MARION COUNTY PUBLIC WORKS

2019-2020 ANNUAL REPORT

TOTAL MAXIMUM DAILY LOAD
July 1, 2019- June 30, 2020

Permit # 102905 | File # 113608

October 19, 2020

REPORT CONTENTS

2019-2020 PERMIT YEAR STATUS REPORT

QUICK-REFERENCE

LIST OF ACRONYMS

BMP	Best Management Practice
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
ESSD	East Salem Service District
HHW	Household Hazardous Waste
MC	Marion County
MCPW	Marion County Public Works
MCM	Minimum Control Measure
MEP	Maximum Extent Practical
MS4	Municipal Separate Storm Sewer System
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
POC	Point of Contact
SWCD	Soil and Water Conservation District
SWMP	Stormwater Management Plan
TMDL	Total Maximum Daily Load
UGB	Urban Growth Boundary
UA	Urbanized Area

LIST OF TABLES

2019-20 TMDL STATUS REPORT

Marion County is recognized by the Oregon Department of Environmental Quality (DEQ) as a Designated Management Agency for the Molalla-Pudding Subbasin and the Willamette River Basin Total Maximum Daily Load (TMDL). As such the County is responsible for submitting a TMDL Implementation Plan that addresses actions the County will take to reduce the impact of the pollutants with load allocations. For the Willamette River Basin, these pollutants are bacteria, mercury and temperature. The Molalla-Pudding Subbasin pollutants include the former as well as nitrate, iron, dissolved oxygen and pesticides.

This section contains Marion County's TMDL Status Report. Additionally, the Oregon DEQ has recognized Marion County as an operator of a small municipal separate storm sewer system (MS4) under Phase II National Pollutant Discharge Elimination System (NPDES) permit. As such, the County has developed and implemented a stormwater management plan (SWMP) to fulfill the requirements of the permit.

Although the SWMP was principally written to manage stormwater in the Salem/Keizer urban growth boundary, many of the activities presented in the SWMP will successfully address TMDL requirements and the three primary parameters. In addition, Minimum Control Measures 1, 2 and 6 are implemented county-wide and therefore are reported as part of the County's TMDL report. Previously, the County would submit the full NPDES annual report as part of the annual TMDL report. The annual NPDES report follows a new reporting format and the County has opted to submit this report as part of the TMDL annual report. Therefore, the remainder of the TMDL report will include TMDL specific program reporting as well as our annual report for our NPDES SWMP. For more clarity, tables 7-A and 7-B show the BMPs that are uniquely targeted for the TMDL implementation plans.

Currently Marion County is implementing TMDL plans for the Middle Willamette and Molalla/Pudding. The parameters include: bacteria, temperature, mercury, pesticides, metals, and nitrates. While the plans are created for specific watersheds, Marion County implements most BMPs county-wide therefore the BMPs will not be designated by watershed.

To address issues of bacteria, Marion County continued to supply pet waste stations at County Parks which include a sign and box that contains disposable, biodegradable bags that park visitors can use to pick up after their pets and a trash receptacle. The parks were selected based on proximity to a water body and whether pets were allowed. These systems were used at most parks immediately following installation. Each year approximately 1,200 bags are dispensed from the pet waste stations.

All thirteen of the County's high-traffic parks have permanent or temporary restroom and refuse facilities installed to reduce bacteria and litter contamination. These are maintained daily during the peak season including removal of debris and refuse from waste containers. During slow periods of visitation, these facilities are maintained on a weekly basis at the discretion of the Parks Coordinator. Interpretive signs providing information about riparian buffers, salmon biology, hydrology, and stream ecology were present along the Powder House Trail at Niagara Park, prior to the Beachy Creek Fire.

To combat issues of harmful bacteria exposure from private septic systems, MC Building Inspection and Planning Division hosted the annual training event for septic installers. Brochures and letters for septic care were distributed at service counters and on Public Work's webpage.

Vegetation management is implemented through multiple programs at Public Works. All herbicide applicators are licensed and receive regular training to maintain that certification. The BMP guide also outlines best practices when using herbicides. Capital projects encourages the use of native plant species near waterways and in water treatment facilities by providing a list of applicable plant species for staff and contractors to use. Additionally, the County has a Noxious Weed Program that partners with Marion Soil and Water Conservation District to remove invasive plants from properties, parks, and right-of-ways. Environmental Specialists perform public and private vegetation services such as plant identification, inspections, and enforcements for noxious weeds.

Additionally, the County has continued education and outreach efforts through media and classroom activities in outlying school districts. Radio and digital media ads have reached broad audiences county-wide. The Waste Matters print publication was sent to residents county-wide which includes a water-quality protection component and multiple Waste Matters e-newsletters were sent out to thousands of community members throughout the County with messages about waste/litter reduction as well as water quality issues.

Finally, to address issues of increasing temperature and stream bank erosion, the County donated native trees to a riparian restoration project along S. Valentine Creek, which was led by the North Santiam Watershed Council. Valentine Creek was planted with 330 native trees paid for by Marion County in 2019. South Valentine Creek is 5.3 miles long and represents a portion of a greater regional restoration initiative that is ongoing.

Table 7-A: TMDL BMPs for Middle Willamette and Pudding Molalla Watersheds.

BMPs	Measurable Goals	Status			
Objective: *Improve water quality and meeting obligation to TMDL program by implementing BMPs within watershed and county-wide.*		Implemented	Ongoing	Modified	Comments
A. Interpretive Signs in Parks	# of Interpretative Signs in Parks. # of Pet Waste Bags used	✓	✓		
B. Establish Native Vegetation	# Volunteer Hours # Native plants planted	✓	✓		
C. Onsite Wastewater Program	# of events and materials created and distributed	✓	✓		
D. Habitat Improvement	# of events; linear feet restored	✓			
E. Vegetation Management - IPM	# trainings	✓	✓		
F. Park Refuse and Waste Reduction	# of facilities added, installed, and/or maintained	✓	✓		

Table 7-B: TMDL BMP Assessment Parameters for Middle Willamette and Pudding Molalla Watersheds

The table below shows the results of information collected during the reporting period.

BMPs	July 2019 to June 2020
A. Interpretive Signs in Parks	Pet waste stations with signage are installed at 9 parks; plus one at Dog Control. Niagara Park had interpretive signage along the Powder House Trail.
B. Establish Native Vegetation	330 trees planted along S Valentine Creek; NSWC volunteer hours utilized
C. Onsite Wastewater Program	2019 Septic Installer training event was hosted by Building Inspection, 18 attendees.
D. Habitat Improvement	Completed in 2017/2018
E. Vegetation Management - IPM	Vegetation crews have attended trainings totaling 48 hours
F. Park Refuse and Waste Reduction	Fifteen restroom facilities were maintained daily during the peak visitor season

GOALS FOR NEXT REPORTING PERIOD

Continuation of Current Requirements

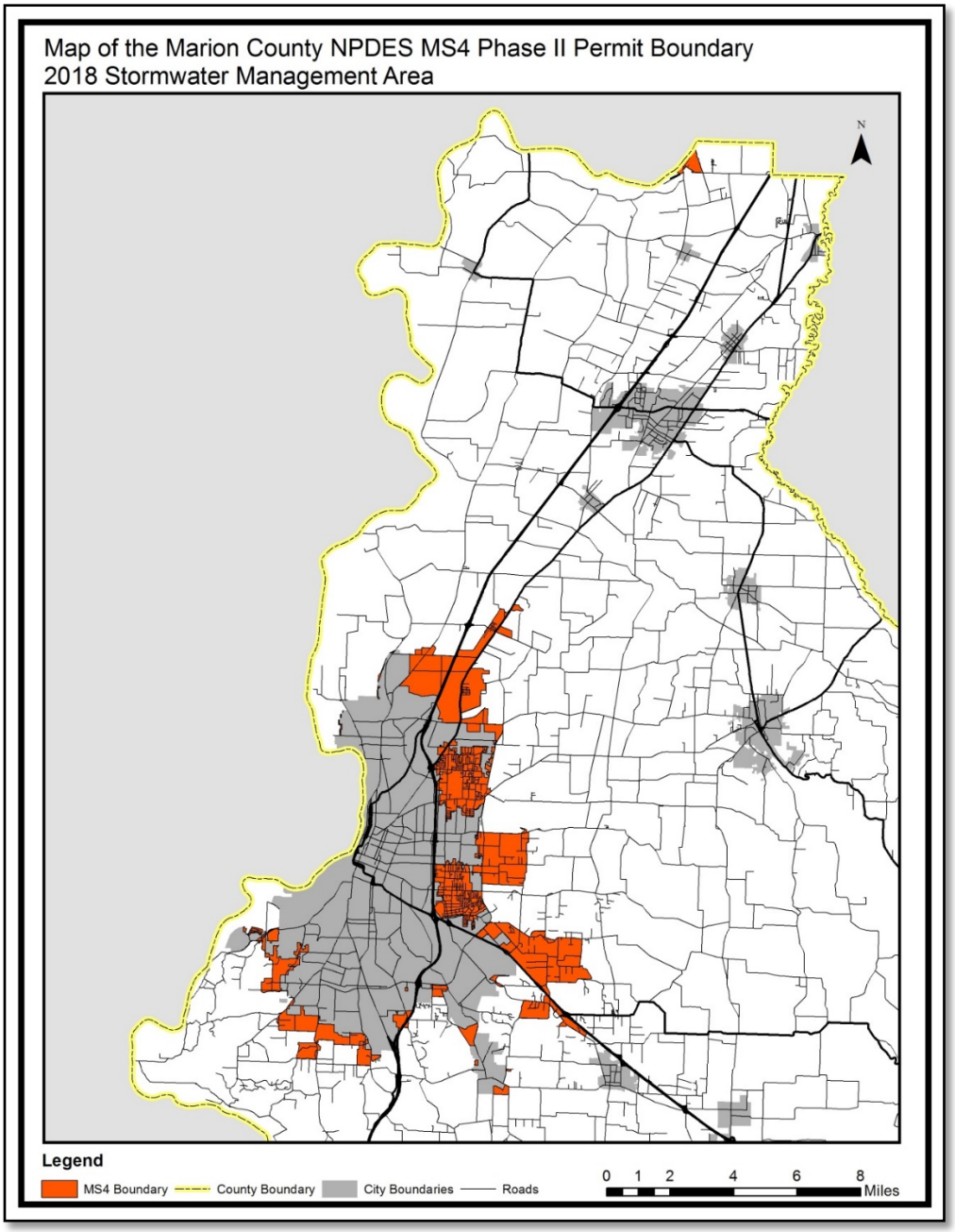
During the next year, Marion County will continue making updates to meet compliance timelines for the new NPDES Phase II General Permit as well as for updated Mercury TMDL standards. During the next reporting period, the County is committed to continuing to provide educational materials through the use of our website, social media outlets and with events and trainings. The County will continue to rely on collaboration with the regional outreach groups and explore opportunities for collaboration with surrounding cities and organizations to promote stormwater issues and we will be implementing the updated requirements into our education and outreach plans.

The County will continue to provide, and increase promotion of, opportunities for organizations, such as watershed councils, to receive free plants from Marion County as a way to promote stream cover and temperature reduction throughout the watershed.

The County will continue to fully implement the BMP Program county-wide. Road maintenance crews will continue to receive supervision and timely training to ensure that their activities have minimal impacts on water quality in Marion County. Staff is currently working on revising and updating those BMPs and implementing a new training program for all new staff.

APPENDICES

Appendix A: Map of Stormwater Management Area



Appendix B: 2019-2020 NPDES MS4 Report

State of Oregon
Department of
Environmental
Quality

www.oregon.gov/DEQ; Search "MS4"

Annual Report

MS4 Phase II General Permit

National Pollutant Discharge Elimination System
MS4 Stormwater Discharge Permit

2019-2020
Monitoring Year

Marion County
October 23, 2020

DEQ File Number: 113608

1.0 Certification and Signature
1. Permit Registrant(s): Marion County
2. Legally Authorized Representative: Brian Nicholas
3. Title: Director of Public Works
4. Email: bnicholas@co.marion.or.us
5. Phone: (503) 588-5036
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations (40 CFR 122.22(d)). Signature:_____ Date: _____

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): Marion County

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: 113608

11. EPA File No: ORS113608

12. Physical Address: 5155 Silverton Rd. NE

City: Salem	State: OR	Zip: 97305

13. Point of Contact: Alexander Wade

Title: Environmental Specialist	Email: awade@co.marion.or.us	Phone: 503-566-4124

14. Mailing Address (*if different*):

City: 5155 Silverton RD NE	State: Salem	Zip: 97305

2.2 Municipal Separate Storm Sewer System (MS4) Information

15. Estimate the area in square mileage served by the MS4: 43.6 square miles

16. Estimate the population served by the MS4: 30,000 + (This is difficult without defined jurisdictional boundary)

2.3 MS4 Stormwater Discharge Information

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

Receiving Waterbody	# of Outfalls	Impaired waterbody		Impairment(s)
		303d listed	TMDL issued	
a. Little Pudding River	131	Yes ☒ No ☐	Yes ☒ No ☐	DO, E. Coli, Chlorpyrifos, DDT, DDE
b. Clagget Creek	68	Yes ☒ No ☐	Yes ☒ No ☐	Biological Criteria, DO, E. Coli
c. Mill Creek	5	Yes ☒ No ☐	Yes ☒ No ☐	temperature, DO, E. Coli
d. Labish Ditch	8	Yes ☐ No ☒	Yes ☐ No ☒	
e. Jory Creek	0	Yes ☐ No ☒	Yes ☐ No ☒	
f. Fruitland Creek	10	Yes ☐ No ☒	Yes ☐ No ☒	
g. Powell Creek	0	Yes ☐ No ☒	Yes ☐ No ☒	
h.		Yes ☐ No ☐	Yes ☐ No ☐	
i.		Yes ☐ No ☐	Yes ☐ No ☐	
j. Battle creek	2	Yes ☒ No ☐	Yes ☒ No ☐	DO, E. Coli

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 measure? *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.

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*

Marion County has strong legal authority to respond to pollutant discharges within the Storm Water Management Area. Code 15.15 prohibits non storm water discharges into the MS4 and surface water drainage system within the Storm Water Management Area. The code provides capability for escalating enforcement actions to promote compliance.

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:

21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*
https:// www.co.marion.or.us/PW/ES/waterquality/Pages/strmwtr.aspx
If necessary, provide an explanation:

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*
Assigned teams track required work tasks and goals. This information is centrally gathered by program staff for evaluation.

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:

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*

    **As of November, 2019: Marion County utilizes both in-person outreach and outreach through social media and advertising. In July, 2019 the County partnered with Cherriots Trip Choice, the regional transportation service to conduct a survey of the East Salem Service District (ESSD) the most densely populated area of the stormwater management area.Through that survey we were able to gather meaningful information about the overall demographic, communication preferences as well as behaviors related to water quality. That survey also helped the County establish the education and outreach topics that would be covered the following years. The activites completed during the permit term included in person presenations to school groups, an outdoor school event, e-newsletters and multiple social media and media advertisements focused on ways individuals can improve water quality. Marion County is part of the Mid Willamette Outreach Group as well, which works together to provide education and outreach mesaging to the area.

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: 6*

30. During the permit term: 6*

    If necessary, provide an explanation:

    The count excludes online campaigns, and only counts physically present activities, i.e. Storm Drain Marking, 2 Leaf Haul events, 2 Trashy Tuesday events, Erosion Control Summit.

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 recycling programs
    ☐ BMPs for power washing, carpet cleaning and auto repair and maintenance
    ☒ Low impact development/green infrastructure
    ☒ Septic systems, 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:

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

    - Facebook posts
    - Short YouTube videos
    - Video played as ads before desired video
    - Erosion Control Summit
    - Billboard (for Leafhaul)
    - Internet browser banner ads
    - Local news channel KPTV videos
    - Trashy Tuesday

- Storm Drain Marking

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: 1 event, the erosion control summit, put on by the Mid Willamette Outreach group.

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*

    A survey of the East Salem Service District was conducted in July, 2019. The purpose of this survey was to collect information from the residents of this area regarding their behavior as it relates to water quality. About 400 people responded to the survey giving us an understanding of the topics that we should be covering in our education and outreach.

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 results of the survey showed where there were gaps in information on behalf of the residents and gave information on what future stormwater education and outreach efforts should be focused on. For instance, about 43% of residents thought that stormwater gets filtered. The results will inform our future programs.

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*

We have a publically accesible website that is updated at least once a year. It has information for IDDE reporting, our SWMP, links to ordinances and relevant documents, and relevant contact information for program staff. There were two stewardship programs during the permit year, a series of litter removal events and a drain marking project. These opportunities will be continued annually as possible.

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 2.c & A.3.b.ii*

Yes ☒ No ☐

43. Was the publicly accessible website updated during this reporting year? *Schedule 2.c & 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:

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:

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:

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:

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).

Trashy Tuesday is one such activity. Local community members were organized to collect litter from water ways within the SWMA. Volunteers got together several times throughout the year to clean up litter in East Salem. Once a month from March through July, volunteers gave up two hours on a Saturday, in rain or shine, to help keep trash out of their waterways and make their community a better place.

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*

We have a GIS database mapping our storm water control assets with relevant information. This has been used to create a maintnenance tracking system using Collector and Survey123. We also are starting to track dry weather screening in the same way. The GIS database is editable by our field staff so that we can continuously ground truth to improve our records. All controls have unique identifiers. We have a very strong ordinance already and are working on a written escalating enforcement procedure that is in draft. We have a phone number and email for the public to report illicit discharges. The phone is always answered, by a contracted company when after hours. We typically respond to complaints within 24 hours. We are tracking complaints and response. We have priority locations, but have not identified them in our SWMP yet.

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):

GIS

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:

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:

This is a living inventory that is subject to ground truthing and quality assurance. It changes with our understanding of the system.

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

☒ Location of all known outfalls, included the requirements in *Schedule A.3.c.ii.B*
☒ Stormwater collection and conveyance system, included the requirements in *Schedule A.3.c.ii.C*
☒ Stormwater structural controls, included 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:

We included a map showing the SWMA as well as a separate map showing a portion of the SWMA highlighting our outfalls, controls, and conveyance system. We have no known chronic discharges.

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:

You can find our illicit discharge ordinance from the following link.
https://www.co.marion.or.us/PW/ES/waterquality/Pages/strmwtr.aspx#policies

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:

Marion County has a strong ordinance that prohibits all non storm water discharges to the MS4 except for the list of exempt discharges as it appears in the permit.

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:

This procedure is in draft form and not yet completed.

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:

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

Number: 13 inside the SWMA *(complaints related to IDDE)*

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

In working days: 1

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

Number of notification: 0

63. Provide the number of complaints where staff performed an investigation during this reporting year. *Schedule A.3.c.v*

Number: 13 inside the SWMA *(investigations related to IDDE)*

64. On average, how long did it take to conduct an initial investigation? *Schedule A.3.c.v.B*

In working days: Less than one day

65. Provide the number of illicit discharges discovered and eliminated during this reporting year. *Schedule A.3.c.v*

Number: 7

66. On average, how long did it take to eliminate an illicit discharge? *Schedule A.3.c.v.B*

In working days: One day. An example would be oil in a catch basin discovered by a Marion County employee, which was documented and cleaned out with a vacuum truck the same day.

67. Provide the number times escalating enforcement procedure was use to eliminate an illicit discharge during this reporting year. *Schedule A.3.c.v.B*

Number of times: 0

Do any of the illicit discharges involve the repair or replacement of the wastewater and/or storm sewer conveyance systems? *Schedule A.3.c.v.B*

Yes ☐ No ☒ NA ☐

If necessary, provide an explanation:

68. Provide the number of illicit discharges that were referred to another entity during this reporting year. *Schedule A.3.c.v.C*

    Number: 1

69. On average, how long did it take to notify the entity(s)?

    In working days: 1

    If necessary, provide an explanation:

    One incident was reported to City of Salem, as it was in their jurisdiction. Other jurisdictions we may report discharges to are: DEQ, ODA, and Cities.

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 that evaluated final compliance

    If necessary, provide an explanation:

71. Provide percentage of outfalls inspected. *Schedule A.3.c.vi.A/B*

    Known outfalls screened this reporting year: 468, 100%

72. Known outfalls screened during the permit term: 468, 100%

    If necessary, provide an explanation:

    The system was walked by storm water personel

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:

    Walk through inspections are performed every Summer. Illicit discharge discoveries get logged and investigated. These dry weather screenings have only turned up 2 wet outfalls in 2 years and neither was noted as having the qualities of an illicit discharge. All outfalls were screened in this way during the last year. We are creating our new tracking sytem and preparing for implementation. It will be fully in use by the deadline.

75. Indicate which of the following dry-weather field activities are performed and documented in accordance with dry-weather field: *Schedule A.3.c.vi*

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

    If necessary, provide an explanation:

    We are beginning full documentation of Dry Weather Screening now. Past screening only turned up 2 wet outfalls in 2 years and neither was noted as having the qualities of an illicit discharge. All of these requirementts will be fully implemented by the deadline.

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*

    Investigation has yet to be performed as part of dry weather screening, as it has been unecessary. This process is being developed to meet the requirements of the general permit. Observations will be made and documented at the outfall. Then, operators will attempt to follow the flow upstream, looking in ditches, manholes, etc. as necessary to

find a point as close to the origin as possible. A point closest to the source will be documented with any relevant observations and marked in GIS. If the source can not be identified in this way, the flow will be screened in the field for pH, temperature, specific conductance, and dissolved oxygen. Action levels have not been defined yet. If action levels are exceeded, samples will be taken and analyzed at a laboratory to characterize and attempt to identify the source of the flow. These analyses will be determined on a case by case basis in collaboration with the laboratory and any other outside counsel that may be able to sharpen the focus of the investigation.

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

    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:

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

    Yes ☒ No ☐

    If necessary, provide an explanation:

    All employees take a version of our Clean Water eLogic training (see Exhibit H in the Supporting Documentation packet). Then they shadow a more experienced employee for on the job training in their specific responsibilities. For those who investigate illicit discharge reports, this includes how to fill out and save our report form, and the follow up steps, including enforcement, necessary to ensure compliance.

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

    Yes ☒ No ☐

    If necessary, provide an explanation:

    Marion County Stormwater BMP training is provided to all applicable employees within 30 days of hire. All employees take a version of our BMPs for Clean Water eLogic training. They then shadow a more experienced employee for on-the-job training in their specific responsibilities.

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*

Marion County has a strongly written construction erosion and sediment control ordinance. We have recently developed a written policy for the escalating enforcement procedure to standardize our response. We are currently improving our inspection procedures to facilitate better tracking and documentation in accordance with new permit requirements. The minimum size to require an erosion control plan, and inspections, needs to be updated in the ordinance, this must be approved by the Board of Commissioners, and is a process that we have begun.

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)*

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

Yes ☒ No ☐ NA ☐

If necessary, provide an explanation:

83. Ordinance: 1307 and 1316, Code Section: Title 15 Section 10

84. 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: 1 ft^2 ☐, acres ☒

If necessary, provide an explanation:

A permit is required for 1 acre or more of ground disturbing activity per the definition of "Large development ground disturbing activities" within the Stormwater Management Area as well as any ground disturbing activity within the high-risk area or within 50 feet of a stream within the Stormwater Management Area. The new permit thresholds will be updated accordingly to meet the permit time lines.

85. 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 how these project are referred to DEQ or the appropriate DEQ agent, to obtain a NPDES Construction Stormwater General Permit. *Schedule A.3.d.iii*

Prior to issuance of Marion County associated permits for the project, such as building permit(s) or right-of-way permit(s), proof of coverage under a DEQ or other appropriate administering agent is required. If requested by the developer, contact information for the appropriate agency is provided.

86. Proved 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.c.iv*

Attached: Yes ☒ No ☐

If necessary, provide an explanation:

•Standard Details (currently from Clean Water Services) for applicable BMPs are provided with issued Erosion Prevention and Sedimentation Control (EPSC) permits. Inspections are performed to ensure BMPs are installed and being maintained appropriately.

•Per standard construction requirements of our EPSC permit language:
"4. Sufficiently maintain the BMP measures to minimize offsite erosion. Gauging of effectiveness is 'Performance Based'."
and
5. Provide to County inspectors continuous access to the property including Construction Site Activity to inspect the maintenance of the approved EPSC Plan measures."

•Additionally, our inspector works with contractors to ensure they are educated and aware of those maintenance needs associated with the chosen BMPs during inspections.

87. Provided the Erosion and Sediment Control Plan template as an attachment? *Schedule A.3.d.iv.A*

Attached: Yes ☒ No ☐

If necessary, provide an explanation:

We utilize Clean Water Services ESC Plan for Sites 1 to 5 Acres template. A link to the template is provided on our Land Development Engineering & Permits (LDEP) webpage.

88. Indicate which of the following are required for qualifying construction projects: *Schedule A.3.d.iv*
    - ☒ Site operator are required to complete an ESCP template prior to beginning construction/land disturbance
    - ☒ Site operator are required to be kept the ESCP on site
    - ☒ Site operator are required maintain and update the ESCP as site conditions change, or as needed.
    - ☒ Site operator are required to provide the ESCP to the permit registrant, DEQ, or another administrating entity

    If necessary, provide an explanation:

    Per the current ordinance/code language it is required of a qualifying construction project to submit and obtain approval of an ESCP (either by utilizing the template provided or by submitting a plan with adequate information), and to adequately install and maintain the approved BMPs. Item 9 of the standard Erosion/Sediment Control Permit language covers Recordkeeping requirements in regards to on site retention and presentation of data to an administrating agency. Revisions of the ESCP would be required in the event an inspection is failed (i.e. additional controls necessary due to site topography not adequately identified in initial plan) or site conditions change in such a way the original approved plans are no longer adequate for the scope of work proposed.

89. ESCP templates [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 ☐

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

    Attached: Yes ☒ No ☐

91. Indicate the minimum land disturbance where you require the ESCP to be review, if different than one acre: ft^2 ☐, acres ☐

    If necessary, provide an explanation:

    Review of an ESC Plan also applies to any ground disturbance within the mapped high risk area, which includes steep and erosive soils as well as areas within 50 feet of a stream within the Stormwater Management Area.

92. 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 expected 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: 24

93. Number of inspections completed to comply with this requirement during the permit term: 24

    If necessary, provide an explanation:

94. 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 ☐

95. Indicate number of projects that were inspected bases on this inspection trigger: 0

    If necessary, provide an explanation:

    There have been no instances in the reporting period where we have been informed of a construction project discharging visible sediment/dewatering discharge nor complaints for projects under our jurisdiction.

96. Indicate the total number of construction projects that were inspected this monitoring year: 21
97. Indicate the total number of construction projects that were inspected during the permit term: 21

98. Indicate which of the following are documented during an inspection: *Schedule A.3.c.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:

    All of these items are encompassed within the inspection approval or denial, observations of non-compliance are

documented. For the future, inspection documentation is being reviewed to better align with the language of the new Phase 2 MS4 General Permit.

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

100. For Existing Large Communities: indicated number of new construction projects inspected that disturb less one acre during this monitoring year. *Schedule A.3.c.vi.B*

If necessary, provide an explanation:
Not applicable. We are a "Small Community".

101. 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:

102. Was the escalating enforcement procedure used to achieve compliance at any construction projects? *Schedule A.3.d.vii*
Yes ☒ No ☐
Indicate number of time during this reporting year: 1
103. Indicate number of time during the permit term: 1
If necessary, provide an explanation:

104. Were all persons responsible for ESCP reviews, site inspections, and enforcement are appropriately trained to conduct such activities? *Schedule A.3.d.viii*
Yes ☒ No ☐
If necessary, provide an explanation:
All inspectors and designated backups attend Certified Erosion and Sediment Control Lead (CESCL) training within 1 year of hire and maintain active certification through recertification courses.

105. 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 ☐
If necessary, provide an explanation:
Marion County Stormwater BMP training is provided to all applicable employees within 30 days of hire. All employees take a version of our BMPs for Clean Water eLogic training. They then shadow a more experienced employee for on-the-job training in their specific responsibilities.

3.5 Post-Construction Site Runoff for New Development and Redevelopment

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

We have executed a contract with a qualified consultant to redevelop our stormwater engineering standards. These new standards will redefine the requirements for post construction runoff control. Meeting the requirements of the new permit language is a top priority of this effort.

107. 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)*

108. 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: 21,780 ft^2

109. If necessary, provide an explanation:

Stormwater detention requirements are triggered at 0.5 acres of impervious surfaces per our 1990 Engineering standards. Water quality treatment requirements are triggered at 1 acre of disturbance within the County's Stormwater Management Area only. This is the current threshold, the new standards will meet the new permit requirements.

110. 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:

111. 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 ☐

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

A preliminary review has been conducted to identify major potential barriers. More thorough reviews will be completed as the program implementation continues.

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

Per our Stormwater Management Plan we are looking to start the process no later than February 2022 and have the program meet permit requirements no later than February 2023.

114. 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:

Per our current 1990 Engineering Standards we classify our requirement as "detention". Per Section V.A.2.c of those Standards, "Detention facilities shall have storage capacities to detain the difference between a 5-year frequency storm with predevelopment conditions and a 10-year frequency storm with development conditions."

115. 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 ☒

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

Yes ☐ No ☒

If necessary, provide an explanation:

Per Section V.A.2.a of the 1990 Engineering Standards "This requirement may be waived if the applicant can show that it is not effective for the basin as a whole.". We currently have no other exemptions for the retention/detention requirement in the event it cannot be met. This will be updated to meet permit requirements as part

of the Stormwater Engineering Standards project.

117. Are the allowable structural stormwater controls and specifications available for review? *Schedule A.3.e.iv.C*
Yes ☒ No ☐

118. Indicate if they are attached or the location where they can be viewed:
Attached ☐
Location:
https://www.co.marion.or.us/PW/Engineering/engineeringstandards
See "2012 Interim Stormwater Quality Treatment Engineering Standards"
If necessary, provide an explanation:
The 2012 Interim Stormwater Quality Treatment Engineering Standards contains our current allowable structural stormwater controls for those sites that require Water Quality Treatment. The Stormwater Engineering Standards project will amend this (as well as pertinent sections of the 1990 Engineering Standards) to comply with the new permit requirements.

119. Have alternatives for projects complying with the retention requirement been approved? *Schedule A.3.e.iv.D*
Yes ☐ No ☒

120. If yes, are the written technical justifications evaluated? *Schedule A.3.e.iv.D*
Yes ☐ No ☐

121. 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*
Not applicable at this time.
If necessary, provide an explanation:
Per Section V.A.2.a of the 1990 Engineering Standards "This requirement may be waived if the applicant can show that it is not effective for the basin as a whole.". We currently have no other exemptions for the retention/detention requirement in the event it cannot be met. This will be updated to meet permit requirements as part of the Stormwater Engineering Standards project.

122. Before the allowance of alternative compliance, were mitigation options established? *Schedule A.3.e.iv.E*
Yes ☐ No ☒
If necessary, provide an explanation:
Not applicable at this time as no alternative compliance has been allowed.

123. 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
☐ Groundwater Replenishment Projects
☐ Treatment Equivalent to the Retention Requirement
If necessary, provide an explanation:
Not applicable at this time as no alternative compliance has been allowed and therefore no mitigration options have been used.

124. 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:
All new development and redevelopment that triggers the stormwater detention requirement (0.5+ acres of impervious surfaces per the 1990 Engineering Standards) and/or the water quality treatment requirement (1+ acres of ground disturbance per the 2012 Interim Stormwater Engineering Standards) is required to obtain an On-site Stormwater Discharge permit per Marion County Code 11.15. The permit is issued once plans are reviewed and meet County standards. Plans are reviewed using the Check List for Engineering Plan Review (available in the 1990 Engineering

Standards) as a guide.

125. Indicate the minimum land disturbance or creation of new impervious area where plans are required to be review: 0.5 ft^2 ☐, acres ☒ of land disturbance ☐ creation of new impervious area ☒

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

Yes ☒ No ☐

If necessary, provide an explanation:

Per the 1990 Engineering Standards, "Peak storm water runoff shall be controlled by detention facilities for all subdivisions, all commercial and industrial developments and all parking lots with a total developed acreage of 0.5 acres or more and all other developments where the county engineer determines control is needed to prevent flooding or damage downstream." We have interpreted "total developed acreage" to mean impervious surfaces.

All new development and redevelopment that triggers the stormwater detention requirement (0.5+ acres of impervious surfaces per the 1990 Engineering Standards) and/or the water quality treatment requirement (1+ acres of ground disturbance per the 2012 Interim Stormwater Engineering Standards) is required to obtain an On-site Stormwater Discharge permit per Marion County Code 11.15. The permit is issued once plans are reviewed and meet County Standards. These thresholds will be updated to meet the new permit requirements.

127. 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:

We are working to implement this inventory and will have it implemented no later than February 28, 2023.

128. 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:

We are working on implementing standard inspection procedures, an inpsection schedule, a tracking mechanism for documenting these inspections and O&M requirements, as well as reporting requirement for privately owned and operated stormwater controls. These will be implemented no later than February 28, 2023.

All On-site Stormwater Discharge permits contain the language "Provide to County inspectors the continuous access to the property and detention system to inspect the maintenance of the system and the proper operation as appoved.", granting legal authority for us to inpsect and require effective O&M of privately owned and operated controls.

129. 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:

We are continuously updating our GIS map to include public and private stormwater controls as we find undocumented existing controls and as new ones are developed.

130. 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 are appropriately trained to conduct such activities? *Schedule A.3.e.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

All inspectors and designated backups attend Certified Erosion and Sediment Control Lead (CESCL) training within 1 year of hire and maintain active certification through recertification courses.

131. 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 ☐

If necessary, provide an explanation:

Marion County Stormwater BMP training is provided to all applicable employees within 30 days of hire. All employees take a version of our BMPs for Clean Water eLogic training. They then shadow a more experienced employee for on-the-job training in their specific responsibilities.

3.6 Pollution Prevention and Good Housekeeping for Municipal Operations

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

During the reoprting period, staff created and launched a computerized training on best management practices for clean water available to all Public Works staff, but mandatory for anybody in a maintenance position. This training covers clean water regulations, defines stormwater and pollutants, discusses beneficial uses for clean water, goes over best management practices for field/shop work, and has an entire section devoted to erosion and sediment control. Supervisors are able to decide which version (the shorter version or the version that covers erosion control) they feel would best benefit their staff members. The training is hosted on the county's learning management system and has each staff member scheduled to take the course within 30 days of hire (usually done in the first two days during new employee onboarding) and then again once every five years. Staff are also beginning to look into a field training component for BMPs. A consultant has been hired to help identify standards for erosion control, which will be used for all operations and maintenance.

133. 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)*

134. 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*

135. Yes ☐ No ☒ N/A ☐

If necessary, provide an explanation:

A consultant has been hired to help create standards for erosion control and post construction stormwater controls, which will be used for all operations and maintenance on County-owned facilities and infrastructure, as well as provided to private developers. The BMP manual also serves as an operation and maintenance guide for road maintenance, vegetation management, facilities maintenance, fleet activities, bridge and ferry maintenance, water/wastewater operations, and parks maintenance.

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

Percentage inspected this reporting year: 21.9; Percentage cleaned: 21.9

137. If known, estimate of material removed: units

138. Percentage inspected during the permit term: 28; Percentage cleaned: 28

139. If know, estimate of material removed: units

If necessary, provide an explanation:

Catch Basins are inspected when they are cleaned. 1322 in 2020, 373 in 2019 after March 1, 2019, for a total of 1,695 so far this permit term.

140. Indicated if a catch basin inspection prioritization system and/or an alternate inspection frequency has been established. *Schedule A.3.f.iv*

Yes ☒ No ☐

If necessary, provide an explanation:

Historically the 2 person crew goes through half the system cleaning CB s and noting dirty half clogged pipes one summer and the other half the next year, typically south one year and north the next. We go by neighborhood, trees, age of system, and some are complaint driven.

141. During the permit term were existing procedures for inspection and maintenance schedules reviewed/updated to ensure pollution prevention and good housekeeping practices are 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 material, used oil storage, and fuel
☐ Fire fighting training activities
☐ Maintenance of municipal facilities including public parks and open space, golf courses, airports, parking lots, swimming pools, marinas, etc.

If necessary, provide an explanation:

We have a BMP program and manual. All employees are trained on it and it is fully implemeneted. Inspections occur throughout the year, and during the next permit year there will be a focus on tracking inspections and reviewing procedures for updates.

142. 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): 103964

If necessary, provide an explanation:

Not inside the SWMA.

143. 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:

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

Yes ☒ No ☐

If necessary, provide an explanation:

145. Are practices in place to ensure that collected material or pollutants removed in the course of maintenance 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:

146. 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 operation appropriately trained to conduct such activities? *Schedule A.3.f.ix*

Yes ☒ No ☐

If necessary, provide an explanation:

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

Yes ☒ No ☐

If necessary, provide an explanation:

4.0 Monitoring

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

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

Yes ☐ No ☒

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

Yes ☐ No ☐

If necessary, provide an explanation:

this was not performed

4.1 Wood Village Monitoring Requirements

150. 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:

Lead:

Bacteria:

151. Indicated 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

152. 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

153. How and when did the excursion of an applicable water quality standard occur? *Schedule A.1.b*

If necessary, provide an explanation:

na

154. 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

155. 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

156. 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

157. 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

158. 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

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

na