Annual Report

MS4 Phase II General Permit

National Pollutant Discharge Elimination System
MS4 Stormwater Discharge Permit

State of Oregon Department of Environmental Quality

Monitoring Year: November 1, 2021 – October 31, 2022
Permit Registrant: Benton County
Date Prepared/Submitted: October 28, 2022

DEQ File No.: 113609

Certification and Signature
1. Permit Registrant(s): **Benton County**
2. Legally Authorized Representative: **Laurel Byer, PE**
3. Title: **Benton County Engineer – Engineering and Survey Program Manager**
4. Email: **laurel.byer@co.benton.or.us**
5. Phone: **541-766-6013**
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations (40 CFR 122.22(d)).

Signature

Date

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Instructions

At least once per year, the permit registrant must evaluate compliance with the requirements of the MS4 Phase II general permit using this Annual Report template. This self-evaluation includes assessment of progress made towards implementing the SWMP control measures in Schedule A, and implementation of actions to comply with any additional requirements identified pursuant to Schedule D.1 (Requirements for Discharges to Impaired Waterbodies).

For each SWMP control measure or activity listed below, please answer all the questions and in the comments field cite any relevant information and/or statistics that helps to illustrate implementation or compliance. If your answer is “No,” in the comments field explain the reasons and outline the anticipated implementation timeline. If the requirement does not apply, explain why it is not applicable in the comments field.

No later than November 1 each year, beginning in 2020, the permit registrant must submit an Annual Report to DEQ. One signed copy and one electronic copy must be submitted to DEQ using the address provided in permit. DEQ can provide an FTP site for submittal of the electronic copy, upon request.

General Information

Registrant Information

6. Permit Registrant(s):		
7. Type(s): ☐ City / ☒ County / ☐ Special District / ☐ Other:		
8. Registrant Type: Existing Registrant: ☒ New Registrant: ☐		
9. Community Type: Large Community: ☐ Small Community: ☒		
10. DEQ Permit No: **113609**		
11. EPA File No: **ORS113609**		
12. Physical Address: **360 SW Avery Ave**		
City: **Corvallis**	State: **OR**	Zip: **97333**
13. Point of Contact: **Gordon Kurtz**		
Title: **Associate Engineer**	Email: **gordon.p.kurtz@co.benton.or.us**	Phone: **541-766-6006**
14. Mailing Address (*if different*):		
City: **Corvallis**	State: **OR**	Zip: **97339**

Municipal Separate Storm Sewer System (MS4) Information

15. Estimate the area in square mileage served by the MS4: 15 square miles

16. Estimate the population served by the MS4: 66,000 (Corvallis and Philomath with surrounding UGB, Unincorporated North Albany)

MS4 Stormwater Discharge Information

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

Receiving Waterbody	# of Outfalls	Impaired waterbody		Impairment(s)
		303d listed	TMDL issued	
a. Marys River		Yes ☒ No ☐	Yes ☒ No ☐	DO, Iron, Temp
b. Willamette River		Yes ☒ No ☐	Yes ☒ No ☐	DO, E. Coli, Hg, Temp
c. Long Tom River		Yes ☒ No ☐	Yes☒ No ☐	E. Coli, Temp
d. Muddy Creek		Yes ☒ No ☐	Yes ☒ No ☐	Temp
e. South Fork Berry Creek		Yes ☒ No ☐	Yes ☒ No ☐	Temp
f.		Yes ☐ No ☐	Yes ☐ No ☐	
g.		Yes ☐ No ☐	Yes ☐ No ☐	
h.		Yes ☐ No ☐	Yes ☐ No ☐	
i.		Yes ☐ No ☐	Yes ☐ No ☐	
j.		Yes ☐ No ☐	Yes ☐ No ☐	

Coordination Among Registrants and Joint Agreements

Required for permit registrants relying on another entity to satisfy one or more of the requirements of the permit.

17. Is there a joint agreement in place for the implementation of one or more stormwater management program control measures? *Schedule A.2* Yes ☐ No ☒

18. If yes, has there been any change to the joint agreement(s) submitted previously? Yes ☐ No ☒
If yes, include, as an attachment, a summary of the changes.
The summary must identify the other co-registrants/co-implementers or other entities

Stormwater Management Program Information

19. Discuss the status and overall progress of establishing legal authority to control pollutant discharges into and discharges from the MS4 and to implement and enforce the conditions of this permit. *Schedule A.2.c*

Benton County addresses storm water quality in Chapters 87, 91, and 99 of the Benton County Development Code, and in Chapters 21, 23, and 36 of the Benton County Code. Methods of enforcement are covered in the County Code Chapter 31 which were modified in early 2022 to address escalating enforcement. To adapt to new control measures regarding construction site runoff and post-construction runoff going into place as of March 2023, Chapter 99 of the Benton County Code will be modified and brought forward to the both the Planning Commission and Board of Commissioners for deliberation and adoption. The County continues to rely heavily on DEQ for enforcement support.

Stormwater Management Program Information

20. Is an updated SWMP Document attached? *Schedule A.2.c*

Yes ☒ No ☐ *(must be submitted with the second Annual Report)*

If necessary, provide an explanation:

21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*
https:// www.co.benton.or.us/cd/page/stormwater-program
If necessary, provide an explanation:

22. Does the SWMP Document include an implementation schedule for control measures that have yet to be or are partially implemented? *Schedule A.2.c*

Yes ☒ No ☐

If necessary, provide an explanation:

23. Describe the method used to gather, track, and use SWMP information to set priorities or assess compliance: *Schedule A.2.d*

    Currently, Benton County employs several methods of gathering and tracking compliance information and data. Public Works has developed GIS apps for basin and outfall inventory, turbidity testing, and illicit discharge (IDDE) response record keeping. These apps are currently fully implemented. Our network has designated storage areas for pertinent programmatic data. The ultimate goal is to rely almost entirely on a GIS based system of record keeping.

24. Have adequate finances, staff, equipment and other support capabilities been provided to implement the permit? *Schedule A.2.e*

    Yes ☐ No ☒

    If necessary, provide an explanation:

    Benton County Public Works hired an Environmental Project Coordinator, part of whose FTE is allotted to the Stormwater Program. Discussions are currently in place as to whether to incorporate another (1.0) FTE CESCL-certified position into either Community Development or Public Works to assist with Erosion and Sediment Control inspections and escalating enforcement, however there are not any currently designated or available funds for this and it would come at the cost of other Benton County programs which are generally short staffed and lacking resources at this time.

25. During this monitoring year was compliance with the requirements of this permit evaluated? *Schedule B.1*

    Yes ☒ No ☐

    If necessary, provide an explanation:

26. During this monitoring year was it determined or reported that discharge from the MS4 caused or contributed to an excursion of an applicable water quality standard? *Schedule A.1.b*

    Yes ☐ No ☒

    If “Yes”, complete Water Quality Standards section (p. 21) of this template.

Stormwater Management Program Control Measures

Public Education and Outreach

27. Provide a brief summary of the ongoing public education and outreach program. *Schedule A.3.a*

The County's outreach efforts consist of a wide variety of online resources, an array of stormwater information pamphlets and printed resources, surveys designed to engage the public in upcoming implementation efforts, a cycle of monthly Facebook, Twitter, Instagram, and Nextdoor posts and water quality educational releases broadcast to the County's email list of over 5,000 local residents. With the new Control Measures, we have also created an additional dynamic outreach strategy that includes broadcasting information on display screens at various County building lobbies, printed information that is included with outgoing ESC permit packets through 2022 and early 2023, and distribution of information regarding new stormwater control measures to local realtors' associations, contractors, builders, and road associations via email contact. We currently host a monthly 'Stormwater Implementation Group (SWIG) which includes a diverse group of interested community members who are providing insight on the implementation of new Control Measures and code changes.

Benton County staff were present for the annual City of Philomath Arbor Day Celebration where students were taught the importance of stormwater quality and stewardship through two hands-on activities. Staff will continue to participate in outreach events as COVID safety allows.

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

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2020 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)*

29. Provide the number of education and outreach activities conducted: Schedule A.3.a.iii
During this reporting year: ~33
30. During the permit term: ~63
If necessary, provide an explanation:

See 2021 social media results & on-line engagement metrics – Social media 'blasts' were halted during the pandemic and County public information staffing changes, and are to be resumed in November 2022 along with providing monthly articles to be broadcast via the County's email distribution list.

31. Indicate target audiences addressed during this reporting year: *Schedule A.3.a.iv*

☒ General public, homeowners, homeowner association, schoolchildren, and businesses
☒ Local elected officials, land use planners and engineers
☒ Construction site operators

32. Have each target audience been addressed during the permit term? *Schedule A.3.a.iv*

Yes ☒ No ☐

33. Indicate target topics addressed during this reporting year: *Schedule A.3.a.iv*

☒ Impacts of illicit discharges on receiving waters and how to report them
☒ Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts
☒ BMPs for proper use, application and storage of pesticides and fertilizer
☒ BMPs for litter and trash control
☒ BMPs for recycling programs
☒ BMPs for power washing, carpet cleaning and auto repair and maintenance
☒ Low impact development/green infrastructure
☒ Information pertaining to maintenance of septic systems
☒ Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife

☐ Other:

34. Describe the types of educational messages or activities distributed and/or offered during this reporting year. *Schedule A.3.a.iii*

Benton County has multiple outreach strategies that address stormwater quality. These include a quarterly stormwater article in the County's employee newsletter the BUZZ. Topics generally include prevention of trash, litter and pollution as well as green infrastructure and other topics. There are various stormwater outreach materials available for public pickup at the front desk of multiple Benton County facilities regarding pet waste, stormwater, wells and water quality and erosion and sediment control. These also include comic books and coloring books for younger audiences.

Benton County Staff has also participated in in-person outreach events such as the City of Philomath Arbor Day Celebration to teach students about watersheds and stormwater. Until the end of 2021, the 'What you can do' stormwater series on Benton County's Social Media was active and this will resume again in November 2021 after a brief hiatus from COVID-related issues and short staffing.

Staff has performed outreach to the public through the SWIG and through Community Development's quarterly roundtable discussions.

County staff also uses each of its required preconstruction meetings to address water quality issues and best management practices and to convey news and information to local developers, engineers, architects, designers, contractors, dry utility representatives and partner jurisdictional staff.

35. Was outreach to construction site operators working within your community offered during this reporting year? *Schedule A.3.a.v*

Yes ☒ No ☐

36. Total number during the permit term: 8 meetings

37. Identify and describe the assessment/evaluation of, at least, one education and outreach activity that occurred during this reporting year. Include the assessment process or metric for evaluation, and why this activity was considered successful. *Schedule A.3.a.vi*

In 2020, staff used Survey Monkey to distribute surveys designed to engage the public in upcoming implementation efforts. The results from these surveys used to create the public Stormwater Implementation Group (SWIG) which began meeting monthly in spring 2022. Twice annually, the County's Public Information Officer and the Board of Commissioner's staff broadcast a cycle of bi-weekly Facebook, Twitter, Instagram, and Nextdoor postings that contain water quality tips, information, and links. Water quality educational releases are broadcast quarterly to the County's email list of over 5,000 local residents. These educational releases are also published internally every quarter in the County's employee newsletter, The BUZZ.

38. Will the assessment be used to inform future stormwater education and outreach efforts? *Schedule A.3.a.vi*

Yes ☒ No ☐

39. Provide an explanation:

Engagement metrics provide a means by which we can evaluate the effectiveness of certain outreach efforts and messaging which can be used to improve these activities in the future.

See 2021 social media results & on-line engagement metrics.

Public Involvement and Participation

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

Staff distributed a survey in 2021 designed to assess interest and to recruit stakeholders as we move into the next stage of compliance with the MS4 permit. In order to prepare for the implementation of Control Measures 5 and 6, staff assembled a list of stakeholders committed to participation in the next implementation stages for the stormwater program. This list of volunteers was established by responses to the survey noted above and consists of representatives from the disciplines of the land development community (realtors, builders, contractors, architects, engineers, planners, environmental specialists, etc.). In order to prepare for coming code changes and to hear their concerns and suggestions a stakeholder group was established in the last quarter of 2021. Regular meetings have been held monthly since April 2022 and will continue through December 2022. The meeting group has been used as an opportunity for education and awareness training to communicate upcoming control measures as well as to obtain advice in regards to effective public and professional outreach, treatment measures, and logistics of implementation.

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

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2020 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)*

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

Yes ☒ No ☐

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

Yes ☒ No ☐

If necessary, provide an explanation:

44. Does the publicly accessible website include illicit discharge complaint/reporting information or procedures? *Schedule A.3.b.ii.A*

Yes ☒ No ☐

If necessary, provide an explanation:

45. Does the publicly accessible website include draft documents issued for public comment, final reports, plans and other official SWMP policy documents? *Schedule A.3.b.ii.B*

Yes ☒ No ☐

If necessary, provide an explanation:

Management and the Board of Commissioners have approved the use of the website for this purpose, but there are no documents currently in draft format open for review. The current SWMP, which is a living document, is available on the website. The control measures in the SWMP are updated as implementation of the control measures' conditions come due. The most recent iteration of the SWMP is always available. Any interested party may submit comments or questions to staff through a variety of media. Revisions and notifications for Chapter 31 updates may become available at the end of this reporting cycle.

46. Does the publicly accessible website include links to all ordinances, policies and/or guidance documents related to the construction and post-construction stormwater management control programs, including education, training, licensing, and permitting? *Schedule A.3.b.ii.C*

    Yes ☒ No ☐

    If necessary, provide an explanation:

47. Does the publicly accessible website include contact information for relevant staff, including phone numbers, mailing addresses and email addresses? *Schedule A.3.b.ii.D*

    Yes ☒ No ☐

    If necessary, provide an explanation:

48. During this reporting year, was a stewardship opportunity created or partnered with another entity? *Schedule A.3.b.iii*

    Yes ☒ No ☐

    If "Yes", summarize the stewardship opportunity(s).

    Benton County was a representative stakeholder in the Marys River Watershed Council's (MRWC) Oak Creek Stewardship effort funded by the Oregon Watershed Enhancement Board (OWEB). County staff primarily participated in the Land Use Policy and Planning Working Group and helped to provide and establish a Knowledge Clearinghouse through an on-line resource tool called Data Basin hosted voluntarily by the Conservation Biology Institute. Additional OWEB funding is being sought by MRWC to implement action items identified by the stewardship stakeholders. Benton County's cooperation with MRWC and participation in this stewardship effort is on-going.

    Benton County works cooperatively with the Marys River, Luckiamute, Long Tom and Mid-Coast Watershed Councils to assist in their restoration and outreach efforts as well as drawing upon their network of volunteers and environmental knowledge to effectively implement our own projects. In June of 2020, Benton County and MRWC signed an Inter-Governmental Agreement (IGA) to solidify the two entities' commitment to working cooperatively. The Marys River Watershed is 40% of the total land area of Benton County and is nearly completely contained within Benton County. The new IGA provides Benton County with technical support and in return MRWC personnel can be hired by the County to monitor, maintain, and repair restoration work required as part of our culvert and bridge replacement programs.

    Benton County staff and leadership are active participants in the OWEB sponsored 100-year Water Vision.

Illicit Discharge Detection and Elimination

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

This control measure has been in place since the issuance of the last permit (2019-2021) and the specifics of our IDDE program can be found in Chapter 36 of the Benton County Code. The County has inventoried and mapped its known outfalls and visits them for dry weather inspections on a cyclic basis. Outfalls are inspected once every four years. The County has and continues to work closely with adjacent and overlapping jurisdictions to detect and respond to IDDE issues. The county investigates reports of illicit discharges where our jurisdictional authority allows and works to obtain the cooperation of adjacent land owners when complaints are located outside of our jurisdiction. The County has and continues to maintain records of all illicit discharge complaints.

Benton County is moving away from paper-based documentation on some subjects. Engineering GIS staff have developed a Survey123 mobile app dedicated to IDDE. The app is modeled on the City of Corvallis Illicit Spill Investigation, also a Survey123 mobile app. The Benton County IDDE app is now fully implemented. The app documents: dates and times; personnel involved; violating party info; violation type; address and GIS location; whether samples were taken, what kind and by whom; the investigation section records photos, if anyone was contacted with info about the spill, if the offender was aware, if the violation was intentional, what material was spilled, how much was spilled, the type and extent of damages, proximity to flow lines or water bodies, and whether or not preventive or mitigating BMPs were present at the incident site.

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

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2022 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)*

51. Is the MS4 map(s) current? *Schedule A.3.c.ii.A*

Yes ☒ No ☐

52. Describe the MS4 map(s) format(s):

The map is a digital, on-line, ESRI product and is available in *.pdf format upon request.

MS4 Map:

https://bit.ly/30e47kK

53. Is the MS4 map(s) included as attachment? Yes ☐ No ☒

Or are the digital shapefiles available for electronic submittal? Yes ☒ No ☐

(Implementation date: Feb. 28, 2022 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

If necessary, provide an explanation:

Storm System Map:

https://bit.ly/2m1Rh4V

54. Is the digital inventory of all known outfalls, with the associated receiving waterbody current? *Schedule A.3.c.ii.B*

Yes ☒ No ☐

If necessary, provide an explanation:

https://bit.ly/2m1Rh4V

55. Indicate if the following features are included on your MS4 map:
- ☒ Location of all known outfalls, including the requirements in *Schedule A.3.c.ii.B*
- ☒ Stormwater collection and conveyance system, including the requirements in *Schedule A.3.c.ii.C*
- ☒ Stormwater structural controls, including the requirements in *Schedule A.3.c.ii.C*
- ☐ Location of known chronic discharges *Schedule A.3.c.ii.D*

If necessary, provide an explanation:

There are no known chronic discharges.

56. Have non-stormwater discharges into the MS4 been prohibited through enforcement of an ordinance or other regulatory mechanism? *Schedule A.3.c.iii*

Yes ☒ No ☐

If necessary, provide an explanation:

Modifications to Chapter 31 of the Benton County Code, Enforcement, was created to bring Benton County code into alignment with the requirements of the MS4 permit in December of 2021.

Modifications to Chapter 36 of the Benton County Code, Illicit (non-stormwater) Discharges, was created to bring County code into alignment with the requirements of the MS4 permit in February of 2022.

57. Indicate which of the following have an ordinance or other regulatory mechanism to prohibit discharge to the MS4: *Schedule A.3.c.iii*
- ☒ Septic, sewage, and dumping or disposal of liquids or materials other than stormwater into the MS4
- ☒ Discharges of washwater resulting from the hosing or cleaning of gas stations, auto repair garages, or other types of automotive services facilities
- ☒ Discharges resulting from the cleaning, repair, or maintenance of any type of equipment, machinery, or facility, including motor vehicles, cement-related equipment, and port-a-potty servicing, etc.
- ☒ Discharges of washwater from mobile operations, such as mobile automobile or truck washing, steam cleaning, power washing, and carpet cleaning, etc.
- ☒ Discharges of washwater from the cleaning or hosing of impervious surfaces in municipal, industrial, commercial, or residential areas (including parking lots, streets, sidewalks, driveways, patios, plazas, work yards and outdoor eating or drinking areas, etc.) where detergents are used and spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed)
- ☒ Discharges of runoff from material storage areas, which contain chemicals, fuels, grease, oil, or other hazardous materials from material storage areas
- ☒ Discharges of pool or fountain water containing chlorine, biocides, or other chemicals; discharges of pool or fountain filter backwash water
- ☒ Discharges of sediment, unhardened concrete, pet waste, vegetation clippings, or other landscape or construction-related wastes
- ☒ Discharges of trash, paints, stains, resins, or other household hazardous wastes
- ☒ Discharges of food-related wastes (grease, restaurant kitchen mat and trash bin washwater, etc.)

If necessary, provide an explanation:

58. Is the written escalating enforcement and response procedure included as an attachment? *Schedule A.3.c.iv*

Yes ☒ No ☐

(For Existing Registrant must be submitted with the third Annual Report, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

If necessary, provide an explanation:

59. Is there a phone number, webpage, and/or other communication channel publicized for the public use to report illicit discharges? *Schedule A.3.c.v.A*
    - ☒ Phone number(s)
    - ☒ Webpage(s)
    - ☒ Other communication channels

    If necessary, provide an explanation:

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

    Number: 0 *(complaints related to IDDE)*

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

    In working days: N/A

62. Provide the number of complaints that included notification of the Oregon Emergency Response System during this reporting year. *Schedule A.3.c.v.B*

    Number of notification: None

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

    Number: 0 *(investigations related to IDDE)*

64. On average, how long did it take to conduct an initial investigation? *Schedule A.3.c.v.B*

    In working days: N/A

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

    Number: 0

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

    In working days: N/A

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

    Number of times: 0

Do any of the illicit discharges involve the repair or replacement of the wastewater and/or storm sewer conveyance systems? *Schedule A.3.c.v.B*

Yes ☐ No ☒ N/A ☐

If necessary, provide an explanation:

68. Provide the number of illicit discharges that were referred to another entity during this reporting year. *Schedule A.3.c.v.C*

    Number: 0

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

    In working days: N/A

    if necessary, provide an explanation:

70. Indicate which of the following are included in the complaints or reports tracking documentation: *Schedule A.3.c.v.D*
    - ☒ Date the complaint was received and, if available, the complainant's name and contact information
    - ☒ Name of staff responding to the complaint
    - ☒ Date the investigation was initiated

- ☒ The outcome of the staff investigation
- ☒ Corrective action(s) taken to eliminate the illicit discharge
- ☒ The responsible party for the corrective action(s)
- ☒ The status of enforcement procedure(s), when necessary
- ☒ The date the corrective action(s) was completed and staff who evaluated final compliance

If necessary, provide an explanation:

71. Provide percentage of outfalls inspected. *Schedule A.3.c.vi.A/B*
    Known outfalls screened this reporting year: **100%**

72. Known outfalls screened during the permit term: **100%**

    If necessary, provide an explanation:

    Benton County has very few outfalls, which allows us to inspect and monitor our outfalls on a schedule that exceeds the frequency required by the permit.

73. Provide percentage of outfalls inspected as part of field screening of priority location. *Schedule A.3.c.vi.C*
    Priority location outfalls screened this reporting year: **100%**

74. Priority location outfalls screened during the permit term: **100%**

    If necessary, provide an explanation:

    Benton County has very few outfalls, which allows us to prioritize all of our outfalls.

75. Indicate which of the following dry-weather field screening activities have been performed in the last year: *Schedule A.3.c.vi*
    - ☒ General observation
    - ☒ Field Screening and Analysis
    - ☐ Pollutant Parameter Action Levels
    - ☐ Laboratory Analysis

    If necessary, provide an explanation:

    Pollutant parameter action levels are under development and will be implemented as required by the permit.

    Benton County does not have its own testing and sampling equipment nor the budget to develop that capacity in the foreseeable future. The County relies on the services of professional testing laboratories and environmental response contractors. In this reporting cycle, general observations and field screening yielded results that deemed laboratory analysis unnecessary.

76. If flow is observed and the source is unknown, provide a brief description of the field investigation and analysis process. *Schedule A.3.c.vi.D-G*

    Flows are traced upstream from the outfall using storm system, topographic and aerial maps to pinpoint a source. If flow is observed with anything other than normal baseline turbidity or if the flow appears contaminated with chemicals or bio-toxins the standard plan of action is to engage NWFF Northwest to sample, investigate, and mitigate/clean-up.

77. Have pollutant parameter action levels been established and are they included as an attachment? *Schedule A.3.c.vi.F*

    Yes ☐ No ☒

    (For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023 and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner))

    If necessary, provide an explanation:
    Pollutant parameter action levels are under development and will be implemented as required by the permit.

78. Are all persons responsible for investigating and eliminating illicit discharges and illicit connections into the MS4 appropriately trained to conduct such activities? *Schedule A.3.c.vii*

    Yes ☒ No ☐

    If necessary, provide an explanation:

79. Are all new staff working to implement the IDDE program trained within 30 days of their assignment to this program*? Schedule A.3.c.vii*

    Yes ☒ No ☐

    If necessary, provide an explanation:

Construction Site Runoff Control

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

Work on this section of the permit has passed its formative stages. Staff distributed a survey in 2021 designed to assess interest and to recruit stakeholders as we prepare for the implementation of Control Measures 5 and 6. Staff assembled a list of volunteers from interest and contact information collected in survey responses. The Stormwater Implementation Group (SWIG) first met in April 2022 and continues to meet monthly. The SWIG consists of representatives from the various disciplines involved in land development and its oversight (realtors, builders, contractors, architects, engineers, planners, environmental specialists, watershed councils, neighborhood districts and conservation group members) and is open for continuous enrollment through 2022 before the group adjourns in December. We plan to re-convene the SWIG at least one year after implementation to gather insight as to how Benton County's stormwater program, and the new Control Measures, are working and/or raising challenges for property owners and developers so we can work to address these challenges.

Since 2021, staff have been actively engaged in updating Benton County BMP's for maintenance and repair of the County's facilities and transportation system. New BMP's were developed based on the ODOT Blue Book. The ODOT Erosion Control and Hydraulics Manuals, and a collection of water quality references have been adopted as guidance documents for this updated program. The guidance documents are the "seed document" for the Benton County Erosion and Sediment Control Manual which is due to be updated and implemented in February, 2023. We have additionally created a BMP reference card 'deck' which will be in all County work vehicles, and will be conducting two trainings in October and November 2022 to review these BMPs with Roads, Parks and Facilities staff members.

Standards established in response to the previous permit remain in place and are currently in use.

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

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2023 for Existing Registrants, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)* All requirements of this Control Measure will be in place by February 28, 2023.

82. Do ordinances or other regulatory mechanisms require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all qualifying construction projects? *Schedule A.3.d.ii*

Yes ☒ No ☐ NA ☐

If necessary, provide an explanation:

83. Indicate the minimum land disturbance where construction site operators are required to complete and implement an Erosion and Sediment Control Plan (ESCP) for construction project sites: *Schedule A.3.d.ii*

In square feet or portion of an acre: 1 ft^2 ☐, acres ☒

If necessary, provide an explanation:

This threshold will drop to ¼ acre in March 2023.

84. For construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres), provide a brief description how these projects are referred to DEQ or the appropriate DEQ agent, to obtain a NPDES Construction Stormwater General Permit. *Schedule A.3.d.iii*

Projects are reviewed by Public Works as applications are made for all land use actions and building permits. Impact areas are provided by the applicant and verified by staff. If disturbance areas meet or exceed one acre the applicant is contacted and informed of the necessary processes and applications. This intake procedure is currently under review and revision in anticipation of impending threshold reductions.

85. Provide the written specifications that address the proper installation and maintenance of such controls during all phases of construction activity as an attachment *Schedule A.3.d.iv*

Attached: Yes ☐ No ☒

If necessary, provide an explanation:

Benton County Development Code Chapter 99:
https://www.co.benton.or.us/sites/default/files/fileattachments/planning/page/2908/dc_ch_99.pdf

Oregon Dept. of Transportation Erosion & Sediment Control Manual:
https://www.oregon.gov/odot/GeoEnvironmental/Docs_Environmental/Erosion_Control_Manual.pdf

Benton County Best Management Practices for Roads, Facilities and Parks & Natural Areas (attached)

Proposed projects that meet the criteria are identified at the land use action or building permit application stage. Where the disturbance threshold is met or exceeded, the County requires that the applicant apply for and obtain a 1200-C permit from DEQ for the proposed project.

Once that approval is in place, the applicant must then apply for a Benton County Erosion and Sediment Control Permit. Staff add additional conditions if warranted, and then issue the County permit. All conditions of the 1200-C Permit apply as well as the County conditions.

86. Provide the Erosion and Sediment Control Plan template as an attachment. *Schedule A.3.d.iv.A*

Attached: Yes ☒ No ☐

If necessary, provide an explanation:

87. Indicate which of the following are required for qualifying construction projects: *Schedule A.3.d.iv*

☒ Site operator required to complete a ESCP template or worksheet prior to beginning construction/land disturbance
☒ Site operator required to keep the ESCP on site
☒ Site operator required to maintain and update the ESCP as site conditions change, or as needed.
☒ Site operator required to provide the ESCP to the permit registrant, DEQ, or another administrating entity

If necessary, provide an explanation:

88. ESCPs [from construction projects that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres)] are reviewed using a checklist or similar document to determine compliance. *Schedule A.3.d.v*

Yes ☒ No ☐

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

Attached: Yes ☒ No ☐

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

ft^2 ☐, acres ☐

If necessary, provide an explanation:

91. All construction projects [that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres)] are expected or scheduled to be inspected at least once per permit term. *Schedule A.3.d.vi.A.1*

    Indicate the number of inspections completed to comply with this requirement during this reporting year: 48
    Indicate the number of inspections completed to comply with this requirement during the permit term: 104
    If necessary, provide an explanation:

92. Are construction projects with visible sediment in stormwater/dewatering discharge or when a complaint is received inspected? *Schedule A.3.d.vi.A.2*

    Yes ☒ No ☐

93. Indicate number of projects that were inspected based on this inspection trigger: 1
    If necessary, provide an explanation: Turbid water discharge from a residential construction site. Silt fence and wattles were required.

94. Indicate the total number of construction projects that were inspected this monitoring year: 15
95. Indicate the total number of construction projects that were inspected during the permit term: 43

96. Indicate which of the following are documented during an inspection: *Schedule A.3.d.vi.B*
    - ☒ That the ESCP is reviewed to determine if the described
    - ☒ Control measures were installed, implemented, and maintained appropriately
    - ☒ Assessment of the site's compliance with the ordinances or requirements
    - ☒ Visual observation of any existing or potential non-stormwater discharges, illicit connections, and/or discharge of pollutants from the site
    - ☒ Recommendations to the construction site operator for follow-up
    - ☒ Education or instruction provided to the site operator related to stormwater pollution prevention practices

    If necessary, provide an explanation:

97. If available, provide a copy of the written or electronic inspection report form. *Schedule A.3.d.vi.B*
    Attached: Yes ☒ No ☐

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

    If necessary, provide an explanation:
    N/A

99. Provide the written escalating enforcement and response procedure as an attachment. *Schedule A.3.d.vii*

    Yes ☒ No ☐

    (For Existing Registrant must be submitted with the third Annual Report. Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)
    If necessary, provide an explanation:

    Benton County Code Section 31: Enforcement can be found at:

https://www.co.benton.or.us/sites/default/files/fileattachments/board_of_commissioners_office/page/2176/ch_31_enforcement_120721.pdf
This code is also included as an attachment.

100. Was the escalating enforcement procedure used to achieve compliance at any construction projects? *Schedule A.3.d.vii*

Yes ☐ No ☒

Indicate number of times during this reporting year: 0

101. Indicate number of times during the permit term: 1

If necessary, provide an explanation:

A preliminary escalating enforcement procedure was used for one enforcement action prior to codification of the procedure.

102. Were all persons responsible for ESCP reviews, site inspections, and enforcement appropriately trained to conduct such activities? *Schedule A.3.d.viii*

Yes ☒ No ☐

If necessary, provide an explanation:

103. Were all new staff working to implement the construction site runoff control program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.d.viii*

Yes ☒ No ☐

Post-Construction Site Runoff for New Development and Redevelopment

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

Work on this section of the permit is in its formative stages. A survey was conducted (as noted in 34, 40, and 80 above) to solicit community engagement as staff advances the process of developing additional site runoff controls and the creation of new code language. The SWIG has been meeting since April 2022.

County staff wishes to adopt standards consistent with already established expectations and have largely modeled our program based on other municipalities in the County as well as ODOT design standards and manuals. Standards and practices established in association with the previous permit remain in place and are currently in use.

Changes to Benton County Code regarding this Control Measure are in the composition phase and will be brought before the Planning Commission and Board of Commissioners by February 28, 2023.

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

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2023 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)*

106. For projects creating or replacing impervious area, indicate the area (or threshold) where the site is required to implement the post-construction site runoff program requirements: *Schedule A.3.e.ii*

In square feet: 43,560 ft^2

If necessary, provide an explanation:

A lower threshold has not been codified yet

107. Indicate which of the following are required at qualifying sites: *Schedule A.3.e.ii*
- ☒ The use of structural stormwater controls
- ☒ A site-specific stormwater management approach that targets natural surface or predevelopment hydrological function through the installation and long-term operation and maintenance of stormwater controls
- ☒ Long-term O&M of stormwater controls at project sites that are under the ownership of a private entity

If necessary, provide an explanation:

108. Were ordinance(s), code(s) and development standards reviewed to identify, minimize or eliminate barriers that inhibit design and implementation techniques intended to minimize impervious surfaces and reduce stormwater runoff? *Schedule A.3.e.iii*

Yes ☐ No ☒

109. If barriers were identified or if necessary, provide an explanation:

Currently in process.

110. Provide an explanation of the timeline for removal of barriers or if removal is outside your authority:

Benton County's jurisdiction is predominantly rural and there are few barriers for low impact development.

111. Indicate which of the following technical standards are used to determine the retention requirement: *Schedule A.3.e.iv.A*
- ☐ Volume-based method
- ☒ Storm event percentile-based method
- ☐ Annual average runoff-based method

If necessary, provide an explanation: The Stormwater Design Manual will be available and the retention requirement will be in effect on March 1, 2023.

112. For projects that are unable to meet the retention requirement, is the remainder of the rainfall/runoff treated prior to discharge with a structural stormwater control? *Schedule A.3.e.iv.B*

Yes ☐ No ☒

113. Was the stormwater structural control designed to remove, at minimum, 80 percent of the total suspended solids?

Yes ☐ No ☒

If necessary, provide an explanation: The Stormwater Design Manual will be available and the treatment requirement will be in effect March 1, 2023.

114. Are the allowable structural stormwater controls and specifications available for review? *Schedule A.3.e.iv.C*

Yes ☐ No ☒

115. Indicate if they are attached or the location where they can be viewed:

Attached ☐

Location:

If necessary, provide an explanation: The Stormwater Design Manual will be available on March 1, 2023.

116. Have alternatives for projects complying with the retention requirement been approved? *Schedule A.3.e.iv.D*

Yes ☐ No ☒

117. If yes, are the written technical justifications evaluated? *Schedule A.3.e.iv.D*

Yes ☐ No ☐

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

If necessary, provide an explanation: The Stormwater Design Manual will be available on March 1, 2023.

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

Yes ☐ No ☒

If necessary, provide an explanation: The Stormwater Design Manual will be available on March 1, 2023.

120. If applicable, indicate which of the following mitigation options have been used and provide a narrative description of the implementation of the mitigation option? *Schedule A.3.e.iv.D*

☐ Off-Site Mitigation
☐ Off-Site Groundwater Replenishment Projects

If necessary, provide an explanation:
At this time, the issue of alternative compliance and/or mitigation options has not been decided.

121. Was a procedure developed for the review and approval of structural stormwater control plans for new development and redevelopment projects? *Schedule A.3.e.v*

Yes ☒ No ☐

If necessary, provide an explanation:
Benton County has a new ESC Permit Application packet and review process that will be implemented March 1, 2023. See upcoming 2023 report for details.

122. Indicate the minimum land disturbance or creation of new impervious area where plans are required to be reviewed: 1 ft^2 ☐, acres ☒ of land disturbance ☐ creation of new impervious area ☒

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

Yes ☐ No ☒

If necessary, provide an explanation: At this time, the issue of alternative compliance and/or mitigation options has not been decided.
The threshold for disturbed area and impervious surface requiring a Benton County ESC Permit will drop to ¼ acre starting March 1, 2023.

124. Indicate if an inventory and implementation strategy is used to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv of the permit? *Schedule A.3.e.vi*

Yes ☐ No ☒

If necessary, provide an explanation:
We have implemented a new stormwater inventory systems using ArcGIS apps in which we inspect and maintain Benton County stormwater controls and facilities on a revolving basis.

This inventory system has not been implemented for private systems because our implementation date is February 28, 2023.

125. Indicate which of the following strategies have been developed to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv. *Schedule A.3.e.vi*

☒ Legal authority to inspect and require effective operation and maintenance of privately owned and operated stormwater controls
☒ Inspection procedures and an inspection schedule to ensure compliance with the O&M requirements of each stormwater control operated by the permit registrant and by other private entities
☒ A tracking mechanism for documenting inspections and the O&M requirements for each stormwater control
☐ Reporting requirements for privately owned and operated stormwater controls that document compliance with the O&M requirement in Schedule A.3.f.

If necessary, provide an explanation:

126. Are the location of all public and private stormwater controls installed during this permit term documented on the MS4 Map? *Schedule A.3.e.vi*

Yes ☒ No ☐

If necessary, provide an explanation:

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

Yes ☒ No ☐

If necessary, provide an explanation:

128. Were all new staff working to implement the post-construction site runoff for new development and redevelopment program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.e.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

Pollution Prevention and Good Housekeeping for Municipal Operations

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

Work on compliance with this Control Measure is in process. Benton County continues to work on improving its water quality compliance in general. Recently, policy language has changed to recognize water quality as a critical component of the goals of the 2040 Vision and our sustainability goals. County Ordinances (by Board of Commissioners resolution) R2017-25 and R2018-24 both recognize the importance of water conservation and stewardship in their implementation strategies. All Benton County BMP's and SOP's regarding water quality have been reviewed and updated in the last 9 months as part of compliance with the new permit. Standards and practices established in association with the previous permit remain in place and are currently in use.

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

Yes ☐ No ☒ *(Implementation date: Feb. 28, 2022 for Existing Registrants, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner))*

131. Were O&M strategies for existing controls developed for both permit registrant-owned controls and controls owned and operated by another entity discharging to the MS4? *Schedule A.3.f.ii*

Yes ☐ No ☒ N/A ☐

If necessary, provide an explanation:
IN DEVELOPMENT

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

Percentage inspected this reporting year: **33%;** Percentage cleaned: **33%**

133. If known, estimate of material removed: **~20 cubic yards**

134. Percentage inspected during the permit term:**100%;** Percentage cleaned: **100%**

135. If known, estimate of material removed: **~77 cubic yards**

If necessary, provide an explanation:

136. Indicate if a catch basin inspection prioritization system and/or an alternate inspection frequency has been established. *Schedule A.3.f.iii*

Yes ☒ No ☐

If necessary, provide an explanation:

137. During the permit term were existing procedures for inspection and maintenance schedules reviewed/updated to ensure pollution prevention and good housekeeping practices were conducted for the following activities? *Schedule A.3.f.iv*

- ☒ Pipe cleaning for stormwater and wastewater conveyance systems
- ☒ Cleaning of culverts conveying stormwater in roadside ditches
- ☒ Ditch maintenance
- ☒ Road and bridge maintenance
- ☒ Road repair and resurfacing including pavement grinding
- ☒ Dust control for roads and municipal construction sites
- ☒ Winter road maintenance, including salt or de-icing storage areas
- ☒ Fleet maintenance and vehicle washing
- ☒ Building and sidewalk maintenance including washing
- ☒ Solid waste transfer and disposal areas
- ☒ Municipal landscape maintenance

☒ Material storage and transfer areas, including fertilizer and pesticide, hazardous materials, used oil storage, and fuel
☒ Firefighting training activities
☒ Maintenance of municipal facilities including public parks and open space, golf courses, airports, parking lots, swimming pools, marinas, etc.

If necessary, provide an explanation:

138. Do any permit registrant-owned facilities have coverage under DEQ's 1200-Z Industrial Stormwater Discharge Permit? *Schedule A.3.f.v*

Yes ☐ No ☒ N/A ☐

If "Yes", provide DEQ File Number(s):

If necessary, provide an explanation:

139. Are practices in place to reduce the discharge of pollutants to the MS4 associated with the application and storage of pesticides and fertilizers? *Schedule A.3.f.vi*

Yes ☒ No ☐

If necessary, provide an explanation:

140. Are methods/practices in place to reduce the discharge of litter within the jurisdiction? *Schedule A.3.f.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

141. Are practices in place to ensure that collected material or pollutants removed in the course of maintenance are managed and disposed of in a manner such as to prevent such pollutants from entering the waters of the state in accordance with state and federal rules? *Schedule A.3.f.viii*

Yes ☒ No ☐

If necessary, provide an explanation:

Benton County has several programs to prevent dumping of pollutants into stormwater systems. Our Best Management Practices include protocols for stockpile management, proper disposal and use of materials during roadwork, construction, vegetation management and emergency maintenance in order to prevent dumping or runoff of excess.

Benton County has a 'Drains to River' stormwater placard program for county MS4s, and also has a voluntary private stormwater marking program for Benton County residents. The County also runs an extensive Adopt-a-Road program for trash and litter pickup. No Dump Signs are used throughout the County and dumpsites are usually reported fairly quickly and remedied by the Roads Department within a few working days.

142. Were all persons responsible for evaluating O&M practices, evaluating compliance with long-term O&M requirements or ensuring pollution prevention at facilities and during operations appropriately trained to conduct such activities? *Schedule A.3.f.ix*

Yes ☒ No ☐

If necessary, provide an explanation:

143. Were all new staff working to implement the pollution prevention and good housekeeping for municipal operations program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.f.ix*

Yes ☒ No ☐

If necessary, provide an explanation:

Monitoring

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

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

Yes ☒ No ☐

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

Yes ☐ No ☒

If necessary, provide an explanation:

The Cities of Corvallis and Philomath file separate annual monitoring reports for their respective jurisdictional areas of the MS4. The monitoring performed by the Cities is included in their annual reports. To avoid confusion, Benton County does not include this data in its report. Further, Benton County has no jurisdictional authority over any municipal outfalls.

Wood Village Monitoring Requirements

146. Provide a summary of the following to evaluate the control strategies established for the Lower Columbia Slough Phosphate, Lead, and Bacteria TMDLs: *Schedule D.1.b*

Phosphate:

Lead:

Bacteria:

N/A

147. Indicate which of the following were completed:

☐ For phosphate, monitor influent and effluent dissolved orthophosphate concentrations and total phosphate concentrations at a representative site in Fairview Lake (Reach 4) and Fairview Creek (Reach 5)
☐ For lead, estimates of the effectiveness of controls to remove TSS
☐ For bacteria, measuring E. coli concentrations and its distribution over flows (for example, flow duration intervals) to demonstrate compliance with E. coli criteria

If necessary, provide an explanation:

N/A

Water Quality Standards

148. During this monitoring year was it determined or reported that the MS4 discharge caused or contributed to an exceedance of an applicable water quality standard? *Schedule A.1.b*

Yes ☐ No ☒

If necessary, provide an explanation:
N/A

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

If necessary, provide an explanation:
N/A

150. Was the exceedance self-reported or did DEQ send written notification? *Schedule A.1.b*

Self-reported: Yes ☐ No ☐

If necessary, provide an explanation:
N/A

151. Within 48 hours was an investigation started into the cause of the water quality exceedance? *Schedule A.1.b.i*

Yes ☐ No ☐

If necessary, provide an explanation:
N/A

152. Within 30 days of becoming aware of the exceedance, was DEQ notified in writing, if self-reporting? *Schedule A.1.b.ii*

Yes ☐ No ☐

If necessary, provide an explanation:
N/A

153. Within 60 days of becoming aware of or being notified of the exceedance, was a report submitted to DEQ that documents the following: *Schedule A.1.b.iii*

☐ The results of the investigation, including the date the exceedance was discovered
☐ A brief description of the conditions that triggered the exceedance or the cause
☐ Corrective actions taken or planned, including the date corrective action was completed or is expected to be completed

If necessary, provide an explanation:
N/A

154. Were the corrective actions implemented in accordance with the schedule approved by DEQ? *Schedule A.1.b*

Yes ☐ No ☐

If necessary, provide an explanation:
N/A

155. Provide any additional comments or narrative description, if necessary:
N/A