

CITY OF SPRINGFIELD, OREGON

DEVELOPMENT AND PUBLIC WORKS DEPARTMENT
ENVIRONMENTAL SERVICES DIVISION



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October 18, 2023

Oregon Dept. of Environmental Quality
MS4 Stormwater Program, ATTN: Floor 7
700 NE Multnomah St. Ste 600
Portland, OR 97232-4100

RE: City of Springfield's MS4 Annual Report for Fiscal Year 2023

Dear MS4 Program Coordinator,

Enclosed, please find the City of Springfield's MS4 Annual Report. This report includes a summary of our implementation efforts for the reporting period of July 1, 2022 through June 30, 2023.

We are including the following attachments that are either requested or a required submittal as listed in our Modified General Permit. Our MS4 map is being provided via a link (see question 53 of the Annual Report).

- Attachment 1 – Public Education Activity Assessment
- Attachment 2 – LDAP Inspection Report Form
- Attachment 3 – Lane County IGA Amendment

The MS4 Plan, IDDE Enforcement Matrix, Pollutant Parameter Action Levels, LDAP Enforcement Matrix, and ESCP review templates and check lists were provided as attachments in the FY22 Annual Report.

We are enclosing a copy of our TMDL Annual Report as a courtesy to show full program implementation.

Springfield anticipates continuing to move forward in our efforts in complying with our issued MS4 Modified General Permit through the next reporting period. No adaptive management amendments are requested as a part of this annual report.

We welcome your continued support in meeting the goals of the Clean Water Act and providing us with any comments or concerns you may have.

Sincerely,

A handwritten signature in dark ink, appearing to read "Meghan Murphy". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Meghan Murphy
Water Resources Supervisor
City of Springfield
225 Fifth Street
Springfield, OR 97477
Phone: 541.744.3385

Email: mmurphy@springfield-or.gov

Enclosures: Springfield's FY23 MS4 General Permit Annual Report with attachments
Springfield's FY23 TMDL Annual Report

CC: Ryan Johnson, MS4 Stormwater Program Coordinator, DEQ
Priscilla Woolverton, Upper Willamette TMDL Basin Coordinator Western
Region, DEQ
Matt Stouder, Environmental Services Division Director, City of Springfield
ESD electronic file, City of Springfield



State of Oregon
Department of
Environmental
Quality

Annual Report

MS4 Phase II General Permit

National Pollutant Discharge Elimination System

MS4 Stormwater Discharge Permit

Monitoring Year: **FY23**

Permit Registrant: **City of Springfield**

Date Prepared/Submitted: **October 24, 2023**

DEQ File No.: **84048**

Certification and Signature

1. Permit Registrant(s): **City of Springfield**
2. Legally Authorized Representative: **Matt Stouder**
3. Title: **Environmental Services Division Director**
4. Email: **mstouder@springfield-or.gov**
5. Phone: **541.736.1006**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations (40 CFR 122.22(d)).

Signature

Date

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Instructions

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

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

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

General Information

Registrant Information

6. Permit Registrant(s): **City of Springfield**

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: **84048**

11. EPA File No: **ORS084048**

12. Physical Address: **225 Fifth Street, Suite 101**

City: **Springfield**

State: **OR**

Zip: **97477**

13. Point of Contact: **Meghan Murphy**

Title: **Environmental Services Supervisor**

Email: mmurphy@springfield-or.gov

Phone: **541.744.3385**

14. Mailing Address (if different): **same**

City:

State:

Zip:

Municipal Separate Storm Sewer System (MS4) Information

15. Estimate the area in square mileage served by the MS4: **15.74 square miles**

16. Estimate the population served by the MS4: **61,400 (US Census)**

MS4 Stormwater Discharge Information

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

Receiving Waterbody	# of Outfalls	Impaired waterbody		Impairment(s)
		303d listed	TMDL issued	
a. Irving Slough	14	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
b. Springfield Mill Race	7	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	DO, bacteria
c. Channel 6	20	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
d. Q-Street Floodway	67	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
e. Main Stem Willamette River	5	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	303(d) = DO; TMDL = Bacteria, Temperature, Mercury
f. Middle Fork Willamette River	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	303(d) = DO; TMDL = Bacteria, Temperature, Mercury
g. McKenzie River	4	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	303(d) = DO, Alkalinity; TMDL = Bacteria, Temperature, Mercury
h. South Cedar Creek	6	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Temperature
i.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
j.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	

Coordination Among Registrants and Joint Agreements

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

17. Is there a joint agreement in place for the implementation of one or more stormwater management program control measures? *Schedule A.2* Yes ☒ No ☐
18. If yes, has there been any change to the joint agreement(s) submitted previously? Yes ☒ No ☐
If yes, include, as an attachment, a summary of the changes. **Our IGA with Lane County was extended in the Spring of 2022.**
The summary must identify the other co-registrants/co-implementers or other entities

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*
Springfield has had coverage under the NPDES permit system since 2007. We have established legal authority under both our development (post-construction) and municipal (IDDE and construction site runoff) codes.

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: **Please see the SWMP document provided in the FY22 Annual Report.**
21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*
<https://springfieldstreams.org>
If necessary, provide an explanation: **The MS4 Plan is posted along with the existing SWMP from 2010.**
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: **The MS4 Plan schedule is based on the MS4 permit, issued June 1, 2021.**
23. Describe the method used to gather, track, and use SWMP information to set priorities or assess compliance: *Schedule A.2.d*
Databases and field tablets are used to gather and track program implementation. A Stormwater Log is used along with program and project descriptions to assess compliance with control measure implementation. Operations uses a work order format and database for tracking purposes. We maintain a set of Compliance Books that track overall program implementation in hard copy. Program assessment/review templates were developed and implemented that provide a program review for the six control measures and summarize progress toward program implementation.
24. Have finances, staff, equipment and other support capabilities been provided to implement the permit? *Schedule A.2.e*
Yes ☒ No ☐
If necessary, provide an explanation: **Currently, program funding comes from stormwater user fees.**

25. During this monitoring year was compliance with the requirements of this permit evaluated? *Schedule B.1*

Yes ☒ No ☐

If necessary, provide an explanation: **Program assessment/review templates were developed and implemented that provide a program review for the six control measures and summarize progress toward program implementation.**

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.b*

Yes ☐ No ☒

If “Yes”, complete Water Quality Standards section (p. 21) of this template.

Stormwater Management Program Control Measures

Public Education and Outreach

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

Springfield's Public Education and Outreach program has been implemented since 2007. We have active programs addressing bacteria, temperature, mercury, and general stormwater pollution prevention. Some highlights from FY23 include:

- Five new UpStream Art murals
- An exhibit at the museum titled Springfield's H2Oh! which ran from July through December of 2023, including Fright Night at the museum
- Spring Clean Up and Public Works Week (May 2023)
- Clean Water University
- Septic system maintenance outreach mailings to owners and renters on septic
- Canines for Clean Water calendar and pledge drive at Pet Fest
- Pollution Prevention Coalition booth at the Lane County Home Show
- Continued participation in the Clean Rivers Coalition
- Earth Day poster contest
- Updates of brochures, fact sheets, and our website

We have programs that address the listed target audiences in section A.3.a.iv. We implement at least two educational messages per year. Some of our largest programs are Canines for Clean Water, Pet Waste Stations, Clean Water Garden, Clean Water Business, EcoBiz, Clean Water University, UpStream Art, Septic System Maintenance, and Little Litter.

We are on track in meeting our proposed MS4 Plan goals and timelines and have completed a Public Education and Outreach Strategy, updated City Council and the public on stormwater pollution prevention, and completed our annual assessment of one educational activity.

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 Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

29. Provide the number of education and outreach activities conducted: *Schedule A.3.a.iii*

During this reporting year: 30, of which 26 included people from the UTZ

30. During the permit term: 30 (FY23) + 32 (FY22) + 8 (FY21) = 70

If necessary, provide an explanation:

FY21 reported as: 8 of which 6 included people from the UTZ – plus

FY22 reporting as: 32 of which 29 included people from the UTZ

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.v*

Yes ☒ No ☐

33. Indicate target topics addressed during this reporting year: *Schedule A.3.a.iv*

- ☒ Impacts of illicit discharges on receiving waters and how to report them
- ☒ Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts
- ☒ BMPs for proper use, application and storage of pesticides and fertilizer
- ☒ BMPs for litter and trash control
- ☒ BMPs for recycling programs

- ☒ BMPs for power washing, carpet cleaning and auto repair and maintenance
- ☒ Low impact development/green infrastructure
- ☒ Information pertaining to maintenance of septic systems
- ☒ Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife
- ☒ Other: **temperature, mercury, and bacteria education per our TMDL**

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

- **Five new UpStream Art murals**
- **An exhibit at the museum titled Springfield's H2Oh! which ran from July through December of 2023, including Fright Night at the museum**
- **Spring Clean Up and Public Works Week (May 2023)**
- **Clean Water University**
- **Septic system maintenance outreach mailings to owners and renters on septic**
- **Canines for Clean Water calendar and pledge drive at Pet Fest**
- **Booth at the Pollution Prevention Coalition booth at the Lane County Home Show**
- **Earth Day poster contest**
- **Created new Explore the Mill Race brochure. This was included as a utility bill insert and was delivered to over 32,000 Springfield residents**
- **Social media posts with stormwater pollution prevention tips**

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: **Five. A newsletter was created and distributed via email and in hard copy in FY23. A slide was created for the TV at the building permit counter. Fact sheets are available on the City website year-round. The LDAP webpage was updated. Site operators are provided educational materials on-site and at the time of development application submittal. Fact sheets are currently being updated.**

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*

We assessed our Earth Day Poster Contest in FY23 – see attached.

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: **Yes, the poster contest was successful, and we will likely continue it in FY24.**

Public Involvement and Participation

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

Springfield's Public Involvement and Participation program has been implemented since 2007. We have active stewardship activities, a public process for SWMP and TMDL development, public process through Council and Springfield Planning Commission, and a website for both information and feedback. Codes, plans, and planning documents are also posted on the website and available for comment when relevant. We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, maintained access and updated our public website, partnered on stewardship opportunities, and continued to comply with public notice laws

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 Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner*)

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

Yes ☒ No ☐ Our 2010 SWMP, 2022 MS4 Plan, and Annual Report are at <https://springfield-or.gov/city/development-public-works/clean-water-and-stormwater/> (our redirect to this page is: springfieldstreams.org)

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

Yes ☒ No ☐

If necessary, provide an explanation: Our website is updated continually with new fact sheets and information.

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: We have on-line reporting on the City webpage, and a reporting hotline by phone. <https://springfield-or.gov/city/development-public-works/report-stormwater-pollution/>

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: We have our website, and then also use <https://springfieldoregonspeaks.org/> for public comment/code update information

Stormwater page: <https://springfield-or.gov/city/development-public-works/clean-water-and-stormwater/>

Planning: <https://springfield-or.gov/city/development-public-works/infrastructure-planning/>

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: <https://springfield-or.gov/city/development-public-works/development-and-public-works-resource-center/> and https://library.qcode.us/lib/springfield_or/pub/municipal_code and https://library.qcode.us/lib/springfield_or/pub/development_code

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). In FY23, we partnered with local groups to pick up litter (4 events). We also partnered with other agencies to plant vegetation in a swale and along a waterway, but these were not open to volunteers. We also emailed our Stream Team group advertising seven Willamalane work parties to plant natives and remove invasives.

Illicit Discharge Detection and Elimination

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

Springfield has had an active IDDE program since coverage under the NPDES individual permit. We have IDDE staff, municipal code, a reporting and response process, a detection process, incident tracking and mapping, and an inspection and enforcement matrix. Our program is documented and has guidance manuals and SOPPs for implementation. Our program focuses on education before citation. We have educational material available in hard copy and on our website as well as online reporting of illicit discharges and stormwater pollution.

We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, continued to implement existing IDDE response and enforcement program, updated our IDDE municipal code, reviewed our IDDE program and SOPPs and updated as needed, reviewed our mapping and inventories and identified gaps and completed most of the needed updates. We have drafted a Dry-weather Screening Program and identified MS4 outfalls, developed a Pollutant Parameter Action Level list, and finalized our priority point locations. We have screened 40% of our MS4 outfalls. We have reviewed and updated both the Non-Stormwater Discharge Assessment Report and the Product Assessment document.

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 Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

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

Yes ☒ No ☐

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

Springfield has a digital infrastructure mapping system and it is available online at:
<https://sporgis.maps.arcgis.com/apps/webappviewer/index.html?id=1446c0a1fe0a4abdacb5fa2157b6dd70>

Updates are ongoing as new development occurs. Some attributes were updated to include additional permit listed attributes such as receiving river. ArcGIS ESRI-based standard mapping with infrastructure layers.

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

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

(Implementation date: Feb. 28, 2022 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

If necessary, provide an explanation: DEQ can download most MS4-related shapefiles from our open data GIS hub at: <https://data-sporgis.hub.arcgis.com/>

Or, DEQ may make a request for digital ArcGIS layers from the City GIS Division - it@springfield-or.gov and filling out the request form - https://springfield-or.gov/wp-content/uploads/2019/01/GIS_DigitalOrderForm_single.pdf

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

Yes ☒ No ☐

If necessary, provide an explanation: Fine tuning and verification are ongoing.

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

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

If necessary, provide an explanation: No known chronic illicit discharges at this time. Illicit discharges are mediated upon discovery. MS4 infrastructure and structural stormwater controls are located at our map hub: <https://data-sporgis.hub.arcgis.com/>

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: **Springfield Municipal Code 4.370 and 4.372**

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 wastewater 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 wastewater from mobile operations, such as mobile automobile or truck washing, steam cleaning, power washing, and carpet cleaning, etc.
- ☒ Discharges of wastewater 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 wastewater, etc.)

If necessary, provide an explanation:

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, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

If necessary, provide an explanation: **This was submitted with the FY22 Annual Report.**

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

- ☒ Phone number(s)
- ☒ Webpage(s)
- ☒ Other communication channels **WaterResources@springfield-or.gov**

If necessary, provide an explanation: **Educational materials and signage has reporting information (e-mail, webpage, and phone number).**

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

Number: **92 by Water Resources staff** *(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: **4.8 hours, or 0.6 days**

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: **1 SSO reported by Springfield Operations**

<p>63. Provide the number of complaints where staff performed an investigation during this reporting year. <i>Schedule A.3.c.v</i> Number: 92 (<i>investigations related to IDDE</i>)</p>
<p>64. On average, how long did it take to conduct an initial investigation? <i>Schedule A.3.c.v.B</i> In working days: 4.4 hours = 0.55 days</p>
<p>65. Provide the number of illicit discharges discovered and eliminated during this reporting year. <i>Schedule A.3.c.v</i> Number: 92 All IDDEs are mitigated and eliminated as they are identified.</p>
<p>66. On average, how long did it take to eliminate an illicit discharge? <i>Schedule A.3.c.v.B</i> In working days: 0.2 months or 6 days</p>
<p>67. Provide the number times escalating enforcement procedure was used to eliminate illicit discharge during this reporting year. <i>Schedule A.3.c.v.D</i> Number of times: 92 – the enforcement procedures are used at every inspection as it is step one of the matrix</p>
<p>Do any of the illicit discharges involve the repair or replacement of the wastewater and/or storm sewer conveyance systems? <i>Schedule A.3.c.v.B</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> If necessary, provide an explanation:</p>
<p>68. Provide the number of illicit discharges that were referred to another entity during this reporting year. <i>Schedule A.3.c.v.C</i> Number: 5 to Lane County, 1 to ODOT</p>
<p>69. On average, how long did it take to notify the entity(s)? In working days: 8.7 hours = 1.09 days if necessary, provide an explanation:</p>
<p>70. Indicate which of the following are included in the complaints or reports tracking documentation: <i>Schedule A.3.c.v.D</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Date the complaint was received and, if available, the complainant's name and contact information <input checked="" type="checkbox"/> Name of staff responding to the complaint <input checked="" type="checkbox"/> Date the investigation was initiated <input checked="" type="checkbox"/> The outcome of the staff investigation <input checked="" type="checkbox"/> Corrective action(s) taken to eliminate the illicit discharge <input checked="" type="checkbox"/> The responsible party for the corrective action(s) <input checked="" type="checkbox"/> The status of enforcement procedure(s), when necessary <input checked="" type="checkbox"/> The date the corrective action(s) was completed and staff who evaluated final compliance <p>If necessary, provide an explanation:</p>
<p>71. Provide percentage of outfalls inspected. <i>Schedule A.3.c.vi.A/B</i> Known outfalls screened this reporting year: 90 outfalls screened (6 unable to locate) 86/219 = 39.3%</p>
<p>72. Known outfalls screened during the permit term: 90 outfalls screened (6 unable to locate) 86/219 = 39.3% If necessary, provide an explanation:</p>
<p>73. Provide percentage of outfalls inspected as part of field screening of priority location. <i>Schedule A.3.c.vi.C</i> Priority location outfalls screened this reporting year: 8 priority outfalls screened/ 23 total priority outfalls = 34.8% of priority locations screened</p>
<p>74. Priority location outfalls screened during the permit term: 8 priority outfalls screened If necessary, provide an explanation:</p>
<p>75. Indicate which of the following dry-weather field screening activities have been performed in the last year: <i>Schedule A.3.c.vi</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> General observation

- ☒ Field Screening and Analysis
- ☒ Pollutant Parameter Action Levels
- ☒ Laboratory Analysis

If necessary, provide an explanation:

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

If discharge is observed, it is evaluated for color, odor, staining, etc. Field measurements are taken with probes and test strips. Any observations that suggest an IDDE or field measurements above the PPAL are source-tracked by looking in the stormwater system upstream of the discharge, looking at aerial photography, etc. Samples are taken depending on observations/field measurements. See PPAL and Dry Weather Screening Plan for details.

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

Yes ☒ No ☐

(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023 and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner))

If necessary, provide an explanation: This was submitted with the FY22 Annual Report.

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

Yes ☒ No ☐

If necessary, provide an explanation:

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

Yes ☒ No ☐

If necessary, provide an explanation:

Construction Site Runoff Control

80. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.d*
Springfield has had an active Construction Site Runoff Control Program since coverage under the NPDES Individual permit in 2007. We have ESC staff, ESC code, a reporting and response process, site inspections, ESC plan review process, and an enforcement matrix. Our program is documented and has guidance manuals and SOPPs for implementation. We have contractor educational material available in hard copy and on our website. We believe that we are meeting the current MS4 General Permit conditions. We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, continued to implement existing Erosion and Sediment Control program, reviewed our current Code and identified updates for improvement, and reviewed our LDAP program inspection and documentation process.
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, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)
82. Do ordinances or other regulatory mechanisms require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all qualifying construction projects? *Schedule A.3.d.ii*
Yes ☒ No ☐ NA ☐

If necessary, provide an explanation: We believe that we are meeting the current MS4 General Permit conditions; a compliance review was completed to determine any gaps. Staff are updating (FY23) sections of the program guidance manual as needed to be clearer on process. Some LDAP fact sheets too are being updated.
83. Indicate the minimum land disturbance where construction site operators are required to complete and implement an Erosion and Sediment Control Plan (ESCP) for construction project sites: *Schedule A.3.d.ii*

In square feet or portion of an acre: ft² ☐, acres ☐ 50 cubic yards of land disturbance or 500 square feet when located in a sensitive area

If necessary, provide an explanation: We use the 50 cubic yard threshold, along with the "intent to support a structure" clause. FY24 updates are planned to incorporate square footage language that is in line with DEQ language and meet the requirements.
84. For construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres), provide a brief description how these projects are referred to DEQ or the appropriate DEQ agent, to obtain a NPDES Construction Stormwater General Permit. *Schedule A.3.d.iii*
1200-CN provides automatic coverage for sites between 1 and 5 acres of disturbance when the registrant obtains an LDAP. LDAP will not be issued for sites over five acres until 1200-C registration is complete.
85. Provide the written specifications that address the proper installation and maintenance of such controls during all phases of construction activity as an attachment *Schedule A.3.d.iv*
Attached: Yes ☒ No ☐

If necessary, provide an explanation: Provided in EDSPM, LDAP Application, LDAP Short Form, fact sheets. Springfield has until February 28, 2024, to address any gaps if current specifications are not in compliance with permit language.
86. Provide the Erosion and Sediment Control Plan template as an attachment. *Schedule A.3.d.iv.A*
Attached: Yes ☒ No ☐

If necessary, provide an explanation: This was submitted with the FY22 Annual Report. The LDAP Short Form provides a template. We have plans on file that can use as additional templates if needed.
87. Indicate which of the following are required for qualifying construction projects: *Schedule A.3.d.iv*
☒ Site operator required to complete a ESCP template or worksheet prior to beginning construction/land disturbance
☒ Site operator required to keep the ESCP on site
☒ Site operator required to maintain and update the ESCP as site conditions change, or as needed.

<input checked="" type="checkbox"/> Site operator required to provide the ESCP to the permit registrant, DEQ, or another administrating entity If necessary, provide an explanation:
88. ESCPs [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. <i>Schedule A.3.d.v</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
89. Provide the ESCP review template or checklist as an attachment. <i>Schedule A.3.d.v</i> Attached: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> This was submitted with the FY22 Annual Report.
90. Indicate the minimum land disturbance where you require the ESCP to be reviewed, if different than one acre: ft ² <input type="checkbox"/> , acres <input type="checkbox"/> If necessary, provide an explanation: Sites disturbing more than one acre require a reviewed and approved ESCP. Sites less than one acre but part of a greater common plan of development require either a site specific ESCP for hillside lots and/or lots that impact sensitive areas, or the prescriptive short form template plan for flat lots that do not impact sensitive areas.
91. All construction projects [that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a “common plan of development or sale” disturbing one or more acres)] are expected or scheduled to be inspected at least once per permit term. <i>Schedule A.3.d.vi.A.1</i> Indicate the number of inspections completed to comply with this requirement during this reporting year: 630 inspections, 214 permits issued (note: some inspections in FY23 may be of sites permitted in previous years) Indicate the number of inspections completed to comply with this requirement during the permit term: FY21 = 50 FY22 = 824 FY23 = 630 Total = 1,504 If necessary, provide an explanation: FY21 was June 1-30, 2021 due to permit issuance date
92. Are construction projects with visible sediment in stormwater/dewatering discharge or when a complaint is received inspected? <i>Schedule A.3.d.vi.A.2</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
93. Indicate number of projects that were inspected based on this inspection trigger: 0 If necessary, provide an explanation: No sites were observed to have, nor reported via complaint, to have sediment discharging by way of stormwater runoff or dewatering during the reporting year.
94. Indicate the total number of construction projects that were inspected this monitoring year: 226 projects 95. Indicate the total number of construction projects that were inspected during the permit term: 226 (FY23) + 237 (FY22) + 50 (FY21) = 513
96. Indicate which of the following are documented during an inspection: <i>Schedule A.3.d.vi.B</i> <input checked="" type="checkbox"/> That the ESCP is reviewed to determine if the described <input checked="" type="checkbox"/> Control measures were installed, implemented, and maintained appropriately <input checked="" type="checkbox"/> Assessment of the site’s compliance with the ordinances or requirements <input checked="" type="checkbox"/> Visual observation of any existing or potential non-stormwater discharges, illicit connections, and/or discharge of pollutants from the site <input checked="" type="checkbox"/> Recommendations to the construction site operator for follow-up <input checked="" type="checkbox"/> Education or instruction provided to the site operator related to stormwater pollution prevention practices If necessary, provide an explanation:
97. If available, provide a copy of the written or electronic inspection report form. <i>Schedule A.3.d.vi.B</i> Attached: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
98. For Existing Large Communities: Indicate the number of new construction projects inspected that disturb less one acre during this monitoring year. Is this number at least 25% of the qualifying new construction sites? <i>Schedule A.3.d.vi.C</i>

50 permits under 1 acre + 159 common plan of development = 209 sites; 220 inspections of less than 1 acre + 391 inspections of common plan of development = 611/630 total inspections = 97%

If necessary, provide an explanation:

99. Provide the written escalating enforcement and response procedure as an attachment. *Schedule A.3.d.vii*

Yes ☒ No ☐

(For Existing Registrant must be submitted with the third Annual Report. Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

If necessary, provide an explanation: **This was submitted with the FY22 Annual Report.**

100. Was the escalating enforcement procedure used to achieve compliance at any construction projects? *Schedule A.3.d.vii*

Yes ☒ No ☐

Indicate number of times during this reporting year: 1

101. Indicate number of times during the permit term: **1 FY23 + 0 FY22 + 0 FY21 = 1**

If necessary, provide an explanation:

102. Were all persons responsible for ESCP reviews, site inspections, and enforcement appropriately trained to conduct such activities? *Schedule A.3.d.viii*

Yes ☒ No ☐

If necessary, provide an explanation:

103. Were all new staff working to implement the construction site runoff control program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.d.viii*

Yes ☒ No ☐

Post-Construction Site Runoff for New Development and Redevelopment

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

Currently, any development that creates or replaces more than 5,000 square feet of impervious surface is required to install stormwater controls under Springfield Development Code (SDC) 4.3-110. This code is in the process of being revised to include a new Numeric Stormwater Retention Requirement (NSRR) and water quality treatment standard (80% TSS removal). These updates will codify standards currently within the City's Engineering Design Standards and Procedures Manual (EDSPM) and will be modified to meet the requirements of the City's MS4 permit issued in 2021. We also received the final report from the UO's Drinking Water Protection Development Standards Assessment and are using some recommendations from that report in our code changes.

Currently, within the Glenwood Refinement Plan Boundary, all new and redevelopment must capture and retain onsite the first one inch of rainfall in a 24-hour period using Low Impact Development Approaches (LIDA) (see EDSPM 4.17.1). LIDA is encouraged throughout Springfield via EDSPM 4.17.

Currently, all public and private development and redevelopment projects must employ a system of one or more post-development BMPs that in combination are designed to achieve at least a 70% reduction in TSS (EDSPM 3.02.3.C).

The long-term operation and maintenance of private stormwater controls is ensured through maintenance agreements with the City (EDSPM 3.03 Private Stormwater Maintenance Requirements). The City's Water Quality Facility Management Program includes the processes for mapping public and private stormwater controls, as well as inspections, education, and compliance.

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

<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ((Implementation date: Feb. 28, 2023 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner) Pending the retention standard for all of Springfield and the new treatment standard in the development code, slated for FY24 adoption.</p>
<p>106. For projects creating or replacing impervious area, indicate the area (or threshold) where the site is required to implement the post-construction site runoff program requirements: <i>Schedule A.3.e.ii</i> In square feet: 5000 ft² If necessary, provide an explanation: 500 sq.ft. (used for parking lots – 100% treatment unless under 500 sq.ft.) (EDSPM) Glenwood only only: Retain first 1" of rain in 24-hour period (EDSPM) 5,000 sq.ft. (requires treatment, facility design, as well as a stormwater study) (Springfield Development Code)</p>
<p>107. Indicate which of the following are required at qualifying sites: <i>Schedule A.3.e.ii</i> <input checked="" type="checkbox"/> The use of structural stormwater controls <input checked="" type="checkbox"/> 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 <input checked="" type="checkbox"/> Long-term O&M of stormwater controls at project sites that are under the ownership of a private entity If necessary, provide an explanation:</p>
<p>108. Were ordinance(s), code(s) and development standards reviewed to identify, minimize or eliminate barriers that inhibit design and implementation techniques intended to minimize impervious surfaces and reduce stormwater runoff? <i>Schedule A.3.e.iii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>109. If barriers were identified or if necessary, provide an explanation:</p>
<p>110. Provide an explanation of the timeline for removal of barriers or if removal is outside your authority: N/A</p>
<p>111. Indicate which of the following technical standards are used to determine the retention requirement: <i>Schedule A.3.e.iv.A</i> <input checked="" type="checkbox"/> Volume-based method (Glenwood only currently) <input checked="" type="checkbox"/> Storm event percentile-based method <input type="checkbox"/> Annual average runoff-based method If necessary, provide an explanation: No increase from the existing condition is allowed; the 25 yr storm is used. This is being revised currently to meet the new retention and treatment standards.</p>
<p>112. For projects that are unable to meet the retention requirement, is the remainder of the rainfall/runoff treated prior to discharge with a structural stormwater control? <i>Schedule A.3.e.iv.B</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>113. Was the stormwater structural control designed to remove, at minimum, 80 percent of the total suspended solids? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If necessary, provide an explanation: Currently, Springfield uses 70% TSS removal as our treatment standard per our EDSPM. This is being revised to 80% TSS removal and moved to the development code.</p>
<p>114. Are the allowable structural stormwater controls and specifications available for review? <i>Schedule A.3.e.iv.C</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>115. Indicate if they are attached or the location where they can be viewed: Attached <input type="checkbox"/> Location: Spfld. Engineering and Design Standards and Procedures Manual & Eugene Stormwater Management Manual If necessary, provide an explanation: Springfield points to the Eugene Stormwater Management Manual for our design standards for post-construction controls. Links provided above.</p>

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

Yes ☐ No ☒

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

Yes ☐ No ☐ N/A

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

N/A

If necessary, provide an explanation:

At this point, if a site plan cannot meet our standards, then they cannot develop. As Springfield develops and grows over time, we will explore offsite mitigation options.

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

Yes ☐ No ☐

N/A

If necessary, provide an explanation:

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

☐ Off-Site Mitigation

☐ Off-Site Groundwater Replenishment Projects

N/A

If necessary, provide an explanation:

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

Yes ☒ No ☐

If necessary, provide an explanation: Springfield currently has a plan review process in place that includes stormwater control review.

122. Indicate the minimum land disturbance or creation of new impervious area where plans are required to be reviewed: 5000 ft² ☒, acres ☐ of land disturbance ☐ creation of new impervious area ☒

See #106 above

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

Yes ☒ No ☐

If necessary, provide an explanation:

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

Yes ☒ No ☐

If necessary, provide an explanation: We have been implementing a Water Quality Facility Management Program since 2010 where staff inventory and inspect stormwater facilities, both public and private. Our design standards, which incorporated the O&M requirements and facility maintenance agreements, have been in place since 2002; updated in 2006 and 2012.

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

- ☒ Legal authority to inspect and require effective operation and maintenance of privately owned and operated stormwater controls
- ☒ Inspection procedures and an inspection schedule to ensure compliance with the O&M requirements of each stormwater control operated by the permit registrant and by other private entities
- ☒ A tracking mechanism for documenting inspections and the O&M requirements for each stormwater control
- ☒ Reporting requirements for privately owned and operated stormwater controls that document compliance with the O&M requirement in Schedule A.3.f.

If necessary, provide an explanation:

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

Yes ☒ No ☐

If necessary, provide an explanation:

Private facilities are mapped (inventoried) only after the development application has closed or is finalized, typically one to two years after installed. Public facilities are mapped after they have been accepted by Council and the warranty period is up. This typically means that public facilities are inventoried about two to three years after construction.

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

Yes ☒ No ☐

If necessary, provide an explanation:

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

Yes ☒ No ☐

If necessary, provide an explanation:

Pollution Prevention and Good Housekeeping for Municipal Operations

129. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.f*
Springfield has an active catch basin cleaning, street sweeping, stormwater facility maintenance, and pollution prevention (good housekeeping) program. We completed a Storm and Surface Water Maintenance Strategy in 2023 which outlines the maintenance guidelines for catch basin cleaning, street sweeping, litter control, and more. Our Pollution Control Manual for Routine Maintenance Activities contains our BMPs for road maintenance, material storage, vehicle maintenance and cleaning, and more. Our fleet shop is EcoBiz certified.

Stormwater controls (water quality and other stormwater infrastructure) are mapped via the Collector for ArcGIS application. Inspections and maintenance activities are tracked here as well. Operation and maintenance plans are attached to each site that contains one or more water quality stormwater controls.

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

Yes ☒ No ☐ (Implementation date: Feb. 28, 2022 for Existing Registrants, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

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

Yes ☒ No ☐ N/A ☐

If necessary, provide an explanation:

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

Percentage inspected this reporting year: 1490/6275 = 23.7% Percentage cleaned: same

133. If known, estimate of material removed: 92.3 tons units

134. Percentage inspected during the permit term: 0% (FY21) + 39.7% (FY22) + 23.7% (FY23) = 63.4% ; Percentage cleaned: same

135. If known, estimate of material removed: 107.5 (FY22) + 92.3 (FY23) tons = 199.8 tons (permit term) units

If necessary, provide an explanation: FY21 was only a 30-day report period, cleaning and inspection fell outside that timeline

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

Yes ☐ No ☒

If necessary, provide an explanation:

137. During the permit term were existing procedures for inspection and maintenance schedules reviewed/updated to ensure pollution prevention and good housekeeping practices were conducted for the following activities?

Schedule A.3.f.iv

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

	<input type="checkbox"/> Maintenance of municipal facilities including public parks and open space, golf courses, airports, parking lots, swimming pools, marinas, etc. If necessary, provide an explanation: Updated the Fire Department Stormwater BMP Guidance Manual, Stormwater Pollution Control Plan for the Operations Complex, Wash Rack Inspection Guidance Manual, and the Spill Prevention Control and Countermeasures Plan for the regional fuel facility. The remainder will be updated in FY24.
138.	Do any permit registrant-owned facilities have coverage under DEQ's 1200-Z Industrial Stormwater Discharge Permit? <i>Schedule A.3.f.v</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> If "Yes", provide DEQ File Number(s): If necessary, provide an explanation: A 1200z determination was completed in January 2021 (this is the 3rd determination completed over the years). It has been determined that Springfield does not need a 1200z permit at any of its facilities
139.	Are practices in place to reduce the discharge of pollutants to the MS4 associated with the application and storage of pesticides and fertilizers? <i>Schedule A.3.f.vi</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Pollution Control BMP Guidance Manual for Maintenance Operations (PC BMP Manual)
140.	Are methods/practices in place to reduce the discharge of litter within the jurisdiction? <i>Schedule A.3.f.vii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Street sweeping, catch basin cleaning, and leaf pick up programs are implemented by Operations. WQF management program, Stream Team, and the Little Litter public outreach program are implemented by Environmental Services in conjunction with Operations and regional partners.
141.	Are practices in place to ensure that collected material or pollutants removed in the course of maintenance are managed and disposed of in a manner such as to prevent such pollutants from entering the waters of the state in accordance with state and federal rules? <i>Schedule A.3.f.viii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Approved Vector dump facility (at the Lane County Transfer Station in Glenwood) and sweeper material bins.
142.	Were all persons responsible for evaluating O&M practices, evaluating compliance with long-term O&M requirements or ensuring pollution prevention at facilities and during operations appropriately trained to conduct such activities? <i>Schedule A.3.f.ix</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation:
143.	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? <i>Schedule A.3.f.ix</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation:

Monitoring

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

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

Yes ☐ No ☒

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

Yes ☐ No ☐

If necessary, provide an explanation:

Wood Village Monitoring Requirements

146. 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:

147. Indicate which of the following were completed:

- ☐ For phosphate, monitor influent and effluent dissolved orthophosphate concentrations and total phosphate concentrations at a representative site in Fairview Lake (Reach 4) and Fairview Creek (Reach 5)
- ☐ For lead, estimates of the effectiveness of controls to remove TSS
- ☐ For bacteria, measuring E. coli concentrations and its distribution over flows (for example, flow duration intervals) to demonstrate compliance with E. coli criteria

If necessary, provide an explanation:

Water Quality Standards

148. During this monitoring year was it determined or reported that the MS4 discharge caused or contributed to an exceedance of an applicable water quality standard? *Schedule A.1.b*

Yes ☐ No ☒

If necessary, provide an explanation:

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

If necessary, provide an explanation: **N/A**

150. Was the exceedance self-reported or did DEQ send written notification? *Schedule A.1.b*

Self-reported: Yes ☐ No ☐

If necessary, provide an explanation: **N/A**

151. Within 48 hours was an investigation started into the cause of the water quality exceedance? *Schedule A.1.b.i*

Yes ☐ No ☐

If necessary, provide an explanation: **N/A**

152. Within 30 days of becoming aware of the exceedance, was DEQ notified in writing, if self-reporting? *Schedule A.1.b.ii*

Yes ☐ No ☐

If necessary, provide an explanation: **N/A**

153. Within 60 days of becoming aware of or being notified of the exceedance, was a report submitted to DEQ that documents the following: *Schedule A.1.b.iii*

- ☐ The results of the investigation, including the date the exceedance was discovered
- ☐ A brief description of the conditions that triggered the exceedance 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: **N/A**

154. Were the corrective actions implemented in accordance with the schedule approved by DEQ? *Schedule A.1.b*

Yes ☐ No ☐

If necessary, provide an explanation: **N/A**

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