

STORMWATER MANAGEMENT PROGRAM (SWMP) Document
in Compliance with the Municipal Separate Storm Sewer System (MS4)
Phase 2 Permit

Permit Registrant: Rogue Valley Sewer Services



ROGUE VALLEY
SEWER SERVICES
CLEAN WATER - HEALTHY COMMUNITIES

Co-Implementers:



Adopted by the RVSS Board October 2021

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- A ILLICIT DISCHARGE DETECTION AND ELIMINATION
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 - IDDE 4. *SOP 14.12 Spill Response/Hotline Calls*
 - IDDE 5. *Quality Assurance Program Plan (QAPP)*
 - IDDE 5. *Pollutant Parameter Action Levels*

- B CONSTRUCTION SITE RUNOFF
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- C MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING
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INTRODUCTION

Rogue Valley Sewer Services (RVSS) has held a National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase 2 permit, hereafter referred to as the Phase 2 permit, since its first issuance in 2007. RVSS is the permit Registrant, the legally responsible entity for permit compliance, on behalf of its co-implementers, Jackson County, City of Phoenix and City of Talent. A service map showing RVSS' MS4 program boundary is available on our [website](#). Intergovernmental Agreements (IGAs) have been entered into with each of the co-implementers to outline responsibilities for permit compliance. A new [MS4 Phase 2 permit](#) was issued by DEQ that went into effect March 1st, 2019. In June 2019, IGAs with the cities of Talent and Phoenix were updated to reflect changes in the MS4 permit. RVSS and Jackson County are currently in the process of updating their IGA to reflect the same changes.

The Phase 2 permit contains six control measures: Public Education and Outreach; Public Involvement and Participation; Illicit Discharge Detection and Elimination; Construction Site Stormwater Runoff Control; Post-Construction Stormwater Management; and Pollution Prevention in Municipal Operations. Specific requirements for program development and implementation of each of the key measures are included in the permit. One of the permit requirements is that the Registrant maintain a written Stormwater Management Program Document (SWMP Document) that describes in detail how the permit requirements will be met. Timelines for implementation of any requirements not yet implemented must be included in the SWMP Document. Table 1 includes the permit specified implementation dates for each of the six control measures. The SWMP Document must be reviewed annually and updated as necessary.

The permit Registrant must develop and implement mechanisms to track and document compliance with the permit requirements, this documentation must be provided in annual reports to DEQ. This SWMP Document outlines the Phase 2 permit requirements, RVSS' strategy to meet them, and timelines for implementing requirements not yet in place.

Table 1. SWMP Control Measures Implementation Schedule

SWMP Control Measures	Implementation Deadline
Public Education and Outreach	February 28, 2020
Public Involvement and Participation	February 28, 2020
Illicit Discharge Detection and Elimination	February 28, 2022
Construction Site Runoff Control	February 28, 2023
Post-Construction Site Runoff for New Development and Redevelopment	February 28, 2023
Pollution Prevention and Good Housekeeping for Municipal Operations	February 28, 2022

SWMP DOCUMENT DEVELOPMENT

The public education and outreach and Public Involvement and Participation portions of the SWMP were required to be implemented by February 28th, 2020. Prior to that date, RVSS developed those portions of the SWMP Document, put them out for public comment and had a final version adopted by the RVSS Board. In September 2021, RVSS developed the remaining portions of the SMWP Document and sent them out for public comment. They were adopted by the RVSS Board in October 2021.

PUBLIC EDUCATION & OUTREACH

Description: RVSS has a long-standing and robust public education and outreach program and will continue to implement this program to inform the public about the impacts of stormwater discharges on waterbodies and the steps that people can take to reduce pollutants in stormwater runoff. This section of the Stormwater Management Program (SWMP) outlines the education and outreach strategies that RVSS will implement to satisfy the conditions of the Phase 2 permit.

Requirements:

Distribute or offer at least two educational messages or activities per year to reduce the behaviors and practices that cause or contribute to adverse stormwater impacts on receiving waters, (Schedule A.3.a.iii). Conduct education and outreach to each of the target audiences listed below at least once during the permit term, construction site operators must be targeted at least twice, (Schedule A.3.a.iv).

Target Audiences:

1. General Public, homeowners, homeowner association, schoolchildren, and businesses (including home based and mobile businesses).
2. Local elected officials, land use planners and engineers.
3. Construction site operators

Stormwater Education & Outreach Strategy: The objective of the RVSS education and outreach program is to engage customers, residents, and business owners and their employees within the RVSS jurisdictional boundary, to increase their awareness of human impacts on stormwater quality and influence their behavior to reduce actions that have negative impacts on water quality.

All Public Education and Outreach activities will be tracked and reported quarterly to our partners and annually to DEQ. The Annual Report will assess the program's implementation progress including the number of events, type of event, message delivered, number of people and type of audience reached. At least one education and outreach activity taking place during the reporting timeframe will be evaluated using a pre and post poll, survey, test, or other method to quantify the effectiveness of the message delivery (Schedule A.3.a.vi).

In addition to the specific audiences and messages identified below, RVSS will create materials and content for electronic and physical distribution through both the RVSS and Stream Smart websites and social media channels and events to include:

- a. RVSS annual newsletter in English & Spanish (print & electronic)
- b. Monthly posts to RVSS and Stream Smart social media (electronic only)
- c. Annually update RVSS website Stormwater pages (electronic only)

Through the audiences and modes of contact identified below, RVSS has set the following annual (fiscal year) goals:

- a. Number of direct contacts by RVSS staff: 500
- b. Number of engagements with RVSS electronic content: 200

RVSS will distribute the following educational messages to the specified audiences:

General Public:

Specific Audience #1: Homeowners and landscape contractors:

Specific topic/message #1: Best management practices should be followed for proper use, application and storage of pesticides and fertilizers to reduce negative impacts on stormwater quality.

Methods/means of contact:

- Presentations and participation in events and trainings on Integrated Pest Management and other best management practices for proper use, application and storage of pesticides and fertilizers.
- Creation, distribution, and display of printed and electronic materials related to Integrated Pest Management and other BMPs related to use of yard chemicals.

Specific Audience #2: Auto shop owners:

Specific topic/message #2: practice pollution prevention BMPs to reduce negative impacts on stormwater quality.

Methods/means of contact:

- Promote and administer [EcoBiz](#) certification of shops in RVSS jurisdiction.

Specific Audience #3: Dog/pet owners:

Specific topic/message #3: pick up pet waste to reduce negative impacts on stormwater quality.

Methods/means of contact:

- Sponsorship of pet waste stations with signage at local dog walking locations.
- Creation, distribution, and display of printed and electronic materials related to proper disposal of pet waste.

Specific Audience #4: School-age children:

Specific topic/message #4: nothing but rain into storm drain inlets and grates to reduce negative impacts on stormwater quality.

Methods/means of contact:

- In-class presentations and site tours.
- Teach Salmon Watch station.

Local Elected Officials, Land Use Planners and Engineers:

Specific topic/message: Describe the purpose and benefit of the RVSS Stormwater Program and how others can be involved in implementing or supporting the SWMP or how their activities or business can engage with the Stormwater Program.

Methods/means of contact:

- Request an opportunity to present to city councils, county commissioners in RVSS jurisdiction once/year.
- Continue to contribute and promote quarterly Stormwater Advisory Team (SWAT) meetings and invite interested individuals and groups to provide feedback on and participate in the development and implementation of the SWMP.

Construction Site Operators, (Schedule A.3.a.v):

Specific topic/message: how to design, install and maintain erosion prevention and sediment control BMPs at construction sites.

Methods/means of contact:

- Offer Erosion Prevention and Sediment Control Inspector Certification Class and Inspector Certification Renewal class at least once/year. The EPSC class is targeted to construction site operators and design engineers. Topics include appropriate selection, design, installation, use and maintenance of erosion prevention and sediment control measures and inspection frequency and documentation requirements.

PUBLIC INVOLVEMENT & PARTICIPATION

Description

The RVSS public involvement and participation program provides opportunities for the public to participate in the development of the SWMP control measures. When implementing a public involvement participation process, RVSS will comply with public notice requirements. RVSS will track public involvement and participation activities and assess progress towards implementation of the program in its Annual Report (Schedule A.3.b.iv).

Stormwater Advisory Team (SWAT)

As a part of Public Involvement and Participation, the SWAT will continue to meet quarterly and RVSS will actively invite participation from entities and individuals who may have interest in stormwater pollution prevention in the region. The goal of inviting non-permitted entities to the SWAT meetings is to increase public involvement in developing, reviewing, and implementing the SWMP, the Rogue Valley Stormwater Design Manual, and other related SWAT activities and work products.

Publicly Accessible Website (Schedule A.3.b.ii)

RVSS will maintain and promote its own stormwater related content on the RVSS website and will contribute to the Stream Smart website. The RVSS website will continue to include information on the RVSS SWMP and its implementation, including the SWMP Document, contact information, and educational materials. The RVSS website will be maintained with current information and be updated at least annually. The website will include the following:

- How to file an Illicit Discharge Complaint or Report
- Draft documents issued for public comment, and final reports, plans and other official SWMP policy documents.
- 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.
- RVSS's contact information for relevant staff, including phone numbers, mailing addresses, and email addresses.

Stewardship Opportunities (Schedule A.3.b.iii)

RVSS will develop and implement, either individually or in partnership, one stewardship opportunity each year that may include:

- Stream clean-up
- Storm drain marking
- Riparian planting
- Stormwater management facility enhancement or maintenance

ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

Description: The IDDE program is developed and implemented to detect and eliminate illicit discharges into the MS4, to the extent allowable by state laws. An illicit discharge to the MS4 is defined in the MS4 permit as any substance not listed under “Allowable Non-Stormwater discharges”, Schedule A.1.d.

Six best management practices (BMPs) are outlined in the Phase II permit for IDDE and will be developed and implemented by RVSS, Table 2.

Table 2. IDDE BMPs

BMP #	BMP Name	Permit Section	Implementation Deadline
IDDE 1	Digital MS4 Map	Schedule A.3.c.ii	February 28, 2022
IDDE 2	Ordinance Prohibiting IDDE	Schedule A.3.c.iii	February 28, 2022
IDDE 3	Enforcement Procedures	Schedule A.3.c.iv	February 28, 2022
IDDE 4	Complaint Response	Schedule A.3.c.v	February 28, 2022
IDDE 5	Dry Weather Screening	Schedule A.3.c.vi	February 28, 2022
IDDE 6	IDDE Staff Training	Schedule A.3.c.vii	February 28, 2022

IDDE 1: Digital MS4 Map

Requirements

1. Maintain a digital map of the conveyance system, and assign unique identifiers as needed, to all known:
 - a. conveyances,
 - b. manholes,
 - c. inlets
 - d. stormwater management facilities, and
 - e. outfalls
2. Delineate the MS4 by drainage basin
3. Map chronic illicit discharges
4. Map outfalls with regular flow during dry season

Strategy

RVSS has existing [digital MS4 maps](#) that were assembled from a combination of on-the-ground and as-built surveys during the first Phase 2 permit term. Beginning in 2018, RVSS undertook to re-survey the MS4 and update the digital mapping to include all required items. As re-surveying is completed, RVSS will be assigning unique identifiers to outfalls, stormwater nodes and stormwater management facilities. Once re-surveying of a stream basin is complete, drainage basins will be delineated.

Digital maps are updated on an on-going basis as new projects are completed. The locations of stormwater management facilities are GPS'd in the field and new conveyance systems are added to the GIS maps from CAD drawings of the as-built survey.

Mapping and Data Standards

RVSS utilizes Environmental Systems Research Institute (ESRI) Geographic Information System (GIS)

Horizontal Datum: NAD83 (North American Datum of 1983 - CORS96)

Projection System: Lambert Conformal Conic

Coordinate System: State Plane Oregon South FIPS 3602

Coordinate Units: "foot",0.3048

Accuracy Standard: EPSG Accuracy Standard:

IDDE 2: Ordinance Prohibiting IDDE

Requirements

An ordinance prohibiting non-stormwater discharge, except those items listed in Schedule A.1.d, into the MS4 must be adopted. The ordinance must specifically prohibit items listed in A.3.c.iii. from discharge into the MS4.

Strategy

RVSS adopted an ordinance prohibiting illicit discharges into the MS4 under the first Phase 2 permit term, [4.05.100.3](#), and is now in the process of updating the code to meet the revised list of prohibited discharges.

Timeline

Revisions to RVSS' code will be brought to the board for adoption prior to February 28th, 2022.

IDDE 3: Enforcement Procedures

Requirement

A written escalating enforcement procedure for illicit discharges to the MS4 must be developed and implemented. The procedure must address repeat violations through progressively stricter responses to achieve compliance. Timelines for compliance must be included and responses to discharge must consider the amount and type of pollutant discharged, and whether the discharge was accidental or intentional.

Strategy

RVSS reviewed its existing Code Enforcement Policy and updated it in FY21 to meet the requirements of IDDE 3, Appendix A. Resolution 21-06 adopted the revised Code Enforcement Policy in May 2021.

IDDE 4: Complaint Response

Requirements

Publicize a phone number, webpage or communication channel to allow the public to report illicit discharges. Develop and implement a complaint response program to respond to complaints within the permit specified timelines.

Strategy

RVSS will continue to implement its existing IDDE program, which utilizes a combination of our Code Enforcement Policy, Standard Operating Procedure 14.12 Spill Response/Hotline Calls, and an Access database for complaint tracking. Our website homepage publicizes the phone number to call to report spills. Response timelines will adhere to those specified in the Phase 2 permit. In 2020, RVSS updated its complaints tracking database to include the required minimum documentation specified in the Phase 2 permit. The Code Enforcement policy and SOP 14.12 are included in Appendix A.

Timeline

2019- Forward	Continue implementing the IDDE program
Annual	Summary of complaints in the annual report

IDDE 5: Dry Weather Screening

Requirements

1. RVSS must conduct dry weather screening of at least 40% of its outfalls by February 28, 2022 and 20% every year thereafter.
2. Annual field screening of priority locations
3. Establish Pollutant Parameter Action Levels

Strategy

RVSS established a dry weather field screening program under the first Phase 2 permit and has screened outfalls every year for the past nine years. Screening follows procedures outlined in the Center for Watershed Protection's 2014 manual. Since RVSS had already screened all outfalls prior to the 2019 effective date of the current permit, RVSS will continue to screen 20% of its outfalls each year.

Priority locations must be located downstream of any source of suspected illegal or illicit activity, or at a location identified by the permit registrants. Through previous outfall screening work, RVSS has identified and eliminated sanitary sewer cross connections and those directly connected to swimming pools. At this time, there are no known priority locations. Should priority locations be established in the future, they will be screened annually. Before beginning dry weather field screening, the complaint database will be reviewed to determine whether there are locations that should be followed up on.

Outfalls with sufficient flow are sampled and analyzed in the lab in accordance with RVSS' Quality Assurance Program Plan (QAPP) that was most recently approved by DEQ in 2018, Appendix A. Pollutant Parameter Action Levels were developed by RVSS prior to the FY22 dry weather screening, Appendix A. An Access database has been used to track dry weather screening data since 2005 and includes notes from each time an outfall is screened.

Timeline

FY2022	Submit Pollutant Parameter Action Levels to DEQ
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Annual	Review complaint database to determine any priority sampling locations
Annual	Conduct dry weather screening at 20% of outfalls and any priority locations
Annual	Track and report dry weather screening results

IDDE 6: IDDE Staff Training

Requirements

1. Train new staff implementing IDDE programs within 30 days of their assignment to the program.
2. Train all staff on IDDE at least once during the permit term.
3. Provide follow-up training as procedures or technology changes.

Strategy

All RVSS field staff will receive orientation to identifying illicit discharges and how to submit a complaint for follow-up. Staff conducting dry weather screening will be properly trained by the Stormwater Program Manager prior to conducting the work. Follow-up training will be provided as needed.

CONSTRUCTION SITE RUNOFF CONTROL

Table 3. Construction Site Runoff Control BMPs

BMP #	BMP Name	Permit Section	Implementation Deadline
CS 1	Ordinance or Regulatory Mechanism	Schedule A.d.ii	February 28, 2023
CS 2	1200-C/CN information requirement	Schedule A.d.iii	February 28, 2023
CS 3	Erosion and sediment control plan Specifications	Schedule A.d.iv	February 28, 2023
CS 4	Erosion and Sediment Control Plan Review	Schedule A.d.v	February 28, 2023
CS 5	Construction Site Inspections and Documentation	Schedule A.d.vi	February 28, 2023
CS 6	Enforcement Procedures	Schedule A.d.vii	February 28, 2023
CS 7	Construction Runoff Control Training and Education	Schedule A.d.vii	February 28, 2023

CS 1. Ordinance or Regulatory Mechanism Requirements

An ordinance must be in place that requires erosion, sediment and waste management controls from the initiation of construction through final stabilization on all qualifying construction projects and must require implementation of an Erosion and Sediment Control Plan (ESCP) for construction project sites that disturb a minimum of 7,000 square feet.

Strategy

RVSS will review its ordinance and update as needed prior to the February 28, 2023 implementation deadline.

Timeline

By FY23, review and update ordinance.

CS 2. 1200-C/CN Information Requirement Requirement

Refer projects disturbing one or more acres, or that disturb less than one acre, but are part of a common plan of development disturbing one or more acres, to DEQ or the appropriate DEQ agent to obtain a 1200-C/CN permit.

Strategy

RVSS is an Agent of DEQ for issuance of the 1200-C permit and also administers the 1200-CN permit. Developers of projects disturbing one or more acres will be referred by the city and county planning departments to RVSS to obtain permit coverage prior to receiving building permits.

CS 3. Erosion and Sediment Control Plans for site disturbing 7,000sf or more

Requirements

Maintain written specifications addressing the proper installation and maintenance of controls during all phases of construction activity occurring in their coverage area. At a minimum, through ordinance or other regulatory mechanism, the permit registrant must:

1. Provide the construction site operator an ESCP plan, template, worksheet or similar document for construction site operators to document erosion, sediment and water management at the project site.
2. Require construction site operator to complete a site-specific ESCP prior to commencement of construction/land disturbance;
3. Require the ESCP be maintained and updated as site conditions change, or as needed; and
4. Require ESCPs to be kept on site and made available for review by the permit registrant, DEQ, or another administrating entity.

Strategy

RVSS worked with ACWA in 2013 to produce the ACWA Construction Site Stormwater Guide for construction site BMPs. This guide is distributed to all individuals taking RVSS' Certified Erosion and Sediment control Inspector course. We will work to update the RVSS code to require a site specific ESCP for projects disturbing 7,000sf or more that must be maintained as site conditions change and kept onsite during active construction.

Timeline

By FY23	Develop ESCP template worksheet or similar document
By FY23	Review and update ordinance.

CS 4. Erosion and Sediment Control Plan Review

Requirement

At a minimum, review ESCPs from construction projects that will disturb one or more acres of land, or that disturb less than one acre but are part of a larger common plan of development disturbing one or more acres.

Strategy

RVSS is an Agent of DEQ on the 1200-C permit and administers the 1200-CN permit, as such RVSS already reviews all ESCPs for projects disturbing one or more acres. By February 2023, projects disturbing 7,000sf or more will be required to have site specific erosion and sediment control plans that will be reviewed as part of the stormwater management plan review process.

CS 5. Construction Site Inspections and Documentation

Requirements

At a minimum, inspect:

1. Each site that disturbs one or more acres, at least once during the permit term.
2. Sites with visible or reported sediment in stormwater runoff
3. Every site for which a complaint is received
4. At least, 25% of sites disturbing less than one acre, at least once during the permit term.

Inspections must be documented with written reports covering proper installation and maintenance of BMPs depicted in the ESCP plans, compliance with ordinances, and existing or potential discharge issues.

Strategy

RVSS will continue to follow existing SOP 9.06 that stipulates minimum inspection times for 1200-C and CN permitted sites, Appendix B. RVSS will develop and implement an SOP for inspecting sites disturbing less than one acre.

Timeline

By FY23: Develop SOP for inspection frequency and documentation of sites disturbing less than one acre.

CS 6. Enforcement Procedures

Requirement

Develop, implement and maintain a written escalating enforcement and response procedure for construction sites.

Strategy

The RVSS Board adopted an escalating enforcement procedure with resolution 21-06 in FY21, which RVSS will continue to enforce, see Appendix A.

CS7. Construction Runoff Control Training and Education

Requirements

1. Ensure all staff responsible for ESCP review, site inspections and enforcement are trained to conduct such activities within 30 days of their assignment to these duties.
2. All staff must receive training at least once during the permit term.

3. Provide follow-up training as procedures and technology in this program change.

Strategy

RVSS conducts Designated Certified Erosion and Sediment Control Inspector training twice per year. This training is listed as an approved certification course in the DEQ NPDES 1200-C permit. All RVSS field staff conducting potentially erosion generating activities, or inspecting sites disturbing less than one acre in area will be required to take the training. RVSS inspectors for sites disturbing one or more acres will also take a two-day erosion prevention and sediment control training.

POST-CONSTRUCTION SITE RUNOFF FOR NEW DEVELOPMENT AND REDEVELOPMENT

Table 4. Post-Construction Site Requirements

BMP #	BMP Name	Permit Section	Implementation Deadline
PC 1	ORDINANCE OR REGULATORY MECHANISM	Schedule A.3.e.ii	Feb. 28, 2023
PC 2	REMOVING BARRIERS TO LOW IMPACT DEVELOPMENT	Schedule A.3.e.iii	Feb. 28, 2023
PC 3	POST-CONSTRUCTION STORMWATER MANAGEMENT REQUIREMENTS	Schedule A.3.e.iv	Feb. 28, 2023
PC4	POST CONSTRUCTION SITE RUNOFF PLAN REVIEW	Schedule A.3.e.v	Feb. 28, 2023
PC5	LONG-TERM OPERATION AND MAINTENANCE	Schedule A.3.e.vi	Feb. 28, 2023
PC 6	TRAINING AND EDUCATION	Schedule A.3.e.vii	Feb. 28, 2023

PC 1. Ordinance or Regulatory Mechanism Requirements

Through ordinance, require projects developing or redeveloping 5,000sf of impervious surface to manage stormwater using an approach that targets natural surface or predevelopment hydrological function through the installation and long-term operation and maintenance of structural stormwater controls. The ordinance must include procedures for review and approval of structural stormwater control plans as well as authority to conduct inspections of installed structural stormwater controls.

Strategy and Timeline

RVSS will review and update its ordinance as needed by February 28th, 2023.

PC2. Removing Barriers to Low Impact Development Requirements

Identify, minimize or eliminate ordinance, code and/or development standard barriers that inhibit design and implementation techniques, such as Low Impact Development and Green Infrastructure. Any barrier identified must be modified within three years.

Strategy and Timeline

RVSS will review its own code, as well as those of the cities of Talent and Phoenix and Jackson County by Sept. 1, 2023. Any barriers identified will be modified within three years of identification.

PC 3. Post- Construction Stormwater Management Requirements

Requirements
Develop post-construction stormwater management requirements that include the technical standards provided in Schedule A.3.e.iv of the Phase 2 permit.

Strategy

RVSS is working at a regional level to revise the [Rogue Valley Stormwater Design Manual](#) to meet the requirements of the Phase 2 permit reissued in 2021.

Timeline

A revised Rogue Valley Stormwater Design Manual will be adopted by Feb. 28th, 2023.

PC 4. Post-Construction Site Runoff Plan Review

Requirements

Review and approve plans for structural stormwater control of sites that develop or redevelop 5,000sf or more of impervious surface.

Strategy: RVSS will continue to review and approve all projects requiring compliance with the Rogue Valley Stormwater Design Manual.

PC5. Long Term Operation and Maintenance

Requirements

Maintain an inventory and implement a strategy to ensure all structural stormwater controls installed in compliance with the Phase 2 permit are operated and maintained to meet the site performance standard in schedule A.3.e.iv.

Strategy

RVSS requires an Operation and Maintenance manual be submitted for every project going through the stormwater management review process. The manual includes standard inspection guidelines, templates for recording inspections, contact information and a Declaration of Covenants, recorded on the deed of the property. RVSS conducts installation inspections of these facilities to ensure they are installed per the approved plans. Once installation is accepted by RVSS, the facilities are entered into our geodatabase, all privately owned and operated facilities in our database are inspected at least once every three years to ensure their long-term operation and maintenance.

PC 6. Training and Education

Requirements

1. Ensure all staff responsible for performing post-construction runoff site plan review, field inspections or administering the post-construction program requirements are trained to conduct such activities within 30 days of their assignment to these duties.

2. All staff must receive training at least once during the permit term.
3. Provide follow-up training as procedures and technology in this program change.

Strategy

All RVSS staff reviewing plans and conducting field inspections are qualified and trained to do so, any new staff will be trained prior to conducting the activity.

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Table 5. Good Housekeeping BMPs

BMP #	BMP Name	Permit Section	Implementation Deadline
MPP 1	Operation and Maintenance Strategy for Existing Structural SW Controls	Schedule A.3.f.ii	Feb 28, 2022
MPP 2	Inspection and Cleaning of Catch Basins	Schedule A.3.f.iii	Feb 28, 2022
MPP 3	Pollution Prevention in Facilities and Operations	Schedule A.3.f.iv	Feb 28, 2022
MPP 4	Registrant-owned NPDES Industrial SW Permit Facilities	Schedule A.3.f.v	Feb 28, 2022
MPP 5	Requirements for Pesticide and Fertilizer Applications	Schedule A.3.f.vi	Feb 28, 2022
MPP 6	Litter Control	Schedule A.3.f.vii	Feb 28, 2022
MPP 7	Materials Disposal	Schedule A.3.f.viii	Feb 28, 2022
MPP 8	Stormwater Infrastructure Staff Training	Schedule A.3.f.ix	Feb 28, 2022

MPP 1 Operation and Maintenance Strategy for Existing Structural SW Controls

Requirements

For existing structural stormwater controls installed prior to the March 2019, develop and implement an operation and maintenance strategy for both permit registrant owned controls and controls owned and operated by non-MS4 entities. This must meet the long-term operation and maintenance requirements outlined in the post-construction stormwater management section.

Strategy

RVSS' Standard Operating Procedure (SOP), 14.10 Manufactured SW Quality Feature Inspection & Maintenance, stipulates frequency of inspection and maintenance for SW structural controls maintained by RVSS, which covers all manufactured devices within the MS4, Appendix C. Vegetated structural stormwater controls within the MS4, including those owned and operated by co-permittees, as well as those privately owned and operated, are inspected through RVSS' Post-Construction Long-Term Operation and Maintenance program. RVSS' goal is to annually inspect 1/5 of facilities owned and operated privately or by co-permittees. Following inspection, RVSS communicates with the owner/operator regarding any maintenance needs and follows-up to ensure the work is completed.

Jackson County: The County will establish an inspection schedule for stormwater controls and will have them in place by Feb. 28th, 2022.

MPP 2 Inspection and Cleaning of Catch Basins

Requirements

1. Must inspect at least 50% of the permit owned or operated inlets at least once every five years.
2. Complete all maintenance and repairs identified during inspections.

Strategy

Jackson County: The County will inspect 30% of its catch basins annually and maintain those requiring it within the year.

Phoenix: Phoenix will inspect 30 percent of the SW system every year. Catch basins, pipes and inlets that are determined to need cleaning and/or maintenance will be cleaned and maintained within one month.

RVSS: RVSS maintains the stormwater system in White City Industrial and maintains a list of hotspots. All hotspots and culverts are inspected annually, if catch basin sumps are 50% or more full, flushing is scheduled. The White City Industrial area is divided into five stormwater basins, one basin is flushed and TV'ed each year.

Talent: Talent will inspect 10 percent of the SW system every year. Catch basins, pipes and inlets that are determined to need cleaning and/or maintenance will be cleaned and maintained within 6 months.

MPP 3 Pollution Prevention in Facilities and Operations

Requirements

The permit registrant must develop, review and update procedures for inspection and maintenance schedules to ensure pollution prevention and good housekeeping are conducted for the following activities:

- a. Pipe cleaning for stormwater and wastewater conveyance systems.
- b. Cleaning of culverts conveying stormwater in roadside ditches.
- c. Ditch maintenance.
- d. Road and bridge maintenance.
- e. Road repair and resurfacing including pavement grinding.
- f. Dust control for roads and municipal construction sites.
- g. Winter road maintenance, including salt or de-icing storage areas.
- h. Fleet maintenance and vehicle washing.
- i. Building and sidewalk maintenance including washing.
- j. Solid waste transfer and disposal areas.
- k. Municipal landscape maintenance.
- l. Material storage and transfer areas, including fertilizer and pesticide, Hazardous material, used oil storage, and fuel
- m. Fire-fighting training activities.
- n. Maintenance of municipal facilities including public parks and open space, golf courses, airports, parking lots, swimming pools, marinas, etc.

Strategy

Jackson County: Utilizes the Oregon Department of Transportation (ODOT) Blue Book as its guide to best management practices for municipal operations. Several items required by the MS4 permit are not covered by the Blue Book, the County will develop its own SOPs for these areas and have them in place by Feb. 28th, 2022.

Phoenix, RVSS, and Talent: Have each adopted a *Standard Operating Procedure and BMP manual for Pollution Prevention and Good Housekeeping*. The manuals cover all the required items outlined above under their jurisdiction and are included in Appendix C.

Note that fire-fighting training activities are conducted by fire districts, which are special districts and not under the jurisdiction of the city, county or RVSS.

MPP 4 Registrant-owned NPDES Industrial SW Permit Facilities (1200-Z)

As of September 2022, RVSS and its co-permittees do not own or operate any NPDES Industrial SW permitted facilities.

MPP 5 Requirements for Pesticide and Fertilizer Application

Requirement

Must implement practices to reduce the discharge of pollutants to the MS4 associated with the application and storage of pesticides and fertilizers.

Strategy

RVSS: Has participated in the Middle Rogue Pesticide Stewardship Partnership (PSP) on behalf of itself and the co-permittees since 2014. The PSP developed a strategic plan in 2019 that aims to reduce the concentration and prevalence of pesticides of concern and local problem pesticides through monitoring, working with land managers and education.

The SOP manuals developed for MPP3 include BMPs for fertilizer usage.

Talent: Adopted an Integrated Pest Management (IPM) plan in 2018 that governs pesticide usage within the city and is included in Appendix C

MPP 6 Litter Control

Requirements

The permit registrant must implement methods to reduce litter within its jurisdiction.

Strategy

Jackson County: White City Residential side streets are swept once every two to three months. The main roads in White City Residential; Antelope, Ave. G, Atlantic and Ave A are swept ten times per year. Outside White City Residential, Antelope Rd., and curb and gutter portions of

Table Rock Rd and East and West Vilas are swept ten times per year. Streets without curb and gutter and less than 22 feet wide are considered to be self-cleaning and are not swept.

The county also has an Adopt-a-Road Program, through which organizations pledge to clean roadside areas at least twice a year, and the County's Community Justice Crews clean-up litter along county roadways. Additionally, the County's parks program invests considerable resources into clearing homeless camps from county parks and riparian areas.

Phoenix: The City of Phoenix is divided into three zones, East Side, West Side, and Old Town with each zone swept once every three weeks. The City sweeps one zone every week usually on Fridays, it takes about seven hours to complete sweeping for one zone.

RVSS: Staffs Bear Creek clean up events for the cities of Talent and Phoenix.

Talent: The City of Talent is divided into 2 zones with each zone being swept every other week. The Northern Zone is generally Colver Rd. to Rapp Rd. and the Southern Zone is everything South of Rapp Rd.

MPP 7 Materials Disposal

Requirement

Material or pollutants collected or removed as part of maintenance must be managed and disposed of in a manner to prevent pollutants from entering waters of the state.

Strategy

The City of Phoenix, City of Talent, and RVSS' SOPs manuals developed for MPP3 cover BMPs for material disposal.

Jackson County: Jackson County will develop SOPs to address this and will have them in place by Feb. 28th, 2022.

MPP 8 SW Infrastructure Staff Training

Requirements

1. Ensure staff responsible for overseeing or implementing O and M practices are trained or qualified to conduct such activities.
2. Training must be provided within 30 days of assignment to an area covered under MPPs 1-7.
3. Training must be provided at least once during the permit term.
4. Training must be provided as procedures and/or technology change.

Strategy

Jackson County: The County will develop a training schedule that will be in place by Feb. 28th, 2022.

Phoenix: All staff will be required to read the *Standard Operating Procedure and BMP manual for Pollution Prevention and Good Housekeeping* and new hires will shadow current employees to learn how to implement the BMPs. Phoenix will also have RVSS SW staff conduct training of their employees at least once per permit term.

RVSS: Upon hire, new staff will be provided a copy of the *Standard Operating Procedure and BMP manual for Pollution Prevention and Good Housekeeping*. Training will be conducted within a year. A checklist will be used to track when the manual is provided.

Talent: All staff will be required to read the finalized SOP manual. Additional training will be sought out as needed.

RVSS SWMP List of Appendices

- A ILLCIT DISCHARGE DETECTION AND ELIMINATION
 - IDDE 3. *Code Enforcement Policy*
 - IDDE 4. *SOP 14.12 Spill Response/Hotline Calls*
 - IDDE 5. *Quality Assurance Program Plan (QAPP)*
 - IDDE 5. *Pollutant Parameter Action Levels*

- B CONSTRUCTION SITE RUNOFF
 - CS 5. *SOP 9.06*

- C MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING
 - MPP1. *SOP 14.10 Manufactured SW Quality Feature Inspection and Maintenance*
 - MPP3.:
 - SOP and BMP Manual for Pollution Prevention and Good Housekeeping for RVSS*
 - SOP and BMP Manual for Pollution Prevention and Good Housekeeping for Phoenix*
 - SOP and BMP Manual for Pollution Prevention and Good Housekeeping for Talent*
 - MPP5. *Talent Integrated Pest Management Plan*

Appendix A

Illicit Discharge Detection and Elimination

IDDE 3. *Code Enforcement Policy*

IDDE 4. *SOP 14.12 Spill Response/Hotline Calls*

IDDE 5. *Quality Assurance Program Plan (QAPP)*

IDDE 5. *Pollutant Parameter Action Levels*

Code Enforcement Policy

Subject: Code Enforcement

Approved by: Resolution 21-06

Rogue Valley Sewer Services has adopted a Code to regulate certain activities related to sanitary sewer and stormwater. Enforcement of these code provisions is generally done through the provisions of Section 8.50.050 which authorizes the assessment of a civil fine not to exceed \$2,000 for each code violation.

Enforcement of certain stormwater violations is addressed in Section 4.05.110 3).

Enforcement of FOG regulations is defined by Resolution 17-19. The penalty for violation includes a monthly surcharge set each year with the annual rate resolution.

Penalties for making sewer connections without a permit are defined in Code Section 9.10.045.

The purpose of this policy is to establish a framework to assess and collect civil penalties within the limits established by Sections 4.05.110 and 8.50.050 of the RVSS Code.

Policy Goals: The goals of this enforcement policy are to:

- Protect public health and the environment
- Obtain and maintain compliance with applicable code provisions
- Deter future violations
- Ensure consistent and predictable enforcement actions

Progressive Enforcement: RVSS may undertake informal communications to obtain compliance without resorting to formal enforcement action. Such communications are not required nor are they considered part of the progressive enforcement plan. Depending on the immediacy and severity of the violation, RVSS may skip steps 1 and 2 and move directly to step 3 of the enforcement plan.

1. Warning: A Warning is a written notice of violation. This can be in the form of a hand written Brown Tag, email or actual letter. The Warning will identify:
 - a. the nature of the violation,
 - b. actions needed to correct the violation
 - c. time period in which corrections must be made.

2. Notice of Violation: If compliance is not attained from a Warning, RVSS will issue a Notice of Violation. The Notice will include the following:
 - a. a citation of the ordinance, rule or order involved;
 - b. a description of the violation;
 - c. steps needed to correct the violation;
 - d. a time frame to complete all corrective action;
 - e. the penalty that will be levied if the violation is not corrected.
3. Notice of Civil Penalty: If the deadlines identified in the Notice of Violation are not met, or, if the severity of the violation is such that no warnings are deemed necessary, RVSS will issue a Notice of Civil Penalty. This notice will include the following:
 - a. all of the information included in the Notice of Violation
 - b. the amount of the penalty assessed
 - c. a time frame to complete all corrective action
 - d. a time frame to pay the penalty.
 - e. a statement of the right to request a hearing before the RVSS Board of Directors.
4. Additional penalty: Failure to complete corrective action or pay the civil penalty imposed within the allotted time frame will result in an additional civil penalty equal to the initial penalty.

Remedies for Non-Compliance: At any point deemed necessary by RVSS, RVSS may take any or all of the following actions:

1. Undertake corrective actions using RVSS resources . In this case the violator will be billed for all costs incurred by RVSS in addition to any civil penalty.
2. Report the violation to Oregon DEQ or other government agency with jurisdiction for further enforcement.
3. File suit in Jackson County Circuit Court for collection of unpaid civil penalties.

Classification of Violation: Code violations are separated into three classifications, with three levels of magnitude, broadly defined in Table 1.

Any repeat of a minor or moderate level violation within a two year time span will move the violation to the next highest magnitude.

Civil Penalty: The amount of the civil penalty will be based on the Class and magnitude of the violation, in accordance with Table 2. Each day a violation continues shall be considered a separate violation.

Table 1. Violation class and magnitude matrix with example violations.

	Class 1 <i>Actions that result in discharge of pollutants</i>	Class 2 <i>Actions that impact RVSS infrastructure and/or non-compliance with permit and agreement requirements</i>	Class 3 <i>Failure to comply with administrative provisions of permits and agreements</i>
Major	Release of pollutants into waters of the state		
Moderate	Release of pollutants that are contained before reaching waters of the state	Any unpermitted work on, or damage to, public sewer or stormwater facilities, or work in conflict with agreements	
Minor	Release of pollutants that are contained on property where the release originated	Failure to install or maintain stormwater controls; failure to allow proper inspection of sewer or stormwater facilities.	Failure to comply with administrative provisions of permits and agreements

Table 2. Civil penalty value based on class and magnitude.*

	Class 1	Class 2	Class 3
Major	\$2,000	\$1,000	\$500
Moderate	\$1,000	\$750	\$500
Minor	\$500	\$500	\$250

*In addition to these civil penalties, RVSS will recover any costs incurred to correct or mitigate the violation.

Appendix B
Construction Site Runoff

CS 5. *SOP 9.06*

Appendix C

Municipal Pollution Prevention and Good Housekeeping

MPP1. *SOP 14.10 Manufactured SW Quality Feature Inspection and Maintenance*

MPP3.:

SOP and BMP Manual for Pollution Prevention and Good Housekeeping for RVSS

SOP and BMP Manual for Pollution Prevention and Good Housekeeping for Phoenix

SOP and BMP Manual for Pollution Prevention and Good Housekeeping for Talent

MPP5. *Talent Integrated Pest Management Plan*