacent ponds with the fish that inhabit them.

July 17th, 2017-City of Albany field day, met with City of Albany engineering, stormwater staff. Toured several facilities and discussed inlets/design/plants etc. Albany provided concrete cloth for an inlet project.

September 1, 2017 Website - Beavers in the Watershed post on the ticker provides messaging about riparian habitat and the role of beavers in riparian ecosystems. Ticker post ran for 2 weeks

September 1, 2017 Website - Capital Canine Club, City of Salem site here: http://temp.cityofsalem.net/Residents/CleanStreams/Pages/capital-canine-club.aspx Ticker post ran 2 weeks

September 12th, 2017, Released the Volume 1 Issue 3 of the Stormwater Newsletter, messaging focused on waterway pollutants, IDDE, as well as crawfish, the arboretum project, and GIS.

September 14th, 2017 Participated in Salmon Watch with the Marion Soil and Water Conservation District (MSWCD). Conducted water quality monitoring class for the Stayton High School, AG and Forestry classes. 41 Students total, helped train another water quality monitoring teacher in DO, pH, Temperature, Nitrates and Phosphates for salmon spawning habitat determinations.

September 15th, 2017. Website Ticker-Volume 1, issue 3 of the Stormwater Newsletter

2017 Thursday and Friday September 28 and 29, Participated in Salmon Watch-MSWCD, Conducted water quality monitoring class for Turner Elementary classes. 41 Students total, helped train another WQ monitoring teacher in DO, pH, Temperature, Nitrates and Phosphates for salmon spawning habitat determinations.

October 3rd, 2017, Forest Ridge Elementary school field trip to Keizer Rapids Park. Provided the “Critters in the Creek and Pond” lab science station, in partnership with MSWCD, birds and habitat presentation. Hands on crawfish and a live catfish, with mosquito fish, and a
microscope. Discussed habitat and water quality in the pond and how it affects the inhabitants, 46 kids from the 2nd grade class.

October 5th, 2017 Keizer Elementary School Field trip to Keizer Rapids Park. Provided the “Critters in the Creek and Pond” lab science station, and utilized crawdads to talk about clean water and habitat in the creeks. Public Works employees did a vactor truck demo and groundwater demonstration model. 82 kids from 4 different 5th grade classes, parents and teachers.

October 9th, 2017- Keizer Fire District and City of Keizer Public Works Open House. “Critters in the Creek and Pond” lab science station, utilized crawdads, mosquito fish and mayfly larvae to talk about clean water and habitat in the creeks. Hosted the fishing game, showing the difference between fishing in a clean creek and fishing in one polluted by urban stormwater runoff. Distributed many stormwater newsletters to the general public in attendance. Estimated 200+ in attendance.

October 23rd, 2017-Kennedy Elementary school at Claggett Creek Park for the adopt-a-stream program, water quality testing and macros. Sampled the creek with a crawdad trap but got only shiners. Not many macros besides snails. Talked about urban pollution and the food chain. 40 students

October 23rd, 2017-Chemeketa Community College Urban Forestry Class, tour of Keizer Rapids Park. Discussion on policy and planning for urban forest management, history of the park, discussed trees for water quality and habitat, stormwater basin and pollution prevention with LID and trees. 32 students

October 27th, 2017-Parish Middle School Avid, 3 classes, 2 - 6th grade and 1- 8th grade. Careers in Horticultural Science and Phytotechnology. Discuss college choices for careers in plant based fields for environmental remediation, talk about storm drains and the MS4 system, treatment with plant based systems like bioswales and rain gardens.

December 8, 2017-Avid Presentation-Stephens Middle School, 2-8th grade classes, 75 students, 2 teachers. Gave the Careers in Horticulture/Phytotech class with water quality messaging. Discussed college choices for careers in plant based fields for environmental remediation, talked about storm drains and the MS4 system, treatment with plant based systems like bioswales and rain gardens.

December 12th, 2017-Stormwater Newsletter Volume I, issue 4. This edition covers phthalates as a pollutant, stormwater sampling for the UIC permit, Keizer Rotary arboretum and an update on the General Permit. Target Audience: Elected Officials, City planning and City Staff. Posted on the website ticker.
December 23rd, 2017-Toured the City of Salem waste transfer facility. Storm and streets operations got a tour of the newly constructed waste transfer facility, discussions on waste transfer, hazmat handling, oil and water separation, decanting, dewatering of solid waste was all beneficial.


March 13th, 2018 Adopt a Stream program at Battlecreek Elementary- Assisted Salem staff with the event. Discussed watersheds, storm drains and beaver habitat, as well as migratory birds in the wetlands, water quality and human impacts on wildlife. 110 students between 4 classrooms.

March 16th, 2018 Parrish Middle School, AVID careers in horticulture/phytotech Presentation to 4 classes, 88 students total. Messaging included clean water, stormwater runoff, phytotechnology for a clean environment.

March 20th, 2018 Geographical Information Systems- A training for Public Works maintenance staff. Discussed the origins of GIS and the use of it in municipal operations, including stormwater and natural resource management.

March 27, 2018 Newsletter- March Edition. March newsletter was released and put onto the website ticker, and also onto the outreach and education page. Sent out to all City staff, hard copies to City Council, engineering.

March 28, 2018 Annual Drinking Water Quality Report is released-Stormwater messaging includes watersheds, NPDES education, messaging about clean streets, car washing, homeowner BMPs, etc. Also messaging about pollutants of concern, and pesticides and fertilizers.

April, 10th, 2018-Whiteaker middle school, leadership class. Careers in Horticulture/Phytotech presentation, with carnivorous plants and messaging on storm drains, common pollutants, and removal through phytoremediation. 40 students, 1 teacher.

April, 11th, 2018-Adopt a Stream-Forest Ridge Elementary, 4th and 5th grade classes. Topics included macro invertebrates and water quality, used the storm drain maker and crawdads to talk about water quality concerns.
April 26th, 2018-Career Center/Avid Sprague High School, 3 classes, junior, sophomore, senior’s. Gave the Careers in Horticulture/Botany, water quality presentation. Discussed carnivorous plants and talked about the link between plants and water quality. 100 students.

May 15th, 2018-Water Festival, 200+ kids from Mary Eryre, 14 different educational stations.

May 24th, 2018-Forest Ridge 4th grade class, gave the careers in science and horticulture talk, used the microscope to look at carnivorous plants and talk about the adaptation to clean water, storm drains, and storm drain marking. 30 students

June 6th, 2018,-Tour of the City of Salem WEFTEF River Road sewage treatment facility for maintenance personnel. Informative and educational talk by Stephanie Eisner the plant manager.

June 10th, 2018 Newsletter, Volume 2, issue 2, posted on the website and distributed through email and hardcopy. Topics: Rare Plants in Keizer, ADA Ramps, Pervious Street Rehab, ArcGis Online, Pentachlorophenol pollution, MWOG outreach.

June 20th, 2018-NPDES Annual Report posted on the City’s website.

2.3 Appropriateness of the BMP / Effectiveness

PE-1 Development of the Public Education Plan will provide staff a clear path forward for future educational activities. This BMP is appropriate and effective.

The MWOG group is becoming more efficient and the activities more focused over time. This portion of the BMP is appropriate and effective.

PE-2 Based on the outcome of the Phase II permit, this BMP may need to be revised.

PE-3 Utilizing the City’s CCR was a useful way to reach a large portion of Keizer residents.

PE-4 Staff needs to have more time to devote to fine-tuning this BMP. Although material is added to the site, it could be more fully expanded. This BMP is appropriate and effective.

PE-5 Environmental staff continue to participate in Claggett Creek Watershed Council (CCWC) meetings and activities. The Council lacks consistency and membership and is extremely limited. This BMP is appropriate, but should be evaluated from year to year.

2.4 Future Activities Planned for 2018/19

The City will continue to implement an education and outreach program in subsequent years which will be tailored following issuance of new regulations.
### Section 3 – Public Involvement

#### 3.1 BMPs

**PI-1**  Develop Stormwater Program Evaluation Methodology  
Utilize the Stormwater Advisory Committee (SWAC) for Program Review and Adaptive Management

**PI-2**  Install 125 – 150 Storm Drain Markers Annually

**PI-3**  Utilize Community Groups and/or Volunteers to maintain restoration Sites

#### Table 3.1 – BMP Overview

<table>
<thead>
<tr>
<th>BMP</th>
<th>Activity</th>
<th>Action</th>
<th>Measureable</th>
<th>Results</th>
</tr>
</thead>
</table>
| PI-1 | Develop stormwater program evaluation methodology | BMPs will be evaluated by 1.program implementation, 2.information collected, 3.evaluation, and 4.needs identification.  
SWAC to review annually | Partial | Staff did not utilize evaluation methodology in 2017, but the SWAC has been utilized for program review. We are planning for new BMPs with the new permit. The SWAC held 3 meetings and were provided 4 memo style program updates |
| PI-2 | Install catch basin markers | Utilize community groups to install catch basin markers | N | Storm drain markers were not installed in 2017/2018 |
| PI-3 | Utilize community groups to maintain restoration sites |  | Y | 2/10/18 CCWC, 5/12/18 CCWC.  
Work at Ben Bill Park restoration site, and work at Keizer Rapids Park targeting invasives |

#### 3.2 Additional Activities for Report Year 2017/2018

The City of Keizer worked with Chemeketa Community College during permit year 2017/2018 utilizing a Cooperative Work Experience (CWE) student. This student conducted research for tree types and costs for a new arboretum at Keizer Rapids Park from which he created an
updated street tree list and addressed the criteria for arboretum status. 76 trees were planted at Keizer Rapids Park in November 2017 and February 2018.

The City has found the relationship with Chemeketa to be beneficial and we look to continue this work in subsequent years.

3.3 Appropriateness of the BMP / Effectiveness

PI-1 This BMP is appropriate but may need to be altered based on conditions in the new permit. Overall, the City has used some method of evaluation through the permit term in order to provide justification for needed changes to BMPs.

PI-2 While the markers are useful for identification purposes, there has been no determination made as to if they deter illegal dumping. Furthermore, the markers are vandalized and removed around school property. However, during outreach events for local students, the markers have been useful in explaining the stormwater conveyance system and impact to waterways.

PI-3 The Claggett Creek Watershed Council conducts specific work at Keizer Rapids Park every year. That project has been successful. However, relying on volunteers to take on a more active role is probably not feasible. The City has had no real success with engaging this group to date. For larger restoration efforts, the City will look to more dependable resources in the future.

3.4 Future Activities Planned for 2018/2019

Staff will look to the new permit to provide appropriate BMPS for Public Involvement in the future.
Section 4 – *Illicit Discharge Detection and Elimination*

4.1 BMPs

ID-1 Revise the IDDE Plan
   Conduct Annual Training
ID-2 Develop Criteria for High Risk Areas
ID-3 Link Information to GIS and Annually Update
ID-4 Develop an Inspection and Inventory Plan for Privately Owned Stormwater Facilities
ID-5 Analyze Inspection Data and Develop a Management Strategy

<table>
<thead>
<tr>
<th>BMP</th>
<th>Activity</th>
<th>Action</th>
<th>Measureable Goal Met Y/N</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ID-1</td>
<td>Revise the original IDDE Plan</td>
<td>Task Completed in 2013/2014</td>
<td>Y</td>
<td>Implementation of the new plan</td>
</tr>
<tr>
<td></td>
<td>Conduct annual training</td>
<td>IDDE/Spill Response</td>
<td>Y</td>
<td>4/17/18 IDDE training for maintenance staff</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1/18/18 Stormwater 101 training for maintenance staff</td>
</tr>
<tr>
<td>ID-2</td>
<td>Develop criteria for high risk areas</td>
<td></td>
<td>Y</td>
<td>Complete</td>
</tr>
<tr>
<td>ID-3</td>
<td>Link to GIS</td>
<td>Developed High Risk Tool Set</td>
<td>Y</td>
<td>Complete – compiled data will need infrequent maintenance</td>
</tr>
<tr>
<td>ID-4</td>
<td>Develop inspection and inventory plan</td>
<td>Inventory is expected to be</td>
<td>Y</td>
<td>393 taxlots inventoried in 2017/2018. 44 lots identified that</td>
</tr>
<tr>
<td></td>
<td></td>
<td>completed in 2018/2019</td>
<td></td>
<td>connect to the MS4</td>
</tr>
<tr>
<td>ID-5</td>
<td>Analyze inspection data and develop management strategy</td>
<td></td>
<td>N/A</td>
<td>Management strategy to be developed in the next year</td>
</tr>
</tbody>
</table>
4.2 Additional Activities for Report Year 2017/2018

IDDE Plan Revisions

The IDDE Plan was revised in 2013/2014. The Stormwater Operations and Streets Division Manager is responsible for implementation of the plan. The overall plan has not been reviewed thoroughly in the last 3 years and the Department would benefit from this activity.

Outfall Inspections

Outfall inspections were completed in July and August of 2017. A total of 176 outfalls were inspected according to records. The City of Keizer provides annual outfall inspection for all such facilities. Data is collected electronically by maintenance personnel in the field.

Staff are now using tablets to collect data in the field which has increased efficiency and decreased overall costs.

Develop Criteria for High Risk Areas

As it applies to ID-2, criteria has been established to help identify areas which may be prone to IDDE incidents. These include land use type, past history of IDDE incidents, hazardous material storage or use (SARA site locations from Keizer Fire Department database), and traffic levels. SARA site locations are noted in Figure 4.2.1

Fig. 4.2.1 SARA Sites

<table>
<thead>
<tr>
<th>KEIZER FIRE DIST</th>
<th>Location Address</th>
<th>City</th>
<th>Facility ID No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>PRECAST INC</td>
<td>KEIZER</td>
<td>073445</td>
</tr>
<tr>
<td></td>
<td>1302 CANDLEWOOD DR N</td>
<td>SALEM</td>
<td>117969</td>
</tr>
<tr>
<td></td>
<td>3600 RIVER RD N</td>
<td>KEIZER</td>
<td>090559</td>
</tr>
<tr>
<td></td>
<td>6494 WINDSOR ISLAND RD</td>
<td>KEIZER</td>
<td>090559</td>
</tr>
<tr>
<td></td>
<td>2715 TEPPER LN NE</td>
<td>KEIZER</td>
<td>020628</td>
</tr>
</tbody>
</table>
Map High Risk Areas in GIS

This BMP is being implemented as designed. A GIS project was established and data is accessed to evaluate ongoing risk. Compiled data in the GIS project will need infrequent maintenance to remain current.

Private Facility Inspection and Inventory

2017/2018 was the 3rd year of the private inventory program. 393 tax lots were inventoried during the FY 17/18.

- 125 lots were identified that did not connect to our MS4 or UIC systems. This includes VSFs, UIC and surface infiltration facilities.
- 44 lots were discovered that did connect to our MS4 system. This includes VSFs and traditional conveyance.
- The remaining lots did not have any type of storm drainage system.
  - All of the drainage systems identified above were captured via GPS and integrated into our GIS.

Spill Prevention and Response

The Spill Prevention and Response program was developed in 2013/2014. Training has occurred for field staff in conjunction with IDDE training. See Table 4.1

Both Public Works and Keizer Fire staff are accustomed to responding to and cleaning up spills as well as reporting and documenting them. We received 37 spill-related incident reports from Keizer Fire, and 24 were logged from Keizer Public Works.

Automotive spills (due to leaks or accidents) are the most frequent reported spill. Sediment from construction track off, stockpiles and landscaping materials are the second-most frequent issue. The most time consuming issues usually relate to food service dumping of wastewater, and swimming pool draining.

Due to increased vigilance on the part of Keizer staff, most incidents were dealt with before any material moved from the original spill location. Keizer has continued to utilize Code Enforcement staff to deal with repeat or uncooperative offenders relating to spills or dumping.

4.3 Appropriateness of the BMP / Effectiveness

ID-1 The revised IDDE Plan is up-to-date, but will need to be reviewed and refined based on new permit requirements. The original ordinance developed in 2009 has been a useful document.

Ongoing training for maintenance personnel is crucial for the success of this BMP.

ID-2 This task is complete and appropriate
ID-3  This task is ongoing and highly appropriate

ID-4  This task is appropriate and the City continues to learn more about the system each year.

4.4  Future Activities Planned for 2018/2019

The City anticipates the new General Phase II permit will provide guidance for future activities when it is issued.

Enforcement actions are listed in Appendix A
Section 5 – Construction Site Stormwater Runoff Control

5.1 BMPs

CS-1  Conduct Erosion Control Training for Public Works Personnel
CS-2  Develop and Maintain an inventory of Active Construction Sites that Require a Construction Site Pollution Prevention Plan (CSPPP)
CS-3  Revise the CSPPP and Erosion Control Ordinance
CS-4  Develop a Separate Hotline for Erosion Control Complaints from the Public

Table 5.1 – BMP Overview

<table>
<thead>
<tr>
<th>BMP</th>
<th>Activity</th>
<th>Action</th>
<th>Measureable Goal Met Y/N</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS-1</td>
<td>Conduct erosion control training for Public Works personnel</td>
<td>Annual training for maintenance personnel.</td>
<td>Y</td>
<td>9/20/17 Erosion Control training for maintenance personnel. Video, review of EC permit process, ROW permits, contracted projects, and in-house projects 1/30/18 Erosion Control Summit for 10 employees</td>
</tr>
<tr>
<td>CS-2</td>
<td>Develop and maintain an inventory of active CSPPP sites</td>
<td>Y</td>
<td>Staff provided plan review, permit issuance, and inspection on 18 new private development projects, 125 ROW permits, and 5 City of Keizer projects</td>
<td></td>
</tr>
<tr>
<td>CS-3</td>
<td>Revise the CSPPP and erosion control ordinance</td>
<td>Y</td>
<td>The ordinance was adopted by City Council on 12/1/14. Forms were simplified and are available online.</td>
<td></td>
</tr>
</tbody>
</table>
CS-4 Develop a separate hotline for erosion control complaints

Partial The City has an after-hours phone system which allows the caller to choose an option for streets/stormwater issues. A separate hotline has not been developed

5.2 Additional Activities for Report Year 2017/2018

The City of Keizer was included in the 1200-CN permit during this permit year.

Record-Keeping and Plan Management

All new and existing CSPPPs are spatially managed through an ArcMap shapefile which shows the location and status of each permit. All CSPPPs are also managed through an excel spreadsheet and kept up to date with inspection information and status updates.

Erosion Control Ordinance Revisions

Environmental staff have made revisions to the Erosion Control Ordinance. Those revisions were approved by City Council on December 1, 2014. All City of Keizer projects that disturb over 2000 sq ft are required to have an internal CSPPP developed and implemented. In addition, projects that disturb over 200 sq ft that are adjacent to a waterway must have a CSPPP.

5.3 Appropriateness of the BMP / Effectiveness

CS-1 Annual training for Public Works employees is appropriate.

CS-2 Maintaining an inventory of active CSPPP sites is appropriate and useful.

CS-3 Revision of the erosion control ordinance and associated CSPPP was appropriate and will result in protecting water quality.

CS-4 As was reported last year, the City currently uses a telephone system that allows the public to reach Public Works personnel 24 hours a day. The hotline referenced in BMP CS-4 has not yet been developed. Because of lean staffing resources it is difficult to determine if a hotline would actually make a difference in the response time for City staff. As was noted in last year’s report, it may be premature for the City to have a separate hotline at this time. The Spill Response Plan and associated manual has a matrix for staff to utilize in the event of a non-routine event. Furthermore, staff is working with support agencies to make certain that Public Works personnel are contacted in the event of an emergency.
5.4 Future Activities Planned for 2018/2019

CS-1 Annual training is expected to continue for Public Works personnel.

CS-2 No changes are anticipated for this BMP

CS-3 No changes are anticipated for this BMP

CS-4 No changes are anticipated for this BMP
Section 6 – *Post-Construction Stormwater Runoff*

### 6.1 BMPs

**DS-1** Revise Design Standards and Development Code  
**DS-2** Implement the Revised Water Quality Standards for New and Re-development  
  Conduct Plan Reviews, Inspections, and Enforcement  
**DS-3** Conduct Annual Training for Program Components for Public Works Personnel

<table>
<thead>
<tr>
<th>BMP</th>
<th>Activity</th>
<th>Action</th>
<th>Measureable Goal Met Y/N</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>DS-1</td>
<td>Develop standards to control runoff from new and re-development</td>
<td>Y/N</td>
<td>9 meetings held w/ City Engineer, Project Manager and Public Works Director, 2 meeting with Community Development.</td>
<td></td>
</tr>
<tr>
<td>DS-2</td>
<td>Implement the Revised Water Quality Standards for New and Re-development</td>
<td>N</td>
<td>The City is actively requiring portions of the updated information in the new Water Quality Manual, but no progress has been made on actively approving the manual.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Conduct plan reviews, inspections, and enforcement for new development</td>
<td>Y</td>
<td>Plan review is ongoing and inspections are ongoing</td>
<td></td>
</tr>
<tr>
<td>DS-3</td>
<td>Conduct annual training for program components for Public Works Personnel</td>
<td>Y</td>
<td>12/20/17 and 1/18/18. Stormwater quiz for maintenance personnel and Stormwater 101 training for maintenance personnel</td>
<td></td>
</tr>
</tbody>
</table>

### 6.2 Additional Activities for Report Year 2017/2018

As was noted in last year’s report, Environmental staff developed a draft Water Quality Manual with the goal of having that document formally approved and utilized as the standard for City of Keizer stormwater development. The draft manual was developed to preserve vegetation, reduce
impervious surface and reduce runoff to surface water. Staff has not received any comments from the City Engineer.

While the City currently implements plan review and inspections for water quality facilities being constructed, there is no formally approved document that spells out a process, recordkeeping, or responsibilities.

Training will be an important element of the new Water Quality Manual. Staff have had more opportunities to learn about water quality treatment, infiltration, and properly maintaining facilities over the past several years.

The City is asking for maintenance agreements for new developments with water quality structures and features.

6.3  Appropriateness of the BMP / Effectiveness

DS-1  The BMP as written is appropriate and effective

DS-2  The BMP as written is appropriate and effective

DS-3  The BMP as written is appropriate and effective

6.4  Future Activities Planned for 2018/2019

Staff will continue to move forward with development of revised Design Standards and the requirements specified in the new Phase II permit.
Section 7 – Pollution Prevention in Municipal Operations (Good Housekeeping)

7.1 BMPs

OM-2 Inspect 10% of the MS4 Annually (Contracted Activity)
OM-3 Conduct Employee Training
OM-4 Implement the Catchbasin Inspection Program
OM-5 Conduct Street Sweeping

Table 7.1 – BMP Overview

<table>
<thead>
<tr>
<th>BMP</th>
<th>Activity</th>
<th>Action</th>
<th>Measureable Goal Met Y/N</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>OM-1</td>
<td>Utilize Public Works personnel to review existing O &amp; M Manual</td>
<td>Revise the manual that was developed in 2011</td>
<td>Y</td>
<td>Complete. The manual was revised in 2014. The manual will again be updated when we have a new permit</td>
</tr>
<tr>
<td>OM-2</td>
<td>Video Inspection of Stormwater System</td>
<td>Contracted inspection with a goal of 10% of the system annually</td>
<td>Y</td>
<td>Video Inspection was conducted in 2017/2018. Information that had been stored on a City hard drive was lost late in the report year. This information had not been backed up.</td>
</tr>
<tr>
<td>OM-3</td>
<td>Conduct employee training</td>
<td></td>
<td>Y</td>
<td>11/7/2017 training occurred for municipal staff.</td>
</tr>
<tr>
<td>OM-4</td>
<td>Catch basin inspection program</td>
<td>Inspect structures, clean and develop a repair list</td>
<td>Y</td>
<td>2283 catchbasins inspected and 304 were cleaned. 299 manholes inspected and 17 cleaned. 22 catchbasin repairs 32 cu yds of material removed from cleaning</td>
</tr>
<tr>
<td>OM-5</td>
<td>Street Sweeping</td>
<td>This is a contracted activity</td>
<td>Y</td>
<td>1089 cubic yards of material was removed in 2017/2018</td>
</tr>
</tbody>
</table>
7.2 Additional Activities for Report Year 2017/2018

**OM-1** The Good Housekeeping Manual was updated in Spring 2014 and now contains pertinent UIC information. The manual includes a regulatory overview, inspection and maintenance protocol, structure design and function, record keeping and adaptive management, as well as a section on roles and responsibilities.

Maintenance personnel are providing routine ‘Shop’ inspections and are properly maintaining records of the inspections. A database has been developed with inspection dates and personnel who conducted the work.

BMPs include:

- Absorbent supplies and spill response plan are “on-hand.”
- Absorbent pads are used for minor spills.
- Catchbasins are protected by bio bags.
- Chemicals are stored indoors at facilities and in proper containment.
- Containers are labeled.
- Dry methods are used for cleaning when possible (sweeping instead of washing)
- Leaks are reported to the Storm/Streets Manager.
- Sanitary sewer drain is used in central bay for washing/clean-up at the PW Shop.
- Secondary containment is provided in areas where spills, leaks, or ruptures could enter the stormwater system and/or water bodies.
- Tanks are installed on a solid foundation.
- Vehicles and equipment are properly maintained to reduce unnecessary repairs or leakages.
- Valves are in closed position and containers are sealed when not in use.
- Recycle old parts, chemicals, and other materials when possible.
- Work is performed inside the shop when applicable to reduce the spread of pollutants

**Repairs**

Total Number of Repairs Completed in Fiscal Year 2017/2018 = 26
Number of Repairs Generated from TV Books coming in 2017/2018 = 40
Number of Repairs completed from TV books in 2017/2018) = 21

Materials: $9,310
Staff Time: $11,777
Equipment: $9,695
TOTAL: $30,782

2017/2018 CIP PROJECT: $247,500
K&E-Dearborn Storm line and outfall realignment
TV Inspection

The hard drive that stored the TV inspection data crashed late in FY 2018. The City still has the raw data in notebooks and on thumb drives provided by the contractor. The City has been fairly consistent with reaching the percentage goal for subsequent years and there is no reason to believe that this goal was not obtained in 2017/2018.

7.3 Appropriateness of the BMP / Effectiveness

**OM-1** The revision of the Good Housekeeping Manual was appropriate. Consistent training will hopefully result in increased usage by Public Works personnel.

**OM-2** This BMP is appropriate and effective. Changes may be made to the program with the conditions of the new permit.

**OM-3** Employee training is effective and appropriate.

**OM-4** This BMP is effective and appropriate.

**OM-5** This BMP is effective and appropriate.

Street Sweeping Quarterly Removal Totals – Annual Comparisons

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>July-Sept</td>
<td>236</td>
<td>187</td>
<td>182</td>
<td>156</td>
</tr>
<tr>
<td>Oct-Dec</td>
<td>962</td>
<td>678</td>
<td>670</td>
<td>627</td>
</tr>
<tr>
<td>Jan-Mar</td>
<td>220</td>
<td>222</td>
<td>199</td>
<td>157</td>
</tr>
<tr>
<td>April-June</td>
<td>226</td>
<td>197</td>
<td>177</td>
<td>149</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1644</strong></td>
<td><strong>1284</strong></td>
<td><strong>1228</strong></td>
<td><strong>1089</strong></td>
</tr>
</tbody>
</table>

7.4 Future Activities Planned for 2017/2018

Continue existing BMPs and implement new conditions of the Phase II permit
Section 8 – Record-Keeping and Reporting

8.1 BMPs

RR-1 Develop an Electronic Stormwater Database (ArcGIS) to Specifically Identify Assets in Order to Track Stormwater Program Elements Including Repair and Maintenance Activity

RR-2 Maintain Spatial Information for Private Stormwater Infrastructure. Add Spatial Information for SWMP Program Elements

Table 8.1 – BMP Overview

<table>
<thead>
<tr>
<th>BMP</th>
<th>Activity</th>
<th>Action</th>
<th>Measureable Goal Met Y/N</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>RR-1</td>
<td>Develop an electronic stormwater database (ArcGIS)</td>
<td>Y</td>
<td>This BMP is complete</td>
<td></td>
</tr>
<tr>
<td>RR-2</td>
<td>Maintain spatial information for private stormwater infrastructure.</td>
<td>Y</td>
<td>All known private connections and structures are now catalogued using a specific code. The program will continue in 2018/2019</td>
<td></td>
</tr>
</tbody>
</table>

8.2 Additional Activities for Report Year 2017/2018

RR-1 – Over the last year Keizer’s Public work’s Department has transitioned to the ArcGIS online platform. This is a new cloud-based platform that allows all Public Works employees to access and manage spatial and tabular data seamlessly. For stormwater specifically, it means ready access to asset information for maintenance, erosion control and IDDE tracking. It also means more eyes on infrastructure management which has led to identification of errors and more updates, ensuring accurate data.

The list below captures only a portion of the numerous data management and record-keeping activities undertaken by Environmental staff:

- Outfall inspection results updated. This field has been changed to identify specific structures such as culverts, inflows, etc.
- Catchbasin and manhole inspections recorded in the database
- Grid maps updated on a quarterly basis
- Erosion control permits and status displayed in ArcMap
- Public and private water well data updated in GIS
- Marion County updates included in the system
- City of Salem updates included in the system
- Archived document file added to the Stormwater Drive and index developed
- Infrastructure corrections updated in the GIS system
- Repair work inventoried and prioritized to include backlog work
- Private inspection project has been added to GIS
- Assets have been reviewed to determine ownership (public or private) and maintenance responsibilities (public or private)

8.3 Appropriateness of the BMP / Effectiveness

RR-1 This BMP is appropriate and effective.

RR-2 This BMP is appropriate and effective.

8.4 Future Activities Planned for 2018/2019

The Environmental and Stormwater Divisions anticipate moving on to the next phase of the private inventory inspection program
Section 9 – Annexed Area / Expansion of the MS4

9.1 Overview

No annexation occurred in 2017/2018.

No major annexations are expected in the upcoming report year, but the City is expecting a large expansion in the next 5 to 10 years.

There were no expansions of the MS4 in 2017/2018.
2017/18 - IDDE REPORTING SUMMARY TABLES

PUBLIC WORKS IDDE – Total COMBINED PW Incidents

<table>
<thead>
<tr>
<th>Category</th>
<th>Incidents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automotive</td>
<td>9</td>
</tr>
<tr>
<td>Chemical</td>
<td>3</td>
</tr>
<tr>
<td>Construction</td>
<td>2</td>
</tr>
<tr>
<td>Food/Grease</td>
<td>1</td>
</tr>
<tr>
<td>Sediment</td>
<td>2</td>
</tr>
<tr>
<td>Sanitary Sewer</td>
<td>2</td>
</tr>
<tr>
<td>Vegetation</td>
<td>4</td>
</tr>
<tr>
<td>Waterwaste</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total Incidents</strong></td>
<td><strong>24</strong></td>
</tr>
</tbody>
</table>

MS4 Incidents by Type

<table>
<thead>
<tr>
<th>Category</th>
<th>Incidents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automotive</td>
<td>9</td>
</tr>
<tr>
<td>Chemical</td>
<td>3</td>
</tr>
<tr>
<td>Construction</td>
<td>2</td>
</tr>
<tr>
<td>Food/Grease</td>
<td>1</td>
</tr>
<tr>
<td>Sediment</td>
<td>1</td>
</tr>
<tr>
<td>Sanitary Sewer</td>
<td>2</td>
</tr>
<tr>
<td>Vegetation</td>
<td>2</td>
</tr>
<tr>
<td>Waterwaste</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total Incidents</strong></td>
<td><strong>21</strong></td>
</tr>
</tbody>
</table>

UIC Incidents by Type

<table>
<thead>
<tr>
<th>Category</th>
<th>Incidents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automotive</td>
<td>0</td>
</tr>
<tr>
<td>Chemical</td>
<td>0</td>
</tr>
<tr>
<td>Construction</td>
<td>0</td>
</tr>
<tr>
<td>Food/Grease</td>
<td>0</td>
</tr>
<tr>
<td>Sediment</td>
<td>1</td>
</tr>
<tr>
<td>Sanitary Sewer</td>
<td>0</td>
</tr>
<tr>
<td>Vegetation</td>
<td>2</td>
</tr>
<tr>
<td>Waterwaste</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total Incidents</strong></td>
<td><strong>2</strong></td>
</tr>
</tbody>
</table>

KEIZER FIRE IDDE – Total Fire Incidents by Type

<table>
<thead>
<tr>
<th>Category</th>
<th>Incidents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automotive Spill</td>
<td>34</td>
</tr>
<tr>
<td>Chemical Spill</td>
<td>1</td>
</tr>
<tr>
<td>Motor Vehicle Fire</td>
<td>1</td>
</tr>
<tr>
<td>Portable Building Fire</td>
<td>0</td>
</tr>
<tr>
<td>Biohazard Fluid</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total Incidents</strong></td>
<td><strong>37</strong></td>
</tr>
<tr>
<td>Date</td>
<td>Type</td>
</tr>
<tr>
<td>------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>7/10/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>7/18/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>7/29/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>8/2/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>8/19/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>8/26/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>8/30/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>9/2/2017</td>
<td>Biohazard</td>
</tr>
<tr>
<td>9/14/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>9/25/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>9/25/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>10/12/2017</td>
<td>Motor Vehicle Fire</td>
</tr>
<tr>
<td>10/14/2017</td>
<td>Chemical Spill</td>
</tr>
<tr>
<td>10/23/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>10/26/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>Date</td>
<td>Type</td>
</tr>
<tr>
<td>------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>10/27/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>10/28/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>10/29/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>11/22/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>12/1/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>12/4/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>12/5/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>12/9/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>12/13/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>12/22/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>12/22/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>12/22/2017</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>1/5/2018</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>2/3/2018</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>Date</td>
<td>Type</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>2/17/2018</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>2/17/2018</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>3/12/2018</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>3/15/2018</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>3/21/2018</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>4/3/2018</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>4/12/2018</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>4/16/2012</td>
<td>Automotive Spill</td>
</tr>
<tr>
<td>Date</td>
<td>Type</td>
</tr>
<tr>
<td>------------</td>
<td>------------------</td>
</tr>
<tr>
<td>7/5/2018</td>
<td>MS4 Food / Grease</td>
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<tr>
<td>7/14/2017</td>
<td>MS4 Sanitary Sewer</td>
</tr>
<tr>
<td>8/31/2017</td>
<td>UIC Sediment</td>
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<tr>
<td>8/31/2017</td>
<td>MS4 Automotive</td>
</tr>
<tr>
<td>8/31/2017</td>
<td>MS4 Automotive</td>
</tr>
<tr>
<td>9/14/2017</td>
<td>MS4 Waterwaste</td>
</tr>
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