



October 24, 2022

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 FY22 MS4 Annual Report

MS4 Program,

Enclosed is Springfield's MS4 Annual Report for FY22. It outlines the City's progress toward full implementation of our stormwater management program. This report includes summaries of implementation efforts for the reporting period 7-01-2021 through 6-30-2022. We are including attachments that are either requested or a required submittal as listed in the Modified General Permit. Attachments and documents included are:

- Springfield's Proposed MS4 Plan 2022
- MS4 Map – a digital link to Springfield's infrastructure map included in question 53 – hard copy would be unreadable
- Att1 - Public Education Activity Assessment
- Att2 - IDDE escalation enforcement matrix
- Att3 – Pollutant parameter action level list
- Att4,5,6,7 - ESCP review templates and checklists
- Att8 – LDAP enforcement matrix

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

We are submitting one printed copy and one electronic copy per instructions.

Springfield anticipates continuing to move forward in our efforts in compiling with our recently 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,

Sunny Washburn
Water Resources Supervisor
City of Springfield Oregon
225 5th Street, Springfield, Oregon 97477
541-736-1022 swashburn@springfield-or.gov

Enclosures: Springfield's FY22 MS4 General Permit Annual Report with attachments
Springfield's FY22 TMDL Annual Report

cc: Matt Stouder, Environmental Services Division Director
Priscilla Woolverton, Upper Willamette TMDL Basin Coordinator Western Region
Springfield ESD electronic file



Annual Report

MS4 Phase II General Permit



National Pollutant Discharge Elimination System

MS4 Stormwater Discharge Permit

State of Oregon
Department of
Environmental
Quality

Monitoring Year: **FY22**

Permit Registrant: **City of Springfield**

Date Prepared/Submitted: **Oct 24, 2022**

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): <input checked="" type="checkbox"/> City / <input type="checkbox"/> County / <input type="checkbox"/> Special District / <input type="checkbox"/> Other:		
8. Registrant Type: Existing Registrant: <input checked="" type="checkbox"/> New Registrant: <input type="checkbox"/>		
9. Community Type: Large Community: <input checked="" type="checkbox"/> Small Community: <input type="checkbox"/>		
10. DEQ Permit No: 84048		
11. EPA File No: ORS084048		
12. Physical Address: 225 5th Street Ste. 101		
City: Springfield	State: OR	Zip: 97477
13. Point of Contact: Sunny Washburn		
Title: Water Resources Supervisor	Email: swashburn@springfield-or.gov	Phone: 541-736-1022
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: square miles 15.85
16. Estimate the population served by the MS4: 63,000 (U.S. Census estimate)

MS4 Stormwater Discharge Information

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

Receiving Waterbody	# of MS4 Outfalls	Impaired waterbody				Impairment(s)
		303d listed		TMDL issued		
a. McKenzie River	4	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	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
b. Willamette River	5	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	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
c. Middle Fork Willamette	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	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
d. South Cedar Creek	6	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Temperature
e. Q Street Floodway	67	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
f. Springfield Mill Race	6	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	DO
g. Channel 6	20	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
h. Irving Slough	12	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
i.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	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"/>	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.
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 and has established legal authority under both its Development Code and Municipal Code.

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://springfield-or.gov/city/development-public-works/clean-water-and-stormwater/>
If necessary, provide an explanation: Proposed MS4 Plan is posted along with the existing SWMP from 2010 until MS4 Plan is accepted.

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: MS4 Plan timeline schedule based on permit issuance date 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 workorder format and database to track. There is a set of Compliance Books that track overall program(s) implementation in hard copy. Program assessment/review templates were developed and implemented that provided a program review for the six control measures and summarize progress toward program implementation.

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: Currently use a user fee base for stormwater program funding.

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 provided 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 program has been implemented since 2007. We have active programs addressing bacteria, temperature, mercury, and general stormwater pollution prevention. We offer brochures, factsheets, booklets, public events, post stormwater pollution prevention tips on social media, and have a publicly accessible website with our outreach material(s). 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 Gardens, Clean Water Business, EcoBiz, Clean Water University, UpStream Art, Septic System Maintenance, and Little Litter. We either host or participate in regional events such as Earth Day, Public Works Week, and Home and Garden shows, where educational materials are handed out and the public is engaged in conversation. We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, drafted education and outreach strategies, updated Council and the public on stormwater pollution prevention, renewed our IGA with Lane County, completed our annual program review and 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) **Springfield is on track**
29. Provide the number of education and outreach activities conducted: *Schedule A.3.a.iii*
 During this reporting year: **32 of which 29 included people from the UTZ**
30. During the permit term: **40 of which 35 included people from the UTZ**
 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.iv*
 Yes No
33. Indicate target topics addressed during this reporting year: *Schedule A.3.a.iv*
 Impacts of illicit discharges on receiving waters and how to report them
 Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts
 BMPs for proper use, application and storage of pesticides and fertilizer
 BMPs for litter and trash control
 BMPs for recycling programs
 BMPs for power washing, carpet cleaning and auto repair and maintenance
 Low impact development/green infrastructure
 Information pertaining to maintenance of septic systems
 Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife
 Other: **Mercury education**
34. Describe the types of educational messages or activities distributed and/or offered during this reporting year. *Schedule A.3.a.iii*
Program outreach efforts include five new UpStream Art murals, printed material distribution, website materials available for download, signage, Canines for Clean Water pledge and other community events, social media postings, on-line education classes for elementary students (Clean Water University), online events (COVID), Council Briefing Memos, and targeted business mailings.

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: **Factsheets are available on the City website year-round. Site operators are provided on-site educational materials if needed/warranted. Handouts are also provided to contractors at some development application submittals.**

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*. **The assessment this year was done on the utility insert distribution option and the brochure that was provided; "Good Habits for Good Habitats". (see attachment: PE ActivityAssessment_SUB Insert 2022.pdf)**

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 assessment draws a conclusion as to if the outreach effort was successful, and if not, implement adaptive management and redirect efforts. In this assessment, the conclusion is that it is a very effective way to reach a large number of people and that the practice will continue into the next year. See the assessment attached for more details.

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*) **Springfield is on track**

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

Yes No **Our current 2010 SWMP, the proposed MS4 Plan 2022 and FY22 Annual Reports are posted:**
<https://springfield-or.gov/city/development-public-works/clean-water-and-stormwater/>

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

Yes No

If necessary, provide an explanation: **We have ongoing updates that occur and include everything from updating reports, plans, GIS mapping, education material updates, public events, and contact information. A compliance review was completed in FY22 that ensured all requirements listed under the permit were posted/met.**

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

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 see some of the links above as well as: <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

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 See above links 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).

We participated and partnered with regional partners on 6 events.

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, 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, reviewed our current Code and identified updates for improvement, reviewed our IDDE program and SOPP's 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 are currently identifying priority point locations. 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) We believe that we are meeting the current MS4 General Permit conditions; a compliance review was completed to determine any gaps. Gaps are currently being addressed by product review and updates according to the MS4 Plan schedule.

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 is available on-line. 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 A hard copy of the map would be too small to read.
DEQ may access infrastructure maps online at:
<https://sporgis.maps.arcgis.com/apps/webappviewer/index.html?id=1446c0a1fe0a4abdacb5fa2157b6dd70>

54. Or are the digital shapefiles available for electronic submittal? Yes No
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

(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:

55. 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 currently taking place.

56. 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:

Currently we do not have any known chronic discharges as all illicit discharges are mediated upon discovery. 1200z industrial site outfalls are mapped but are under the discharge approval and authorization of the DEQ, and thus not considered chronic illicit discharges.

57. 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: Municipal Code 4.370 and 4.372

58. 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:

59. 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:

60. 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: **All printed educational materials and signage has reporting information (e-mail, webpage, and phone number).**

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

Number: **58 with in the City Limits and 8 in the UTZ by Water Resources IDDE staff (complaints related to IDDE)**

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

In working days: **66 complaints responded to in 6.6 hours.**

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 public SSO**

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

Number: **64 (58+8 = 66 minus the 2 from informational/guidance category)** (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: **11.6 hours**

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

Number: **64 - All IDDEs are mitigated and eliminated as they are identified.**

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

In working days: **0.2 months or 6 days.**

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

Number of times: **64 – the enforcement procedures are used at every inspection as it is step one of the matrix.**

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: **3 to OR DEQ and 2 to Lane County = 5 total**

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

In working days: **15.6 hr**

if necessary, provide an explanation: **The way Springfield. is defining this question is based on where the IDDE occurred and which jurisdiction is responsible for enforcement in that location.**

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)

<p><input checked="" type="checkbox"/> The status of enforcement procedure(s), when necessary</p> <p><input checked="" type="checkbox"/> The date the corrective action(s) was completed and staff who evaluated final compliance</p> <p>If necessary, provide an explanation:</p>
<p>71. Provide percentage of outfalls inspected. <i>Schedule A.3.c.vi.A/B</i></p> <p>Known outfalls screened this reporting year: 0</p>
<p>72. Known outfalls screened during the permit term: 0</p> <p>If necessary, provide an explanation: We developed our dry weather screening map and program in FY22 and began screening in FY23</p>
<p>73. Provide percentage of outfalls inspected as part of field screening of priority location. <i>Schedule A.3.c.vi.C</i></p> <p>Priority location outfalls screened this reporting year: N/A</p>
<p>74. Priority location outfalls screened during the permit term: N/A</p> <p>If necessary, provide an explanation: Priority locations do not need to be in place until Feb 28, 2024. Staff are currently identifying location (FY23)</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> <p><input type="checkbox"/> General observation</p> <p><input type="checkbox"/> Field Screening and Analysis</p> <p><input type="checkbox"/> Pollutant Parameter Action Levels</p> <p><input type="checkbox"/> Laboratory Analysis</p> <p>If necessary, provide an explanation: We developed our dry weather screening program in FY22 and began screening in FY23 (August 2022)</p>
<p>76. If flow is observed and the source is unknown, provide a brief description of the field investigation and analysis process. <i>Schedule A.3.c.vi.D-G</i></p> <p>If discharge is observed, it is evaluated for color, odor, staining, etc. Field measurements are taken with probes and test strips. Any observations or field measurements that suggest an IDDE are source-tracked by looking in the stormwater system upstream of the discharge, looking at aerial photography, etc., and samples are taken depending on observations/field measurements. See PPAL and Dry Weather Screening Plan for details.</p>
<p>77. Have pollutant parameter action levels been established and are they included as an attachment? <i>Schedule A.3.c.vi.F</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>(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)</p> <p>If necessary, provide an explanation:</p>
<p>78. Are all persons responsible for investigating and eliminating illicit discharges and illicit connections into the MS4 appropriately trained to conduct such activities? <i>Schedule A.3.c.vii</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p>
<p>79. Are all new staff working to implement the IDDE program trained within 30 days of their assignment to this program? <i>Schedule A.3.c.vii</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p>

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) 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 factsheets too are being updated to ensure better understanding of processes.
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:
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. FY23 updates might 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, Factsheets. 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: Provided in EDSPM, LDAP Application, LDAP Short Form, Factsheets. Springfield has until February 28, 2024 to address any gaps if our current specifications are not in compliance with permit language.
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.
 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. *Schedule A.3.d.v*

Yes No

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

Attached: Yes No See attachments 4, 5, 6, 7

Indicate the minimum land disturbance where you require the ESCP to be reviewed, if different than one acre:
ft² , acres

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.

90. 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: 544 routine, 162 initial, 118 final

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

FY21= 37 routine, 4 initial, 9 final (plus)

FY22= 544 routine, 162 initial, 118 final (=) 581 routine, 167 initial, 127 final

If necessary, provide an explanation:

91. 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

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

If necessary, provide an explanation:

93. Indicate the total number of construction projects that were inspected this monitoring year: 237

94. Indicate the total number of construction projects that were inspected during the permit term: FY21 (50) (plus) FY22 237) = 287

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

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

If necessary, provide an explanation:

96. If available, provide a copy of the written or electronic inspection report form. *Schedule A.3.d.vi.B*

Attached: Yes No Our system is in electronic format and stored in a digital archive. A pdf of the electronic form was included in the attachments last reporting cycle. We can do it again if DEQ requires.

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

If necessary, provide an explanation: Yes – 1131 inspection performed = 99.8%

98. 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:

99. 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: 0

100. Indicate number of times during the permit term: 0 from FY21 and FY22

If necessary, provide an explanation:

101. 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: CESCL Certification is held for both ESC staffers.

102. 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 There were no new staff hired; current staff have maintained ongoing certification.

Post-Construction Site Runoff for New Development and Redevelopment

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

Springfield has had a Post-Construction Program since coverage under the NPDES Individual permit. We have engineering, planning, and inspection staff, post-construction code, treatment standards, design manual, a tracking system for development and inventory, site inspection and enforcement, and a plan review process. We have had a Water Quality Faculty Management Program for both public and private facilities in place since 2010 that provides education and enforcement of water quality maintenance to facility owners/managers. This program is documented and has guidance manuals for implementation. We have facility owner educational material available in hard copy and on our website. We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, continued to implement existing codes and standards, reviewed and made program improvement to the WQF Program, reviewed and identified needed code and standard updates, completed program reviews, and maintained public stormwater controls.

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

Yes No ((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) Springfield's development code is being reviewed and updated to meet the new treatment, retention, and off-site mitigation requirements. This will also require a review and update of our design standards. Staff and legal counsel are currently drafting code updates in FY23

105. 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: 1000 ft²

If necessary, provide an explanation: Currently this threshold is not applied in the same manner as listed in the permit. Does not apply to all impervious surfaces as defined in the general permit that will be required to meet treatment. Example is that we currently do not require a 1000 sq.ft. residential addition (stand-alone) to meet treatment requirements.

We have thresholds at 3 different levels:

- 500 sq.ft. (used for parking lots – 100% treatment unless under 500 sq.ft.)
- 1,000 sq.ft. (requires a site plan and facility design w/stormwater controls, meet pre-development, O&M))
- 5,000 sq.ft. (requires treatment, facility design (same as 1000 sq.ft.), as well as a stormwater study)

<p>106. Indicate which of the following are required at qualifying sites: <i>Schedule A.3.e.ii</i></p> <ul style="list-style-type: none"> <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 <p>If necessary, provide an explanation:</p>
<p>107. 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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>108. If barriers were identified or if necessary, provide an explanation: This activity took place while under the Individual Permit coverage. It is expected that another review will occur during the post-construction and construction code review and updates.</p>
<p>109. Provide an explanation of the timeline for removal of barriers or if removal is outside your authority: N/A, but there is a code review currently taking place in FY23 that might identify needed updates.</p>
<p>110. Indicate which of the following technical standards are used to determine the retention requirement: <i>Schedule A.3.e.iv.A</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Volume-based method (Specific to the Glenwood area) <input checked="" type="checkbox"/> Storm event percentile-based method <input type="checkbox"/> Annual average runoff-based method <p>If necessary, provide an explanation: No increase from the existing condition is allowed; the 25 yr storm is used. This may need to be revised upon implementation of the new retention and treatment standards.</p>
<p>111. 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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>112. Was the stormwater structural control designed to remove, at minimum, 80 percent of the total suspended solids?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If necessary, provide an explanation: The permit does not require 80% removal of TSS, it requires the registrant to set upper and lower bounds for stormwater controls that to treat TSS: "stormwater structural control must be designed to remove a defined percentage of total suspended solids and may include an upper and lower bound to their treatment requirement that reflect the practical limitation of an engineered control". The permit uses 80% as an example. Springfield will be reviewing its treatment standards and if needed, making updates by Feb. 28, 2024. Springfield currently uses 70% as listed in our EDSPM.</p>
<p>113. Are the allowable structural stormwater controls and specifications available for review? <i>Schedule A.3.e.iv.C</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>114. Indicate if they are attached or the location where they can be viewed:</p> <p>Attached <input type="checkbox"/></p> <p>Location: Spfld. Engineering and Design Standards and Procedures Manual And Eugene Stormwater Management Manual</p> <p>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>
<p>115. Have alternatives for projects complying with the retention requirement been approved? <i>Schedule A.3.e.iv.D</i></p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>116. If yes, are the written technical justifications evaluated? <i>Schedule A.3.e.iv.D</i></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>

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

If necessary, provide an explanation: **Springfield will need to make code and/or design standard changes to incorporate the changes in the retention standards and required offsite mitigation options as they differ from previous NPDES permit requirements. This change is not required until Feb. 28, 2024 for Springfield.**

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

Yes No

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

119. 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

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

120. 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.**

121. Indicate the minimum land disturbance or creation of new impervious area where plans are required to be reviewed: 1000 ft² , acres of land disturbance creation of new impervious area
See question 106 above. Depends on what type of activity is being done. A driveway would trigger a plan review were as a roof-top addition may not.

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

Yes No

If necessary, provide an explanation: **Currently, if a site cannot meet the existing post-construction requirements due to site constraints, developers are allowed to provide alternative compliance such as wetland enhancement, or a treatment facility at an offsite location to meet the current standards.**

123. 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: **There has been a Water Quality Facility Management Program in place 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 2011/12.**

124. 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:

125. 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.**

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

Yes No

If necessary, provide an explanation:

127. 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

128. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.f*
Springfield has been implementing best management practices and good housekeeping for pollution prevention since coverage under the Individual Permit. Pollution control guidance manuals and SOPPs have been developed as well as site-specific housekeeping guidance manuals. An assessment was conducted to determine if there was a requirement to have coverage under the 1200z permit. Routine sweeping, catch basin cleaning, litter control, and water quality facility and stormwater control maintenance are all current operational strategies that the City implements.

129. 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*)

130. 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: **Springfield has a Water Quality Facility Management Program that includes both private and public (City-owned) facilities.**

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

Percentage inspected this reporting year: **2128 basins cleaned, 39.7%**; Percentage cleaned: **same**

132. If known, estimate of material removed: **107.5 tons** units

133. Percentage inspected during the permit term: **0% for FY21 & 39.7% FY22**; Percentage cleaned: **same**

134. If known, estimate of material removed (**permit term**): **107.5 tons** units

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

135. 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: **Routine work orders based on previous year's schedule**

<p>136. 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? <i>Schedule A.3.f.iv</i></p> <ul style="list-style-type: none"><input type="checkbox"/> Pipe cleaning for stormwater and wastewater conveyance systems<input type="checkbox"/> Cleaning of culverts conveying stormwater in roadside ditches<input type="checkbox"/> Ditch maintenance<input type="checkbox"/> Road and bridge maintenance<input type="checkbox"/> Road repair and resurfacing including pavement grinding<input type="checkbox"/> Dust control for roads and municipal construction sites<input type="checkbox"/> Winter road maintenance, including salt or de-icing storage areas<input type="checkbox"/> Fleet maintenance and vehicle washing<input type="checkbox"/> Building and sidewalk maintenance including washing<input type="checkbox"/> Solid waste transfer and disposal areas<input type="checkbox"/> Municipal landscape maintenance<input type="checkbox"/> Material storage and transfer areas, including fertilizer and pesticide, hazardous materials, used oil storage, and fuel<input type="checkbox"/> 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. <p>If necessary, provide an explanation: No updates were made to the existing BMP Guidance Manuals this permit cycle. We do have guidance manuals in place that address all the subjects listed above, and they are scheduled to be reviewed and updated over the course of the permit term and according to the proposed MS4 Plan.</p>
<p>137. Do any permit registrant-owned facilities have coverage under DEQ's 1200-Z Industrial Stormwater Discharge Permit? <i>Schedule A.3.f.v</i></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> If "Yes", provide DEQ File Number(s):</p> <p>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.</p>
<p>138. 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></p> <p>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)</p>
<p>139. Are methods/practices in place to reduce the discharge of litter within the jurisdiction? <i>Schedule A.3.f.vii</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>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.</p>
<p>140. 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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation: Approved Vector dump facility (at the Lane County Transfer Station in Glenwood) and sweeper material bins.</p>
<p>141. 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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p>

142. 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:

Monitoring

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

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

Yes No

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

Yes No

If necessary, provide an explanation:

Wood Village Monitoring Requirements

145. 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* **N/A**

Phosphate:

Lead:

Bacteria:

146. 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: **N/A**

Water Quality Standards

147. 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:

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

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

149. 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**

150. 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

151. 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

152. 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

153. 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

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

Annual PE Activity Assessment

Date of Assessment: 7/1/2021

Assessment Staff and Position: Sunny Washburn ESD Supervisor & Meghan Murphy Management Analyst

Public Education Activity: SUB Billing Insert – Good Habits for Good Habitats

Project Staff: Meghan Murphy, Brooke Mossefin

Date of Activity: 2/1/2022 to 3/1/2022 Council memo February 2022 - Insert mailed out March 2022

Applicable to TMDL? **Temperature** **Bacteria** **Mercury**

MS4 General Permit Language: Schedule A.3.a. vi. Tracking and Assessment. The permit registrant must track implementation of the Public Education and Outreach requirements. In each corresponding Annual Report, the permit registrant must assess their progress toward implementation of the program, including the evaluation of at least one education and outreach activity corresponding to the reporting timeframe for the associated Annual Report. The assessment(s) should be used inform future stormwater education and outreach efforts to most effectively convey the educational material to the target audience(s).

Permit required activities, audiences, and topics

As required by the MS4 General Permit, Springfield is required to focus its efforts on conveying relevant messages using the Target Topics identified below or stormwater issues of significance in our community:

Target Audience:

1. General public, homeowners, homeowner association, schoolchildren, and businesses (including home-based and mobile business).
2. Local elected officials, land use planners and engineers.
3. Construction site operators (See Schedule A.3.v below).

Target Topics:

1. Impacts of illicit discharges on receiving waters and how to report them.
2. Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts.
3. Best management practices for proper use, application and storage of pesticides and fertilizers.
4. Best management practices for litter and trash control.
5. Best management practices for recycling programs.
6. Best management practices for power washing, carpet cleaning and auto repair and maintenance.
7. Low-impact development/green infrastructure.
8. Septic systems, information pertaining to maintenance of septic systems.
9. Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife.
10. Stormwater issues of significance identified by permit registrant.

Enter activity information

Target Audience (from list)	1. # General public, homeowners, homeowner association, schoolchildren, and businesses (including home-based and mobile business).	Target Audience Reached? Y=1 N=0
		1

Annual PE Activity Assessment

	2. Local elected officials, land use planners and engineers.	
Target Topics (from list)	<ol style="list-style-type: none"> 1. Impacts of illicit discharges on receiving waters and how to report them. 2. Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts. 3. Best management practices for proper use, application and storage of pesticides and fertilizers. 4. Best management practices for litter and trash control. 6. Best management practices for power washing, carpet cleaning and auto repair and maintenance. 7. Low-impact development/green infrastructure. 9. Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife. 	
Type of messaging (brochure, social media, utility billing, newsletter, postcard, PSA...)	Brochure used as a billing insert and associated briefing memo for the mayor, City Council, and City Manager's Office.	
Type of outreach effort (mailing, event, posting...)	Memo and mailing, also on City website and provided to those who receive digital billing statements.	
Describe the activity.	Two-part activity - Council was provided a packet that contained information about the project and MS4 permit and a copy of the brochure. The brochure is then provided to SUB, the local water and electric utility, so that it can be inserted into the monthly billing statements that are mailed out to Springfield residents. The brochure was also part of a Facebook post. The fb post reached 660 people and did not generate a lot of interactions.	
Are we providing information on the potential pollution of the activity?		Yes=1 N=0
		1
Are we providing awareness of the direct links between land activities, rainfall-runoff, storm drains, and local water resources?		Yes=1 N=0
		1
Are we providing clear guidance on steps and specific actions that they can take to reduce potential stormwater pollution?		Yes=1 N=0
		1
Are we providing information on alternative methods and providing resource information?		Yes=1 N=0
		1
Do people ask for information on the subject?	Unknown. On the social media post, 1 person clicked on the link to view Springfieldstreams.org and 5 people clicked to view the photos larger (the 2nd photo has 4 points about pollution). We are going to assume that would be at least 1 yes.	Yes=1 N=0
		1
		Yes=0 N=1

[https://springfioregon.sharepoint.com/sites/DPW-ESD-WaterResources/WaterResources/Projects/MCM1_Public_Edu/Public_Edu_Assessments/FY22/PEActivityAssessment_SUB Insert 2022.docx](https://springfioregon.sharepoint.com/sites/DPW-ESD-WaterResources/WaterResources/Projects/MCM1_Public_Edu/Public_Edu_Assessments/FY22/PEActivityAssessment_SUBInsert2022.docx)

Annual PE Activity Assessment

Is the material out of date (appearance, BMPs, phone #, websites, etc...?)	No, material was updated with current branding, web locations, and contact info prior to mailing	1
<p>Performance Measurement</p> <p>Measurement must be included as an integrated component from the outset: goals should be determined in part by what can be measured in both quantitative and qualitative terms, and measurement requirements should be integrated into each component.</p>		
<p>Desired outcome1</p> <p>How many members of each audience do you wish to reach?</p>	34,000	General Public: 32,000 hard copies and 2,213 digital copies went out
<p>Desired outcome2</p> <p>What do you want those people to:</p> <ol style="list-style-type: none"> 1. Know and/or think? 2. Do as a result of the campaign? 	<ol style="list-style-type: none"> 1. The smallest actions of pollution can have big impacts. The smallest actions of pollution at home have big impacts on our water recreation and habitat. To recognize water is linked to our City's identity, enjoyment, and survival, and to feel responsible for Springfield's water quality. Then to create a sense of empowerment by showing each big pollution concern, plus multiple achievable actions to prevent it. 2. Think twice about their actions and consider alternatives. Think twice about their actions and apply one or several solutions listed on the table." 	
<p>How will it be measured & benchmark</p> <ul style="list-style-type: none"> o Quantitative measurements: inquiry rates, submissions, attendance, media taken/given away, website visits, volunteer hours. o Surveys can be used to capture data such as opinions and perceptions, including perceived value and engagement on the part of participants and perceptions of the program. 	<p>Quantitative measurements of how many mailed, returned, requested additional information.</p> <p>Facebook: 660 people reached, 10 reactions, 0 comments, 1 share, 7 clicks. IG: It wasn't posted there. Twitter: 410 impressions, 19 engagements, 0 comments, 0 shares, 2 likes.</p>	
Expected resources	Yearly mailing – 2 staff Printing and postage In-house creation of material	
Systems in place to capture quantitative data.	PE Database Facebook analytics	
<p>Metrics</p> <p>Exposure (number of readers or viewers reported by the media outlet carrying message, readership statistics, views, days in the field, days of event, etc....)</p> <p>Experience How they interacted with it, what they thought of it, and what they got out of it. (focus groups, observations, interviews, phone survey).</p>		

Annual PE Activity Assessment

Number of days material exposed	1 and 1 Council	Day mailing – 1 Council	
Event days	1	660 fb	
People at event	X	XX	
Total taken/given	34,000	(Over) Inserts and digital	
People stopped at booth	X	XX	
People interacted with	See right	Facebook: 660 people reached, 10 reactions, 0 comments, 1 share, 7 clicks. IG: It wasn't posted there. Twitter: 410 impressions, 19 engagements, 0 comments, 0 shares, 2 likes	
Total downloads from website	X	XX	
Any feedback? (positive scale 5-1, 5 being positive)	2	There was reaction on fb and twitter	
Any technical assistance requested because of the type of material or activity? (positive scale 5-1, 5 being positive)	1	None	
Total staff effort: (ease of resource scale 5-1, 5 being easy)	5	Memos are regular communication with City Council and the inserts have been being provided to SUB since the early 2000s. We regularly develop material such as brochures.	
Number of materials taken divided by the days the material was out	34,000/1=34,000	5	Pieces of material a day 34,000 per day (positive scale 5-1)
OR - Number of materials taken divided by the number days of the event	M/D=Z (not event)	0	Pieces of material a day XXX (positive scale 5-1)
Enter more metrics as needed			This is an extra row if needed
Comparable and Percent change - compared to last year: 34,000 in 2021 Divide the new value by the old value. Multiply by 100 Subtract 100 returns percent change Enter results as a positive scale 5-1, 5 being positive). Enter to the far-right the percent change. Note that some activities may not be comparable to calculate a percent change.			Enter percent change from the table below = 0 %

Conclusion:

If data from the metrics table did not automatically fill in then right click in the blue box, select “update field” to update a field so it will auto-calculate.

Assessment Outcome - Right Click in the blue box and select “update field”				
Target reached	11			

Annual PE Activity Assessment

Potential pollution	1			
Direct links	1			
Clear guidance	11			
Alternative method	1			
Requests	11			
Out of date	11			
Feedback	2			
Assistance request	1			
Staff effort	5			
Exposure Material	5			
Exposure Event	0			
	20	Out of	27	Success scale Highly - - Moderately - - Low - - Failure 27 20 10 0
Percent Change	0			
Outcome	34,000 Springfield residents reached via mail, and FB 660 + TW 410 = 1,070 total reached via Facebook and the website			
Outreach effective?	Yes			
Recommend continuing this outreach?	Yes, the outreach is easy to implement, and a large amount customers can be reached in one process. Plus, the extra copies of the brochure can be given away at events. Staff time is minimal as the material can be generated or updated in-house, and our regional partner helps in the printing and mailing.			
What changes are recommended for the future?	Continue annual stormwater brochure and associated Council Briefing Memo and Facebook post.			

Any additional information about the process and results.

- See attachments – brochure and fb screenshot
-

MEMORANDUM

City of Springfield

Date: 2/22/2022

To: Nancy Newton, City Manager

COMMUNICATION

From: Matt Stouder, Environmental Services Division
Director

PACKET

Brooke Mossefin, Communications Coordinator

Meghan Murphy, Environmental Services
Management Analyst

Subject: Stormwater brochure insert in March SUB bill

MEMORANDUM

ISSUE:

Stormwater runoff is not cleaned in the same way as wastewater, and in many cases enters receiving water bodies without treatment, contributing to the degradation of water quality in local waterways such as the Willamette and McKenzie Rivers. As part of the City’s Municipal Separate Storm Sewer System (MS4) permit issued by the Oregon Department of Environmental Quality (DEQ), the City is required to inform the public about the impacts of stormwater discharges on waterbodies and steps that they can take to reduce pollutants in stormwater runoff.

BACKGROUND:

Every month, the Springfield Utility Board (SUB) bills its customers for drinking water and electrical services. The bill also includes charges for City stormwater and wastewater services. One feature of these bills is a printed insert or emailed attachment – typically a brochure or flier – which carries a public service message to more than 33,900 Springfield residents.

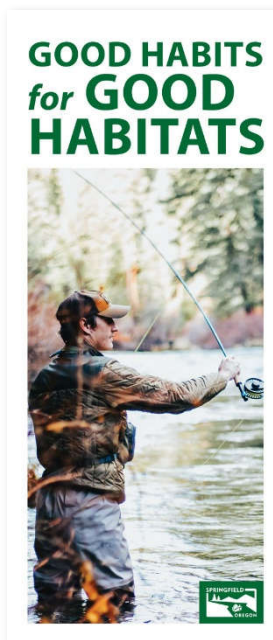
For more than 20 years, the City has provided up to two of the 12 inserts for the customer bills. In March, the City typically presents an aspect of our stormwater program, which is funded by stormwater user fees. In July, the City explains stormwater and wastewater user fees for the coming year.

MARCH SUB BILL INSERT:

The stormwater insert for March 2022 presents a big-picture view: water underlies Springfield’s founding and identity, and we love to play in and around our waterways (ATT1). The star of the brochure is a table that identifies, at an individual level, the most common causes of water pollution and the good behaviors that keep water clean.

This table creates a simple framework for understanding a gamut of information on what community members can do and why. The table’s “Pollution Causes” are the categories the City must address from its MS4 permit. The tips in the “Pollution Solutions” column have been presented in separate campaigns by the City’s Stormwater Team over many years. It describes only desired behaviors, to help community members visualize the best actions to take.

For more information, please contact Brooke Mossefin, Communications Coordinator for the Development and Public Works Department, at 541.214.5304.



SPRINGFIELD IS SURROUNDED BY WATER
where we love to play!



Springfield is named after a spring in a field, located downtown. It's still there, underground!



Springfield is between two rivers – the Willamette and the McKenzie. These rivers are our BFFs.



Springfield developed from industries fueled by the Mill Race waterway. We're here thanks to water.



Springfield gets a lot of rainfall – 40-45 inches annually. Water management is our way of life.



Springfield families and businesses need clean water. Our future requires water for us to thrive.

Your stormwater FEES AT WORK

The City helps you help water! Every person in Springfield contributes to our water quality – our daily actions either cause or prevent pollution. The City uses your stormwater rates, paid through SUB, to help improve water quality. The City:



- Removes 1,000 tons of street debris (including litter, tire particles, etc.) every year through our street sweeping program.
- Keeps 100 tons of sediment and pollutants out of our local waterways by cleaning storm drain basins every year.
- Picks up 200 tons of leaves every year through the Leaf Pickup Program, keeping them out of the stormwater system.
- Requires new developments to add drainage areas containing plants, also called green infrastructure, to help filter pollutants.
- Plants native vegetation and removes invasive species along public waterways.
- Establishes codes to protect riparian and wetland areas, which provide important wildlife habitat. They're also excellent for cooling water temperatures, which native fish love!
- Collaborates with partner agencies on regional efforts to protect water quality – such as the Clean Rivers Coalition, Pollution Prevention Coalition, and more.

CONTACT US ANY TIME!

STORMWATER TEAM

Environmental Services Division
 Development & Public Works Dept.
 City of Springfield, Oregon

WaterResources@springfield-or.gov
 541.726.3694
SpringfieldStreams.org

SPRINGFIELDOR
 CITYOFSPRINGFIELDOREGON
 SPFLDOREGON
 CITY-OF-SPRINGFIELD

Report stormwater pollution

We can't be everywhere at once. Please help reduce stormwater pollution by reporting problems you see around

GOOD HABITS for GOOD HABITATS



Water needs you!

YOU ARE THE SOLUTION TO WATER POLLUTION!

Every leaking vehicle, bit of yard chemical, piece of litter, and clump of pet waste adds up to a lot of pollution when multiplied across the City. All of these pollutants are picked up by rain, and carried into storm drains and out to waterways.



Springfield's water pollution challenges

We collected samples from waterways during the rainy months and found:



E. coli – Bacteria that makes us sick. Common source: pet waste left on the ground.



Sediment – Debris that clouds water. Common source: decomposed leaves & outdoor washing.



Total phosphorus – Nutrients that cause algal blooms. Common source: yard fertilizer.



Copper, lead, zinc – Minerals that harm aquatic life. Common source: moss killers and auto wear.

Check out this table for how to keep your property and our waterways pollution free. ▶

WATERWAY HEALTH *at the* STORM DRAIN



Collect dog waste



Collect leaves



Build swales



Sweep debris & trash it



Plant native species



Weed by hand



Protect storm drains



Catch auto leaks



Block storm drains



Absorb spills

Pollution CAUSE	Pollution SOLUTION
Bacteria	Pick up and throw away pet waste.
	Don't feed ducks or other wildlife.
	If on septic: check drain field annually, pump tank every 3-5 yrs.
Solid Surfaces*	Clean up leaves and sediment to prevent clogged storm drains and flooded streets.
	Create rain gardens: spaces for water to soak into the ground.
	Plant trees and vegetation that shade pavement and cool water.
Litter & Trash	Build green infrastructure: swales, permeable pavement, etc.
	Discard cigarettes in safe containers.
	Put wrappers and trash in the garbage.
Pesticides & Fertilizers	Sweep driveway debris before it rains and throw it in the trash – sawdust, used fireworks, wildfire ash, etc.
	Take items with mercury or other landfill toxins (prescriptions, chemicals, etc.) to Lane County Hazardous Waste Disposal.
	Reconsider what a healthy lawn looks like, to allow for weeds.
Power Washing & Car Care	Grow native plants that need less special care.
	Use manual yard & garden techniques to reduce chemical use, including moss removal.
	Block the storm drain so wash water doesn't enter it. Direct wash water to landscaped areas where plants filter pollution.
Spills	Fix vehicle leaks. Meanwhile, catch fluids in a drip pan.
	Use a commercial car wash (drains to wastewater system). Otherwise wash on the lawn.
	Soak up spills with absorbent material (kitty litter, sawdust, etc.), sweep up, and discard in trash.
Spills	Block storm drains so spills don't enter. For assistance, contact the City of Springfield's Stormwater Team.
	Report spills to the Stormwater Team for free consultation and cleanup information.

*Solid surfaces include roofs, driveways, roads, and parking lots. All impervious surfaces.



City of Springfield, Oregon Government

March 4 · 🌐



New CLEAN WATER info! We need clean water to live and that's why the City's Stormwater Team is excited to share updated info on how to ensure clean water for our city. [Springfield Utility Board](#) (SUB) will distribute our new brochure along with their March bill, so keep an eye out!

It's about the habits at home that matter to the habitats in our rivers and streams. View the brochure at springfieldstreams.org.

#springfielddoregon #stormwater #scoopthepoop #onlyraindownthedrain



Springfield's water pollution challenges:



E. coli – Bacteria that makes us sick.
Common source: pet waste left on the ground.



Sediment – Debris that clouds water. Common source: decomposed leaves & outdoor washing.



Total phosphorus – Nutrients that cause algal blooms. Common source: yard fertilizer.



Copper, lead, zinc – Minerals that harm aquatic life. Common source: moss killer & car wear.

📣 Boost this post to reach up to 893 more people if you spend \$35.

Boost post

👍❤️😄 7

1 Share

👍 Like

💬 Comment

➦ Share



The purpose of all enforcement actions is to eliminate the potential for stormwater contamination through education and communication of City codes (as well as state and federal regulations) to residents and businesses. Warning and citations are issued after all other enforcement avenues have been exhausted.

Table 1: Incident Enforcement Matrix:

Violation Type	Verbal Notice	Written notice	Written warning (of citation)	Citation Issued	Billed for clean-up
Minor incident (1st offense)	Contact individual(s) in person or over phone. Provide with City Municipal code information and BMP fact sheet(s). Discuss infraction and timeline for remediation.	Send letter detailing necessary steps-identified as "Corrective Actions"- and timeline to remediate incident. *			
Minor incident (2nd offense)	Contact individual(s) in person or over phone. Provide with City Municipal code information and BMP fact sheet(s). Discuss infraction and timeline for remediation.	Send letter detailing necessary steps -identified as "Corrective Actions"- and timeline to remediate incident.			
Minor incident (3rd offense)	Contact individual(s) in person or over phone. Provide with City Municipal code information and BMP fact sheet(s). Discuss infraction and timeline for remediation.		Send warning letter, with Corrective Actions required and timeline to remediate incident		
Minor incident (4th and additional offenses)				Issue citation or other applicable penalty. *	If applicable.
Major incident (1st offense)	Contact individual(s) in person or over phone. Provide with City Municipal code information and BMP fact sheet(s). Discuss infraction and timeline for remediation.	Send letter detailing necessary steps-identified as "Corrective Actions"- and timeline to remediate incident.	Send warning letter, with Corrective Actions required and timeline. *	Issue citation or other applicable penalty. *	If applicable.
Major incident (2nd offense)	Contact individual(s) in person or over phone. Provide with City Municipal code information and BMP fact sheet(s). Discuss infraction and timeline for remediation.		Send warning letter, with Corrective Actions required and timeline.	Issue citation or other applicable penalty. *	If applicable.
Major incident (3rd and additional offenses)	Contact individual(s) in person or over phone. Provide with City Municipal code information and BMP fact sheet(s). Discuss infraction and timeline for remediation.			Issue citation or other applicable penalty. *	If applicable.

Enforcement Matrix as of June 2022

* = These actions will be taken depending on the severity of the offense.

Second, third, and fourth offense may be similar/related issues to first incident addressed or unaddressed first-time incidents.

Minor incidents include (but are not limited to) minor vehicle leak, pressure washing (without chemicals), minor mud/debris in driveway or ROW, blowing/sweeping lawn clippings or other vegetation into ROW, improper storage of chemicals.

Major incidents include (but are not limited to) dumping paint, chemicals, auto fluids, carpet cleaning wash water, etc. directly into storm system, pressure washing with chemicals, stockpiling soil/debris in ROW, driveway, ditches, etc., auto shop or factory floor drains plumbed to storm system, sewage spills, and some industrial hazardous waste incidents. (In the case of illicit connections, enforcement procedures will be implemented in order to eliminate the illicit connection within six (6) months. In cases of Septic System failure, the flowing discharge may be stopped, but the installation of a new system may require additional time.)

Explanation of Progressive Enforcement Escalation by the City of Springfield:

The purpose of all enforcement actions is to eliminate the potential for stormwater contamination through education and communication of City codes (and state and federal regulations) to residents and businesses. Warning and citations are issued after all other enforcement avenues have been exhausted. As identified in the Illicit Discharge Enforcement Escalating Enforcement Matrix, the Corrective Action letter will identify the nature of the violation, Corrective Action(s) required to correct the violation, and a timeline by which the Corrective Action(s) must be completed within, and applicable City of Springfield Municipal Code information. If the identified Corrective Actions are completed by the responsible party (or parties), the City will determine the issue has been resolved, and will notify the responsible party (or parties) that the necessary Corrective Actions have been completed; however, if the identified violation remains uncorrected and persists, the City may determine to issue a citation and other applicable penalties.

Table 2: Field Screening Pollutant Parameter Action Levels (PPAL)

*Parameter	Reporting limit	*Action Level	Method	Rationale for Action Level
Observations				
Color	NA	Any color	Human sense	Used to distinguish between process or wastewater and potable or groundwater, as well as the presence of IDDEs.
Odor	NA	Any odor	Human sense	Used to distinguish between natural groundwater and sewage, industrial process water, etc.
Presence of flow	NA	Active flow	Human sense	Flow indicates either an allowable discharge (such as groundwater) or an illicit discharge.
Field Measurements				
Temperature	NA	> 20°C	pH meter or Sondes	Used to identify presence of wastewater and/or process water. Potable water is generally below 15°C. A temperature reading > 3°C above receiving waters can be an indicator of industrial or sanitary sources.
pH	NA	< 6.0, > 8.5 S.U.	pH meter or Sondes	State Standards, used to identify presence of liquid wastes from industrial processes.
Ammonia	Range 0 - 6.0 mg/L	> 0.5 mg/L	Test strip	The presence of ammonia suggests sewage. If the test strip concentration is above 0.5 mg/L, an <i>E. coli</i> sample will be taken.
Specific Conductivity	1 µS/cm	> 300 µS/cm	Meter or sondes	A specific conductivity >300 µS/cm indicates something other than a natural source based on past field monitoring in Springfield.
Chlorine, Total	Range 0 - 10 mg/L	Any presence	Test strip or grab	Any presence of chlorine indicates a drinking water source. Used to identify presence of commercial and or industrial wastewater. If at or above action levels, likely sources include commercial or industrial wastewater, or discharges from pools and hot tubs.
Sampling				
<i>E. coli</i>	1 CFU	> 1000 CFU/100 ml	SM 9223 B	<p>An <i>E. coli</i> sample is taken when odors or visual cues indicate sewage, and with an ammonia value > 0.5 mg/L.</p> <p>Bacterial inputs can come from a number of natural sources, such as wildlife, but when they exceed about 1000 CFU/100 ml during dry weather, there is a possibility that the source is sewage.</p> <p>Through past sampling of stormwater and waterways in Springfield, we have determined</p>

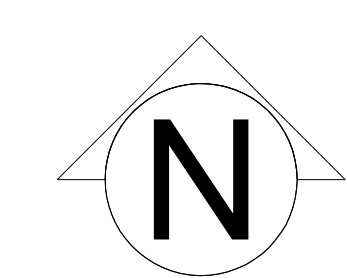
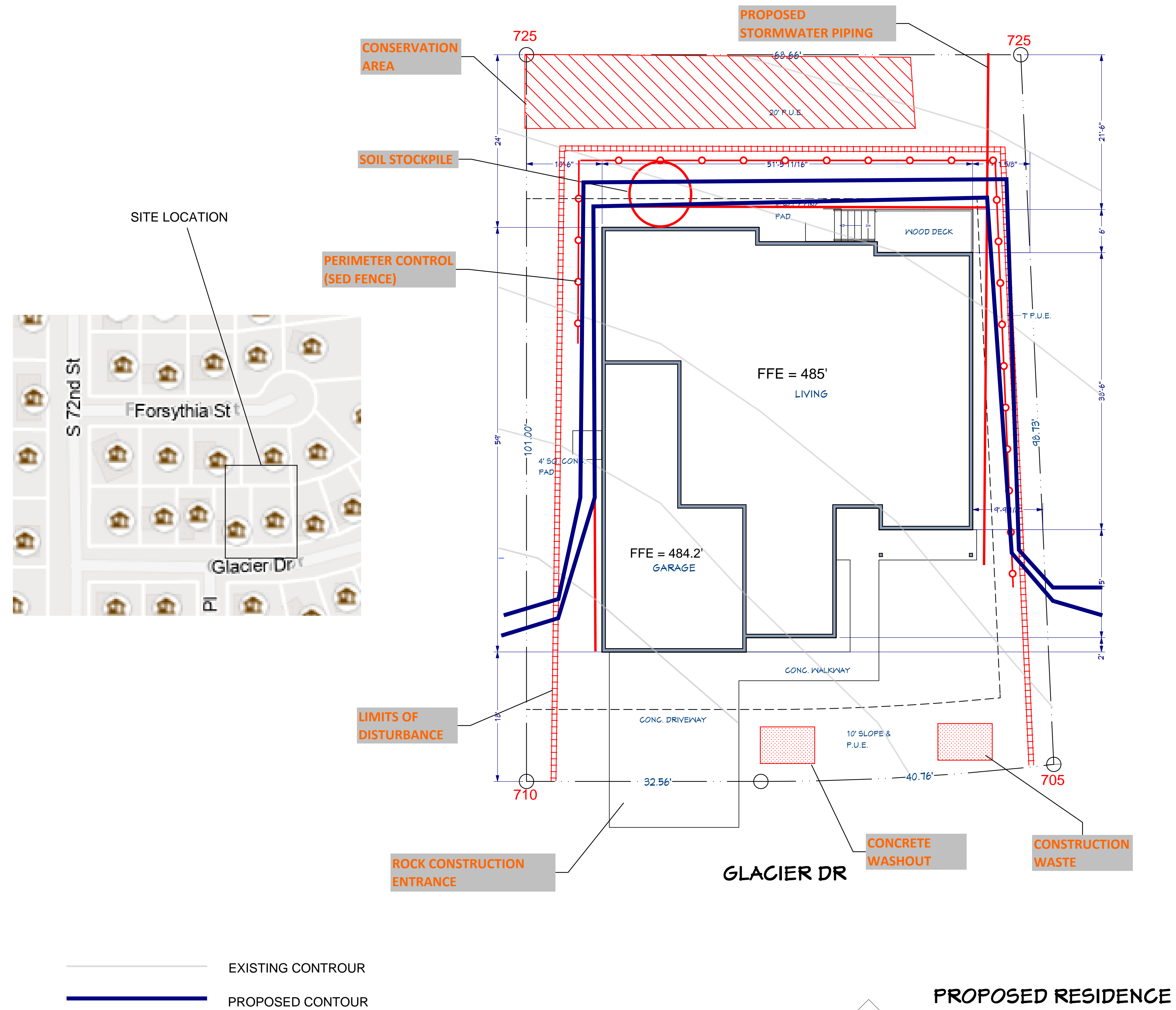
*Parameter	Reporting limit	*Action Level	Method	Rationale for Action Level
				<p>the following as a guide for interpreting <i>E. coli</i> results and follow up actions:</p> <ul style="list-style-type: none"> • 0 – 1000 CFU/100 ml = sewage unlikely. Possible dog or wildlife source. Taking source tracking samples for human DNA markers is optional, as is upstream tracing of the stormwater system. • 1000 – 5000 CFU/100 ml = sewage possible. Take source tracking sample and analyze for human DNA markers. Check upstream stormwater maintenance holes and catch basins, compare to wastewater infrastructure, and septic system maps. • >5000 CFU/100 ml = sewage likely. Take source tracking sample and analyze for human DNA markers. Check upstream stormwater maintenance holes and catch basins, compare to wastewater infrastructure and septic system maps. Contact City Operations for possible dye/smoke testing and camera investigation.
<p>*Parameters and Action Levels may be adaptively managed as the City of Springfield deems necessary, to accurately identify potential illicit discharges.</p>				

August 31, 2022

REVISION:	DATE:
ORIGINAL	02/17
DD	

LDAP STANDARD NOTES

1. Prior to any ground disturbance on the site one inspection with LDAP staff is required. Issuance of this plan does not relieve the permit holder and or the contractor from all other permitting requirements. Prior to beginning construction activities, all other necessary approvals shall be obtained.
2. The erosion and sediment control measures shown on the plan are the minimum requirements for anticipated site conditions. During the construction period, these measures shall be upgraded as needed for unexpected storm events and to ensure that sediment and sediment-laden water does not leave the site.
3. The implementation of the ESCP and the construction, maintenance, replacement, and upgrading of the erosion and sediment control measures is the responsibility of the permit holder and or the contractor until all construction is completed and accepted and vegetation / landscaping is established.
4. The boundaries of the clearing limits shown on this plan shall be clearly flagged in the field by the engineer prior to construction. During the construction period, no disturbance beyond the flagged clearing limits shall be permitted. The flagging shall be maintained by the permit holder and or the contractor for the duration of construction.
5. The erosion and sediment control measures on active sites shall be inspected and maintained daily and within the 24 hours after any storm event of greater than 0.5 inches of rain per 24 hour period. Measures shall be inspected by the permit holder and or the contractor after each rainfall and at least daily during prolonged rainfall. Any required repairs or adjustments shall be made immediately. The erosion and sediment control measures on inactive sites shall be inspected a minimum of once every two (2) weeks or within 48 hours following a storm event.
6. All erosion and sediment control measures shall be protected from damage at all times. Control measures shall remain in place until permanent re-vegetation has been stabilized. Any measure that is damaged or destroyed shall be repaired or replaced immediately.
7. Any areas of exposed soils, including roadway embankments, that will not be disturbed for two days during the wet season (October 1 to April 30) or seven days during the dry season (May 1 to September 30) shall be immediately stabilized with an approved ESC method (seeding & mulching with straw, bark, compost, or plastic covering, ect.).
8. Street sweeping shall be performed as needed or when directed by the City inspector to insure public right-of-ways are kept clean and free of debris. Street flushing is prohibited.
9. When trucking saturated soils from the site, either water-tight trucks shall be used or loads shall be drained on site until dripping has been reduced to no more than one gallon per hour. Sediment laden water will not be allowed to enter the storm water system
10. Extracted ground water from excavated trenches shall be disposed of in a suitable manner without damage to adjacent property, City's storm water system, water features, and related natural resources. Approval of a dewatering system does not guarantee that it will meet compliance or be acceptable for use in all situations. Modifications to the dewatering system will be required if compliance can not be met. At no time will sediment laden water be allowed to leave the construction site.
11. A supply of materials necessary to meet compliance and implement the LDAP or other best management erosion practices under all weather conditions shall be maintained at all times on the construction site.
12. No hazardous substances, such as paints, thinners, fuels and other chemicals shall be released onto the site, adjacent properties, or into water features, the City's storm water system, or related natural resources.
13. The ESC facilities shall be inspected daily by the contractor and maintained to ensure continued proper functioning. Written records shall be kept of weekly reviews of the ESC facilities during the wet season (October 1 to April 30) and of monthly reviews during the dry season (May 1 to September 30).



**PROPOSED RESIDENCE
ON LOT 75
McKENZIE HILLS 1st ADD
SPRINGFIELD, OR**

LDAP STANDARD NOTES:

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GENERAL SITE INFORMATION

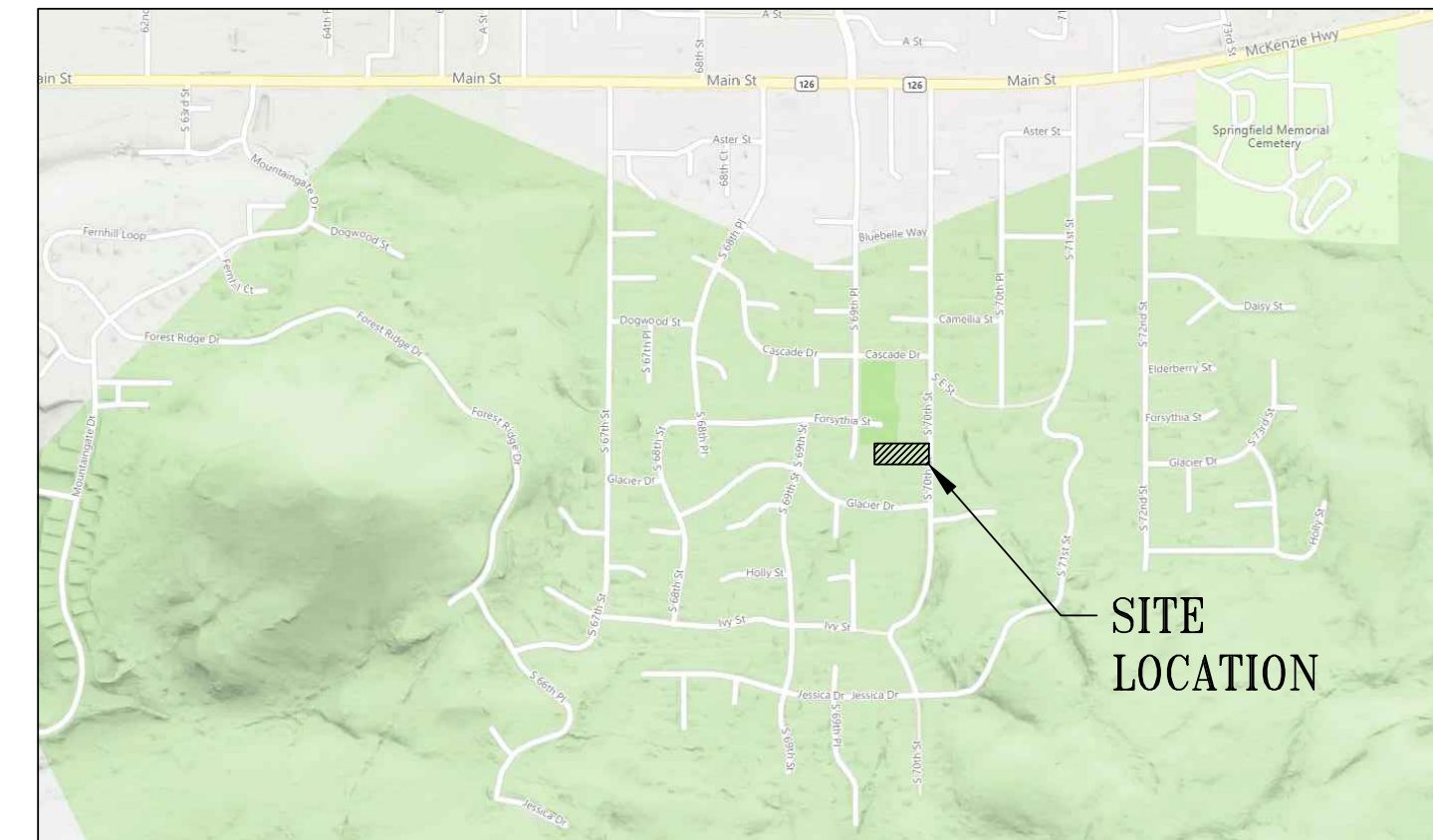
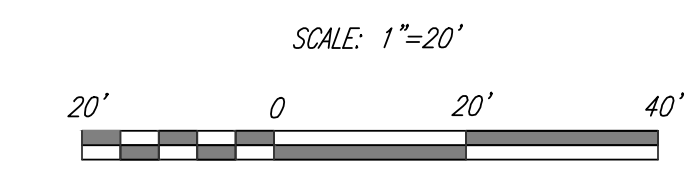
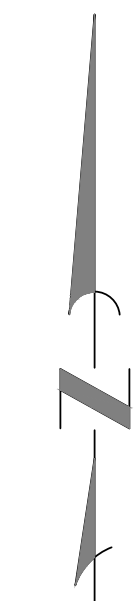
- TYPE OF DEVELOPMENT: LOW-DENSITY RESIDENTIAL
- CONSTRUCTION ACTIVITY WILL CONSIST OF:
 - PRIVATE GRAVEL DRIVEWAY AND FOOTINGS
 - PRIVATE WASTEWATER, WATER, AND STORM DRAINAGE SYSTEMS.
- PROPOSED CONSTRUCTION SCHEDULE:
 - BEGINNING DATE: OCTOBER 2021
 - COMPLETION DATE: FEBRUARY 2022
- DEVELOPMENT AREAS:
 - TOTAL AREA: 0.73 ACRES (31,743 SF)
 - PERCENT OF SITE DISTURBED: 58%
 - CUT = 312 CU. YD. OF EXISTING ONSITE MATERIAL
 - FILL = 1798 CU. YD. OF EXISTING ONSITE MATERIAL
- SOIL TYPE: HAZELAIR SILTY CLAY LOAM #52D, HSG D. AND URBAN LAND HAZELAIR-DIXONVILLE COMPLEX 3127C, HSG D.

GENERAL NOTES:

- ALL EXPOSED SOILS DISTURBED DURING CONSTRUCTION SHALL BE STRAWED AND HYDROSEEDED UPON COMPLETION OF CONSTRUCTION.
- EXISTING GROUND SURFACE IS MAINLY GRASS COVERED WITH GRAVEL DRIVEWAY.
- PLANTERS SHALL BE PLANTED PER THE APPROVED BUILDING PERMIT PLANS.
- CONTRACTOR SHALL INDICATE HAUL ROUTES AND CONSTRUCTION SCHEDULE TO CITY STAFF AT LDAP PRE-CONSTRUCTION MEETING.

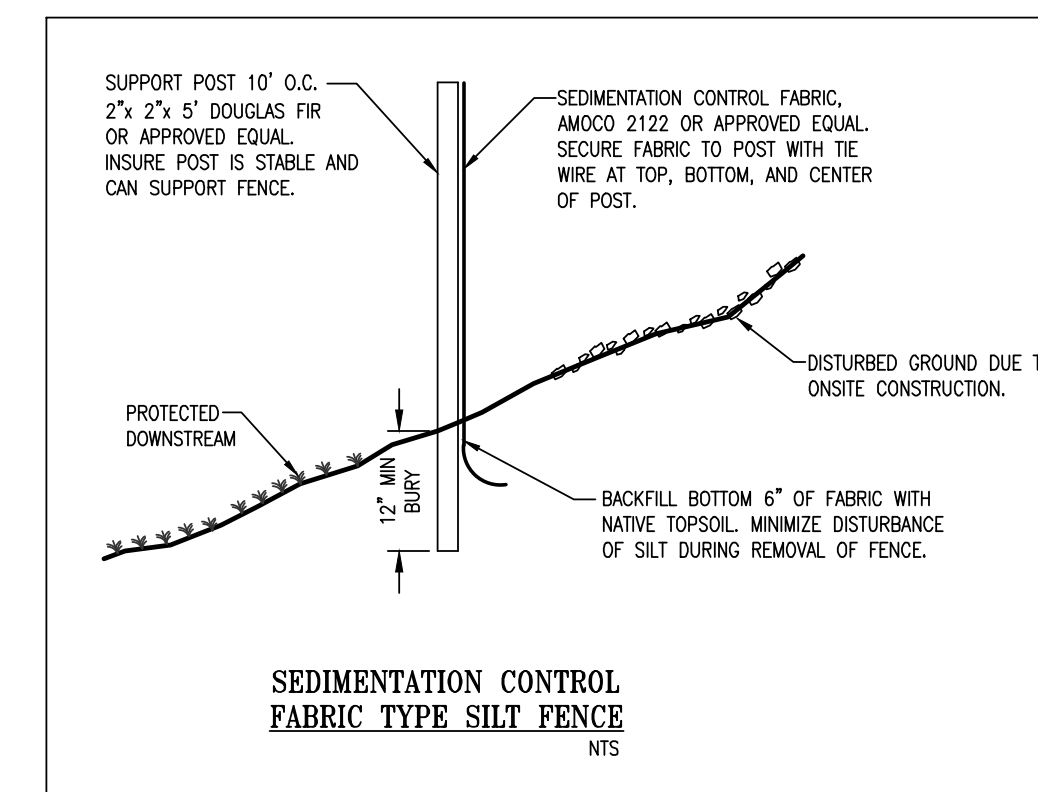
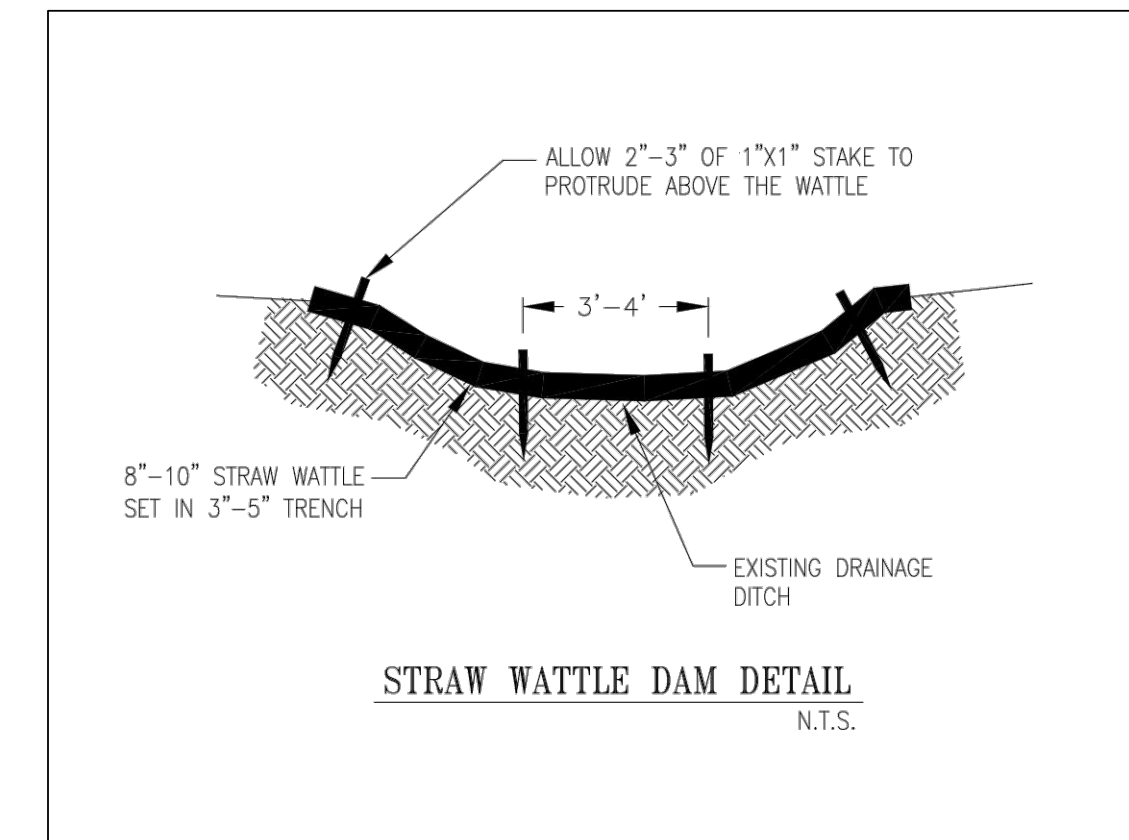
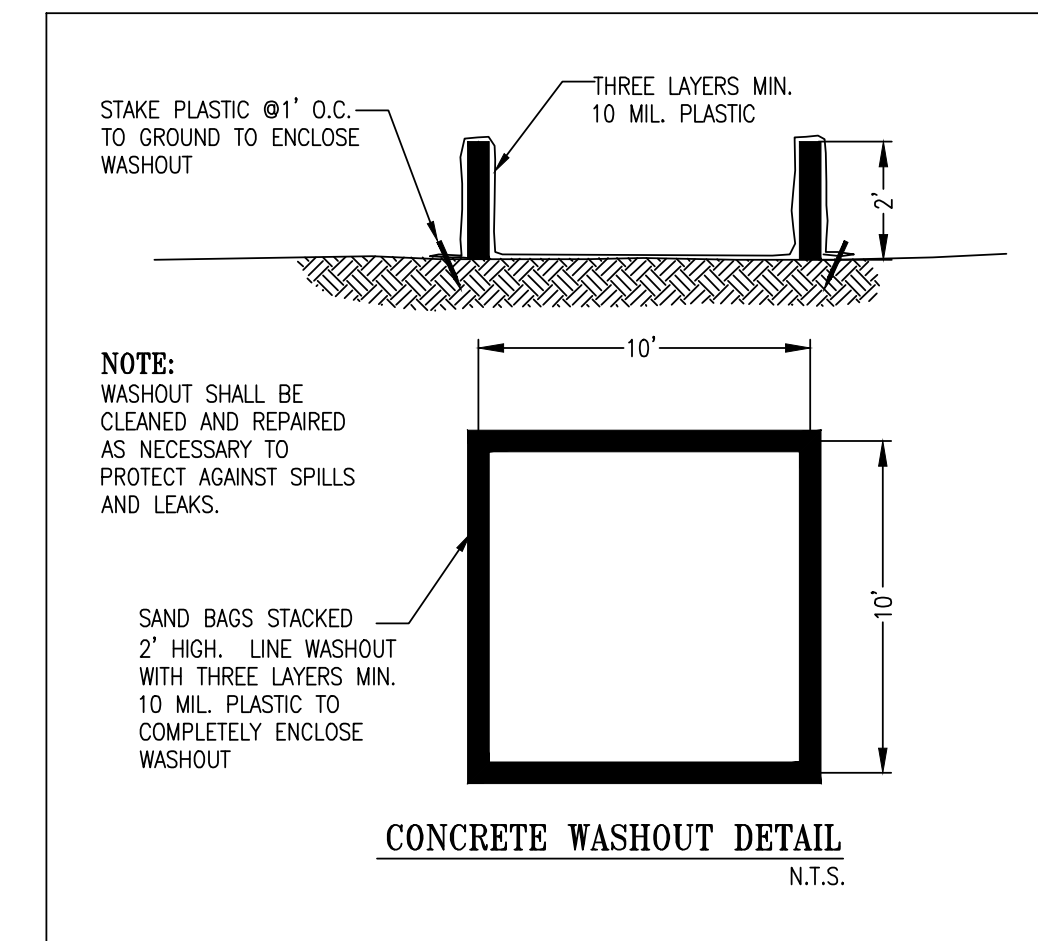
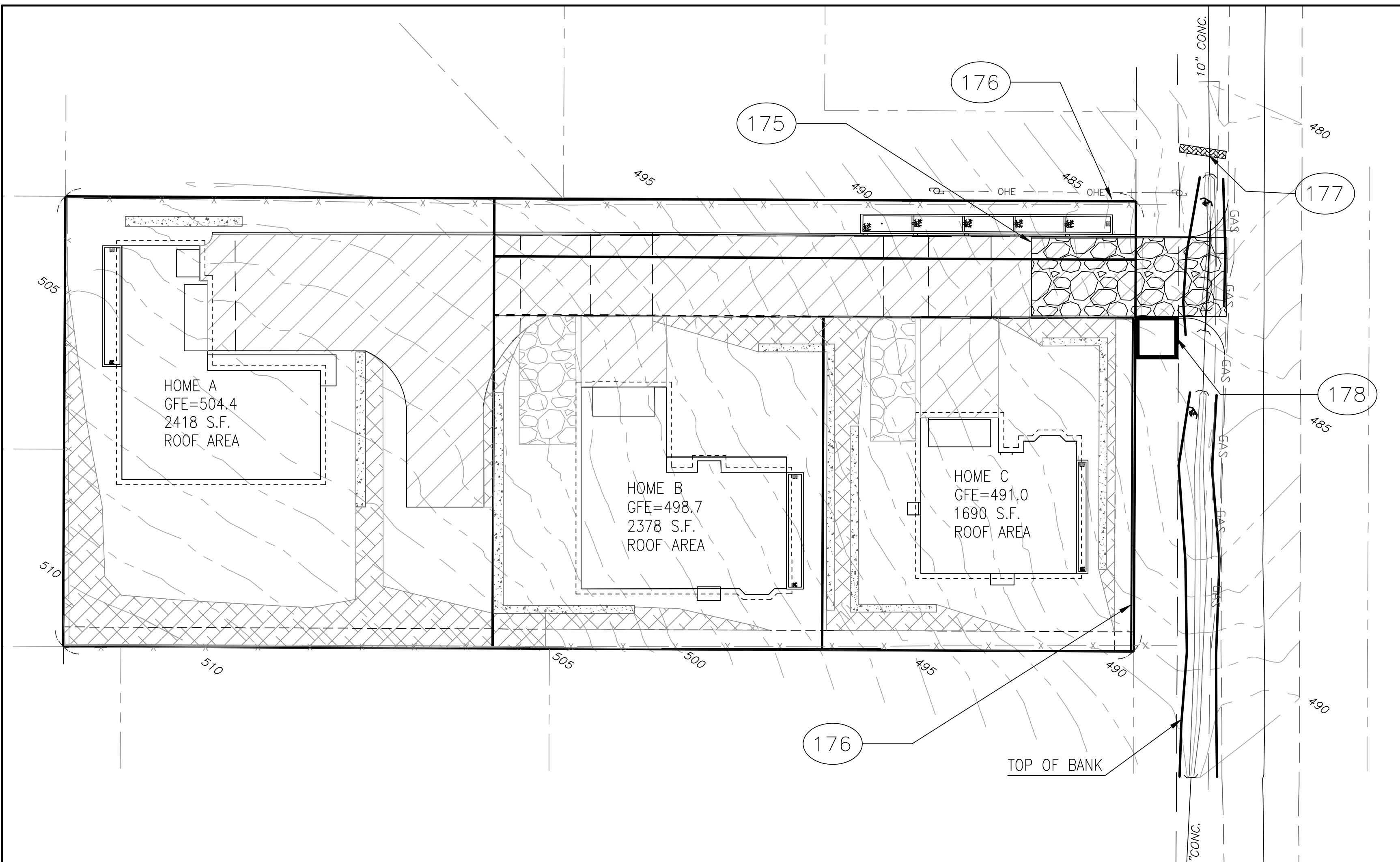
CONSTRUCTION NOTES

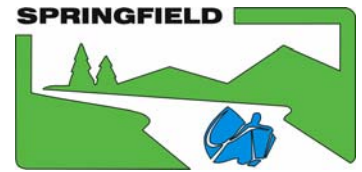
- CONSTRUCT CRUSHED ROCK ACCESS PAD. PROVIDE 6" MINIMUM DEPTH 2"-3" CRUSHED ROCK COMPACTED TO 90% MAXIMUM DENSITY. PAD SHALL BE 20' MIN WIDTH BY 50' LONG.
- CONSTRUCT SEDIMENTATION CONTROL SILT FENCING PER DETAIL. REFER TO SHEET EC-1.0
- CONSTRUCT SEDIMENTATION CONTROL STRAW WATTLE PER DETAIL. REFER TO SHEET EC-1.0.
- CONSTRUCT CONCRETE WASHOUT AREA AS PER DETAIL. REFER TO SHEET EC-1.0



LEGEND

- ASPHALT SURFACE
- CONCRETE RETAINING WALL
- FILL SLOPE
- GRAVEL PARKING
- PROPOSED DRAINAGE PATTERN
- EXISTING MAJOR CONTOUR (505)
- EXISTING MINOR CONTOUR (503)





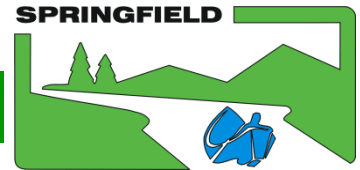
Minimum Requirements

Contents: At a minimum, the LDAP plan (two sets need to be provided) shall address the follow factors. Please use the check boxes below to assure that you have addressed all of the below information on your plans.

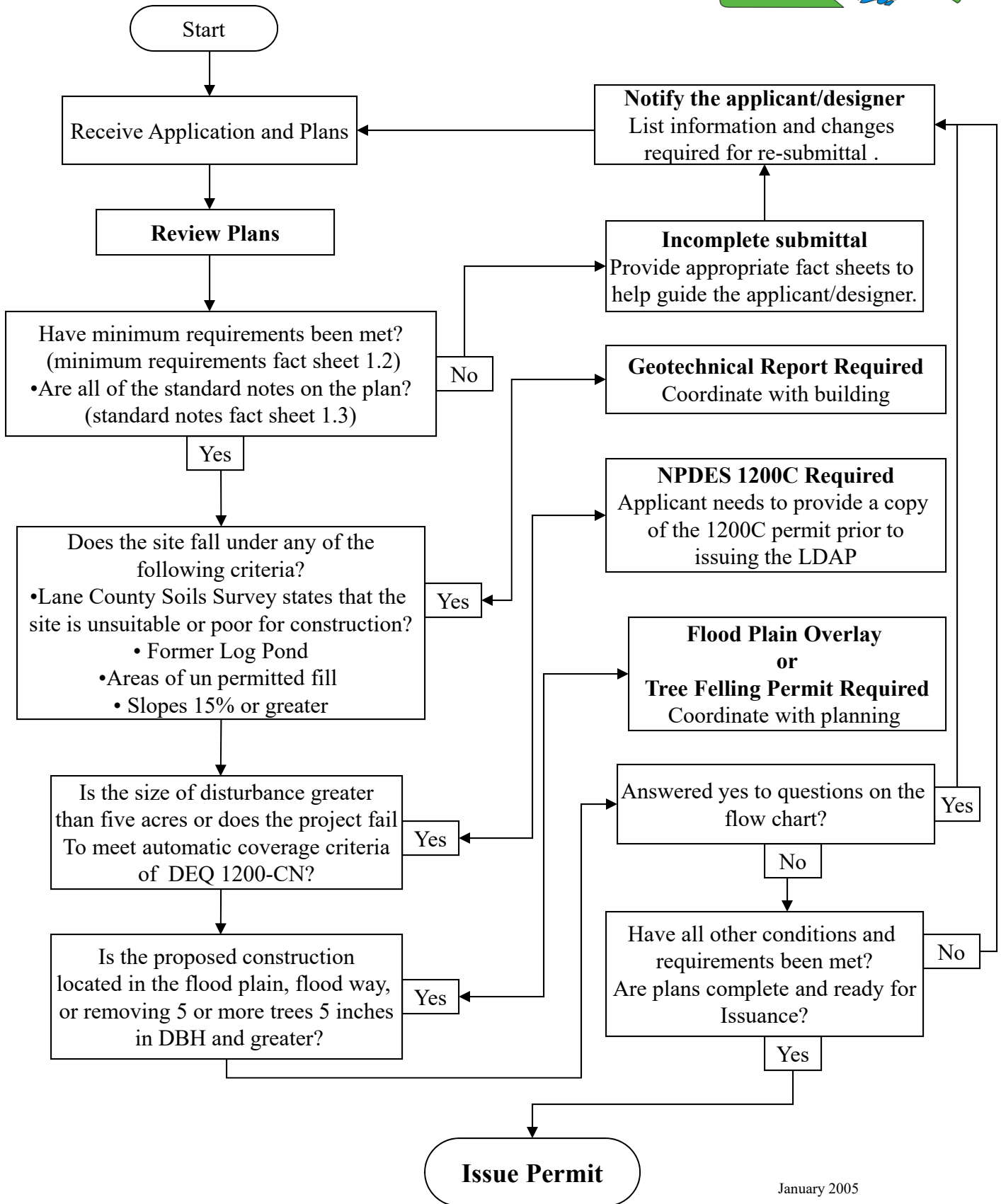
- Site location and vicinity map.
- A site development drawing containing the following:
 - a) Soil types and areas subject to flooding or landslides (include 100 year floodplain boundaries).
 - b) Existing and proposed contour lines.
 - c) Property lines, easements and north arrow.
 - d) Building pad floor elevations and retaining walls.
 - e) Foundation type and foundation drains.
 - f) Identify threatened or endangered species habitat (if applicable).
 - g) Surface drainage patterns, riparian areas, top of bank and wetlands.
 - h) Existing vegetation type & trees over 5 inches in DBH and greater.
- Delineate areas where ground clearing or ground disturbing activities are prohibited such as but not limited to conservation zones, wetlands, public or private drainage easements, open waterways, natural resource sites, buffer areas, roadside ditches, water features and other protected areas.
- Identify measures which will be implemented to physically protect areas where ground disturbance is prohibited.
- Show measures for preventing, and/or controlling erosion, sedimentation and other pollutants into the City's stormwater system and related natural resources.
- Vegetation specifications for temporary and permanent stabilization (include a planting plan).
- Access for all vehicles including:
 - a) Areas where a construction entrance/exit will be constructed.
 - b) Location of vehicle's wheel wash area (if applicable).
- All storm drainage facilities, such as but not limited to catch basins, curb inlets, ditches, and outfalls.
- Disposal **locations** and **methods** of containment for the following:
 - a) Debris and Garbage
 - b) Stockpiles
 - c) Concrete Wash Out
- If a geotechnical report is attached, reference it on the site plan.

Unless the following information is to be provided by the contractor please indicate them on the LDAP. If the information is to be provided by the contractor indicate that in a note on the plans.

- Construction Schedule:
 - a) Haul routes
 - b) Schedule construction



Permit Review



Land & Drainage Alteration Program Enforcement Matrix

Stage	Inspectors Memo or Educational Letter	Issue a Notice of Violation	Stop Work	Issue Citation
Description	Inspection memo identifying potential negative impacts. Send educational letters or have educational out reach. On-site meetings.	Deliver a Notice of Violation. A violation and necessary compliance or corrective measures. Charge re-inspection fees. (when established)	Written notice posted on site to stop work activity that violates the LDAP program / enforcement matrix.	Financial citation imposed due to non-compliance or a violation with the LDAP program.
Purpose	Identify minor corrections or action to take to remain in compliance with the LDAP program requirements and for consistency with approved LDAP plans.	Code-authorized enforcement action for repetitive minor non-compliance, or for clear violations of LDAP program.	Address crisis or potential crisis situations, on-going or forthcoming probable serious impacts, or beginning work without an LDAP or any implementation of the LDAP plan.	Attention grabber for repetitive violations, or for a large violation.
Examples	-Lack of maintenance on erosion prevention measures, covering stockpiles, sweeping the street, maintaining storm inlet protection. -Not following the LDAP correctly.	-Construction activity, actions, or site conditions that may negatively impact storm water may be considered as violations. -Minor problems which have led to prior Inspector Memos exceeding limits. -Failure to comply with an educational letter, on-site meetings or Inspector Memo's. -High potential for, but not immediate to Safety, unapproved Drainage Alteration, or Water Quality. -Failure to implement or maintain an LDAP plan.	-Working without approved permits. -Failure to correct violations. -Ineffective BMP's installed on-site. -Not following the approved LDAP plans. -A Stop Work Order can occur before an on-site meeting, memo, citation, or NOV occurs.	-Violations after receiving one or more Notice of Violation issued to a single entity. -Violations that include a discharge into the public storm water system.
Goal	Intervention. Inform and educate. Prevent violations.	Bring violations into compliance.	Stop construction activity occurring without proper permits or in a violation mode. Protect the safety of adjacent properties, right of way, water quality, and unapproved drainage alteration.	Recover cost of correcting violations. Eliminate and discourage reoccurring violations.
Limits	-Maximum of three memos or special site visits on different issues per permit holder per year.	Failure to comply with a Notice of Violation will trigger a Stop Work Order and/or a possible citation. -Multiple NOV's will trigger penalty discussion.	Determine if a Stop Work Order is necessary if the owner / permit holder is making efforts to correct a violation.	Review the owner / permit holders history of violations prior to issuing a citation.

-Re-inspection fees will be charged for inspecting work that is out of compliance with the LDAP program.

-Corrective LDAP's will only be issued when there is an immediate threat to public safety.

-Currently LDAP & IDDE staff are working on the citation portion of this enforcement chart. The citations may change to civil penalties.

The conditions of this enforcement matrix may be waived at the discretion of the Public Works Director.