

2019

# ***CITY OF COLUMBUS STORMWATER MANAGEMENT PLAN (SWMP)***

## ***PHASE II MS4 ANNUAL REPORT***

*Nebraska Department of Environmental Quality*

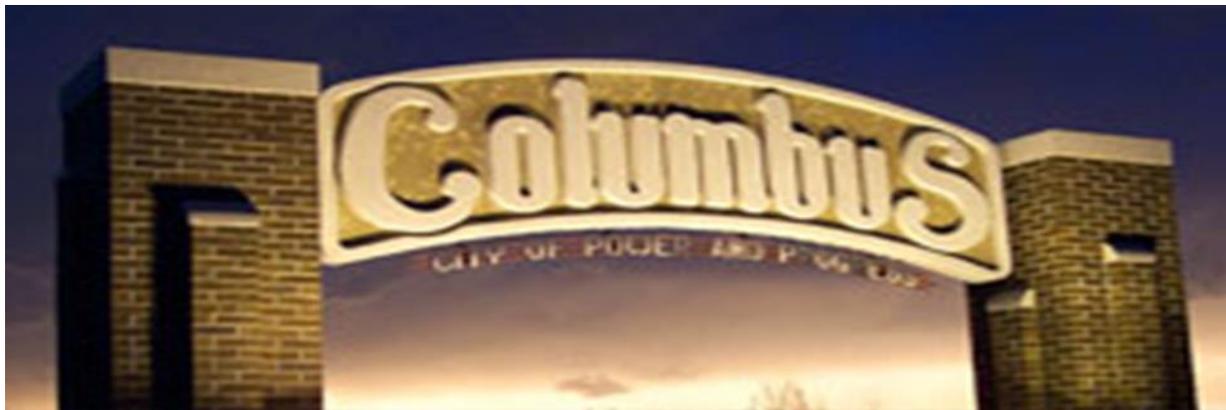
*Authorization to Discharge Stormwater*

*Under the NPDES Stormwater Phase II Municipal, Separate Storm  
Sewer System (MS4) General Permit Number NER310000*

*Authorization Number NER 300007*

*Issued July 1, 2017*

*For the Reporting Period: 01/01/19 through 12/31/19*



*March 18, 2019*

*Ryan Joe, Stormwater Coordinator*

*1200 N St. Suite 400*

*Lincoln, NE 68509-8922*

*RE: City of Columbus NPDES Annual Report 2019*

*Ryan:*

*Enclosed is the City of Columbus 2018 NPDES Phase II General Permit NER3000007 Annual Report.*

*In January of 2020, the City of Columbus underwent an audit from the NDEE. During the audit, there was discussion about the removal of the branded products and of our issues with the Small Lot Inspections.*

*In 2019, the City of Columbus made some minor changes to their Stormwater Management Plan (SWMP). One of the changes that were made is the decision to remove the branded material from Minimum Control Measure (MCM) 1.1. The influencing factor on this decision was that the branded materials being handed out were not being accepted well. We will work on finding another way to help educate and promote stormwater awareness to the public to replace this.*

*The other change was the implementation in late 2018 of the Small Lot Notice of Intent and their inspections under Minimum Control Measure (MCM) 4.3.2. The Engineering Project Manager began working with the Community Development Department on conducting the inspections. During our meeting with the NDEE it was suggested that maybe reducing the percentage that needed to be inspected from 100% to something more manageable. Therefore, we reduced percentage from 100% to 75% and feel that will be attainable moving forward for 2020.*

*If you need anything, further or have any questions, please feel free to contact me at my office 402-562-4237 or on my cell phone 402-910 6817*

*Sincerely,*

*David D. Boswell*

*Engineering Project Manager*

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## EXECUTIVE SUMMARY

*This Stormwater Management Plan (SWMP) documents commitments by the City of Columbus to implement stormwater management procedures and practices. The City of Columbus is required to maintain compliance with a National Pollution Discharge Elimination System (NPDES) permit issued by Nebraska Department of Environment and Energy (NDEE) that regulates the quality of stormwater runoff from the community. The Federal Clean Water Act establishes authority and the required compliance that NDEE enforces. Reducing the risk of stormwater pollution in local receiving waters by way of non-point source discharges is the purpose of the NPDES permit. Our NPDES Permit number NER300000 was issued to the City of Columbus in July of 2005. Updated NPDES Permit number NER 310000 was issued July 1, 2017.*

*Procedures have been developed to comply with each of the six Minimum Control Measures (MCM's) stated in the permit. These MCM procedures and activities are reviewed by the NDEQ as part of the annual reporting process and are defined as follows:*

- ◆ *Public Education and Outreach (MCM #1) was accomplished by using social media and cooperative programs with the UNL Extension Agency. Pamphlets were also handed out at the local Home Builders Show as well.*
- ◆ *Public Involvement and Participation (MCM #2) was accomplished by keeping individual Storm Water Manuals updated and published on the cities web site.*
- ◆ *Illicit Discharge Detection and Elimination (MCM #3) the manual was updated as well as the required outfalls were observed.*
- ◆ *Construction Site Storm Water Runoff Control (MCM #4) was accomplished by handing out pamphlets to General Contractors and Home Builders as well as site visits.*
- ◆ *Post-Construction (MCM #5) was updated as well as visits with contractors about the updated material. In addition, additional pamphlets were handed out.*
- ◆ *Good Housekeeping & Prevention (MCM #6) had training done as well as 100% of the cities sites were evaluated for high priority control.*

*This SWMP document is organized to communicate required regulatory compliance information to NDEE and EPA. The outline of the document is consistent throughout and is written in a manner to satisfy specific wording of the NPDES permit. References, Assignments, Frequencies and Measurable Goals are all clearly documented to successfully achieve the requirements of the NPDES permit.*

*The SWMP document outlines strategy details that are defined within program supporting documents. The details in these documents are not included in the SWMP except by reference for each strategy. The content that must be addressed within the supporting documents is clearly outlined by the activities of Program Defining Strategies. These Strategies are intended to provide integration between NPDES permit requirements, SWMP document content and Annual Reporting.*

EXECUTIVE SUMMARY (CONTINUED)

*In 2019, the City of Columbus went through a change in the position of Street Superintendent along with the flooding that occurred in the spring. Which hindered us in regards to accomplishing our goals for MCM 6.3.2 The Engineering Project Manager and the Street Superintendent have been working to form a plan to get the City back up to where it should be in regards to MCM 6.3.2.*

*Finally, this document is made available for the public to view on the Cities web site. The public understands of the program and their active participation with it is important to accomplishing the purpose of the SWMP.*

CERTIFICATION

*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 gathered and evaluated 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 submitted, this document 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.*

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*Tara Vasicek, City Administrator*

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*Date*

## MCM #1 PUBLIC EDUCATION AND OUTREACH

### PUBLIC EDUCATION AND OUTREACH DECISION PROCESS AND RATIONALE

*The purpose of this Minimum Control Measure (MCM) is to educate the public on the benefits of keeping our receiving waters clean of pollutants. An informed public can make a significant reduction for pollutants that enter our stormwater systems. Multiple media forms are used to convey this information. Which includes Social Media, Websites, Radio, Household Awareness Surveys, and more all play a role in this process.*

*The City of Columbus informs individuals and households by public awareness surveys. Once the results of the survey are in, a pamphlet of information discussing common household stormwater pollution topics is distributed to each utility customer.*

#### **How will the City of Columbus inform individuals and groups on how to become involved in the stormwater program and activities?**

*The City of Columbus Stormwater Division has a website and an email address listed on the City's webpage. Also, on the NebraskaH2O.org website. When events are scheduled, a press release is sent out to the public.*

#### **Who is the target audience for the city of Columbus education and outreach program that are likely to have stormwater quality impacts and why are they the target audience?**

*The City of Columbus has chosen the following target audiences for our education and outreach program that are likely to have stormwater quality impacts: Home Owners, Pet Owners, Lawn and Garden Care, Property Owners, Automobile Dealers/Mechanics/Detailers, Construction Site Operators/Home Builders/Contractors and Engineers/Developers/Realtors. These target audiences was chosen due to the impact of their activities and their availability to be reached.*

#### **What are the target pollutant sources the City of Columbus Public Education and Outreach program is designed to address?**

*The target audiences have been designated to address different types of non-point source pollution through the Public Education and Outreach (PEO) Program. They are household hazardous wastes, pet waste, oil and other fluids from automobiles, and grass clippings are some of examples.*

**What is the City of Columbus Public Education and Outreach strategy? What mechanisms used to reach the target audience, and how many people are expected to be reached by the program each year?**

*The City of Columbus's Public Education and Outreach (PEO) Program has the ability to utilize an array of formats to reach the public. Previously, the City has collaborated with other Nebraska H2O communities and the UNL Extension Office, Radio PSA's, Stormwater Pamphlets, Facebook posts, Press Releases, and newspaper articles. The City has the goal of eventually reaching all age groups and genders utilizing these various media platforms.*

**Who is responsible for the overall management and implementation of the City of Columbus Public Education and Outreach program and its activities?**

*The City of Columbus Engineering Project Manager is responsible for overall management and implementation of the City's education and outreach program. The Engineering Project Manager can be found at the Engineering Department and reached at 402-562-4237*

**How will the City of Columbus evaluate the success of the education and outreach program and how were the measurable goals identified?**

*The City of Columbus evaluates the success of the education and outreach program by implementing effectiveness measures for each BMP that will be met and acknowledged for each reporting period. These measures are meant to be a guide and measuring stick for each BMP and proof progress for that item.*

*This Municipal Separate Storm Sewer Systems (MS4) Public Education and Outreach (PEO) Strategy is a targeted approach to delivering education, training and public involvement and is tailored to target audiences and groups of individuals that may influence stormwater quality associated with municipal stormwater runoff. The City of Columbus can have a significant influence on the education and training provided to Municipal Employees, Engineering Consultants, Contractors, Sub contractors and General Public by delivering public education and outreach activities. By focusing on the target audiences described in the PEO Strategy, the City of Columbus can best develop awareness of stormwater BMP's, increase knowledge about recommended and required BMP's and develop skills for correctly implementing BMP's.*

**PEO Strategy Goal 1:** Educate and train Municipal Employees, Engineering Consultants, Contractors/Sub Contractors, and General Public to follow recommended and required BMP's and the steps that the targeted audience can take to reduce stormwater pollution.

**PEO Strategy Goal 2:** Utilize a combination of appropriate strategies to reach target audiences that can implement Stormwater BMP's.

**PEO Strategy Goal 3:** Inform the public about how to participate in environmental stewardship opportunities, review the SWMP and report about illicit discharges and other municipal stormwater pollution concerns.

**PEO Strategy BMP's:** The PEO Strategy Goals are supported by the PEO Strategy BMP's described throughout the Stormwater Management Plan (SWMP). The following PEO Strategy BMP's provide details about how the City of Columbus will accomplish the goals.

**BMP 1.1:** Deliver stormwater education materials that are tailored, current and relevant to the SWMP.

**BMP 1.2:** Deliver stormwater training and events that is tailored, current, and relevant to the SWMP.

**BMP 1.3:** Maintain public review, comment, and input resources that support the SWMP.

**BMP 1.4:** Support the notification from the target audience about the SWMP and pollution problems affecting stormwater quality.

**BMP 3.4:** Deliver education about the impact of illicit discharges, common types of illicit discharges and response procedures when illicit discharges are identified.

**BMP 4.4:** Deliver education about the impact of construction related stormwater pollution construction site erosion, sediment and good housekeeping BMP's, enforcement and inspection requirements.

**BMP 5.2:** Deliver education about planning and design BMP's required to treat stormwater runoff from new and re development.

**BMP 6.3:** Deliver education about the impact of maintenance and facility operations on stormwater, operation BMP's, inspection, and enforcement requirements.

**PEO Strategy Defining Activities:** *The PEO Strategy BMP's are defined by a set of materials and efforts that the City of Columbus maintains. The SWMP tables define each BMP with descriptions, target audiences, messages, methods/resources as well as dates materials were last provided and when they are next due. The defining activity tables follow the same general format shown below.*

<i>Description</i>	<i>Target Audience</i>	<i>Messages</i>	<i>Methods/Resources</i>	<i>Last Provided</i>	<i>Due Next</i>
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**PEO Strategy Implementation Activities:** *The PEO Strategy BMP's are measured by as a set of goals that the City of Columbus implements. The SWMP table lists the goals for the activity, a measure for evaluation and assessment, as well as the reporting for annual performance that is compared against the evaluation and assessment targets. The implementation tables follow the same general format shown below.*

<i>Goals:</i>	<i>Evaluation and Assessment</i>	<i>Annual Performance</i>
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***PEO Strategy Target Audiences:*** a diverse audience that the City of Columbus addresses can affect the quality of stormwater discharging to the Municipal Separate Storm Sewer System (MS4). Each target audience requires education and outreach techniques that accommodated their unique availability, behaviors, motivations, communication patterns, and liability to the city. Education materials and outreach activities are tailored with each target audience in mind to effectively reduce risk of stormwater pollution. Educating the target audience is expected to have a positive impact on stormwater quality by reducing the risk of discharging target pollutants.

*The Primary Target Audience is characterized by a high level of responsiveness to the city. The group includes any individual or entity that the City places expectations upon with a high degree of confidence that those expectations will be met. Failure to meet the Cities expectations can have negative impact upon the Primary Target Audience, which increases the potential, that education, and outreach efforts will be effective. The Primary Target Audiences includes:*

- *City Employees*
- *Engineering Consultants*
- *Contractors and Sub Contractors*

*The Secondary Target Audience is characterized by a lower level of responsiveness to the City to adopt personal best practices. The group includes any individual or entity that contributes stormwater and pollutants to the storm drain system. The City of Columbus has very little advantage over this group but provides education and outreach to raise awareness and influence perceptions of stormwater management in ways that protect water quality. The Secondary Target Audience includes:*

- *Residents*
- *Business Owners*
- *Service Providers*
- *Youth*
- *Community Groups*
- *Trade Associations*
- *Vendors*

**MCM#1: BMP 1: DEVELOP, MAINTAIN AND DISTRIBUTE CURRENT EDUCATION MATERIALS**

*1.1 Coordinate the Public Education and Outreach (PEO) Strategy with updates and maintenance of general stormwater education or outreach materials for distribution to residential, construction, industrial and commercial sources identified as high priority, community-wide issues related to the impact of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.*

*The PEO Strategy identifies the following:*

- *Goals, objectives, target messages, and audiences for information.*
- *Resources used and frequency for distributing information.*

<i>Reference:</i>				<i>Frequency:</i>	
<i>The City of City of Columbus PEO Strategy</i>				<i>Annually</i>	
<i>Description</i>	<i>Target Audience</i>	<i>Messages</i>	<i>Methods/Resources</i>	<i>Last Provided</i>	<i>Next Due</i>
<i>Online Websites</i>	<i>General Public</i>	<i>Stormwater Program Management and BMP topics</i>	<i>City of City of Columbus Website Nebraska H<sub>2</sub>O Website</i>	<i>2019</i>	<i>2020</i>
<i>Social Media</i>	<i>General Public</i>	<i>Stormwater Program Management &amp; BMP topics</i>	<i>City of City of Columbus Facebook &amp; Twitter Page Nebraska H<sub>2</sub>O Website</i>	<i>2019</i>	<i>2020</i>
<i>Internet Advertisements</i>	<i>General Public</i>	<i>Stormwater Program Management and BMP topics</i>	<i>Columbus News Team website</i>	<i>2019</i>	<i>2021</i>
<i>Radio PSA's</i>	<i>General Public</i>	<i>Basic Stormwater Protection Awareness – Prevent pollution</i>	<i>Local Radio Station</i>	<i>2019</i>	<i>2020</i>
<i>Storm Drain Awareness</i>	<i>General Public</i>	<i>Prevent pollution by keeping water draining to inlets, streams and lakes clean</i>	<i>Storm Drain Design Standard Storm Drain Adhesive Markers</i>	<i>2019</i>	<i>2020</i>
<i>Report:</i>	<i>We will continue with updating the web sites, social media, and storm drain awareness. We also have made contact with the local radio, and internet run advertisements although they could not give us an accurate number of people that were reached. In addition, we have decided to do away with the branded materials, at this time, as there is not much interest in them for our community.</i>				

1.1.2 Distribute general stormwater education and outreach materials related to the impact of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

<i>Reference:</i>	Public Education and Outreach Tracking Form		
<i>Responsible:</i>	Engineering Project Manager	<i>Frequency:</i>	On-going/ Annually
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Measure:</i>
<b>STORMWATER AWARENESS INFORMATION TO THE GENERAL PUBLIC</b>			
<i>ADMINISTRATION: Resources used with estimated/actual number of public reached.</i>	Recorded	Yes	
<i>EFFECTIVENESS: Use of stormwater program management websites.</i>	Available	Yes	
<i>EFFECTIVENESS: Social Media for stormwater program management and BMP information.</i>	30% of residents	25% of 23,130 or 5782 residents	
<i>EFFECTIVENESS: Use of storm drain markings for stormwater awareness.</i>	50 storm drains marked or replaced	153	
<i>EFFECTIVENESS: Use of Television Advertisements for stormwater awareness.</i>	Total aired.	3	
<i>EFFECTIVENESS: Use of Internet Advertisements for stormwater awareness</i>	Total produced.	5	
<i>EFFECTIVENESS: Use of Radio Advertisements for stormwater awareness</i>	Total aired.	128	
<i>EFFECTIVENESS: Use of Stormwater program materials for stormwater awareness to visitors at events, trainings, and activities.</i>	Total distributed at Home Builders Show and other activities.	173	
<b>SECTOR-SPECIFIC AWARENESS INFORMATION TO THE GENERAL PUBLIC</b>			
<i>ADMINISTRATION: Record of all resources used with actual number of public reached.</i>	Completed.	Yes	
<i>EFFECTIVENESS: Information provided to Household Hazardous Waste generators and collection locations.</i>	Total distributed.	9,600	
<i>EFFECTIVENESS: Information provided to pet owners with information about best practices and recommendations for collecting and disposing pet waste.</i>	Total distributed.	100	
<i>EFFECTIVENESS: Information provided to property owners with BMP practices and for minimizing Lawn and Garden pollutants.</i>	Total distributed.	30	
<i>EFFECTIVENESS: Information provided for Best Management Practices on Automobile Dealers, Mechanics, and Detailing Businesses.</i>	Total distributed.	50	

Satisfied:

*Yes x No Explanation: We feel satisfied with these numbers for this year for the social media, radio, and internet. The percentage of people reached is an approximate number. This is due to the social media could not give us an exact number of people reached. We will continue working with Radio and Internet markets in 2020 on new; PSA's and advertisements as well as we will place more emphasis on the social media aspect to increase our percentage of people that we reach. We also will work on reaching more people about pet waste as well as lawn and garden information.*

**MCM#1: BMP 2: DEVELOP, MAINTAIN AND PROVIDE TOURS AND EVENTS**

1.2.1 Coordinate the Public Education and Outreach Strategy with updates and maintenance of general stormwater tours and events that raise awareness for the impact of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. The Strategy includes for these awareness tours and events:

- Goals, objectives, target messages and audiences
- Resources used and frequency

<i>Reference:</i>				<i>Frequency:</i>	
<i>The City of Columbus PEO Strategy</i>				<i>Annually</i>	
<i>Description</i>	<i>Target Audience</i>	<i>Messages</i>	<i>Methods/Resources</i>	<i>Last Provided</i>	<i>Next Due</i>
<i>Keep Columbus Beautiful Clean-up Day</i>	<i>General Public</i>	<i>Community awareness of impacts of pollution to local waterbodies</i>	<i>Coordination with the Chamber, Keep Columbus Beautiful, and the UNL Extension Agency. As advertise through print and social media</i>	<i>2019</i>	<i>2020</i>
<i>Household Hazardous Waste Disposal Day</i>	<i>General Public</i>	<i>Prevent pollution by disposing household hazardous waste properly</i>	<i>Advertise through print and social media</i>	<i>2019</i>	<i>2020</i>
<i>Storm Drain Marking Installations</i>	<i>General Public</i>	<i>Provide community awareness to impacts of pollution to local waterbodies</i>	<i>Coordination with local youth groups, advertise through print and social media</i>	<i>2019</i>	<i>2020</i>
<i>Report:</i>	<i>The city partially funds Keep Columbus Beautiful and did work with Keep Columbus Beautiful by doing an Electronic Recycle Day and then a Tire Recycle event as well. In addition, we did an event with the UNL Extension office in the summer to show the kids the difference of impervious and pervious surfaces. We also worked with local youth in placing Stormwater Markers on Inlets that needed them. There are pamphlets at City Hall about hazardous waste and how to properly dispose of them when needed.</i>				

*1.2.2 Provide general stormwater education or outreach tours and events that raise awareness for the impact of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.*

<i>Reference:</i>	<i>Public Education and Outreach Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Performance:</i>
<i>ADMINISTRATION: Record Stormwater Education &amp; Outreach event.</i>	<i>Recorded</i>		<i>Yes</i>
<i>EFFECTIVENESS: General Public attendance at Keep Columbus Beautiful Education &amp; Outreach events as well as the UNL Extension events.</i>	<i>Recorded</i>		<i>1257</i>
<i>EFFECTIVENESS: Volunteer Youth participants for Storm Drain Marking installations</i>	<i>1 youth group per year</i>		<i>10</i>
<i>EFFECTIVENESS: City wide household Hazardous Waste Disposal event.</i>	<i>1 Event</i>		<i>0</i>
<i>Satisfied:</i>	<i>Yes X No Explanation: We had a local youth help with the marking of Storm Drain Inlets. Keep Columbus Beautiful held an Electrical Disposal and Tire Collection that the City of Columbus helped with. The City also helped with UNL Extension events about water quality and how it effects our bodies of water. We also have pamphlets at City Hall about hazardous waste.</i>		

PUBLIC PARTICIPATION AND INVOLVEMENT DECISION PROCESS AND RATIONALE

The purpose of this Minimum Control Measure (MCM) partly goes along with the first MCM, Public Education, and Outreach. The idea is to use the informed public to get involved to the point of participating in activities and/events. With this enthusiasm, the public will be spreading the idea of stormwater pollution prevention via word of mouth amongst members of the community and beyond.

**How does the City of Columbus involve the community in the development and submittal of the MS4 permit application and Stormwater Management Program?**

The City of Columbus involves the public in the development and submittal of the MS4 permit application and Stormwater Management Program by formal comments and public notices of changes to permits, SWMP, and supporting documents during the process of approval of the document and when amended.

**What is the plan for actively involving the public in the development and implementation of the City of Columbus Stormwater Management Program?**

The City of Columbus also actively involves the public in the development and implementation of the Stormwater Management Program by providing public notices when updating ordinances pertaining to the City of Columbus Stormwater Management Program. The City Council Meetings and work sessions allow the public to ask questions and give comments prior to the approval of any City Ordinance changes.

**Who is the target audience for the City of Columbus for public participation and involvement program?**

The City of Columbus actively approaches any group regardless of ethnicity or economic status as it pertains to stormwater pollution. Pollutant source identification is the key component of the City's Stormwater Management Program. Any group, whether industrial, trade, environmental, educational, is approachable.

**What are the types of public involvement and participation activities included in the City of Columbus Stormwater Management program?**

The types of public involvement and participation activities The City of Columbus uses Rain Garden Tours and demonstrations, storm drain marking, illicit discharge hotline, Water Expo provided by UNL Extension, and community cleanup events.

**Who is responsible for the overall management and implementation of the City of Columbus public participation and involvement program activities?**

*The City of Columbus Engineering Project Manager is ultimately responsible for the management and implementation of the City of Columbus Public Participation and Involvement program and finding program activities that the public can participate in. The Engineering Project Manager can be found at the Engineering Department and reached at 402-562-4237.*

**How will the City of Columbus evaluate the success of the participation and involvement program and how were the measurable goals identified?**

*The City of Columbus evaluates the success of the public participation and involvement activities by implementing several 'effectiveness measures' to measure the successful implementation of each Best Management Practices (BMP). These effectiveness measures are reported annually in our NDEQ Annual Report.*

**MCM #2: BMP 1: PUBLIC INVOLVEMENT AND PARTICIPATION MATERIALS**

2.1.1 Coordinate the Public Education and Outreach Strategy with materials that demonstrate compliance with State and local public notice requirements and involve the public in planning and implementation of programs and activities related to the City of Columbus Stormwater Management Program (SWMP) and NPDES Permit. The Public Education and Outreach (PEO) Strategy identifies the following:

- Target messages and audiences for public involvement and participation.
- Resources used and frequency for providing public involvement and participation.

<i>Reference:</i>				<i>Frequency:</i>	
<i>The City of Columbus PEO Strategy</i>				<i>Annually</i>	
<i>City of Columbus City Code Chapters 53-54</i>					
<i>Description</i>	<i>Target Audience</i>	<i>Messages</i>	<i>Methods/Resources</i>	<i>Last Provided</i>	<i>Next Due</i>
<i>MS4 Permit</i>	<i>General Public</i>	<i>Regulations and Ordinances are available for the public to use and follow for compliance</i>	<i>Available on City of Columbus Web site. Also available in Engineering Project Managers Office.</i>	<i>2019</i>	<i>2020</i>
<i>Stormwater Management Plan</i>	<i>General Public</i>	<i>Regulations and Ordinances are available for the public to use and follow for compliance</i>	<i>Available on City of Columbus Web site. Also available in Engineering Project Managers Office.</i>	<i>2019</i>	<i>2020</i>

<p><i>Stormwater Program Ordinances for:</i></p> <ul style="list-style-type: none"> <li>• <i>Illicit Discharge Detection and Elimination</i></li> <li>• <i>Erosion and Sediment Control</i></li> <li>• <i>Post-Construction Stormwater Treatment</i></li> </ul>	<p><i>General Public</i></p>	<p><i>Regulations and Ordinances are available for the public to use and follow for compliance</i></p>	<p><i>Available on City of Columbus Web site. Also available in Engineering Project Managers Office.</i></p>	<p><i>2019</i></p>	<p><i>2020</i></p>
<p><i>Formal Comments for Ordinance Adoption and Revision</i></p>	<p><i>General Public</i></p>	<p><i>Public input helps form public policy and ordinances for protecting water quality</i></p>	<p><i>City Council, Public Notices</i></p>	<p><i>2018 N/A IN 2019</i></p>	<p><i>AS NEEDED 2020</i></p>
<p><i>Report:</i></p>	<p><i>We have made some clerical corrections to the SWMP, IDDE, and Post-Construction Stormwater Treatment Manuals. We also reorganized the web site to hopefully make it easier to find these documents as we discussed in NDEE's site visit. We will continue to update the manuals on an as needed basis throughout the upcoming year.</i></p>				

*2.1.2 Provide public involvement and participation opportunities that demonstrate compliance with State and local public notice requirements and involves the public in planning and implementation of programs and activities of the SWMP.*

<i>Reference:</i>	<i>Public Education and Outreach Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going Annually</i>
<i>Goals</i>	<i>Evaluation and Assessment:</i>	<i>Performance:</i>	
<i>Administration: Provide program reference documents on-line and make available to the general public for the following:</i> <ul style="list-style-type: none"> <li>• <i>Municipal Separate Storm Sewer (MS4) Permit.</i></li> <li>• <i>Storm Water Management Plan (SWMP)</i></li> <li>• <i>Illicit Discharge and Connection Ordinance.</i></li> <li>• <i>Post-Construction Stormwater Treatment Ordinance.</i></li> </ul>	<i>Provided</i>	<i>Yes</i>	
<i>Administration: Provide a public forum to receive input about proposed stormwater compliance plans and ordinances.</i>	<i>Record public attendance and comment numbers</i>	<i>Proposed Changes: None Number Attended: Comments: None</i>	
<i>Administration: Make web form and telephone resources available to the public for submitting requests, such as Mayors Phone Hotline, City web report form and Nebraska H<sub>2</sub>O web report form received from public requests related to stormwater information, potential pollution situations and stormwater program recommendations.</i>	<i>Report all resources utilized</i>	<i>Yes</i>	

<p><b>EFFECTIVENESS:</b> All proposed changes to regulations and ordinances are posted for review at least one week prior to decision.</p>	<p>100%</p>	<p>Yes</p>
<p><b>EFFECTIVENESS:</b> Coordinate a stormwater committee (or similar group) with community members that receive information about the City of Columbus Stormwater Program, to review and comment on proposed program, policy, and ordinance changes as well as make recommendations for program activities included in the SWMP.</p>	<p>Number of participants and meetings.</p>	<p>Citizens: Meetings: N/A for 2020</p>
<p>Satisfied:</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explanation: We did not make any changes to the manuals or the Ordinances in 2019. Therefore, we did not have a need for the committee to hold any meetings. Our committee is the same one that helped adopt our SWMP and is on an on call basis.</p>	

ILLICIT DISCHARGE DETECTION & ELIMINATION DECISION PROCESS RATIONALE

The purpose of this MINIMUM CONTROL MEASURE (MCM) is to minimize the effect of illicit discharges within the municipality. An Illicit Discharge Detection and Elimination (IDDE) program is followed and an ordinance has been enacted within the City Code. Dry weather inspections of storm sewer outfalls are performed within the community. In addition, a detailed storm sewer map is maintained to track flow of stormwater and identify affected areas from illicit discharges. Finally, the City of Columbus's website allows the public to acknowledge their concerns regarding all forms of stormwater pollution.

**How did the City of Columbus develop a stormwater system map and what information is used to verify outfall locations and make updates?**

The City of Columbus developed a stormwater system map by consolidating all information gathered by City of Columbus staff and other entities. This included all outfall points, inlets, storm sewer pipes, and manhole boxes. Maintenance and upkeep of this stormwater system map is done when as-builts and changes to the system are received

**How does the City of Columbus effectively prohibit discharges and why was that mechanism chosen?**

The City of Columbus effectively prohibits illicit discharges with an active IDDE program that is identified in our Municipal Code, complete with an Enforcement Response Plan. (ERP) The city holds violators accountable by implementing appropriate levels of enforcement, based on the nature and circumstances of the illicit discharge. City Municipal Code Chapter 53 defines and prohibits stormwater discharges.

**How does the City of Columbus plan to ensure that the illicit discharge ordinance, procedures, and actions are implemented?**

The City of Columbus plans to ensure that the illicit discharge ordinance, procedures, and actions are implemented through proper and consistent education of City employees to be able to recognize illicit discharges. The City of Columbus has a protocol with an ERP that identifies the procedure to follow based on the severity of non-compliance.

**How does the City of Columbus detect and address illicit discharges to the storm sewer system, including illegal dumping and spills?**

*The Illicit Discharge Detection and Elimination (IDDE) Program defines protocol for reporting the requirement to investigate trace and remove potential illicit discharges, including illegal dumping or spills. Using the appropriate City contact information (via phone or website), a citizen can identify to a responsible party what they saw. The citizen can remain anonymous or be known. The discharge is addressed and tracked until the issue is clean and a party is found responsible.*

**How does the City of Columbus inform public employees, business and the public about the hazards to water quality from illegal discharges and disposal of waste?**

*The City of Columbus informs public employees, businesses, and the public about the hazards to water quality from illegal discharges and improper disposal of waste through training videos, posters, bulletins, website, and press releases. As the IDDE Program continues to develop, additional materials or educational effort would include flyers, additional website content, social media, and providing more presentation materials for training purposes.*

**Who is responsible for the overall management and implementation of the City of Columbus Illicit Discharge Detection and Elimination program and program activities?**

*The City of Columbus Public Works Director is responsible for the overall management and implementation of the IDDE Program and its activities.*

**How will the City of Columbus evaluate the success of the Illicit Discharge Detection and Elimination program and how are the measurable goals identified?**

*The City of Columbus evaluates the success of the IDDE Program through effectiveness measures to be met on a regular basis. The measures are acknowledged at each annual report to show the measure of success for the IDDE Program.*

**MCM #3: BMP 1: DISCHARGE INVESTIGATION AND REMOVAL**

*3.1.1 Coordinate updates and maintenance of discharge record-keeping, investigation, removal and enforcement information in the MS4 Illicit Discharge Detection and Elimination (IDDE) Program, which references and defines the following:*

- *State and/or local regulatory mechanism(s) that effectively define allowable non-stormwater discharges and prohibit non-stormwater discharges into the storm sewer system related to illicit discharges (including on-site sewage disposal systems, spills, discharges, connections and dumping).*
- *Internal spill/dump/discharge/connection procedures, departmental staff responsibilities, contact information (including NDEQ for occurrence believed to be an immediate threat to human health or the environment), and equipment used to investigate illicit discharges.*
- *Enforcement response protocol used to remove illicit discharges that occur within the MS4.*
- *Data collected, database used, and data export procedures for records of investigation, removal and enforcement efforts, enforcement status, and outcomes for illicit discharges.*
- *Protocol for reporting the requirement to investigate and remove potential illicit discharges that flow into the MS4 from adjacent MS4 operators and property owners.*

<i>Reference</i>	<i>Frequency</i>
<i>City of Columbus Ordinance Chapter 53 Illicit Discharge Detection and Elimination (IDDE) Operation Manual Chapters 4 &amp; 5</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>The Engineering Project Manager and the Public Works Director met and had a lengthy discussion about the manual and the procedures for the program and they both agreed that the procedures were still viable. Therefore, no changes were made to the manual or the procedures for 2019.</i>

**3.1.2 Investigate, remove, or cause responsible party to remove spills, illegal discharges, and illicit connections within and into the MS4.**

<b>Reference:</b>	IDDE Program Tracking Form		
<b>Responsible:</b>	Public Works Director & Engineering Project Manager	<b>Frequency:</b>	On-going/ Annually
<b>Goals:</b>	<b>Evaluation and Assessment:</b>		<b>Measure</b>
<b>ADMINISTRATION:</b> Record dates of all notifications of potential illicit discharges, stakeholders involved, investigation and communication efforts, status, and final resolution taken for potential illicit discharges.	Record discharge information required.		Yes
<b>EFFECTIVENESS:</b> Initiate investigation of potential illicit discharges and/or contact adjacent MS4 operator within two days of notification.	100%		3 of 3 100%
<b>EFFECTIVENESS:</b> Once a source is determined, initiate notification of responsible party of potential illicit discharges within one working day of notification.	100%		3 of 3 100%
<b>EFFECTIVENESS:</b> Open records are updated once a week with status and any new information until the issue is resolved.	100%		Yes
<b>EFFECTIVENESS:</b> Summarize all instances that were closed without resolution including who made determination to close the record and why the instance could not be resolved.	Record instances closed without resolution		0
<b>Satisfied:</b>	Yes X No Explanation: There was a small learning curve for the city personnel as for using the Lucity software, and the process of the program. In the end, all Illicit Discharges were resolved in a timely fashion with one instance that required a letter of warning which was resolved in a timely fashion.		

*MCM #3: BMP 2: DRY WEATHER SCREENING*

*3.2.1 Coordinate updates and maintenance of Dry Weather Screening Inspection and data collection information in the MS4 Illicit Discharge Detection and Elimination (IDDE) Program, which defines the following:*

- Basis for selecting outfall locations used to screen for the presence of illicit discharges to the MS4 considering likelihood of illicit connections or ambient sampling.*
- Frequency used to screen major and minor outfalls for the presence of illicit discharges to the MS4.*
- Current policies, staff, contact information, equipment, and known impairments or TMDL pollutants of concern used to conduct dry weather screening for the presence of illicit discharges to the MS4.*
- Field tests of selected chemical parameters, evaluation methods and sample concentration action levels for pollutants during dry weather screening that trigger determination to investigate flow as a potential illicit discharge to the MS4.*
- Data properties collected, geo-database used, illicit discharge identification and tracking database used, and data export procedures for reporting dry weather screening conducted to determine the presence of illicit discharges to the MS4.*

<i>Reference</i>	<i>Frequency</i>
<i>IDDE Program Chapter 7 and Appendix “B” &amp; “C”</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>In 2019 we visited all know large (36”) or lager outfalls. We also visited at least 33 percent of the smaller outfalls (35”) or smaller. There were some minor clerical revisions to the program manual. We also added some new outfall locations to the list from new construction or extra research to find missing ones or ones that were in question. Some field tests were performed for pollutants if we thought that there might be some contamination. No pollutants were found on the ones that were observed in 2019.</i>

3.2.2 Conduct Dry Weather Screening Inspections and record all results in the stormwater outfall geodatabase.

<i>Reference:</i>	<i>Dry Weather Screening Tracking</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/ Annually (Summer or Fall)</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Measure</i>
<b>ADMINISTRATION:</b> Conduct and record outfall inspections in the outfall geodatabase within the calendar year.	Input all records.		176
<b>EFFECTIVENESS:</b> Screen each major outfall annually.	100%		57 of 57 (100%)
<b>EFFECTIVENESS:</b> Investigate each minor outfall every three years	33%		100% of 119 39 outfalls annually
<i>Satisfied:</i>	Yes X No Explanation: All of the major outfalls were checked inspected and verified with our geodatabase. As well as all of the minor outfalls. Because of locating additional outfalls, the map has been updated.		

*MCM #3: BMP 3: STORM SEWER SYSTEM MAPPING*

*3.3.1 Coordinate updates and maintenance of MS4 area maps and stormwater outfall location information in the MS4 Illicit Discharge Detection and Elimination (IDDE) Program, which defines and references the following:*

- Internal procedures, frequencies, municipal staff responsibilities, contact information, and equipment used to capture and verify existing and future stormwater outfall location information.*
- How outfall locations are described, minimum size of outfall required to be mapped, smaller size outfalls that may be mapped, and justifications for mapping smaller outfalls.*
- Sources of information used for the maps listing land use types, waters of the state, outfall locations, storm drain infrastructure, collection system, and structural stormwater treatment BMPs.*
- Latest version of the outfall map with receiving waters.*

<i>Reference</i>	<i>Frequency</i>
<i>IDDE Program Chapter 6 City of Columbus GIS</i>	<i>Review Annually</i>
<i>Report:</i>	<i>We are still updating and adding to our Lucity database for all of the outfall location. Also better ways to update or add to our software program so that it can be used in the field to fill out the specific forms, attach pictures, and other types of information. We have added some new outfalls and updated the GIS map to reflect the new outfalls, drainage basins, and waters of the state. In 2020, we will be looking into ways to tag the outfalls in the field so everyone will be able to identify one without a map or software.</i>

3.3.2 Maintain map, to the extent required by the permit, of current geographic locations of all stormwater outfalls, the approximate boundary of their drainage area that discharge to State-designated receiving waters in the MS4, dry weather field screening locations, storm drain infrastructure and collection system as well as structural stormwater treatment locations.

<i>Reference:</i>	City of Columbus GIS As-built Records City of Columbus GIS		
<i>Responsible:</i>	GIS Supervisor & Engineering Project Manager	<i>Frequency:</i>	On-going/ Annually
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Measure</i>
<b>ADMINISTRATION:</b> Maintain all outfall attribute updates in geo-database of stormwater outfall information currently available for major and minor outfalls.	Maintained		Major: 57 Minor: 119
<b>ADMINISTRATION:</b> Update estimated drainage boundary attributes with existing and future land use at a minimum of five years for all outfalls that discharge to State-designated receiving waters in the MS4.	Maintained		Yes
<b>EFFECTIVENESS:</b> All outfall, storm drain infrastructure, collection system, and storm water treatment geo-reference attributes are updated in the geo-database within one year of new construction or 30 days following routine outfall dry weather screening.	100%		100% of 0
<i>Satisfied:</i>	Yes X No Explanation: There were no completed projects for 2019 there for no additional potential outfalls have been added. We evaluate and reassess all major outfalls on an annual basis. There is a Dry Weather monitoring process that inspects all major outfalls.		

**MCM #3: BMP 4: ILLEGAL DISCHARGE AND IMPROPER WASTE DISPOSAL  
EDUCATION**

3.4.1 Coordinate updates and maintenance of educational and training information for distribution related to the hazards associated with illegal discharges and improper disposal of waste in the Public Education and Outreach Strategy, which establishes the following:

- Training program with at least one target message related to identification and reporting of illicit discharges and connections for a sector of Public Employees involved in Operation and Maintenance activities every reporting year.
- At least one target message and distribution method for a sector of Public Employees not involved in Operation and Maintenance every reporting year.
- At least one target message and distribution method for a sector of Commercial/Industrial Businesses within the MS4 every reporting year.
- At least one target message and distribution method for at least one sector of the General Public within the MS4 every reporting year.

<i>Reference</i>				<i>Frequency</i>	
<i>The City of Columbus PEO Strategy</i>				<i>Annual</i>	
<i>Report:</i>	<i>The City did update the training information and it was discussed with all department heads.</i>				
<i>Reference:</i>				<i>Frequency:</i>	
<i>The City of Columbus PEO Strategy</i>				<i>Annual</i>	
<i>Description</i>	<i>Target Audience</i>	<i>Messages</i>	<i>Methods/Resources</i>	<i>Last Provided</i>	<i>Next Due</i>
<i>Water Quality Brochure: Illicit Discharge Resource &amp; References</i>	<i>Municipal Staff involved with O&amp;M</i>	<i>Identify, report, investigate and remove Illicit Discharges and Connections</i>	<i>Available at O&amp;M Facility</i>	<i>2019</i>	<i>2020</i>

<i>Water Quality Brochure: Household Hazardous Waste</i>	<i>General Public</i>	<i>Prevent pollution by disposing household hazardous waste properly</i>	<i>Downloadable from website. Available in the Engineering Lobby.</i>	<i>2019</i>	<i>2020</i>
<i>Water Quality Brochure: Pet Waste</i>	<i>General Public</i>	<i>Prevent pollution from pet waste by collecting and disposing it properly</i>	<i>Downloadable from website. Available at City Hall Business counter.</i>	<i>2019</i>	<i>2020</i>
<i>Water Quality Brochure: Lawn and Garden Care</i>	<i>General Public</i>	<i>Prevent pollution by controlling lawn and garden waste and chemicals from leaving your property</i>	<i>Downloadable from website. Available in the Engineering Lobby.</i>	<i>2019</i>	<i>2020</i>
<i>Water Quality Brochure: Automotive Repair</i>	<i>Business Sector: Automotive Repair</i>	<i>Prevent pollution from automotive maintenance activities</i>	<i>Downloadable from website. Distributed to businesses conducting automotive maintenance. Available in the Engineering Lobby.</i>	<i>2019</i>	<i>2020</i>
<i>Water Quality Brochure: Outdoor Landscaping</i>	<i>Business Sector: Outdoor Landscaping</i>	<i>Prevent pollution from landscape maintenance activities</i>	<i>Downloadable from website. Available in the Engineering Lobby.</i>	<i>2020</i>	<i>2021</i>
<i>Brochure for Restaurants</i>	<i>Business Sector: Restaurants</i>	<i>Prevent pollution from waste materials, oils and grease from restaurants</i>	<i>Downloadable from website. Distributed to restaurants. Available in the Engineering Lobby.</i>	<i>2020</i>	<i>2021</i>
<i>IDDE training</i>	<i>City staff</i>	<i>Identify, report, and remove illicit discharges and connections</i>	<i>Illicit Discharge Detection &amp; Elimination Guide &amp; references.</i>	<i>2019</i>	<i>2020</i>
<i>Brochure for Concrete Delivery</i>	<i>Concrete Companies</i>	<i>Prevent pollution due to improper washout of truck.</i>	<i>Water Quality Brochure: Concrete Delivery distributed to businesses.</i>	<i>2019</i>	<i>2020</i>
<i>Report:</i>	<i>The City of Columbus was able to get personnel IDDE training as well as the seasonal help. We implemented a better way of getting them trained for 2019 and will continue to expand on the process for 2020. We were able to visit with 75% of all business in the City of Columbus in 2019.</i>				

3.4.2 Distribute information related to the hazards associated with illegal discharges and improper disposal of waste to Public Employees, Businesses, and the General Public.

<b>Reference:</b>	Education and Outreach Strategy Tracking Form		
<b>Responsible:</b>	Engineering Project Manager Human Resource Director	<b>Frequency:</b>	On-going/ Annually
<b>Goals:</b>	<b>Evaluation and Assessment:</b>	<b>Performance:</b>	
<b>ADMINISTRATION:</b> Water Quality brochure for household hazardous waste distributed matches current PEO Strategy.	Material is current	Yes	
<b>ADMINISTRATION:</b> Water Quality brochure for pet waste distributed matches current PEO Strategy.	Material is current	Yes	
<b>ADMINISTRATION:</b> City Employees, who as part of their normal job responsibilities, may meet or observe an illicit discharge or illicit connection to the MS4, completed training.	Number of Supervisors Trained	25	
<b>EFFECTIVENESS:</b> At least seventy-five percent (75%) of the estimated target audience sector of Business Owners had information made available to them in the reporting year.	75%	75% of 126 Business Owners	
<b>EFFECTIVENESS:</b> At least fifty percent (50%) of the estimated target audience sector of General Public had information made available to them in the reporting year.	50%	60% of 23,100 residents	
<b>EFFECTIVENESS:</b> All new City employees at maintenance facilities responsible for maintaining MS4 areas, who as part of their normal job responsibilities, may come into contact with or observe an illicit discharge the MS4, receive training within one year of hire and for current employees every three years	100%	11 New Employees 147 Current employees	
<b>SATISFIED:</b>	Yes X No Explanation: In 2019 I started placing flyers on the back of our water bills that are mailed out in hopes they will read them. We implemented a more efficient way to train existing and new employees by using Human Resource Department since they see all new hires they have them watch a video and read a pamphlet on Illicit Discharge and Detection. Then the Engineering Project Manager addresses the regular employees as needed.		

CONSTRUCTION STORMWATER MANAGEMENT DECISION PROCESS RATIONALE

*The purpose of this MCM is to reduce pollutants in stormwater runoff from construction activities that result in land disturbance. In accordance with NDEQ Administrative Code 119.10.002.12D, Nebraska Small MS4 General Permit NER310000 IV.B.3, and City of Columbus Municipal Ordinance CHAPTER 54, the Construction Stormwater Program includes and adheres to the following elements:*

- 1. Construction Stormwater Ordinance*
- 2. Operator Requirements to Implement Sediment & Erosion Control, Waste, and Stormwater Controls*
- 3. Construction Sediment & Erosion Control and Site Plans*
- 4. Construction Site Inspection and Enforcement Procedures*
- 5. Construction Stormwater Education.*

*Construction Stormwater Design standards meeting the NDEQ and NPDES Permit requirements are available on the City website. Construction site operators for sites disturbing one acre or more, or less than one acre if part of a larger common plan of development or sale are required to enact Erosion and Sediment Controls.*

**How does the City of Columbus require erosion and sediment control measures on construction sites in the City of Columbus and why were those mechanisms chosen?**

*The City of Columbus requires erosion and sediment control measures on construction sites via City Code (CHAPTER 54). The ordinance language ensures every construction project within the City Limits requires proper Erosion and Sediment Controls, as well as inspection and evaluation methods.*

**How does the City of Columbus enforce erosion and sediment control requirements when there is non-compliance with requirements?**

*The City of Columbus- has an Enforcement Response Plan (ERP) for the Erosion & Sediment Control Program, which defines the level of enforcement based on the level of non-compliance. The ERP was created to address all levels of non-compliance. The City will follow through on issues of non-compliance until resolved. Communication with the violator can vary from a phone call to a formal notice of violation to enforcement of Civil Penalties.*

**What types of waste materials are construction site operators required to manage onsite with Best Management Practices?**

*The City of Columbus has a defined list of pollutants, including solid waste and hazardous materials, which construction site operators are required to manage onsite with Best Management Practices in City Ordinance CHAPTER 54. Waste materials include construction activity trash from building materials, equipment and vehicle track out, and potential sanitary waste.*

**What procedures does the City of Columbus follow for selecting and completing site plan review when applications for construction are submitted for approval?**

*The City of Columbus requires an Erosion and Sediment Control plan meeting the NDEQ and NPDES Permit requirements for review by City staff. For sites greater than an acre, and those less than an acre but part of a larger common plan of development or sale, a Stormwater Pollution Prevention Plan (SWPPP) is required to be followed.*

**Who is responsible for the overall management and implementation of the City of Columbus Construction Stormwater Program and program activities?**

*The City of Columbus Engineering Project Manager and the City Engineer are ultimately responsible for the management and overall implementation of the Construction Stormwater Program.*

**How will the City of Columbus evaluate the success of the Construction Stormwater Program and how are the measurable goals identified?**

*The City of Columbus has multiple effectiveness measures implemented to ensure the BMP's are being utilized correctly. Each annual report sent in to the NDEQ will address these effectiveness measures and how to interpret them.*

*MCM #4: BMP 1: MAINTENANCE, IMPLEMENTATION, AND ENFORCEMENT OF  
EROSION AND SEDIMENT CONTROL AUTHORITY*

*4.1.1 Coordinate maintenance of enforceable authority and escalation procedures in the MS4 Construction Stormwater Operations Guide (CSW) Program Guidance Document, which references local regulatory mechanisms that:*

- Defines and enables municipal enforcement.*
- Defines and requires construction erosion and sediment control implementation.*
- References local regulatory mechanism(s) that effectively defines waste control implementation.*
- References local regulatory mechanism(s) that effectively defines and establishes a range of penalty options and when they will be used to ensure compliance.*

<i>Reference</i>	<i>Frequency</i>
<i>City Ordinance CHAPTER 54</i>	<i>Update: 10/23/19</i>
<i>Construction Stormwater Operations Guide (CSW) Chapter 2</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>After the review process there were a few clerical changes made to the Operations Guide (CSW). As well as to the Construction Stormwater and Runoff Enforcement Response Plan. There were no additions or changes to our City Ordinance.</i>

4.1.2 Conduct procedures to investigate, remove, and enforce each instance of construction stormwater non-compliance for observed non-compliance of the municipal code/ordinance.

<i>Reference:</i>	Construction Stormwater Enforcement Tracking Form		
<i>Responsible:</i>	Engineering Project Manager	<i>Frequency:</i>	On-going/Annually
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Measure</i>
<b>ADMINISTRATION:</b> Record dates of all notifications of potential construction stormwater program non-compliance. Record stakeholders involved investigation efforts, communication efforts, interim steps of enforcement if taken to resolve, and final resolution taken for potential construction stormwater program non-compliance.	100%		4 of 4 100%
<b>EFFECTIVENESS:</b> Initiate investigation of potential construction stormwater program non-compliance within two working days of notification or identification.	100%		2 of 2 100%
<b>EFFECTIVENESS:</b> Open records are updated once a week with status and any new information until the issue is resolved.	Total number of instances:		0
<i>Satisfied:</i>	Yes: x No: When the contractors were contacted about the issues of their site they had them taken care of with a timely fashion. We had two instances that needed more attention band was resolved within a reasonable time usually by the end of the day.		

*MCM #4: BMP 2: CONSTRUCTION SITE PLAN REVIEW*

*4.2.1 The City will coordinate maintenance of site plan review procedures in the MS4 Construction Stormwater Operations Guide (CSW) Program, which references local regulatory mechanisms that define the following:*

- Authority to conduct construction site plan reviews for all land development and building projects that will disturb at least one acre of soil surface alone or as part of a larger common plan of development or sale.*
- Minimum requirements for site plan submittals to address construction erosion, sediment, and waste control best management practices.*
- Minimum standards by reference for design of construction erosion, sediment, and waste control best management practices.*
- Basis for selecting certain sites for site plan review.*
- Current policies, staff, contact information and required procedures for construction site plan review.*

<i>Reference</i>	<i>Frequency</i>
<i>City ordinance 54.08</i>	<i>Update: 09/04/18</i>
<i>Construction Stormwater Operations Guide (CSW) Chapter 3</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>After the review process there were a few clerical changes made to the Stormwater Operations Guide (CSW) Chapter 3. As well as updated, review checklist. There were no additions or changes to our City Ordinance.</i>

4.2.2 The City will conduct and record site plan reviews for all land development and building projects that will disturb at least one acre of soil surface alone or as part of a larger common plan of development or sale.

<i>Reference:</i>	<i>Construction Stormwater Plan Review Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/ Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Measure</i>
<b>ADMINISTRATION:</b> Complete construction stormwater site plan review form for every land development and building project that will disturb at least one acre of soil surface alone or as part of a larger common plan of development or sale.	100%		8 of 8 100%
<b>EFFECTIVENESS:</b> Record when construction stormwater site plan submittal requirements were not satisfied and required revision and resubmittal.	100%		0
<i>Satisfied:</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>Explanation: Our methods of this process was updated in 2019 to make it the process more efficient.</i>		

*MCM #4: BMP 3: CONSTRUCTION SITE INSPECTIONS*

*4.3.1 The City will coordinate review and maintenance of site inspection procedures in the Construction Stormwater Operations Guide (CSW), which references local regulatory mechanisms that define the following:*

- Local regulatory mechanism(s) that effectively defines and enables authority to conduct site inspections*
- Minimum standards by reference for installation and maintenance of construction erosion, sediment control best management practices.*
- Minimum standards by reference for installation and maintenance of waste control best management practices.*
- Current policies, staff, contact information, frequency and required procedures for routine municipal inspections of public and private construction projects.*
- Minimum required frequency and information for construction operator self-inspections.*

<i>Reference</i>	<i>Frequency</i>
<i>City Ordinance Chapter 54</i>	<i>Update: 09/04/18</i>
<i>Construction Stormwater Operations Guide (CSW) Chapter 4</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>No changes were made this year to this section and no additions or changes to our City Ordinance. We did however refine the use of our Lucity software program to better suit the needs of the city, which has made it more efficient for site inspections and tracking purposes.</i>

4.3.2 Conduct site inspections for construction projects to document construction stormwater installation and maintenance compliance.

<i>Reference:</i>	<i>Construction Stormwater Plan Review Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>	<i>Measure</i>	
<b>ADMINISTRATION:</b> Record the total number of active construction site inspections conducted during reporting period.	Total Number conducted	48	
<b>EFFECTIVENESS:</b> Every private building lot and land development received municipal oversight inspection for erosion and sediment control an average of quarterly (routine) during the period of active construction.	100%	31 of 95 or 33%	
<b>EFFECTIVENESS:</b> Every public project with an NPDES permit completes routine stormwater inspections on a frequency required in the permit authorization.	100%	5 of 5 100%	
<b>EFFECTIVENESS:</b> All active construction projects that have non-compliance with local construction stormwater requirements receive a follow-up inspection within one week.	100%	1 of 1 100%	
<b>EFFECTIVENESS:</b> All information provided from the public about stormwater management of an active construction site leads to an inspection or a documented reason why an inspection was not conducted.	100%	2 of 2 100%	
<b>EFFECTIVENESS:</b> Record soil stabilization conditions and if unresolved non-compliance exist for the project at time of all closeout inspections required before municipal approval is given.	100%	100% of 0	
<i>Satisfied:</i>	Yes X No Explanation: In 2019, all of our observations was done electronically and attached to the site information in our Lucity software, which will make this easier and more efficient.		

**MCM #4: BMP 4: CONSTRUCTION STORMWATER EDUCATION**

4.4.1 Coordinate updates and maintenance of educational and training information for distribution related to impacts of construction stormwater pollution in the Public Education and Outreach Strategy, which references the following:

- Establishment of a training program and distribution method with at least one target message related to Construction Stormwater Program Requirements (i.e., erosion and sediment controls, soil stabilization, dewatering, pollution prevention, prohibited discharges, surface outlets, plan submittal, site inspection, and enforcement) every reporting year.
- Defines training that municipal staff primarily responsible for permitting, plan review, construction site inspections, and enforcement receives.
- Defines the resources used and frequency for distributing information related to construction stormwater pollution.

<i>Reference:</i>				<i>Frequency:</i>	
<i>The City of Columbus PEO Strategy</i>				<i>Annually</i>	
<i>Description</i>	<i>Target Audience</i>	<i>Messages</i>	<i>Methods/Resources</i>	<i>Last Provided</i>	<i>Next Due</i>
<i>Required Standards</i>	<i>Municipal Staff and Public</i>	<i>Prevent construction-related stormwater pollution by following City policy and standards.</i>	<i>City of Columbus – Construction Stormwater Program and Approved Stormwater Design Manual links available on website, and Available in the Engineering Lobby.</i>	<i>2019</i>	<i>2020</i>
<i>Construction Stormwater BMP Pocket Guide</i>	<i>Municipal Staff and Public</i>	<i>Prevent construction-related stormwater pollution by selecting and installing appropriate BMPs.</i>	<i>Downloadable from website. Available in the Engineering Lobby.</i>	<i>2019</i>	<i>2020</i>
<i>Construction Stormwater Program Presentation</i>	<i>Municipal Staff and Public</i>	<i>Prevent pollution from selecting and installing appropriate BMPs.</i>	<i>Presentation</i>	<i>2019</i>	<i>2021</i>
<i>Report:</i>	<i>A contractor mailing-list of Plumbers, Fence Companies, General Contractors, Developers, Lawn and Landscape Companies, Food Service Companies, Automobile/Mechanical Maintenance Companies, is kept and each of these receives brochures about Stormwater Pollution Prevention Best Management Practices to be implemented in their Good Housekeeping procedures.</i>				

4.4.2 Distribute education and training information related to construction stormwater pollution.

<i>Reference:</i>	<i>Education and Outreach Strategy Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Performance:</i>
<b>ADMINISTRATION:</b> <i>Construction site operators can obtain information about BMPs and requirements for minimizing pollutants discharged from construction sites each year.</i>	<i>Total number of pocket guides distributed.</i>		<i>15</i>
<b>EFFECTIVENESS:</b> <i>Distribute training information to all (100%) Municipal Employees responsible for permitting, plan review, construction site inspections, and enforcement.</i>	<i>100%</i>		<i>100%</i>
<b>EFFECTIVENESS:</b> <i>Target audience sector of Construction Site Operators had educational information made available to them in the reporting year.</i>	<i>100%</i>		<i>100%</i>
<b>EFFECTIVENESS:</b> <i>Construction Site Operators had training offered during even calendar years.</i>	<i>100%</i>		<i>Offered to: 100% Attended:</i>
<i>Satisfied:</i>	<i>Yes X No Explanation: We handed out pocket guides to the construction site operators during site inspections. In addition, we did training with the municipal staff that would be involved in issuing the building permits for small lots. All the site operators were given our web address as well as handouts for any of the BMP's they had questions on. We are working on a training syllabus for the 2020 Construction Season. We did not offer it this year, as it is an odd year.</i>		

POST-CONSTRUCTION STORMWATER MANAGEMENT DECISION PROCESS RATIONALE

The purpose of this MCM is to ensure the quality of water leaving a previously completed construction site remains continuously treated prior to leaving the property. With the implementation of specifically required Stormwater Treatment Facilities (STF's) the quality of water will have the best chance of remaining clean prior to entering receiving waters. These STF's will be monitored and maintained based on official Maintenance Agreements signed by the owner and the City.

**How will the City of Columbus require post-construction stormwater runoff from new development to be treated in the city?**

The City of Columbus requires post-construction stormwater runoff from new development and redevelopment to be treated through different Stormwater Treatment Facilities (STF's). Rain Gardens, Bioswales, Sediment Forebays, and Regional Detention Facilities will all be acceptable STF's within the City Limits. These were chosen based on their performance, accessibility, and aesthetics.

**How will the City of Columbus enforce post-construction stormwater runoff treatment when there is non-compliance with the requirements?**

The City of Columbus has created an ordinance as it relates to Post-Construction Stormwater. This ordinance refers to a 'Post Construction Stormwater Management Program and there are penalties of different severity upon non-compliance. These were chosen due to their positioning within the Municipal City Code.

**What do the terms New Development and Re-Development mean and what sites are exempt from the Post-Construction Program requirements?**

The term "New Development" refers to any new construction project that has been platted after September 1 2017. The term "Re-development" refers to any construction on existing property that affects more than one acre of impervious surface area. The sites that are exempt from the Post-Construction Program Requirements are those that were platted prior to 2010.

**What procedures will the City of Columbus follow for selecting and completing Post-Construction site plan review when applications for construction are submitted for approval?**

The City of Columbus Post Construction Stormwater Program provides a submittal checklist that describes the required information on each Site for proper selection and completion of a Post-Construction site plan review when applications for construction are submitted for approval. This checklist will be made available online, at the Engineering Department upon the developer's introduction of the plan to the City. Once the proper specifications have been implemented, then the site plans are up for review on a department-by-department basis. The Engineering Project Manager will observe the Post-Construction specifications and site plan.

**What procedures will the City of Columbus follow when information is submitted by phone or the City of Columbus web site?**

The City of Columbus will require a series of inspections of the constructed Stormwater Treatment Facilities to insure proper functionality of the Stormwater Treatment Facilities. The engineer will perform by a licensed engineer in the State of Nebraska or by a delegated person these inspections prior to completion of the development project. The City Ordinance outlines requirements for these STFs to function appropriately in perpetuity.

**What procedures and prioritization will the City of Columbus follow to inspect and enforce Post-Construction stormwater treatment facilities?**

The prioritization and procedures for inspection and enforcement for Post Construction STFs are identified in the Post-Construction Stormwater Management Program. Enforcement will be conducted through maintenance agreements, and the owner allows inspections whenever the City wishes to perform them.

**Who is responsible for the overall management and implementation of the City of Columbus Post- Construction Stormwater program and program activities?**

The City of Columbus Engineering Project Manager is responsible for the implementation of the Construction Stormwater Program. The Engineering Project Manager creates and inspects the Stormwater Pollution Prevention Plans (SWPPP) for Municipal projects greater than one acre. The Engineering Project Manager communicates directly with the developers and contractors as needed to resolve non-compliant issues.

**How will the City of Columbus evaluate the success of the Post-Construction Stormwater program and how was the measurable goals identified?**

The City of Columbus has implemented "Effectiveness Measures," found throughout the Post Construction Stormwater MCM, to evaluate the success of the Program. These 'Effectiveness Measures' are tabulated each year and identified within each Annual Report submitted to NDEQ.

*MCM #5: BMP 1: POST-CONSTRUCTION STORMWATER CONTROL AUTHORITY*

*5.1.1 Coordinate maintenance of enforceable authority and escalation procedures in the MS4 Post-Construction Stormwater (PCSW) Program, which references the following local regulatory mechanism(s) that effectively:*

- Defines and enables municipal enforcement for permanent stormwater quality treatment facilities.*
- Defines and requires permanent stormwater quality treatment facility implementation for new development and redevelopment projects and the effective date of the requirement.*
- Defines and establishes a range of penalty options and when they will be used to ensure compliance.*

<i>Reference</i>	<i>Frequency</i>
<i>PCSW Program Procedures City of Columbus Chapter 54</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>After the review process, there were no changes to be made to Chapter 54. There were some minor clerical changes to the Post Construction Storm Water Program Manual for this year.</i>

5.1.2 Conduct enforcement procedures for permanent stormwater treatment facility non-compliance and/or non-compliance.

<i>Reference:</i>	<i>Post-Construction Stormwater Treatment Facility (STF) Enforcement Tracking Form,</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Measure</i>
<b>ADMINISTRATION:</b> <i>Record of responsible party, date enforcement initiated, reason for non-compliance or violation, status, enforcement steps taken to resolve, and final resolution of each instance of potential non-compliance with post-construction stormwater treatment.</i>	<i>Total Number of instances recorded.</i>		<i>0</i>
<b>EFFECTIVENESS:</b> <i>Initiate Enforcement Response Plan investigation within seven days of identification of potential non-compliance</i>	<i>100%</i>		<i>100% of 0</i>
<b>EFFECTIVENESS:</b> <i>Open records are updated once a week with status and any new information until the issue is resolved.</i>	<i>100%</i>		<i>100% of 0</i>
<i>Satisfied:</i>	<i>Yes X No Explanation: With this program being somewhat new to the City of Columbus we are working with the NDEE on the implementation of this into our community. During our NDEE inspection this was addressed, the NDEE said they will research this and give us some direction later in the year.</i>		

*MCM #5: BMP 2: STORMWATER TREATMENT PLAN REVIEW*

*5.2.1 Coordinate maintenance of site plan review procedures in the MS4 Post-Construction Stormwater (PCSW) Program, which references and defines the following:*

- Local regulatory mechanism(s) that effectively defines and enables authority to conduct stormwater treatment plan reviews.*
- Minimum treatment volume with calculation method, volume treatment design criteria, and stormwater treatment practice design standards by reference for design of permanent stormwater treatment practices.*
- Maximum allowable impervious cover by land use zone.*
- Minimum requirements for post-construction stormwater treatment plan submittals to satisfy structural and non-structural stormwater treatment standards.*

<i>Reference</i>	<i>Frequency</i>
<i>Columbus City Code Chapter 54 Post Construction Stormwater (PCSW) Program Procedures Appendix "D"</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>After the review process there were some clerical changes made to Chapter 54 or the Post Construction Storm Water Program Manual.</i>

5.2.2 Conduct site plan review for stormwater treatment design compliance.

<i>Reference:</i>	<i>Post-Construction Stormwater Treatment Development Review Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>	<i>Measure</i>	
<b>ADMINISTRATION:</b> Complete stormwater treatment design review form for every new development and redevelopment project.	<i>Recorded</i>	<i>Yes</i>	
<b>ADMINISTRATION:</b> Record date of STF Certification and as-built record drawings received with all required information including updated STF design tables if field modifications were made.	<i>Recorded</i>	<i>7</i>	
<b>EFFECTIVENESS:</b> Record when STF design requirements for new development and redevelopment projects were not satisfied and required revision and resubmittal.	<i>Recorded</i>	<i>0</i>	
<b>EFFECTIVENESS:</b> Complete as-built record drawings are received within one year of municipal approval for project completion.	<i>100%</i>	<i>6 of 7 85% were submitted</i>	
<i>Satisfied:</i>	<i>Yes X No Explanation: The program had 8 projects and none of them were completed in 2019. We are in the processes of identifying all STF's and then we will put in place a utilize Lucity. During our site visit with the NDEE, they indicated that they would help with this area of difficulty since the City of Columbus does not typically have Homeowners Associations this makes it difficult to know who will be doing the maintenance on the STF's. The NDEE indicated they would reach out to other communities and provide the City of Columbus some guidance. In the interim, the City of Columbus will inspect and maintain all of the public STF's.</i>		

*MCM #5: BMP 3: STORMWATER TREATMENT SITE INSPECTIONS*

*5.3.1 Establish and review site inspection procedures in the MS4 Post-Construction Stormwater (PCSW) Program, which define and reference the following:*

- Local regulatory mechanism(s) that effectively defines and enables authority to conduct site inspections.*
- Minimum standards by reference for installation and maintenance of stormwater treatment practices.*
- Minimum required timing and information for construction operator self-inspections prior to receiving municipal approval constructed STF's.*
- Minimum required timing and information for property owner self-inspections following municipal approval of constructed STF's.*
- Current policies, staff, contact information, frequency and required procedures for municipal inspections prior to approving STF's constructed for the project.*
- Minimum required timing and information for municipal inspections following municipal approval of constructed STF's.*

<i>Reference</i>	<i>Frequency</i>
<i>City of Columbus City Code Chapter 54 Post-Construction Stormwater (PCSW) Manual Procedures</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>Some clerical changes made to the Post Construction Storm Water Program manual. We will make changes to this part when we have received some direction from the NDEE on the Cities issues with private STF's that was stated in 5.2.2.</i>

5.3.2 Conduct site inspections for new development and redevelopment projects to document post-construction Stormwater Treatment Facility (STF) installation and maintenance compliance.

<i>Reference:</i>	Post Construction Stormwater Treatment Facility Inspection Tracking Form		
<i>Responsible:</i>	Engineering Project Manager	<i>Frequency:</i>	On-going/Annually
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Measure</i>
<b>ADMINISTRATION:</b> Record last date of inspection by <u>Owner</u> for STFs submitted or requested for review.	100%		No
<b>ADMINISTRATION:</b> Record last date of inspection by <u>Municipality</u> for STFs.	100%		Yes
<b>EFFECTIVENESS:</b> Record modifications made from design plans, engineer name providing certification, and anticipated date as-built record drawings will be submitted to the City.	100%		100% of 0
<b>EFFECTIVENESS:</b> Always record current condition, maintenance planned, and next anticipated applicant inspection date.	100%		100% of 0
<b>EFFECTIVENESS:</b> Self-inspections are submitted by Owner of project within 90-days following municipal approval of completed project.	100%		100% of 0
<b>EFFECTIVENESS:</b> Self-inspections are submitted by Owner of project no longer than three years following the previous self-inspection.	100%		N/A for 2019
<b>EFFECTIVENESS:</b> Always record final constructed condition at time of inspection, observations, and on-going municipal inspection frequency before municipal approval is given.	100%		100% of 0
<b>EFFECTIVENESS:</b> Always record current condition, maintenance planned, and next anticipated applicant inspection date	100%		100% of 0

<p><b><i>EFFECTIVENESS:</i></b> Inspections are conducted by the City within (14) fourteen days following an information request submitted by the public and/or failure of the Owner to submit a routine self-inspection.</p>	<p>100%</p>	<p>100% of 0 None were submitted</p>
<p><b><i>EFFECTIVENESS:</i></b> All information provided from the public about stormwater management of an approved STF leads to an inspection or a documented reason why an inspection was not conducted.</p>	<p>100%</p>	<p>100% of 0 None were requested</p>
<p>Satisfied:</p>	<p>Yes    No <input checked="" type="checkbox"/> Explanation: We are in the process of working with the NDEE on this issue and waiting on guidance/help on this issue. See explanation of 5.2.2 for clarification on this.</p>	

GOOD HOUSEKEEPING AND POLLUTION PREVENTION DECISION PROCESS  
RATIONALE

*The purpose of this MCM is to minimize the effect of the municipality's efforts to the contribution of stormwater pollutants into receiving waters. Operations have been identified that have the greatest likelihood to cause pollution to stormwater runoff. The facilitators of these operations are educated and trained in Standard Operating Procedures for reducing pollutants from entering the storm sewer system.*

**What types of municipal operations and maintenance are managed by the City of Columbus to prevent or reduce impacts to water quality from stormwater and what facilities does this include?**

*The City of Columbus is responsible for the stormwater pollution that its municipal operations and maintenance activities create. Pollution Prevention activities and procedures such as training, standard operating procedures, and record-keeping help minimize the affect our actions take on the environment. The Operations Water Quality Guide (OWQG) identifies these implemented processes and can be found on the City of Columbus Web Site and Engineering Department.*

**What types of training is provided to the City of Columbus staff to help them prevent and reduce impacts to water quality from stormwater runoff?**

*The City of Columbus has different departments that create stormwater pollution. Several formats of training have been given to the members of these departments. Presentations and training videos are given to the employees regarding Stormwater Pollution Prevention. The Operations Water Quality Guide has a description of all training provided to City staff.*

**How do the City of Columbus document policies and procedures for maintenance activities, schedules, inspections, controls for paved areas and activities required for operation and maintenance throughout the city disposal of waste and maintenance of stormwater detention and treatment system?**

*The City of Columbus performs many procedures to document our efforts against stormwater pollution from maintenance activities. There are proper standard operating procedures for street sweeping activities for city employees to follow. These policies and procedures are documented in the Operations Water Quality Guide, which can be found at the City of Columbus Engineering Department.*

**Who is responsible for the overall management and implementation of the City of Columbus Good Housekeeping and Pollution Program?**

*The City of Engineering Project Manager is responsible for the overall management and implementation of the Good Housekeeping and Pollution Prevention Program. It is the responsibility of each Department/Division involved to implement their activities and report to the Engineering Project Manager upon enquiry.*

**How will the City of Columbus evaluate the success of the Good Housekeeping and Pollution Prevention Program and how was the measurable goal identified?**

*The City of Columbus has created and installed 'Effective Measures' throughout the Good Housekeeping and Pollution Prevention MCM. These effectiveness measures are identified for all BMP and reported as a measurable goal through the process of our Annual Report submitted to NDEQ.*

**MCM #6: BMP 1: MUNICIPAL FACILITY MAINTENANCE ACTIVITIES**

6.1.1 *Coordinate reviews and updates of municipal facility evaluation and maintenance policy information in the Operations Water Quality Guide, defines and describes the following:*

- *A listing and maps of all MS4 facilities, including storage yards, which are subject to maintenance activity best management practice policies.*
- *Lists of industrial facilities owned or operated by the City subject to NPDES Industrial Storm Water Discharge Permit with Notice of Intent or certificate of No Exposure for each facility attached.*
- *High Priority risk assessment policies for municipal maintenance facilities.*
- *Content and purpose of a Facility Runoff Control Plan developed for high priority municipal maintenance facilities.*
- *Describes building and grounds, vehicles and equipment (including maintenance, fueling and washing), product materials (including de-icing materials), bulk fluid storage and waste materials (including dredge spoil, accumulated sediments, floatables, debris, salvage products for reuse, and recyclables) best management practice policies for municipal maintenance facilities.*
- *Current policies, frequency, staff, contact information and required procedures for municipal facility site inspections, and time for resolving identified maintenance.*

<i>Reference</i>	<i>Frequency</i>
<i>Operations Water Quality Guide Chapters 2 &amp; 3</i>	<i>Review: Annually</i>
<i>Facility Runoff Control Plan</i>	
<i>Report:</i>	<i>After the review process there were some clerical changes made to the Operations Water Quality Guide. We also updated the Facility Runoff Control Plan for Central Maintenance Facility after completing the risk assessment that was conducted in 2019.</i>

6.1.2 Conduct municipal facility maintenance evaluations and record results of maintenance facility activities.

<i>Reference:</i>	<i>Municipal Facility Inspections Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>	<i>Measure</i>	
<b>ADMINISTRATION:</b> Record the total number of facility inspections conducted during reporting period.	Recorded	Yes	
<b>ADMINISTRATION:</b> Record at least one MS4 Oversight inspection per year at each municipal facility with an NPDES Industrial Stormwater Permit authorization (no routine or benchmark monitoring required of the NPDES Industrial Stormwater permit holder).	100%	1 of 1 100%	
<b>ADMINISTRATION:</b> Record at least one MS4 Facility Evaluation per five years at each municipal facility with an NPDES Industrial Stormwater Permit No Exposure Certification.	100%	1 of 1 100%	
<b>ADMINISTRATION:</b> Record if corrective actions that have been identified documented and addressed for every maintenance facility during the reporting period.	100%	1 of 1 100%	
<b>ADMINISTRATION:</b> Maintain status of each corrective maintenance identified but not resolved within the recommended 30-day period.	Record status	Yes	
<b>EFFECTIVENESS:</b> Record the dates and inspectors for two (2) inspections per year at each high priority maintenance facility.	100%	1 of 1 100%	

<p><b>EFFECTIVENESS:</b> Record the dates and inspectors for one (1) inspection per year at each low priority maintenance facility.</p>	<p>100%</p>	<p>60 of 60 100%</p>
<p><b>EFFECTIVENESS:</b> Record during oversight facility inspection of each municipal facility with an NPDES Industrial Stormwater Permit authorization whether facility is actively managing all Industrial Stormwater Permit requirements and or No Exposure Certification conditions including; training, routine inspections, benchmark monitoring, physical characteristics evaluations, SWPPP information, SWPPP updates, and required reporting criteria.</p>	<p>100%</p>	<p>1 of 1 100%</p>
<p><b>EFFECTIVENESS:</b> Interim corrective maintenance is implemented when final corrective actions cannot be completed within 30-days of being identified during an inspection or complaint.</p>	<p>100%</p>	<p>100% of 0</p>
<p><b>EFFECTIVENESS:</b> Summarize the reason(s) corrective maintenance was not resolved within 30-days for each corrective maintenance record and what communication, education and/or enforcement was used to get the corrective maintenance resolved as soon as possible.</p>	<p>100%</p>	<p>100% of 0</p>
<p>Satisfied:</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explanation: Oversight inspections were performed as outlined. If there was any need for corrective action, it was taken care of in the allotted time. Our list of sites will be updated as needed with at least two new sites in 2020.</p>	

**MCM #6: BMP 2: MUNICIPAL ROADWAY/PARKING LOT MAINTENANCE ACTIVITIES**

6.2.1 Coordinate updates and maintenance of municipal roadway/parking lot maintenance policy information in the Operations Water Quality Guide, which describes the following:

- Type of roadways (streets, roads, and highways) and which parking lots are impacted by maintenance activity best management practice policies that control floatables and other pollutants to the MS4.
- Current policies, frequencies and/or schedule, staff, equipment, contact information and required procedures for street and parking lot sweeping activities.
- Procedures for transportation and disposal of floatables and other pollutants collected because of roadway and parking lot maintenance activities.

<i>Reference</i>	<i>Frequency</i>
<i>Operations Water Quality Guide Chapter 3</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>We have made some minor clerical corrections to the Operations Water Quality Guide. We have also updated the reports that are run from Verizon Fleet Connect as well. We continue to look for a better way to dispose of the sweepings that would help lower the cost of disposing them.</i>

6.2.2 Conduct and report municipal roadway and parking lot maintenance within the MS4 area.

<i>Reference:</i>	<i>Municipal Sweeping Operations Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Measure</i>
<b>ADMINISTRATION:</b> Report hours of equipment usage and number of lane miles of streets swept.	<i>Recorded</i>		<i>Hours: 574 Miles: 1474</i>
<b>ADMINISTRATION:</b> Report number and dates of parking lots swept.	<i>Reported</i>		<i>15 Lots &amp; 26 Days</i>
<b>EFFECTIVENESS:</b> Verify that all public streets listed on the street maintenance plan were swept at least two times during the year.	<i>100%</i>		<i>100%</i>
<b>EFFECTIVENESS:</b> All parking lots on the parking lot maintenance plan were swept at least once during the year.	<i>100%</i>		<i>15 of 15 100%</i>
<b>EFFECTIVENESS:</b> Report number of instances that non-routine sweeping was requested and the number of sweeping events provided to address a public complaint or internal identification that non-routine street sweeping was needed.	<i>100%</i>		<i>6 of 6 100%</i>
<i>Satisfied:</i>	<i>Yes: x No: Explanation: The main reason for the decrease in miles swept and time spent sweeping from 2018 is that we have established a better way of reporting using Verizon Connect. In addition, due to the flooding in the springtime it took the extra person-hours to help with cleanup of the flooding.</i>		

**MCM #6: BMP 3: MUNICIPAL STORM DRAIN SYSTEM MAINTENANCE ACTIVITIES**

6.3.1 *Coordinate updates and maintenance of municipal storm drain system maintenance policy information in the MS4 Operations Water Quality Guide, which defines and describes the following:*

- *Procedures for inspecting and cleaning municipally owned inlets, open channels and other drainage structures for debris.*
- *Procedure to dispose of materials extracted from inlets so that no stormwater drainage system waste material will re-enter the MS4.*
- *Procedures to document drainage structure maintenance activity.*
- *Procedures for inspecting and sweeping municipally owned streets.*
- *Procedures to assess existing flood management locations for potential incorporation of water quality protection devices or practices.*
- *Procedure to dispose of materials swept so that waste material will not re-enter the MS4.*
- *Procedures to require any contractors hired by the Municipality to perform maintenance activities.*

<i>Reference</i>	<i>Frequency</i>
<i>Operations Water Quality Guide Chapters 3 &amp; 4</i>	<i>Review: Annually</i>
<i>Report:</i>	<i>We have made some minor clerical corrections to the Operations Water Quality Guide. In addition, we are in the process of finding a more cost effective way to dispose of the materials that are removed from the inlets and storm sewer pipes.</i>

6.3.2 Conduct municipal storm drain system maintenance.

<i>Reference:</i>	<i>Municipal Stormwater Operations Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>	<i>Measure</i>	
<b>MUNICIPAL STORM DRAIN INLET MAINTENANCE</b>			
<b>ADMINISTRATION:</b> Report hours of equipment usage and number of storm drains cleaned.	Recorded	Hours: 87 Number: 136	
<b>EFFECTIVENESS:</b> All storm drain inlets listed on the storm drain system maintenance plan were cleaned once every five (5) years.	100%	1% of 2765	
<b>EFFECTIVENESS:</b> Report number of instances that non-routine storm drain inlet cleaning was requested and the number of storm drain cleaning events provided to address a public information request or internal identification that non-routine storm drain inlet cleaning was needed.	100%	100% of 0	
<b>MUNICIPAL STORM DRAIN PIPE MAINTENANCE</b>			
<b>ADMINISTRATION:</b> Report hours of equipment usage and lineal feet of drainage system cleaned.	Recorded	Hours: 136 Feet: 17915	
<b>EFFECTIVENESS:</b> All of storm drain pipes listed on the storm drain system maintenance plan was cleaned once every ten (10) years.	100%	2% of 407,217	
<b>EFFECTIVENESS:</b> Report number of instances that non-routine storm drainpipe cleaning was requested and the number of storm drainpipe cleaning events provided to address a public complaint or internal identification that non-routine storm drainpipe cleaning was needed.	100%	100% of 0	

**MUNICIPAL STORMWATER DETENTION/RETENTION AREA MAINTENANCE**

<p><b>ADMINISTRATION:</b> Report hours of equipment usage and detention/retention areas cleaned and maintained.</p>	<p>Recorded</p>	<p>Hours: 400 Facilities: 8</p>
<p><b>EFFECTIVENESS:</b> Verify that all detention/retention areas listed on the storm drain system maintenance plan were cleaned once every ten (10) years.</p>	<p>100%</p>	<p>4 of 4 100%</p>
<p><b>EFFECTIVENESS:</b> Report number of instances that non-routine detention/retention area cleaning was requested and the number of detention/retention cleaning events provided to address a public complaint or internal identification that non-routine detention/retention cleaning was needed.</p>	<p>100%</p>	<p>100% of 0 None were reported</p>
<p>Satisfied:</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explanation: The City of Columbus does not have staff devoted to specific full-time positions such as "Storm Sewer Maintenance." We have a crew that we can call on to perform specific incidents as they arise. That being said we did not reach our goal of cleaning of storm sewer pipe for this year. This was due in part to the flooding this spring and not enough work force. We also had a change over with our Street Superintendent. All those combined made it hard to get everything completed. Our Street Superintendent and myself will work together to form a plan to help get us where we need to be.</p>	

**MCM #6: BMP 4: MUNICIPAL OPERATION AND MAINTENANCE PROGRAM TRAINING**

6.4.1 Coordinate updates and maintenance of training materials for distribution related to reducing stormwater pollution from municipal operation and maintenance activities in the Public Education and Outreach Strategy, which defines the following:

- Target messages and distribution methods for pollution prevention or reduction training related to municipal operation and maintenance activities.
- At least one target message for Public Employees involved in Parks and Recreation Operation and Maintenance Activities every reporting year.
- At least one target message for Public Employees involved in Transportation and Utilities Operation and Maintenance Activities every reporting year.
- At least one target message for Public Employees involved in Storm Sewer Operation and Maintenance Activities every reporting year.

<i>Reference:</i>				<i>Frequency:</i>	
<i>The City of Columbus PEO Strategy</i>				<i>Annually</i>	
<i>Description</i>	<i>Target Audience</i>	<i>Messages</i>	<i>Methods/Resources</i>	<i>Last Provided</i>	<i>Next Due</i>
<i>Standard Procedures</i>	<i>City Staff involved with O&amp;M</i>	<i>Prevent pollution from municipal operations throughout the City.</i>	<i>Operations Water Quality Guide</i>	<i>2019</i>	<i>2020</i>
<i>Maintenance Facility Runoff Control Plans</i>	<i>City Staff involved with O&amp;M</i>	<i>Prevent pollution from municipal operations at municipal maintenance facilities.</i>	<i>Facility Runoff Control Plan for Central Maintenance Facility</i>	<i>2019</i>	<i>2020</i>
<i>Supplemental Guides</i>	<i>City Staff involved with O&amp;M</i>	<i>Prevent pollution from municipal operations at municipal maintenance facilities.</i>	<i>City of Columbus Municipal Good Housekeeping Poster (located at each FRCP facility)</i>	<i>2016</i>	<i>2021</i>
<i>Municipal Good Housekeeping Training</i>	<i>City Staff involved with O&amp;M</i>	<i>Prevent pollution from municipal operations throughout the City.</i>	<i>Live Training or Video</i>	<i>2019</i>	<i>2020</i>
<i>Report:</i>	<i>All of the required criteria of this section have been met.</i>				

6.4.2 Deliver training related to pollution prevention and reduction from municipal operation and maintenance activities conducted by Municipal Employees.

<i>Reference:</i>	<i>Education and Outreach Strategy Tracking Form</i>		
<i>Responsible:</i>	<i>Engineering Project Manager</i>	<i>Frequency:</i>	<i>On-going/Annually</i>
<i>Goals:</i>	<i>Evaluation and Assessment:</i>		<i>Performance:</i>
<b>ADMINISTRATION:</b> <i>Deliver training to all Municipal Employee sectors identified to receive information for the reporting year.</i>	100%		Yes
<b>EFFECTIVENESS:</b> <i>Management staff for Parks and Open Space, Fleet and Building, Permanent Stormwater Treatment, and Storm Sewer Maintenance and Operation received training every <b>even</b> numbered calendar year.</i>	75%		51 of 51 100%
<b>EFFECTIVENESS:</b> <i>Non-management, non-seasonal staff for Parks and Open Space, Fleet and Building, Permanent Stormwater Treatment, and Storm Sewer Maintenance and received training every <b>odd</b> numbered calendar year.</i>	75%		80%
<b>EFFECTIVENESS:</b> <i>Seasonal staff for Parks and Open Space, Fleet and Building, Permanent Stormwater Treatment, and Storm Sewer Maintenance and received training every calendar year.</i>	75%		160 of 160 100%
<i>Satisfied:</i>	<i>Yes X No Explanation: I held training for all of our staff this year to help the city get back on track with the training set forth above, having the training continuing in even and odd years. We have also been working with our Human Resource Director about arrainging training for new hires and seasonal staff.</i>		

*MS4 PROGRAM SUPPORTING DOCUMENTS*

<i>Construction Stormwater (CSW) Program.....</i>	<i>Version III</i>	<i>2019</i>
<i>Post-Construction Stormwater (PCSW) Program.....</i>	<i>Version IIII</i>	<i>2019</i>
<i>Operations Water Quality Guide (OWQG).....</i>	<i>Version III</i>	<i>2019</i>
<i>Facility Runoff Control Plan (FRCP).....</i>	<i>Version II</i>	<i>2019</i>
<i>IDDE Enforcement Response Plan.....</i>	<i>Version II</i>	<i>2019</i>
<i>Construction Stormwater &amp; Runoff (ERP).....</i>	<i>Version I</i>	<i>2018</i>
<i>Post-Construction Management (ERP).....</i>	<i>Version I</i>	<i>2018</i>

*These documents may be found on the City of Columbus web site [www.columbusne.us](http://www.columbusne.us))*