



CITY OF WINCHESTER

PERMIT YEAR 1 MS4 - ANNUAL REPORT

Reporting Period: July 1, 2023 – June 30, 2024

October 1, 2024

Prepared for:  Prepared by: 

General Permit for Small Municipal Separate Storm Sewer Systems

Permit Number: VAR040053

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I. Background Information

In accordance with the requirements of Permit Number VAR040053, this Annual Report is hereby submitted in compliance with the City of Winchester General Permit for Small Municipal Separate Storm Sewer Systems (MS4). A link to the MS4 Program Plan and latest Annual Report can be found at the following link or scan the QR code and follow the “MS4 Stormwater Permits” header:



<https://www.winchesterva.gov/Government/Plans-Publications>

This Annual Report covers all information required by the permit as described in 9VAC25-890 but is not intended to fully describe all activities the city has performed, programs the city has implemented, or plans the city has made or is in the process of making. Please note that as all activities conducted by permittees are not required to be reported, certain data may not be included in this report, but can be furnished upon request from DEQ. Any omissions of data in that regard should not be inferred, nor is it intended to imply, that additional requirements are not being fulfilled or addressed by the city.

II. Annual Reporting Requirements

Regulatory Requirement

The permittee, system name, and permit number as listed below:

Permittee: City of Winchester

System Name: General Permit for Small Municipal Separate Storm Sewer Systems

Permit Number: VAR040053

Reporting Period

This document serves as the Annual Report for Permit Year 1 of the 2023-2028 Virginia MS4 General Permit. The reporting period for which this annual report is being submitted is July 1, 2023, to June 30, 2024.

Signed Certification per Part III K

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.

Kelly Henshaw, P.E.
Deputy Public Services Director

9/27/2024

Date

Minimum Control Measures (MCMs) Reporting Items

All applicable Minimum Control Measure (MCM) reporting items for the current permit year, to include MCM compliance supporting information, can be furnished upon request from DEQ and can be found in MS4 Permit Year 1 – Annual Report Reference Library folder repository here:



[Plans & Publications - City of Winchester, VA \(winchesterva.gov\)](https://www.winchesterva.gov/plans-publications)

Please follow the heading at the above link to the “MS4 Stormwater Permits” section and navigate to the current permit year.

Evaluation of the MS4 Program Implementation

Based on the current program results, the City is confident that the Minimum Control Measures (MCMs) being implemented are appropriate, effective, and meet the requirements of the 2023-2028 Virginia MS4 General Permit. As such, the city does not anticipate the need to make any changes to its MS4 Program at this time; however, the City will continue to monitor the status, appropriateness, and effectiveness of each MCM as part of its iterative process to reduce pollutant loadings and protect water quality.

Chesapeake Bay TMDL Special Condition Update

An update of the Chesapeake Bay TMDL Special Condition as established under Part II A of the General Permit requirements can be found in the City’s Chesapeake Bay TMDL Action Plan and Chesapeake Bay TMDL Implementation Annual Status Reports.

Local TMDL Special Condition Status Report

A status report of the Local TMDL Special Condition, as established under Part II B of the General Permit requirements, can be found in Section VIII.

III. Minimum Control Measure 1 – Public Education and Outreach High Priority Stormwater Issues

The City addressed the following three (3) high priority stormwater issues during this reporting period:

1. Reduce the amount of sediment and Chesapeake Bay nutrients in local stormwater discharges.
2. Reduce bacteria levels in City streams generated by pet wastes.
3. Reduce the number of Illicit Discharges.

High Priority Stormwater Strategies

The City used the strategies outlined in Table 1 below to address the above-referenced high priority stormwater issues. These strategies varied in target audience and delivery method to maximize the efficiency and effectiveness of its outreach and education efforts. See Section 4.C for more information regarding individual public education and outreach events.

Table 1. High Priority Stormwater Strategies

High Priority Stormwater Issue	Strategy Category	Public Education and Outreach
Reduce the amount of sediment and Chesapeake Bay nutrients in local stormwater discharges.	<ol style="list-style-type: none"> 1. Traditional Written Materials 2. Signage 3. Media Materials 4. Curriculum Materials 	<ol style="list-style-type: none"> 1. City Publications 2. Community Signage 3. Watershed and Stormwater Education Opportunities Program
Reduce bacteria levels in City Streams generated by pet waste.	<ol style="list-style-type: none"> 1. Traditional Written Materials 2. Signage 3. Media Materials 4. Curriculum Materials 	<ol style="list-style-type: none"> 1. City Publications 2. Community Signage 3. Watershed and Stormwater Education Opportunities Program
Reduce the number of illicit dischargers.	<ol style="list-style-type: none"> 1. Traditional Written Materials 2. Signage 3. Media Materials 4. Curriculum Materials 	<ol style="list-style-type: none"> 1. City Publications 2. Community Signage 3. Watershed and Stormwater Education Opportunities Program

IV. Minimum Control Measure 2 – Public Involvement and Participation

Summary of Public Input

During this reporting period, the City continued to advertise the Stormwater Complaint Hotline on its stormwater webpage, process calls placed to the Stormwater Complaint Hotline, and facilitate the distribution (via direct download) of the Stormwater Complaint Hotline flyer. Public input and complaints were categorized into the following three sections:

1. Referral for maintenance by Public Services
2. Large capital project consideration, and,
3. Inter-property/private matter, in which the City would not be involved.

Maintenance recommendations are evaluated and added to the Public Works schedule as necessary. Large capital project considerations are noted and incorporated into future discussions when evaluating the City’s needs. Inter-property/private matters are directed to the appropriate department or handled between the respective property owners; in which case the City has no jurisdiction. In Permit Year 1, there were 8 stormwater pollution complaints under the procedures established in Part I E 2 a (1) of the MS4 Permit. As part of the City’s goal to obtain as much public input as possible with regards to stormwater issues, City staff utilized community events to gain public input that may have been provided during that time

MS4 Program and Stormwater Website

The City of Winchester’s current MS4 Program Plan and previous Annual Reports dating back to 2009 are available at the following link or scan the QR code:

<https://www.winchesterva.gov/Government/Plans-Publications>.

This MS4 Annual Report and any revisions to the City’s MS4 Program Plan can be found on-line. This document is updated in accordance with 9VAC25-890 Part I.C.3.



Public Involvement Activities

The City participates in multiple public involvement activities annually to increase public knowledge and awareness of any stormwater related issues that may exist within the City limits. These activities vary in type and are scheduled at intervals occurring throughout the calendar year for maximum effectiveness.

CITY PUBLICATIONS

The City’s webpage is the primary public education and outreach tool. Education materials are made available to the citizens regarding the City’s various program areas, the associated regulations, and the programmatic obligations. The following publications are currently available at the City’s Stormwater webpage:

- Stormwater Complaint Hotline Flyer
- EPA’s “After the Storm” Video Series
- “Pick it Up, It’s Your Doodie” Pet Waste Brochure
- “Please Do Not Feed the Waterfowl” Wildlife Waste Brochure
- “How to Make Your Own Rain Barrel” Presentation
- 2023 - 2028 Municipal Separate Storm Sewer System (MS4) Program Plan
- MS4 Permit Years 1-5 Annual Reports from the 2018-2023 permit cycle.
- After the Storm Brochure - English
- After the Storm Brochure - Spanish
- SepticSmart: Septic Tank Maintenance – English
- SepticSmart: Septic Tank Maintenance - Spanish
- Make Your Home the Solution to Stormwater Pollution Brochure
- Kids Stormwater Stickers

The Cit-E News, City of Winchester email newsletter, is used to announce and promote various activities throughout the year regarding stormwater quality and quantity management. Educational articles pertaining to the proper management of stormwater are also published in the newsletter. The City provides direct mailings of the Cities newsletter to all 29,000 of its residents and a WinConnect email has a current distribution of nearly eight thousand (8,000) with an average open rate of 50%. It should be noted that readers of the City’s Facebook and Twitter posts are often directed to articles in the WinConnect email and City news mailings, so readership expands into social media.

COMMUNITY SIGNAGE

The City continued to promote picking up pet waste through the use of "Clean Up After Your Dog" signs placed at the Dog Park located in Jim Barnett Park. The number of registered dog owners with access to the Dog Park is not monitored since the dog park is a public facility.

WATERSHED AND STORMWATER EDUCATION OPPORTUNITIES PROGRAM

The City continued the Watershed and Stormwater Educational Opportunities Program as part of the City’s formal program of stormwater education at schools within the City. The City’s engineering staff conducted the following school presentations regarding engineering, high priority water quality issues, and increased precipitation and storms resulting from climate change during the current reporting period:

- August 22, 2023 – Winchester STARBASE Academy – 24 students
- October 3, 2023 – Winchester STARBASE Academy – 23 students
- October 19, 2023 – Winchester STARBASE Academy – 29 students
- December 5, 2023 – Winchester STARBASE Academy – 23 students

- January 19, 2024 – Winchester STARBASE Academy – 39 students
- February 20, 2024– Winchester STARBASE Academy – 37 students
- March 22, 2024– Winchester STARBASE Academy – 29 students
- April 23, 2024– Winchester STARBASE Academy – 31 students

COMMUNITY WELLNESS FESTIVAL

The City participated in the Valley Health Community Wellness Festival on February 24, 2024. During this event, City Public Services staff educated the public on the effects of pollution on waterbodies, conservation of water, and good housekeeping through recycling, proper lawn maintenance, and proper disposal of household products. Roughly two hundred (200) people were provided fliers and coloring books related to the water cycle and ways to prevent pollution, as well as toilet leak detection tablets and pamphlets on water conservation.

HOUSEHOLD HAZARDOUS WASTE COLLECTION DAYS

The City continued to promote the Household Hazardous Waste Collection Days as one of four local participation programs. These events were held on the first and third Wednesdays of each month, from noon to 6 p.m., during the months of April through October. One event was held on the third Wednesday during the months of November, December, January, February, and March.

PICKUP PARTY

The city hosted a series of community cleanup events, occurring in July, August, September, October, and November of 2023, and April, May, and June of 2024, all in this reporting period. The events are intended to encourage citizens to take an active role in keeping their community clean. At the events, staff informs the citizens of the benefits of reduced trash and pollution in our storm sewers and waterways. As an incentive to attend and, citizens earn points and other items for showing up, and prizes are awarded at milestone intervals as outlined below in Table 2. Additional incentive is provided this year with the City’s adoption of the Stormwater Utility. Citizens can save 5% off their Stormwater Utility Fee per household for every event they attend.

Table 2. City of Winchester Community Cleanup Events points and subsequent rewards.

Incentive Points for attendance activities	Prizes for Incentive Points
<ul style="list-style-type: none"> ▪ 1 point = Show up and participate in cleanup activities ▪ 1 point = Bringing water to drink? Make sure a reusable water bottle! ▪ 1 point = Wear something to participate in the theme ▪ 1 point = Bring a new friend to the party (1 point per person who hasn't attended a previous party) ▪ 1 point = Correctly answer the theme-related trivia question at sign in 	<ul style="list-style-type: none"> ▪ 8 points = Water bottle (one per person) ▪ 10 points = Pickup Party T-shirt (one per person) ▪ 12 points = Grand prize raffle entry (1 entry per person per 12 points)

During this permit year the City did not conduct any public outreach events that included education regarding climate change. The City reserves the right to develop materials in future permit years to educate on climate change, and will utilize most up to date, peer reviewed and accepted information to derive these materials.

Water Quality Metric and Evaluation

The City conducts several public involvement opportunities annually and uses a minimum of four (4) to achieve MS4 Permit compliance for Minimum Control Measure 2. Table 3 outlines the public involvement activities conducted in Permit Year 1, a description of the activity/opportunity, tracking metrics to evaluate success of each opportunity, and the water quality benefits summary of each opportunity. The City will track the metrics shown in Table 3 annually to determine the success of each public involvement opportunity throughout the permit year. If the City determines another opportunity, not listed in Table 3, provides greater benefit to Water quality in subsequent permit years, the City reserves the right to revise the revise Table 3 based on evaluation of the success metrics.

Table 3. Public Involvement Opportunities

Public Involvement Opportunity	Activity	Description	Metric	Benefit
Disposal or Collection Events	Household Hazardous Waste Collection Days	Provide household hazardous waste collection opportunities to residents. The events were held on the first and third Wednesdays of each month from noon to 6 pm during the months of April Through October. During the months of November, December, January, February and March, the event was held once on the third Wednesday of the month.	Household waste collected – 6,670.56 tons Recycled Materials – 1,981.11 tons Recycling Bins Distributed - 640	Removed hazardous waste that could enter stormwater systems and dispose of them at approved location that is equipped to handle it
Pollution Prevention	Pickup Party	Citizens volunteer to collect trash at the various locations and are awarded points and prizes depending on their level and frequency of participation. Events are held on the first Thursday of the month from April to November	Weight of Trash collected this reporting period – 740 lbs.	Removed trash from local streams, improving the health and water quality of the stream system.
Educational Events	Watershed and Stormwater Educational Opportunities Program	City Engineering staff conducted presentations at schools and students learned about engineering practices and high priority water quality issues.	Number of schools attended - 1 Number of presentations given – 8 Number of students present – 211	Educated students on the importance of water quality
Educational Events	Valley Health Community Wellness Festival	In-person event where Public Services staff provides educational material on water conservation, pollution prevention, and recycling.	Educational Materials handed out - 141	Educated the public on the effects of pollution, water consumption, and improper recycling on natural resources.

MS4 Permittees Collaboration

The City did not collaborate with any other MS4 permittees during this permit year. The City currently does not have any plans to collaborate with other MS4 permittees but reserves the right to do so if a mutually beneficial opportunity arises.

V. Minimum Control Measure 3 – Illicit Discharge Detection and Elimination

Confirmation Statement

The City confirms that the MS4 map and outfall information table have been updated to reflect any changes to the MS4 occurring on or before June 30 of this reporting year.

Outfalls Screened

The City conducted dry weather screening on fifty (50) MS4 outfalls annually using procedures included in the Illicit Discharge Detection and Elimination (IDDE) Standard Operating Procedures Manual. No suspect discharges were found at any of the fifty (50) outfalls.

Illicit Discharges

The City continues to track and document suspicious and illicit discharges, as well as City investigation, follow-up, and enforcement actions in accordance with procedures included in the Illicit Discharge Detection and Elimination (IDDE) Standard Operating Procedures Manual. During this reporting period, the City investigated eight (8) reports of illicit discharges, all of which were followed up on and eventually closed. A tracking spreadsheet depicting the suspect and illicit discharges has been included in the **MS4 Permit Year 1 – Annual Report Reference Library**.

VI. Minimum Control Measure 4 – Construction Site Stormwater Runoff Control

The City continues to maintain the legal authority for implementation of a local erosion and sediment control program through the City’s Water Protection Ordinance (Chapter 9 Article II of the City Code) consistent with 9VAC25-875-10. A link to the City’s Codified Ordinance in muniCode and to Chapter 9 can be found at the following website:



<https://www.winchesterva.gov/Government/Code-Regulations>



The City continues to require permits for land disturbing activities including a VSMP permit through Chapter 9 of the City Code. Access to a downloadable Land Disturbance Permit Package and Virginia Stormwater Management Program Permit Package is provided on the City website at:

<https://www.winchesterva.gov/Services-Payments/Permits-Licensing-Applications>

The City confirms that all land disturbing projects that occurred during this reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment control.

Inspections Performed

The City continues to maintain an inspection program pursuant to Sections 9-39 and 9-41 of City Code. The City’s inspection program provides for inspection of land disturbing activities during construction to ensure compliance with:

- Approved erosion and sediment control plans
- Approved stormwater management plans

- Development, updating, and implementation of stormwater pollution prevention plans, and
- Development and implementation of any additional control measures necessary to address TMDLs

During this reporting period, there were a total of three thousand seventy-three (3,073) erosion and sediment control inspections conducted across all permitted construction sites located within the City.

Enforcement Actions

No erosion and sediment control enforcement actions were required during this reporting period.

VII. Minimum Control Measure 5 – Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands

Virginia Erosion and Stormwater Management Program Information

The City continues to maintain the legal authority for implementation of a local Virginia Stormwater Management Program (VSMP) consistent with 9VAC25-875-10 through the City’s Water Protection Ordinance (Chapter 9, Article III of the City Code). The following link is provided on the City’s web page directing citizens to Chapter 9 of the City Code:



<https://www.winchesterva.gov/engineering>.



Access is also provided to a downloadable Virginia Stormwater Management Program Permit Package using this link:

<https://www.winchesterva.gov/Services-Payments/Permits-Licensing-Applications>

The City continues to maintain a post development stormwater management facility inspection program in accordance with Section 9-67 of the City Code and requires inspections once every five years by City personnel, *and* annual self-inspections by owners.

Privately Owned Stormwater Management Facility Inspections

During this reporting period, one hundred and ninety-three (193) private BMPs were requested to be self-inspected by their owners; of that number, the City received responses and self-certifications for fifty-five (55) BMPs. The City performed inspections on sixty-four (64) private BMPs.

Privately Owned Stormwater Management Facility Enforcement Actions

During this reporting period, zero (0) of the sixty-four (64) private BMPs inspected by the City failed inspection.

Public Stormwater Management Facilities Inspections

During this reporting period, forty-nine (49) City owned BMPs were inspected.

Significant Maintenance, Repair, or Retrofit Activities on Stormwater Management Facilities

Forty-nine (49) Stormwater management facilities were inspected in this reporting period and all facilities were found to be within normal operating condition and no significant maintenance, repair, or retrofit activities were needed beyond that of routine maintenance.

Virginia Construction Stormwater General Permit Database Confirmation Statement

The City confirms that all best management practices (BMPs) were reported in accordance with Part III B 1 of the General VPDES Permit for Discharges of Stormwater From Small Municipal Separate Storm Sewer Systems, and no best management practices (BMPs) were eligible to be submitted under Part I.E.5.a.1. this reporting cycle.

For all projects that required coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities pursuant to Part III B 1 of the Construction General Permit, the City reviewed all applicable information provided by applicants pertaining to any site stormwater management facilities and entered that information into the Virginia Construction Stormwater General Permit database.

Stormwater Management Facility Electronic Reporting

The City confirms that all stormwater management facilities were reported using the DEQ BMP Warehouse in accordance with Part III B1 and B2 of the General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems, and that the referenced reporting includes the dates when the respective facility was last inspected. The City also confirms that all stormwater management facilities inspected during the permit year were electronically reported using the DEQ BMP Warehouse in accordance with Part III B 5 of the General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems.

VIII. Minimum Control Measure 6 – Pollution Prevention and Good Housekeeping for Municipal Operations

Operation Procedures Summary

During permit Year 1, The City developed written Standard Operating Procedures (SOPs) for Daily Good Housekeeping and Pollution Prevention in accordance with Part I E 6 a and b of the most current MS4 permit. The Pollution Prevention/Good Housekeeping for Municipal Operations - Standard Operating Procedures provides guidance for City staff. The Standard Operating Procedures documents are included in the **MS4 Permit Year 1 – Annual Report Reference Library**.

Confirmation Statement

The City also confirms that all high-priority facilities were reviewed during the reporting period to determine if SWPPP coverage was needed. It was determined that no additional SWPPP coverage was required during this reporting period.

New SWPPPs Summary

During this reporting period no new SWPPPs were developed in accordance with Part I E 6 i of the MS4 Permit.

Modified SWPPPs Summary

At the direction of Virginia DEQ, the SWPPP for the City Yard facility was updated during this reporting period. The revised SWPPP is included in the **MS4 Permit Year 1 – Annual Report Reference Library**. The City has also updated the SWPPP for its Public Services Campus due to a renaming of the facility, and the Grounds Maintenance Facility due to Nutrient Management Plans.

During reporting year 1, no high priority facilities were delisted in accordance with Part I E 6 1 of the MS4 Permit

Nutrient Management Plans Summary

The City developed one new Nutrient Management Plans (NMP) for Frederick Douglas Park during this permit year. Furthermore, during the permit year, the City updated all NMPs and submitted them to DEQ for review and approval. All NMPs were approved by the Department of Conservation and Recreation on July 19, 2024 and will be summarized in the Permit Year 2 Annual Report.

Training Events Summary

The City utilizes four (4) training modules to conduct in-person trainings. These modules require all trainees to take a 10-question quiz and obtain a 75% pass rate for the participant to be counted. The four modules utilized for training in Permit Year 1 were:

- Training Module #1 – Recognition and Reporting of Illicit Discharges
- Training Module #2 – Pollution Prevention for Road, Street, and Parking Maintenance
- Training Module #3 – Pollution Prevention for Fleet and Public Works Facilities
- Training Module #4 – Minimizing Stormwater Pollution Practices for Parks and Recreational Facilities

Forty-Nine (49) City employees were trained this permit year and all passed the modules listed above. The City expects to use this training annually due to the efficiency and convenience of computer based learning and the capabilities of the training application.

IX. Status Report on Local TMDL Special Conditions Requirements

Summary of Actions

The City of Winchester has two (2) Local TMDLs, they are as follows:

1. Abrams Creek and Lower Opequon Creek – Benthic (Sediment)
2. Abrams Creek and Lower Opequon Creek – Bacteria (Fecal Coliform)

The City has developed a comprehensive plan for addressing its local TMDL requirements in the *Abrams Creek and Lower Opequon Creek Combined Sediment and Bacteria TMDL Action Plan* (Permit Number VAR040053), which has been approved by DEQ. There have been no updates to the TMDL Action Plan during this Permit Year. As part of meeting the requirements outlined in the Action Plan, the City continues to evaluate and enhance its public education, outreach, and employee training programs tied to sediment and bacteria generating activities. The City also continues to implement its BMP management strategy for controlling the POC loads and is on track to accomplish its goals and milestone set forth in the report.

X. MS4 Permit Year 1 – Annual Report Reference Library

The MS4 Permit Year 1 Reference Library can be found here:

<https://www.winchesterva.gov/Government/Plans-Publications>

The following appendices containing all required MS4 Permit Year 1 information required in the MS4 Permit are located within the MS4 Permit Year 1 Reference Library.



APPENDIX 1: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) TRACKING

APPENDIX 2: CITY AND PRIVATELY OWNED STORMWATER MANAGEMENT BMP'S

APPENDIX 3: MS4 SERVICE AREA

APPENDIX 4: PARKS MAINTENANCE BUILDING POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS: STANDARD OPERATING PROCEDURES

APPENDIX 5: CITY PARKS MAINTENANCE BUILDING SWPPP