OAK LODGE WATER SERVICES DISTRICT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT

Permit No. 101348

ANNUAL REPORT FY 2019-2020 October 30, 2020

This annual compliance report for the MS4 Discharge Permit No. 101348 is submitted in accordance with Schedule B, Condition 5 of the permit. As required by 40 CFR Section 122.22, 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.

DocuSigned by: JASON RICL 491545C9805D417	
Jason Rice, District Engineer 10/29/2020	
Date	

Prepared by Oak Lodge Water Services Technical Services Department





2019-2020 Annual Report

For

National Pollutant Discharge Elimination System (NPDES)

Municipal Separate Storm Sewer System (MS4)

Permit Compliance

Permit #101348

Prepared by:

Oak Lodge Water Services District, Surface Water Management Program

October 2020

2020 Oak Lodge Water Services District March 2012 MS4 Permit ANNUAL REPORT REQUIREMENTS

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1. Background

The Board of Directors of Oak Lodge Sanitary District created a Surface Water Management program with the adoption of Ordinance 1001 in May of 1993. The purpose of the Surface Water Management Program is to:

- prevent pollutants from entering rivers, lakes, and streams;
- maintain and/or improve water quality; and
- restore or enhance properly functioning conditions in the watersheds.

Program development began officially on July 1, 1993, with the collection of Surface Water Management fees based on impervious surface area.

On January 1, 2017, Oak Lodge Sanitary District and Oak Lodge Water District officially consolidated into Oak Lodge Water Services District. Prior to this consolidation, Oak Lodge Sanitary District passed by Resolution (16-12) assigning all assets and obligations to the Oak Lodge Water Services District. Oak Lodge Water Services District understands that it now must meet the obligations it had made for the MS4 Permit.

Permit History

The Department of Environmental Quality issued a National Pollutant Discharge Elimination System Waste Discharge (NPDES) Permit No. 101348 dated December 15, 1995 to the District as a joint permit with Clackamas County. This five-year permit required the District to implement a stormwater management program to reduce the contribution of stormwater pollutants to the maximum extent practicable and to discharge stormwater to public waters through a municipal separate storm sewer system in conformance with the conditions in the permit.

That original NPDES permit expired on November 30, 2000 and the State of Oregon Department of Environmental Quality (DEQ) issued a new permit in March 2004 (NPDES-MS4 Permit 101348). Due to public comment, the DEQ reopened the permit in June 2004. After a public comment process, the DEQ issued the final Municipal Stormwater Permit on July 25, 2005. This permit was appealed by third party groups, and the Oregon Court of Appeals upheld the issued permit in 2010; the Oregon Supreme Court did not allow further review.

The District was issued another MS4 Permit on March 15, 2011. Based upon the new permit, the District prepared a revised Surface Water Management Plan and Surface Water Monitoring Plan. The Clackamas County MS4 permit was appealed after issuance by a co-permittee. The current MS4 permit was issued to the co-permittees in March, 2012, and that permit is the basis for this annual report. That permit expired March 1, 2017 and the District is awaiting contact from DEQ to negotiate the next permit.

2. Report Organization

This report is organized based on the requirements of the March, 2012 NPDES permit, Schedule B.5.a through B.5.k. The numbers listed after the report headings indicate the portion of the permit schedule that the section addresses. The report covers the activities of the district from July 1, 2019 to June 30, 2020. Information about implementation of required BMP's is summarized in Appendix A. Brief summaries of each topic are described in this document.

3. Status of SWMP Program and Associated Elements (B.5.a)

The Oak Lodge Sanitary District (OLSD) implemented the Surface Water Management Plan in 2012 and was based on the two permits because the new/current permit was issued mid-cycle in March 2012. However, for the purpose of the annual report preparation, implementation of the SWMP is being reported based on the requirements in the current permit (permit 101348). This information is summarized in Appendix A of this report.

4. Status of Public Education Effectiveness Programs (B.5.b)

OLWSD uses multiple avenues to educate the public about the importance of surface water protection. The District includes bi-monthly newsletters in our bills and posts the same and additional information on our website.



OLWSD partners with multiple agencies and non-profits to support public outreach and experiential education focused on stormwater. Over time, the District has created, supported, and implemented a variety of additional programs and partnerships to provide outreach to the community about surface water issues. Ongoing public education through programs includes implementation of the *Stormdrain Cleaning Assistance Program* (SCAP), the *Dump Smart – It's Just Not Water* materials, and the *Watershed Health Education Program* (WHEP) in partnership with Rex Putnam High School and Ecology in Classrooms and the Outdoors. New this year, OLWSD started online signup for the SCAP, which streamlines the process.

During the 2019-2020 fiscal year, the District started a new partnership with the *Pacific Northwest Pollution Prevention Resource Center (PPRC)*. Called EcoBiz, this program is a certification recognizing businesses in Oregon that adopt best practices and go above and beyond compliance to protect the environment. By providing funding to PPRC, we are able to offer EcoBiz as a free and voluntary program, designed to prevent and minimize hazardous waste, air and water pollution. This year, the project will pilot services and assess the viability of the EcoBiz program in the District. As a start, the focus of the work will be on automotive businesses along McLoughlin Boulevard, which includes both urban and sub-urban areas of Clackamas County. Through targeted outreach and technical assistance, building new community partnerships and by focusing in high-priority areas, we expect to enroll and serve 5 OLWS District businesses annually.

The North Clackamas Watersheds Council (NCWC) partnership continues to provide public outreach benefits to people living in the District. Over the course of this year our evaluation of their stormwater outreach program showed the strength of the long-term Streamside Stewards Program (SSP), in existence since 2012. The Oak Lodge Water Services District provides funds for the SSP to educate landowners on best practices for watershed stewardship and to restore stream front properties in the OLWSD service area. The goals of this program remain consistent with years past as listed in previous annual reports.

In addition to the efforts listed here, OLWSD continues participating in several cooperative MS4 stormwater outreach efforts including the Regional Coalition for Clean Rivers and Streams and the statewide Clean Rivers Coalition.

Please see the BMP's for Public Education listed in Appendix A for full detail on the District's progress toward public education and outreach efforts.

5. Adaptive Management Process (B.5.c)

Over time, OLWSD will continue to evaluate the overall health of local watersheds using the information collected through the monitoring program. Monitoring data and information provides a valuable 'snapshot' of water quality in the District and provides program management the opportunity to determine where to focus limited financial resources for program implementation. The District continues targeting water quality issues that are trending toward exceeding state water quality standards; adjustments can be made to focus the messaging to the community about different water quality problems being observed. The anticipated outcome would be a reversal of negatively trending water quality factors because of actions taken by the District. Examples of actions might include stepped up inspection and enforcement in areas with documented water quality issues, targeted public outreach to smaller neighborhood or watershed groups that are the source of the problem, and targeted monitoring activities to try to minimize the area where the source of the water quality problems are coming from.

6. Proposed Changes to SWMP (B.5.d)

OLWSD amended the SWMP during the 2012-2013 permit year as a result of the special conditions required of OLWSD and Clackamas County related to public infrastructure maintenance. The SWMP amendment was approved by DEQ. There are currently no proposed changes to the SWMP anticipated.

OLWSD has been revising its SWMP in preparation for the current permit renewal process.

7. Summary of SWM Program Expenditures (B.5.e)

All revenue generated by the Watershed Protection Fee is retained within with the surface water management program. During the 2020 Fiscal Year, one Equivalent Service Unit (ESU) was \$9.51 per month for residential households. For commercial and industrial users their ESU equivalent is calculated by dividing their total impervious surface by the residential ESU, or by 2,500 SF.

For the 2020 Fiscal Year, OLWSD's expenditures for the surface water program totaled \$2,312,482. With \$1,207,090 being devoted to operational expenditures and \$1,105,392 being spent from the Surface Water Management Capital Improvement fund.

All of the Surface Water Capital Improvement fund was focused on rehabilitating the Boardman Wetland Complex, which was being completed in the 2020 Fiscal Year.

8. Summary of SWM Program Monitoring (B.5.f)

Surface water sampling occurred four times annually as is required in the NPDES permit. The sites sampled included instream samples from each site, and two outfalls. In reviewing the water quality data, water quality elements for sediment and bacteria are elevated, with periodic exceedances of the state standard for e Coli.

Other testing elements appear to be within DEQ range, and program monitoring will continue per the procedures outlined in the 2012 Monitoring Plan.

Sample results are provided in Appendix A.

9. Proposed Modifications to Monitoring Plan (B.5.g)

OLWSD continues using its current Monitoring Plan with no changes during this permit year.

OLWSD did not seek Modifications to its Storm Water Monitoring Plan this permit year.

10. SWMP Enforcement (B.5.h)

OLWSD routinely inspects the various elements of the Surface Water system within the District. A summary of the inspections, enforcements, and ongoing activities related to illicit discharges can be found in Appendix A.

11. <u>Development Activities (B.5.i)</u>

Land within the Oak Lodge Water Services District is largely built-out, with very little undeveloped land available for new development and redevelopment activities are more common. Appendix A summarizes the number and

type of development activities that OLWSD reviewed. At this time, there are no proposals for land annexations, and OLWSD does not implement any part of the Urban Growth Boundary.

12. <u>District Boundary Expansion (B.5.j)</u>

When Oak Lodge Sanitary District consolidated with Oak Lodge Water District to form Oak Lodge Water Services District, it's boundary grew by approximately 25%; this newly acquired area was already within Clackamas County Service District #1 (CCSD#1). In order to clarify whose authority would preside in this area, Oak Lodge Water Services District work with CCSD#1 to create a Memorandum of Understanding (MOU) that allowed CCSD#1 to continue its service in this area since this area naturally drained to watersheds CCSD#1 was already managing. This MOU was later adopted via OLWSD Resolution 2017-5.

13. Public Notice of 2019-2020 Annual Report

OLWSD solicited public comment on this annual report in the following manner:

- Public Notice and Solicitation of Comments on the OLWSD website: 3rd week in October 2020;
- North Clackamas Urban Watersheds Council: OLWSD's monthly report mentions availability of report on website for Public Review and Comment;
- The final 2019/2020 Annual Report was posted on OLWSD website after submission to DEQ;
- Notice on the Annual Report Posting was sent to the District's Interested Parties List.
- 14. Appendix A See Attached BMP Table on the following pages
- 15. <u>Appendix B</u> See Attached FY2020 Sampling Summary on the following pages.

Best Management Practice	MS4 Permit Schedule A Requirement	BMP Description	Performance Measure	Annual Report 2019-2020
Illicit Discharge Detection and Elimination Enforcement Response Plan and Pollution Parameter Action Levels	4.a.i – iii	BMP Description: In cases where an illicit discharge has resulted in a discharge that OLWS suspects resulted in a violation of state water quality standards, water quality samples may be collected at the suspected discharge point, as well as upstream and downstream of the discharge point. This is done in an effort to prove the impact on water quality that the illicit discharge has had. The samples will be tested at the laboratory based on field observations of the discharge in an effort to identify any pollutants present in the discharge. Staff will also investigate the source of the discharge by looking in the surface water system upstream of the discharge point; samples may be taken at locations suspected of originating the illicit discharge. In cases of an oily discharge, OLWS will notify DEQ through the OERS (Oregon Emergency Response System), which is in place to address oil spills into waterways and ditches. If the DEQ and/or EPA become involved, OLWS will provide a support role to these agencies. When the source of the illicit discharge is identified, OLWS will determine whether this discharge violated the District's Surface Water Management Code, and if so, fines may be levied against the offending party, including all cleanup costs, investigative and sampling costs, and OLWS staff costs, including legal fees. OLWS will rely on State of Oregon water quality standards to determine a pollutant level that violates water quality as a trigger to initiate full enforcement action.	1. Documentation of Enforcement Plan 2. Response Procedures 3. Pollutant Parameter Action Levels	 Illicit discharges are managed through the Districts documented Illicit Discharge Program. OLWS maintains an SOP (Standard Operation Procedure) for staff to perform enforcement actions with illicit discharges. OLWS has determined pollutant parameter action levels to match Oregon State water quality standards.
Illicit Discharge Detection and Elimination Conduct Annual Dry Weather Field Screening	4.a.iv	BMP Description: The purpose of dry-weather outfall inspections is to detect an illicit discharge at the outfall or confirm that they are not present. If flow is detected during dry weather, District staff track it upstream through the storm sewer system to the source, and then address, or if necessary, control the discharge. Illicit discharges are detected during dry-weather inspections through the use of hand-held water quality measuring equipment and through visual inspections by the inspector. When a visual inspection or a pollutant level measured at an outfall indicates that an illicit discharge may be present, an upstream investigation through the storm sewer system is performed. When the discharge's source is located, District staff work with the property owner and/or business owner to evaluate, and if necessary, control the discharge.	 Number of outfalls inspected during dry-weather. Number and type of illicit discharges that were encountered and controlled. Status of updating procedures to address new permit requirements Measurable Goals: Inspect major or priority outfalls for the presence of illicit discharges at least once per year. Update maps of major outfalls on an annual basis. Update dry weather field screening program to address new permit requirements by November 1, 2012. 	 Due to staff turnover, 0 Dry Weather Outfalls were inspected during the dry season quarter of the 2019/2020 Permit year. Illicit discharges were not noted from the outfalls in either the 2018/2019 cycle or the 2020/2021 cycle inspections. No new requirements where established for the 2019/2020 OLWS Storm Water Monitoring Plan.

Management Practice	Schedule A Requirement	BMP Description	Performance Measure	Annual Report 2019-2020
Illicit Discharge Detection and Elimination Implement the Spill Response Program	4.a.v	BMP Description: The District's Spill Response Program prevents, contains, and responds to spills of dangerous, hazardous and other materials. The District's Spill Response Program ensures that the actual or possible release of dangerous/hazardous materials to the MS4 is properly addressed. Except for minor incidents, The District's Spill Response Program personnel always coordinate closely with other agencies and departments, including Clackamas County Fire District No. 1 (and for certain incidents involving hazardous materials, the Gresham HazMat Team), DEQ, Oregon State Police, Clackamas County's Road Department (DTD), and Oregon's Department of Transportation.	 (1) Number of reported spills to the MS4 system. (2) Number and type of response to the reported spills. Measurable Goals: Implement the spill response program and associated protocols. 	Due to staff turnover and a lack of documentation, it is unknown how many storm water complaints of potential spills occurred during the 2019/2020 reporting period. There were no complaints reported to DEQ for action.
Respond to reports involving illicit discharges	4.a.V – 4.a.xii	 BMP Description: Reports are often received from Oregon's DEQ, Oregon's ODOT, Water Districts, Fire Districts, cities, citizens, district employees and others which allege that an illicit discharge has occurred or is occurring. When reports are received which allege that an illicit discharge has occurred or is occurring, OLWS will attempt to confirm the allegation in a timely manner. If it can be confirmed that an illicit discharge has occurred or is occurring, District staff will cooperate with the property owner and/or business owner to evaluate, and if necessary, control the discharge. Control options that may be applied or recommended by the District include, but are not limited to: The removal of certain pollutants from the wastewater prior to discharge to the storm sewer system (i.e. cease usage of soap when washing). Issuance of the proper discharge permit from DEQ. A discharge that has been authorized and controlled by a DEQ water quality permit is not an illicit discharge. Application of the wastewater to dry land with no discharge to surface waters or storm sewers. This option is inappropriate for certain types of wastewaters, discharge rates, and soil types and may require the issuance of a WPCF permit from DEQ. Wastewater reuse without any discharge. Hauling the wastewater off-site for proper disposal. With the necessary permits, discharge the wastewater to OLWS's sanitary sewer system. 	 (1) Number of alleged illicit discharges and non-stormwater discharges which were reported each year (2) Number of illicit discharges that were controlled. Measurable Goals: Respond to reports involving alleged illicit discharges within two weeks. 	OLWS received at least 2 possible Illicit discharge complaints during the reporting year 2019/2020. Neither complaint was found to be a reportable Illicit discharge: • 7/31/19: JW Fowler testing new 14" sewer installation in the Boardman wetlands, caused an SSO at 5200 SE Jennings with sewage entering the wetlands. • 9/26/19: Hertz Car Rental at 17185 McLoughlin – staff was washing cars with soap and runoff was entering a CB on Roethe. Staff provided education and oversight that cold water and no soap could be used on site, or they could take the cars thru the local car wash.
Screen Existing and New Industrial Facilities	4.b.i – 4.b.iii	BMP Description: Once during the permit term, OLWS will review new industrial development applications to determine whether any existing or new facilities would be subject to an industrial stormwater NPDES permit. This determination will occur based on a review of the facilities proposed activities and the applicable SIC codes related to the 1200-series NPDES permit. If a facility is identified that would be subject to an industrial stormwater NPDES permit, the facility and DEQ will be notified within 30 days.	 (1) Track the number of existing or new industrial facilities subject to a stormwater industrial NPDES permit during the permit term. Measurable Goals: Review new industrial development applications once during the permit term to identify additional facilities needing to obtain 1200-Z permits. 	The District currently has 2 1200Z permit holders in its boundaries. No new Industrial user accounts were opened in 2019/2020 The District continually reviews all new industrial facilities through its development review process.

MS4 Permit

Best

BMP Description

Performance Measure

Annual Report 2019-2020

Practice	Requirement			
Address Other Industrial Facilities	4.b.i – iii	BMP Description: The facilities that are addressed by the District for this BMP are those that are not required to obtain a 1200Z permit, and/or are anticipated to contribute a substantial load of pollutants to the MS4. Facilities will primarily be inspected on a complaint-driven basis, but it is possible that some inspections will be conducted by the District during source tracking activities if the District's storm event monitoring work or routine monitoring work shows that excessive levels of one or more pollutants are present. All facilities that are the subject of a complaint will be inspected in a timely manner by District staff. The implementation of control measures for stormwater discharges from these facilities will be deemed necessary by the District if the presence of excess levels of stormwater pollution can be confirmed by the District. For instances where the presence of excess levels of pollution in stormwater has been confirmed by the District, and in the event that the discharger's initial attempts to improve stormwater quality do not produce the required improvement, then District personnel will continue to provide guidance and technical assistance until the facility's stormwater quality improves. The presence of excess levels of pollution in stormwater can generally be confirmed by two general methods: visual and analytical. Analytical methodologies include hand-held meters, and those performed by an environmental laboratory. The District will use visual or analytical methods at the District's discretion. Industrial users permitted under the pretreatment program 40CFR403 have an annual facility inspection which includes a review of storm water facilities.	 The number of letters, enforcement actions, or other contacts made. Number of pretreatment inspections performed Measurable Goals: Notify and work with industries to improve stormwater management if an inspection is conducted that indicates improvement is needed. 	There are 4 commercial or industrial sites that were anticipated to contribute a substantial load of pollutants to the MS4 during 2019/2020. 1. 16600 SE Kens Ct. (Blue Sky Filters) 2. 3901 SE Naef Rd. (NW Flex Space) 3. 3810 SE Naef Rd. (Stanley Tools) 4. 3701 SE Naef Rd (Buffalo Welding) There is no storm event monitoring work or routine monitoring work showing excessive levels of pollutants present. There are no industrial users that are permitted under OLWS's pretreatment program. There was no monitoring performed on stormwater discharged by OLWS's commercial or industrial accounts.
Construction Site Runoff	4.c.i – 4.c.vi	BMP Description:	(1) Implement Code	The District makes updates to the Surface Water Management Code (Rules and Regulations and Design and Construction
Control		OLWS Surface Water Management Code	Measurable Goals:	Standards) annually as needed.
Erosion Control Ordinances		The District updated the Surface Water Management Code (Rules and Regulations and Design and Construction Standards) in 2018 and 2020 respectively to match updated requirements through the MS4 permit and reconcile the SWWMP. The combined documents address regulatory and review requirements related to erosion control, tree removal, undisturbed buffers, and flow control and treatment requirements. These regulations require submittal of an erosion prevention and sediment control plan containing methods and/or interim facilities to be constructed or used concurrently with land development. Plan submittals are required to provide details of erosion control measures, schedules for construction, and a maintenance schedule for erosion control activities. OLWS administers "small lot" erosion control permits less than one acre and 1200CN permits for sites between 1-5 acres. OLWS has an agreement with Oregon DEQ for administration of the 1200-C sites greater than five acres in size.	Update SWMC and implement new code	The District adopted a revised Design and Construction standards document April 17, 2020 adopted by Resolution Number 2020-02 March 17,2020. This document contains much of the District's post-construction regulations.
Public Education and Outreach	4.d.iii	BMP Description: OLWS administers a public education program which provides information that attempts to motivate workers and residents to reduce stormwater pollution that is caused by the application of pesticides, herbicides, and fertilizers in the District. Educational information is shared with the public through the use of:	(1) Track programs messages delivered, type of communication piece, and where appropriate, the number of people affected	The following outreach efforts occurred last year: Six newsletters including surface water education topics in each; School Outreach: Administered Watershed Health Education Program (WHEP) with our high school partner, Rex Putnam
Topic: Reduce		Articles in newsletters	Measurable Goals: • Continue to maintain relevant public education materials	H.S. OLWS conducted: four group plant tours for 3 rd - college aged students; macroinvertebrates workshops for elementary

MS4 Permit

Schedule A

Best

Management

Best MS4 Pe Management Schedu Practice Require	ule A BMP Description	Performance Measure	Annual Report 2019-2020
Discharges of Pesticides, Herbicides and Fertilizers	District's website. Through local public involvement campaigns. A recent example of a recent relevant public involvement campaign is the Oregon Environmental Literacy Plan (OELP), which is enacted as part of House Bill 2544 and lays out age appropriate environmental literacy education. Brochures Common topics that are addressed by this program include: Less harmful alternatives to the use of pesticides, herbicides, and fertilizers are provided. For example, use of ladybugs to eat insect pests is encouraged as an alternative to pesticide application. Information about the potential hazards to water quality, public health, and aquatic life associated with the misuse of pesticides, herbicides, and fertilizers in the District. Users are reminded that pesticide and herbicide products need to be used in a manner consistent with the product's label.	on the district's website. • Prepare a minimum of one relevant article per year for inclusion with customer billing statements.	and high school students; native plantings and watershed education for District 5-12 th grade students; Rex Putnam WHEP annual report and Board presentation was cancelled because of the Covid-19 pandemic; planting at Rinearson Creek site with WHEP students and elementary school OELP students occurred 5 out of the 6 scheduled dates, with the last one cancelled because of the Covid-19 pandemic; OLWS partnered with Ecology in Classrooms and Outdoors to conduct water quality lessons; and supported restoration with View Acres Elementary School; 90% of the in-person scheduled lessons occurred with the remaining 10% converted to virtual distance-learning lessons provided in partnership to the teachers through the ECO program. Events: OLWS participated in planning four events which contained water quality education, including the Oak Grove Trolley Trail Festival, the Jennings Lodge Community Planning Organization's Picnic, the CCWET Celebrating Water Forum, the Children's Clean Water Festival and the Children's Clean Water Festival; all events were to have occurred after March 1st, and all were cancelled due to the Covid-19 pandemic. Posted brochures include: "Dump Smart:" Proper Disposal for Paint, Power Washing, and Carpet Cleaning; Think Smart About Pesticides by Clackamas River Basin Council, and a pictorial fact sheet on spraying of pesticides and herbicides by the Clackamas River Water Providers; Participated in regional outreach groups, and public involvement campaigns, including: the Clean Rivers Coalition, Clackamas County Water Education Team (CCWET), and the Regional Coalition for Clean Rivers and Streams; Presented and contributed to creating virtual content relevant to water quality education information for OLWS customers, property owners, tenants, educators and students including stormwater smart yard and garden maintenance.

Best Management Practice	MS4 Permit Schedule A Requirement	BMP Description	Performance Measure	Annual Report 2019-2020
Education and Outreach Privately Owned SWM Facility Education	4.d.iv	BMP Description: Privately owned SWM facilities require periodic inspection and maintenance to keep them working correctly. This effort focuses on outreach and education to those private landowners who own these types of facilities	(1) Number and Type of Education and Outreach efforts specific to privately owned facility inspection and maintenance.	Letters sent to 10% of 115 owners engaging them in awareness, cleaning, maintenance, and functionality of their catchment systems. Participation in the Stormdrain Cleaning Assistance Program (SCAP) with mailers sent to 400+ property owners with private storm drains on their property. Creation of electronic signup for SCAP through our website. Continued to build emails to reach all previous participants as well as new accounts with privately owned facilities in order to increase participation.
Education and Outreach Erosion Control Contractor Training Opportunities	4.d.v	BMP Description: Provide notice to construction site operators concerning where education and training to meet erosion prevention and sediment control requirements can be obtained.	(1) Describe efforts to provide this notice	Oak Lodge has three CESCL certified erosion control staff members and provides construction site operators notice and training opportunities on an ad hoc basis.
Education and Outreach Effectiveness Evaluation	4.d.vi	BMP Description: Over the permit term, OLWS will provide information related to an effectiveness evaluation. This may be conducted in coordination with other local Phase 1 jurisdictions. The effectiveness evaluation information will focus on assessing changes in targeted behaviors and will allow for additional information that can be used in adaptive management of the OLWS education and outreach strategy.	 (1) Report on activities annually. Measurable Goals: Provide/compile information regarding a public education effectiveness evaluation over the permit term. 	During the 2013-2014 permit year, OLWS participated in a regional study about the effectiveness of various stormwater-related public outreach efforts within Oregon. The report was commissioned through Oregon Association of Clean Water Agencies. Refer to previously submitted Appendix B for a copy of the study. OLWS has already begun conversations with the Clackamas County Phase I permittees to discuss a coordinated effectiveness evaluation once the new permit has been issued.
Education and Outreach	4.d.vii	BMP Description: A variety of training is provided to staff associated with surface water management. Training and advisory committee opportunities are made available through local	Track the number of employees receiving training in stormwater management annually.	Specific Staff Trainings included: OLWS Outreach / Education Coordinator scheduled to

Measurable Goals:

• Attend relevant stormwater management related

training based on need and availability.

agencies and groups involved with a broad range of water quality issues including stormwater

(e.g., Oregon Association of Clean Water Agencies conferences). Such training is provided

based on need and availability.

Employee

Training

participate in Oregon ACWA's Annual Stormwater

Coordinator were scheduled to attend the ACWA Stormwater Conference, which was postponed due to

OLWS General Manager and Outreach / Education

the Covid-19 pandemic. (3 days)

Summit, which was rescheduled to be offered virtually

and later in 2020 due to the Covid-19 pandemic. (1 day)

Best	MS4 Permit			
Management	Schedule A	BMP Description	Performance Measure	Annual Report 2019-2020
Practice	Requirement		·	·

Public Education and Outreach Topic: Facilitate Public Reporting of Illicit Discharges	4.d.viii	BMP Description: The District implements a program to promote, publicize, and facilitate public reporting of the presence of illicit discharges and other types of improper disposal of materials into the MS4. After District staff have received a report which relates to one of these discharges, they investigate and, if appropriate, apply control measures. See BMP #3.	 (1) Number illicit discharges reported. (2) Number of illicit discharges requiring action. (3) Number of educational events educating public about illicit discharges and procedures to report. (4) Number of publications educating public about illicit discharges and procedures to report. Measurable Goals: Create a page for public complaints on the District's website and track number of complaints for reporting. 	Potential illicit discharges reported: At least 2 Actions taken: 2 Educational Events: 0 – events were cancelled due to the Covid-19 pandemic. Educational Publications: 1) Dump Smart Campaign – Painting, Carpet Cleaning and Pressure Washing 2) Where to Properly Dispose of unwanted or expired medications 3) EPA – Keep Salmon of Drugs 4) CRWP – Pesticides and Herbicides Out of the River (Pictorial) 5) Regional Coalition for Clean Rivers and Streams River Starts Here Campaign Public submits complaints through the information email on the OLWS website or calls staff directly. Complaints are coded in Lucity, the district's Computerized Maintenance Management System.
Public Involvement and Participation	4.e	BMP Description: Schedule A.4.e of the District's MS4 NPDES permit requires OLWS to provide opportunity for public participation in the development, implementation, and modification of the Storm Water Management Plan (SWMP). Prior to submittal of various milestone reports, OLWS will provide the public with an opportunity to comment for a period of 2 weeks prior to submittal dates. Comments on the documents will be collected and considered. Additionally, OLWS has many opportunities for members of the community to participate in various sub committees that provide oversight and guidance to OLWS management related to MS4 implementation.	(1) Provide for public participation with the SWMP and pollutant load reduction benchmarks prior to the permit renewal application deadline.	SWM Annual Report Public Notice: completed, announced at North Clackamas Watersheds Council and to OLWS Board Members; SWM Annual Report and Permit on website: completed; the website contains a variety MS4 related material, providing ongoing opportunities for public to comment. SWM Master Planning Advisory Committee: Oak Lodge Water Services District is seeking to complete two studies analyzing the benefits and costs of adding services in the Watershed Protection Program. To achieve this, the District has assembled an advisory committee comprised of residential customers, commercial customers and Board Members. Ultimately, this committee will make recommendations to the Board regarding adding these services or not.

Best	MS4 Permit			
Management	Schedule A	BMP Description	Performance Measure	Annual Report 2019-2020
Practice F	Requirement			·

Construction Site Runoff Control	4.f.i - 4.f.iv	BMP Description: OLWS Development Review The District reviews all development plans for new construction or redevelopment projects in the District's service area through the building permit process. All reviews are conducted in accordance with the OLWS Surface Water Management Code (SWMC). These regulations require submittal of a surface water management plan that addresses post-construction pollutant and runoff control measures. The OLWS SWMC was updated during this reporting year, and new, more stringent requirements for surface water management have been adopted.	 (2) Annual number of permitted, active construction projects (i.e., those projects disturbing 800 s.f. or more). (3) Annual number of site plan reviews and approved plans. Measurable Goals: 6) Review all applicable erosion and sediment control plans submitted as part of the building permit. 	Number of development permits issued: 22 Acreage of development activity: 17.31 Acres Number of erosion control permits issued: 112 Number of erosion control inspections completed: 116 Number of enforcements (violations that needed enforcement action): 3 Identify any new industrial businesses in OLWS: 0 Variance Requests: 0 Appeals: 1 Estimate of total new and replaced impervious surface area related to development projects: 6.59 acres
Pollution Prevention for Municipal Operations Street Sweeping	4.g	BMP Description: Major arterial curbed streets within the DTD service area (which includes OLWS) are swept on a regular basis by DTD. The frequency varies depending on a variety of factors (for example, traffic volumes). For information on their street sweeping activities, refer to the DTD MS4 NPDES SWMP.	 (1) Number of miles that were swept within OLWS (2) Mass or volume of material removed during sweeping Measurable Goals: 7) For DTD roads, see tracking measures in the DTD MS4 NPDES SWMP. 	Information Request to CCDTD pending Clackamas DTD Street Sweeping within OLWS Boundary: (1) 222 Curb/ Shoulder Miles (2) 63.31 Cubic Yards debris removed (3) The district has entered into an agreement with the City of Milwaukie to have its WRF impervious surface's swept once a month.
Operations & Maintenance for Public Streets	4.g	BMP Description: Operations and maintenance of public streets within the DTD service area (which includes OLWS) is the responsibility of DTD. For information on their activities, refer to the DTD MS4 NPDES SWMP.	 Measurable Goals: DTD Roads: See DTD's MS4 NPDES SWMP. Remove illegal solid waste dumps as they are discovered. Collect sand applied for ice/snow events within 10 days of the end of the event. 	See Clackamas County/DTD's MS4 Annual Report.

Best Management Practice	MS4 Permit Schedule A Requirement	BMP Description	Performance Measure	Annual Report 2019-2020
Control Infiltration and Cross Connections to the District's Stormwater System	4.g	BMP Description: The District prevents exfiltration of flows from municipal sanitary through the presence of a rigorous maintenance program involving routine cleaning and inspection of lines to ensure that there are very few leaks. Lines are inspected with a television camera on a periodic basis. Tree roots, which could cause leakage, are removed whenever identified. The District prohibits cross-connections in new/redevelopments through the development and building permit review and issuance process. This system, which features plan review in the office and field inspections by certified plumbing inspectors, ensures that fixtures that need to be plumbed into OLWS's sanitary sewer system or a private septic system are actually plumbed into those systems, preventing hundreds of illicit discharges per year. The District is able to identify and control the exfiltration of flows from municipal sanitary sewers when it occurs by: • Performing dry-weather inspections at all major or priority outfalls on an annual basis to detect non-stormwater flows, and • Receiving and promptly responding to reports from citizens of unusual colors, odors and solids.	 (1) Number of cross-connections/ sanitary discharges identified. Measurable Goals: Eliminate any identified sanitary discharges to the storm system. 	No Cross-connections were found during the 2019/2020 permit year.
Flood Management Projects and Water Quality	4.g	BMP Description: There are two Components to this BMP. The first is to ensure that water quality is assessed and addressed when developing capital improvement projects (CIPs) for flooding. The second is to examine the existing system to determine whether water quality retrofits would be beneficial and feasible. CIPs: The District develops 5- and 10-year Capital Improvement Plans to identify major projects necessary to address water quality concerns. One of the main goals and outcomes of the CIP is to prioritize what stormwater management actions and activities should be conducted in specific sub-basin areas, such as where to assist the operations and maintenance program in targeting specific activities in various locales. Another main goal of the CIP is to build projects to protect, restore, and enhance the health and function of a watershed.	 (1) Number of retrofits constructed that address water quality treatment. (2) Number of flood management projects implemented or constructed and the percentage of those projects that include water quality Components. Measurable Goals: Ensure all planned stormwater CIPs include consideration of water quality. 	Oak Lodge Water Services continues to fund North Clackamas Watersheds Council (NCWC) Streamside Stewards Program which enhances water quality and streamside health. In addition, the District funds the Backyard Habitat Certification Program in partnership with the Columbia Land Trust and the Portland Audubon Society. This program educates and informs the public on yard maintenance options that limit the use of herbicides and pesticides on private property that can get into our streams and reduce water quality.
Maintenance of	4.g	BMP Description: The District maintains conveyance and treatment components of the storm	(1) Miles of ditches and storm lines maintained	(1) Ditch Cleaning by Clackamas County DTD: 0 ft/0 miles

water system that are located outside the right-of-way of publicly owned roads in maintenance

include, but are not limited to, culverts, storm sewer lines (8" or greater in diameter) and inlets.

The stormwater treatment components of the system include, but are not limited to, vegetated

aboveground stormwater detention facilities, sedimentation manholes, and various types of underground proprietary pollution control systems. Maintenance records are kept by both DTD

The District and DTD are working on the development of an intergovernmental agreement to

agreement subdivisions or that are owned by the District. The conveyance components

Conveyance

System

Components

and Structural

Controls

and the District.

clarify and coordinate maintenance activities.

(2) Number and type of components inspected and/or

(3) Mass or volume of material removed during cleaning

(2) Culverts Cleaned by Clackamas County DTD: 5 culverts

cubic yards of material.

(3) Mass of Debris Removed by Clackamas County DTD: 3.68

Management Practice	Schedule A Requirement	BMP Description	Performance Measure	Annual Report 2019-2020
Catchbasin Cleaning and Maintenance	4.g	BMP Description: OLWS cleans all District owned or District operated/maintained catch basins once every five years. Catch basin cleaning activities primarily occur during the dry weather season, but during the fall, certain catch basins may be cleaned more frequently if needed. Utility crews utilize a database to document inspection and maintenance activities for the annual reports. Repair or replacement of public catch basins is scheduled following inspection.	 (1) Track the number of District owned or District operated/maintained catch basins cleaned per year. (2) Track the mass or volume of debris removed during cleaning activities. Measurable Goals: Clean OLWS District operated/maintained public catch basins on a 5-year rotational basis. Schedule repair or replacement of catch basins based on inspection results. 	During this reporting period, OLWS and Clackamas Co. continued a coordinated approach to storm system inspection and maintenance (see updated SWMP Zone Map). (1) Catch basin Inspections: 480 (2) Catch basins and Structures Cleaned: OLWS: 184 (3) Structures Cleaned by CCDTD: 27 (4) Mass of Debris Removed by OLWS: 30 Cubic Yards (5) Mass of Debris Removed by CCDTD: 5.63 Cubic Yards
Private Surface Water Facility Maintenance Program	4.g	BMP Description: This BMP includes maintenance agreements for stormwater quality and detention structures in residential areas. There are very few of these facilities in OLWS. This infrastructure varies from subdivision to subdivision but may include any of the following: catch basins, below-ground stormwater detention tanks, above-ground storm water detention and/or water quality ponds, below-ground vortex separators, and swales.	(1) Number of structures inspected and cleaned.	Due to staff turnover and the Covid-19 pandemic, zero asset inspections or cleanings were completed in the 2019/2020 permit year. As mentioned above, a letter was sent to 10% of owners of single-family private facilities with OLWS SWM Facility Agreements that explains the requirement to clean and maintain facilities.
Hydromodificat ion Assessment	5.a – 5.d	BMP Description: OLWS anticipates partnering with adjacent co-permittees (CCSD#1, Clackamas County DTD) to develop a simplified tool for development engineers to easily size LID BMPs to address the duration of elevated flow levels in addition to addressing flow volumes and peaks. Use of the tool in designing LID BMPS is expected to ultimately address the long-term impacts of increased runoff from development. To address flow durations, a long-term continuous simulation of hydrology is required. As a result, designing and sizing BMPs becomes more complicated than traditional design practices focused on a single design event. In order to make the BMP design process easier for the development community, neighboring states have developed a sizing tool. Currently, there are no BMP design/sizing tools to address the impacts of Hydromodification that are applicable to local conditions such as rainfall patterns and critical channel forming flows. This tool will provide a simple, consistent and defensible methodology for designing/sizing LID throughout Clackamas County and the region to address Hydromodification impacts.	Measurable Goals: • The primary goal is to develop, by June 30, 2013, a	In the OLWS SWMC code documents, stormwater management facility sizing guidelines accept two co-permittee tools; the WES sizing tool and the City of Portland PAC tool. The District's Design and Constructions standards require surface water detention and flow control. Most developments are required to detain to the 2-year, 24-hour post-developed runoff rate to a ½ of the 2-year, 24-hour pre- developed discharge rate. In areas of hydromodification concern, the standard is reduced to ½ of the 2-year, 24-hour predeveloped discharge rate. Additionally, in 2019, Oak Lodge implemented a permit review software system (Accela) which tracks impervious surfaces more accurately and precisely than previous systems for future

MS4 Permit

Best

hydromodification assessment and treatment tracking.

Appendix B: OLWS Water Quality Sampling Data Results - Storm Sampling and Quarterly Stream Sampling July 1, 2019 - June 30, 2020

SW 8 - SE Naef Rd / SE Blanton St - South Boardman Creek, 60' north of intersection

MS4 Sample Type: WET WEATHER, 3 events per year

DATE	TSS (mg/L)	BOD (mg/L)	Fecal coliform (MPN)	рН	Temp (celsius)	E. Coli (col/100)	CL2 (mg/L)	TDS (MGL)	COD (mg/L)	O&G (mg/L)	Total Phosphate (mg/L)		FLOATING SOLIDS	O&G SHEEN	Luminescent DO (mg/L)	Conductivity (µS/cm)	Nitrate (mg/L)	Hardness (mg/L)	Calcium (µg/L)	Magnesium (μg/L)	Total Copper (μg/L)	Total Lead (µg/L)	Total Zinc (µg/L)	Copper	Dissolved Lead (µg/L)	Dissolved Zinc (µg/L)	Ortho- Phosphorous (mg/L)	Ammonia Nitrogen (mg/L)
11/26/2019	94	4.8	N/A	7.73	10.1	579	N/A	92	N/A	ND	0.176	N/A	NONE	NO	10.94	109.8	0.467	41.1	10.6	3.56	0.00912	0.00389	0.652	0.00279	0.000245	0.463	0.0976	0.039
12/12/2019	58	3.98	N/A	7.26	9.5	1730	N/A	54	N/A	ND	0.206	N/A	YES	NO	11.46	31.8	0.259	17.3	4.75	1.32	0.00801	0.00396	0.0909	0.00272	ND	0.0424	0.0798	0.021
1/23/2020	44	ND	N/A	8.07	10.9	649	N/A	65	N/A	ND	0.23	N/A	YES	NO	11.04	95.5	0.876	32	8.48	2.63	0.00757	0.00487	0.0882	0.00288	ND	0.0368	0.0368	0.038

SW 15 – 15000 SE Fairoaks Ave – River Forest Creek – River Forest Lake influent MS4 SAMPLE TYPE: Instream Sample, 4 times per year Ortho-Fecal Total Dissolved Ammonia FLOATING O&G TSS BOD E. Coli CL2 TDS COD O&G TKN Luminescent Conductivity Nitrate Hardnes Calcium Total Copper Total Lead Total Zinc Dissolved coliform рΗ Phosphate Copper Nitrogen hosphorous (mg/L) (mg/L) (celsius) (col/100) (mg/L) (MGL) (mg/L) (mg/L) (mg/L) SOLIDS SHEEN DO (mg/L) (µS/cm) (mg/L) (mg/L) (µg/L) (µg/L) (µg/L) (µg/L) (µg/L) Lead (µg/L) Zinc (µg/L) (MPN) (mg/L) (µg/L) (mg/L) (mg/L) DATE 9/19/2019 0.00216 ND 0.022 9.23 10.28 9.41 11.3 2550 N/A 9.7 365 N/A 14.3 >2420 N/A 65 N/A 118 N/A 53 N/A 11/19/2019 ND ND 0.00468 0.000968 0.067 0.0566 2.5 N/A 6.74 0.13 N/A NO ND 76.3 0.532 30.2 7.85 2.58 0.00382 ND 0.0857 ND ND ND 70.09 25.4 0.0223 0.0444 2.17 N/A 2.71 N/A 0.00252 ND 0.00373 ND 178.5 17.6 3/23/2020 6.99 ND 0.892 0.00386 0.000978 0.0353 0.0267 ND 53.3 0.00546 0.00136 0.0541 6.66

SW 12 2121 SE Walta Vista Ct. Lawer Boardman Crook 49" CMD outfall

5W 12 -	· 3 I 3 I SE Walla	a visia Ci	- Lower Bo	oaruman Ci	eek - 48 C	JIVIP OULIAII																							
MS4 SAMPLE TYPE: Instream Sample, 4 times per year																													
	DATE (TSS (mg/L)	BOD (mg/L)	Fecal coliform (MPN)	рН	Temp (celsius)	E. Coli (col/100)	CL2 (mg/L)	TDS (MGL)	COD (mg/L)	O&G (mg/L)	Total Phosphate (mg/L)	TKN (mg/L)	FLOATING SOLIDS		Luminescent DO (mg/L)	Conductivity (µS/cm)	Nitrate (mg/L)	Hardness (mg/L)	Calcium (µg/L)	Magnesium (µg/L)	Total Copper (µg/L)	Total Lead (µg/L)	Total Zinc (μg/L)	Dissolved Copper (µg/L)	Dissolved Lead (µg/L)	Dissolved Zinc (µg/L)	Ortho- Phosphorous (mg/L)	Ammonia Nitrogen (mg/L)
	8/16/2018	6	ND	N/A	7.72	19.2	344	N/A	175	N/A	ND	0.146	N/A	NO	ND	6.88	233	0.272	87.9	21.6	8.21		0.000601		ND	ND	0.00463	0.071	0.03
	12/7/2019	5 1	ND.	N/A	7.49	5.5	214	N/A	154	N/A	ND	0.176	N/A	NO	ND	10.8	169.6	0.822	83	20.8	7.56	0.00189	0.000406	0.0206	ND	0.00102	0.015	0.038	0.053
	3/5/2019	1 8	ND	N/A	6.36	4.5	73.3	N/A	135	N/A	ND	ND	N/A	NO	ND	11.72	165.9	1.42	79.8	20	7.24	0.00164	0.000708	0.0227	ND	ND	0.0148	0.0233	0.054
	6/4/2010 NIC)	JD	NI/A	7 55	15.2	319	R NI/A	153	N/A	ND	0 177	NI/A	NO	ND	8.02	1866	0.374	01.2	23	8 23	0.00156	0.000418	0.0124	ND	ND	0.00604	0.0882	0.078

SW 3 - Courtney Springs Creek on east side of SE McLoughlin Blvd, 350' north of SE Park Ave - outfall of 5' x 5' concrete box culvert

MS4 SAMPLE TYPE	=: instrear	n Sampie, 4	i times per ye	ear																								
DATE	TSS (mg/L)	BOD (mg/L)	Fecal coliform (MPN)	рН	Temp (celsius)	E. Coli (col/100)	CL2 (mg/L)	TDS (MGL)	COD (mg/L)	O&G (mg/L)	Total Phosphate (mg/L)		FLOATING SOLIDS		Luminescent DO (mg/L)			Hardness (mg/L)		Magnesium (µg/L)	Total Copper (µg/L)	Total Lead (μg/L)	Total Zinc (μg/L)	Dissolved Copper (µg/L)	Dissolved Lead (µg/L)	Dissolved Zinc (µg/L)	Phosphorous	Ammonia Nitrogen (mg/L)
9/19/2019	ND O	ND	N/A	6.99	16.8	308	N/A	114	N/A	ND	ND	N/A	NO	ND	9.55	161.9	1.54	70.7	18.5	5.96	0.00293	0.00035	0.0131	0.00254	ND	0.0108	0.0529	0.024
11/19/2019	9	7 3.0)2 N/A	7.23	12.8	2520	N/A	89	N/A	ND	0.129	N/A	NO	ND	10.15	100.9	1.19	41.9	11.3	3.35	0.00464	0.00167	0.11	0.00321	0.000219	0.0428	0.0796	0.033
3/23/2020)	9 2.7	73 N/A	7.22	9.9	88.6	N/A	129	N/A	ND	ND	N/A	NO	ND	10.95	175.5	1.42	69.5	18.2	5.86	0.00409	0.00142	0.167	0.00293	ND	0.141	0.285	0.067
5/18/2020) 3	3.2	21 N/A	8.72	14.4	>2420	N/A	58	N/A	ND	0.159	N/A	NO	ND	9.88	47.1	0.452	25.3	6.8	2.01	0.00706	0.00289	0.0603	0.00332	ND	0.0283	0.05	0.056

ND = non detect NO = None Observed