



# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street Phoenix, Arizona 85007  
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## Small MS4 Annual Report

**ID #:** AZSM65737

**MS4 Name:** CITY OF COTTONWOOD MS4

**Reporting Period:** 01-Jul-2019 To 30-Jun-2020

### Main Office

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# Annual Report Summary

## Company Information

**Name :** CITY OF COTTONWOOD  
827 N MAIN ST  
COTTONWOOD  
AZ , 86326

**Question: During this reporting period, was additional land annexed into the regulated MS4 area?**

Answer: No

**Question: Is stormwater sewer mapping 100 percent complete?**

Answer: Yes

***Provide the description of the measurable goal:***

The City's Stormdrain Mapping Inventory was completed in 2017. The map is available in CAD format.

**Question: Is outfall mapping 100 percent complete?**

Answer: Yes

***Number of outfalls mapped:*** 6

***Provide the description of the measurable goal:***

No new outfalls have been identified.

**Question: Is identification of receiving waters information 100 percent complete?**

Answer: Yes

***Provide the description of the measurable goal:***

The receiving water of the City's storm drainage system is the Verde River. Two outfall locations have been identified as draining directly to the river. The remaining outfalls are not within the City boundaries and discharge to other permitting agencies. Del Monte Wash is one of the outfalls, which conveys runoffs to the Verde River, it has not been observed to have any significant flow events. The second outfall is Santa Cruz Wash since it conveys runoffs from the City's Old Town Commercial corridor to the Verde River.

**Question: Has an Illicit Discharge Detection and Elimination (IDDE) enforcement authority or other regulatory mechanism been established?**

Answer: Yes

Name	Title/Code/Citation	Effective Date	Inactive Date
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Cottonwood Municipal Code	15.40	09/30/2018	
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**Question: Has a Construction Site Stormwater Runoff enforcement authority or other regulatory mechanism been established?**

Answer: Yes

Name	Title/Code/Citation	Effective Date	Inactive Date
Cottonwood Municipal Code	15.44	09/30/2018	

**Question: Has a Post-Construction Stormwater Management enforcement authority or other regulatory mechanism been established?**

Answer: Yes

Name	Title/Code/Citation	Effective Date	Inactive Date
Cottonwood Municipal Code	15.44	09/30/2018	

**Question: For each BMP in the Minimum Control Measure 1: Public Education and Outreach, what was completed during this reporting period?**

Answer:

**BMP Name:** 1-1 Utility Bill Insert

**Category:** Utility Bill Insert

**Personnel Position/Department:** Utility Department

**BMP Description :**

The City will distribute information to residents using utility bill inserts and educate the public on stormwater related issues.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Targeted Audience:** Utility Customers      **Frequency:** 1 Two times per year

**Milestone Description:**

The City reports the number of stormwater related inserts distributed with utility bills during each reporting period. (Inserts are distributed 2 times per year minimum.)

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

This method of outreach was determined to be ineffective. A change was made to relay information to the public via the City's Facebook page.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** Yes

**Milestone Description:**

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**BMP Name:** 1-4 Fact Sheets

**Category:** Fact Sheets

**Personnel Position/Department:** Utility Department

**BMP Description :**

The City will distribute fact sheets for business owners regarding stormwater at local meetings and events and will be made available on the website.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Targeted Audience:** Business owners **Frequency:** 1 Two times per year

**Milestone Description:**

Document number of fact sheets distributed to business owners each year. (Distribute materials at a minimum of 2 events per year.)

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

A total of 100+ brochures were distributed to residents/students at various outreach sessions conducted throughout the year before COVID and at the Verde River Day 2019.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

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**Milestone Description:**

Since COVID19 pandemic has limited contact with group endeavors a different approach via City's webpage and Facebook maybe needed. This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

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**BMP Name:** 1-3 Printed Materials

**Category:** Printed Materials

**Personnel Position/Department:** Public Works

**BMP Description :**

The City will distribute printed materials geared towards the general public regarding stormwater at local meetings and events and will be made available on the website.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Targeted Audience:** General Public      **Frequency:** 1 Two times per year

**Milestone Description:**

Record number of materials distributed. (Distribute materials at a minimum of 2 events per year.)

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

The City has available printed stormwater brochures at a majority of the public facilities that have a customer service focus.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

Again with the COVID19 pandemic and subsequent stay at home orders/ building closures, it has been difficult to distribute printed materials. Again it maybe necessary to move to a social media or web based application. This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

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**BMP Name:** 1-2 Webpage

**Category:** Webpage

**Personnel Position/Department:** Public Works

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***BMP Description :***

The City will maintain and update the storm-water webpage with the most current SWMP and other applicable stormwater information.

***Is another government entity responsible for this BMP ?*** No

**Measurable Goals:**

***Start Date:*** 07/01/2018

***Targeted End Date:*** 09/29/2021

***Targeted Audience:*** General public ***Frequency:*** 1 Daily

***Milestone Description:***

The City will record the dates the site is updated and the number of visitors to the site each reporting period. (Website is available year-round.)

***Were milestones/measurable goals achieved for this reporting period?*** Yes

***Actual BMP Start Date:*** 07/01/2018

***Date:***

***Provide a description of BMP effectiveness, including metrics used to determine effectiveness.***

The number of hits to the webpage are

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

**Question: Minimum Control Measure 1: Public Education and Outreach, Did the program implement any additional BMPs during this reporting period?**

Answer:

***Did the program implement any additional BMPs during this reporting period?*** Yes

***BMP Name:*** Public Works Monthly Inspection

***Provide a description of the BMP, include reason(s) for implementing the BMP, its effectiveness, frequency, and goal:***

The goal of the Public Works monthly inspection program is to collect trash and observe any illicit discharges onsite or that may be flowing offsite.

***Will this BMP be used for future reporting periods?*** Yes

Please add this BMP to the NOI to have it auto-populate in future annual reports

***Provide a summary of compliance with the requirements for Minimum Control Measure1.***

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The City implemented a monthly site inspection program of the Public Works yard and is to be utilized to collect debris and observe site conditions relating to erosion and illicit discharges.

**Question: For each BMP in the Minimum Control Measure 2: Public Involvement and Participation, what was completed during this reporting period?**

Answer:

**BMP Name:** 2-3 Procedure for Receiving Public Comment

**Category:** Procedure for Receiving Public Comment

**Personnel Position/Department:** Public Works

**BMP Description :**

The City will provide the public with an opportunity to report storm-water violations. Residents can call a hotline, or submit complaints via email.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

City will record the number of complaints received and the resolution reached for each complaint. (Annually)

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

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**BMP Name:** 2-2 Adopt-a-Street Program

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**Category:** Public Participation

**Personnel Position/Department:** Streets Division

**BMP Description :**

The City will implement and solicit an Adopt-A-Street Program where residents can directly participate in the reduction of pollutants that may impact stormwater quality.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

City will report the number of clean-up events, number of participants, and the pounds of trash removed during the reporting period. (Annually)

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic employees were furloughed and offices were closed. Staff is approximately seven months behind in inputting data into the MS\$ Front software program.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 2-1 Implement Public Notice

**Category:** Public Involvement

**Personnel Position/Department:** Public Works

**BMP Description :**

The City will provide the most current SWMP and NOI on their webpage and solicit public feedback through the stormwater hotline.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

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**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 One time event

**Milestone Description:**

City will record the feedback received from residents. (Once per permit term)

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

**Question: For Minimum Control Measure 2: Public Involvement and Participation, Did the program implement any additional BMPs during this reporting period?**

Answer:

**Did the program implement any additional BMPs during this reporting period?** Yes

**BMP Name:** Public Outreach Campaign (2019)

**Provide a description of the BMP, include reason(s) for implementing the BMP, its effectiveness, frequency, and goal:**

The City embarked on a new Public Outreach Campaign during the previous reporting period through social media. The goal is to increase awareness of the program and what constitutes a violation as well as to solicit feedback through a previously unexplored media type.

**Will this BMP be used for future reporting periods?** Yes

Please add this BMP to the NOI to have it auto-populate in future annual reports

**Provide a summary of compliance with the requirements for Minimum Control Measure2.**

Implement a media plan for public outreach campaign.

**Question: For each BMP in the Minimum Control Measure 3: Illicit Discharge Detection and Elimination Program, what was completed during this reporting period?**

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Answer:

**BMP Name:** 3-6 Unpermitted Discharges

**Category:** Unpermitted Discharges

**Personnel Position/Department:** Public Works

**BMP Description :**

Check permits of businesses and active construction sites in order to identify potentially unpermitted facilities and non-filers.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

City will audit 100% of active construction sites and 20% of new businesses each year. City will contact potential non-filers and notify ADEQ annually.

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 3-4 Wet Weather Monitoring

**Category:** Wet Weather Monitoring

**Personnel Position/Department:** Public Works

**BMP Description :**

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Visually monitor outfalls and/or screening points in response to a rain event to identify potential illicit discharges.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Two times per year

**Milestone Description:**

Record number of wet weather visual monitoring inspections performed each year. (2 per wet season per year for each outfall or screening point.)

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Staff was able to complete monitoring for the Summer WET season for the Santa Cruz Wash point. However due to a dry monsoon staff was unable to obtain samples for the Winter WET season. If any other visual inspections were conducted no other information was found, however this could be part of the data that hasn't been entered yet.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 3-9 Written IDDE Procedures

**Category:** Written IDDE Procedures

**Personnel Position/Department:** Public Works

**BMP Description :**

Written IDDE Procedures: Develop a SOP to identify, report and resolve IDDE's.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

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**Milestone Description:**

Written IDDE Procedures: Develop a written Policy Document for internal use.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start** 06/15/2019

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

IDDE SOP was completed on September 30, 2019.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** Yes

**Milestone Description:**

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**BMP Name:** 3-5 Follow-Up Screening Procedures

**Category:** Follow-Up Screening Procedures

**Personnel Position/Department:** Public Works

**BMP Description :**

Eliminated ID's will be inspected to ensure they have been.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 10/01/2017

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Locations of original IDs shall be revisited to ensure they are still in compliance. (ID sites revisited within 1 year of discovery.)

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Provide a summary of activities planned for next reporting period**

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**BMP does not apply for next reporting period:**

No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 3-8 Implement IDDE Program

**Category:** Implement IDDE Program

**Personnel Position/Department:** Public Works

**BMP Description :**

Implement IDDE Program: Develop a SOP to identify and report IDDEs.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Implement IDDE Program: Track IDDE's reported in the MS4Front software.

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind. The department is utilizing the MS4 Front software program and an SOP was developed for IDDEs dated September 30, 2019.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 3-7 Employee Training

**Category:** Staff Training

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**Personnel Position/Department:** Public Works

**BMP Description :**

Yearly training of staff on IDDE procedures.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

***Milestone Description:***

City will record number of employees who received stormwater training each year. (Training occurs annually.)

***Were milestones/measurable goals achieved for this reporting period?*** Yes

**Actual BMP Start** 12/01/2018

**Date:**

***Provide a description of BMP effectiveness, including metrics used to determine effectiveness.***

Staff completed three training sessions:

Green Infrastructure for WET Weather: July 31, 2019

Construction BMPS's on August 22, 2019

Illicit Discharge Detection and Elimination on September 12, 2019

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 3-1 Enforcement Procedures

**Category:** Enforcement Procedures

**Personnel Position/Department:** Code Enforcement

**BMP Description :**

Code Enforcement Officers to enforce illicit discharges using ERP.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 10/01/2018

**Targeted End Date:** 09/29/2021

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**Frequency:** 1 Annually

**Milestone Description:**

Update ERP procedures as necessary. Record number of enforcement actions each year. (Ongoing enforcement of all illicit discharges.)

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 3-2 Eliminate Illicit Discharges

**Category:** Eliminate Illicit Discharges

**Personnel Position/Department:** Public Works

**BMP Description :**

IDs will be addressed and eliminated.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 One time event

**Milestone Description:**

City will record number of IDs eliminated during each reporting period. (IDs will be eliminated per IDDE SOP.)

**Were milestones/measurable goals achieved for this reporting period?** No

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**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 3-3 Dry Weather Screening

**Category:** Dry Weather Screening

**Personnel Position/Department:** Public works

**BMP Description :**

Inspect outfalls and/or screening points during dry periods to identify potential illicit discharges.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Record number of dry weather screenings performed each year. (20% of City's MS4 will be inspected annually.)

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Provide a summary of activities planned for next reporting period**

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**BMP does not apply for next reporting period:**

No

**Milestone Description:**

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

**Question: For Minimum Control Measure 3: Illicit Discharge Detection and Elimination Program, Did the program implement any additional BMPs during this reporting period?**

Answer:

**Did the program implement any additional BMPs during this reporting period?** No

**Provide a summary of compliance with the requirements for Minimum Control Measure 3.**

Due to the COVID19 pandemic and staff leaving, being furloughed, returning and being reassigned information and data are slow to be inputted or even found within filing systems.

**Question: Were staff trained in IDDE Awareness and Response?**

Answer:

Yes

Sr.No.	Date of Training Event	Training Subject	Number of Employees Trained	Frequency of Training
1	09/12/2019	Video-Illicit Discharge Detection and Elimination	5	Annually

**Question: Minimum Control Measure 1: Illicit Discharge Detection and Elimination Program, Provide the details of the Illicit Discharge Detection and Elimination (IDDE) incidents that occurred during this reporting period.**

Answer:

**Number of IDDE incidents reported in this reporting period:** 0

**Number of IDDE incidents responded to in this reporting period:** 0

Sr.No.	Enforcement Actions	Enforcements Issued	Enforcements Resolved	Enforcements Unresolved
1	NOV	0	0	0
2	NOC	0	0	0
3	Stop Work	0	0	0
4	Admin Order	0	0	0

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5	Admin Fines	0	0	0
6	Civil Penalties	0	0	0
7	Criminal Action	0	0	0
	Total	0	0	0

**Question: Were there any unpermitted discharges to the MS4?**

Answer: No

**Question: Were any samples collected to characterize illicit discharge(s) in this reporting period?**

Answer: No

**Number of Illicit Discharges Sampled are:**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Question: For each BMP in the Minimum Control Measure 4: Construction Activity Stormwater Runoff Control, what was completed during this reporting period?**

Answer:

**BMP Name:** 4-7 Control Wastes

**Category:** Control Wastes

**Personnel Position/Department:** Public Works

**BMP Description :**

Control Wastes generated onsite with good housekeeping practices.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Control Wastes: Perform monthly site inspections to observe the effectiveness of the good housekeeping practices.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 4-1 Construction Inventory

**Category:** Inventory

**Personnel Position/Department:** Community Development

**BMP Description :**

Keep database of active construction projects.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Number of active construction sites will be recorded for each reporting period. (Database updates performed as needed.)

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Easy to identify where active construction sites are within the City. However due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Provide a summary of activities planned for next reporting period**

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**BMP does not apply for next reporting period:**

No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 4-5 Employee Training

**Category:** Employee Training

**Personnel Position/Department:** Public Works

**BMP Description :**

The City will conduct an annual stormwater training for all employees which will include inspection activities.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Record the number of employees trained during each reporting period. (All employees trained 1 time per year.)

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 4-6 Erosion/ Sediment Control

**Category:** Erosion/ Sediment Control

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**Personnel Position/Department:** Public Works

**BMP Description :**

Erosion/ Sediment Control: Implement and/or maintain berms or vegetative buffers along the perimeter of the Public Works Yard to prevent runoff.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Erosion/ Sediment Control: Perform annual inspection and repair of damaged implements.

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

However due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 4-4 Contractor Education

**Category:** Construction Operator Training

**Personnel Position/Department:** Public Works

**BMP Description :**

Contractor education program and onsite training.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

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***Milestone Description:***

Document and record trainings each year. (All contractors to receive storm-water compliance information.)

***Were milestones/measurable goals achieved for this reporting period?*** No

***ADEQ Directed*** No

***Change:***

***Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.***

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

This is also dependent upon the new public works personnel that will be responsible for implementation of the program.

---

***BMP Name:*** 4-3 Construction Site Inspection and Enforcement Procedures

***Category:*** Inspections

***Personnel Position/Department:*** Public Works

***BMP Description :***

Inspect construction projects for stormwater compliance.

***Is another government entity responsible for this BMP ?*** No

**Measurable Goals:**

***Start Date:*** 07/01/2018

***Targeted End Date:*** 09/29/2021

***Frequency:*** 1 Annually

***Milestone Description:***

Record number of inspections each year. (All construction sites will receive 1 inspection minimum.)

***Were milestones/measurable goals achieved for this reporting period?*** No

***ADEQ Directed*** No

***Change:***

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**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

However due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

**BMP Name:** 4-2 Review Construction Plans

**Category:** Site Plan Review

**Personnel Position/Department:** Public Works

**BMP Description :**

Review erosion control plans to ensure compliance with storm-water practices.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Review all plans and record number of erosion control plans reviewed.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

All development plans received by Community Development are reviewed for grading and drainage requirements including stormwater protection. In most instances, each set of plans has a separate SWPP document, but sometimes they are included in the grading plan. The City has instituted a requirement for individual developments of one acre or greater to obtain an NOI from ADEQ directly and requires this submittal to be approved by ADEQ prior to the issuance of a building permit.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

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The City will continue to require that SWPP documents be submitted with all development plans and will also require that all developments on 1 acre or more submit for an individual NOI from ADEQ.

**Question: For Minimum Control Measure 4: Construction Activity Stormwater Runoff Control, Did the program implement any additional BMPs during this reporting period?**

Answer:

***Did the program implement any additional BMPs during this reporting period?*** No

***Provide a summary of compliance with the requirements for Minimum Control Measure4.***

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Question: Were any construction activity operator training events conducted?**

Answer:

No

***Why weren't training events conducted?***

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Question: Minimum Control Measure 4: Construction Activity Stormwater Runoff Control, Provide the details of the construction activity complaints and inspections that were conducted during this reporting period.**

Answer:

***Number of active construction sites in this reporting period:*** 0

***Has an inspection frequency been developed and implemented?*** YES

***Number of active construction sites inspected at least weekly:*** 0

***Number of active construction sites inspected at least one time every six months:*** 0

***Number of active construction sites inspected at least monthly:*** 0

***Number of active construction sites inspected at least annually:*** 0

***Number of construction activity complaints that were resolved or responded to:*** 0

***Number of active construction sites not inspected:*** 0

***Number of construction activity complaints received in this reporting period:*** 0

***Number of active construction sites that required re-inspections in this reporting period:*** 0

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Sr.No.	Enforcement Actions	Enforcements Issued	Enforcements Resolved	Enforcements Unresolved
1	NOV	0	0	0
2	NOC	0	0	0
3	Stop Work	0	0	0
4	Admin Order	0	0	0
5	Admin Fines	0	0	0
6	Civil Penalties	0	0	0
7	Criminal Action	0	0	0
	Total	0	0	0

**Question: For each BMP in the Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment, what was completed during this reporting period?**

Answer:

**BMP Name:** 5-4 Operations and Maintenance of Post-Construction BMPs

**Category:** O&M Procedures

**Personnel Position/Department:** Public Works

**BMP Description :**

Require private developments to maintain their structural BMPs. City shall inspect public post-construction BMPs using the Post-Construction Inspection Form.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 10/01/2017

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

City shall inspect 20% of post-construction BMPs at public facilities each year and respond to all complaints at private facilities.

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**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 5-2 Enforcement Procedures

**Category:** Enforcement

**Personnel Position/Department:** Public Works

**BMP Description :**

Follow ERP for all post-construction BMPs not in compliance.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Record all enforcement actions and outcome each year.

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known. A draft of the Stormwater Enforcement Ordinance was completed in January of 2020, however it is unknown as to the status of this.

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**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 5-5 Structural/Non-Structural BMP

**Category:** Structural/Non-Structural BMP

**Personnel Position/Department:** Public Works

**BMP Description :**

Structural/Non-Structural BMP: Use of berms and other natural barriers to prevent stormwater runoff.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Structural/Non-Structural BMP: Implement appropriate berthing to prevent runoff from the site.

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

Program will continue as designed

---

**BMP Name:** 5-1 Stormwater Control Inventory and Inspection

**Category:** Inventory

**Personnel Position/Department:** Public Works

**BMP Description :**

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Develop and maintain a GIS database of permanent stormwater BMPs and ensure permanent stormwater BMPs are maintained by private property owners.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

***Milestone Description:***

Update database as new BMPs are completed. Report number of additions to database each year.

***Were milestones/measurable goals achieved for this reporting period?*** No

**ADEQ Directed** No

***Change:***

***Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.***

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 5-3 Site Plan Review Procedures

**Category:** Site Plan Reviews

**Personnel Position/Department:** Public Works

***BMP Description :***

Implement SOPs for permanent stormwater BMP design, construction oversight and as-built verification. Review plans for compliance with regulations and SOP.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

***Milestone Description:***

Document plans reviewed per reporting period.

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

**Question: For Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment, Did the program implement any additional BMPs during this reporting period?**

Answer:

**Did the program implement any additional BMPs during this reporting period?** No

**Provide a summary of compliance with the requirements for Minimum Control Measure5.**

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Question: Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment, Provide the details of the Post-Construction Stormwater controls used during this reporting period**

Answer:

**Number of sites that required Post-Construction Stormwater controls in this reporting period:** 0

**Number of Post-Construction Stormwater controls inspected in this reporting period:** 0

Sr.No.	Enforcement Actions	Enforcements Issued	Enforcements Resolved	Enforcements Unresolved
1	NOV	0	0	0

2	NOC	0	0	0
3	Stop Work	0	0	0
4	Admin Order	0	0	0
5	Admin Fines	0	0	0
6	Civil Penalties	0	0	0
7	Criminal Action	0	0	0
	Total	0	0	0

**Question: For each BMP in the Minimum Control Measure 6: Pollution Prevention and Good Housekeeping, what was completed during this reporting period?**

Answer:

**BMP Name:** 6-2 O&M Procedures

**Category:** O&M Procedures

***Facility Information:***

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

**Personnel Position/Department:** Public Works

***BMP Description :***

A. Street Sweeping Program

B. Vehicle Maintenance and Washing

***Is another government entity responsible for this BMP ?*** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Monthly

***Milestone Description:***

A. Continue street sweeping program; record miles swept and tons of debris removed.

B. Perform maintenance on City vehicles as-needed at local repair shops and wash vehicles at wash bay as-needed.

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**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** Inventory

**Category:** Inventory

**Facility Information:**

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

**Personnel Position/Department:** Public Works

**BMP Description :**

Inventory

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Inventory

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

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**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

**BMP Name:** 6-1 Inspect Municipal Facilities

**Category:** Inspections

**Facility Information:**

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

**Personnel Position/Department:** Utilities Department

**BMP Description :**

Develop an inspection schedule for municipal facilities based on potential discharge priority.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 10/01/2017

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Quarterly

**Milestone Description:**

A. Inspect facilities based upon prioritization.

B. Document inspection findings annually.

(Low priority: 20% per year

Med priority: Annually

High priority: Quarterly)

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start** 07/01/2018

**Date:**

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**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Partially- Utilities Staff inspects Mingus WWTP quarterly in conjunction with the MSGP for the site. Riverfront WRF is also inspected although it does not have a MSGP. Staffing changes have occurred in Public Works and at the Airport it is unknown if these site have been inspected.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

Utilities staff will continue to inspect Mingus WWTP and Riverfront WRF. Other departments should be assigned to the other facilities.

**BMP Name:** Maintenance Schedule

**Category:** Maintenance Schedule

**Facility Information:**

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

**Personnel Position/Department:** Public Works

**BMP Description :**

Conduct a visual inspection after each rainfall event (a minimum of 1 rime per year) to identify any points of erosion or concentrated flow leaving the site.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Repair the eroded area and look upstream to identify the cause and implement a remedy (e.g. straw wattles, berms, etc.)

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

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**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

**BMP Name:** 6-3 Implement Pollution Controls

**Category:** Implement Pollution Controls

**Facility Information:**

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

**Personnel Position/Department:** Public Works

**BMP Description :**

- A. Maintain structural controls installed on municipal facilities.
- B. Review pollution prevention plans for municipal facilities.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

- A. Inspect and maintain structural controls and document inspections. (Annually)
- B. Review and update pollution prevention plans as necessary. (Annually.)

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

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Partially- Mingus WWTP and Riverfront WRF have been inspected. Staff repaired the outfall located in the parking lot. It is unknown what the other sites have been inspected. When staff is able to upload the data this information can be updated.

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

---

***BMP Name:*** Maintenance Activities

***Category:*** Maintenance Activities

***Facility Information:***

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

***Personnel Position/Department:*** Public Works

***BMP Description :***

Routine trash collection. Staff will conduct weekly rounds at the Public Works Yard to cleanup trash found onsite.

***Is another government entity responsible for this BMP ?*** No

**Measurable Goals:**

***Start Date:*** 07/01/2018

***Targeted End Date:*** 09/29/2021

***Frequency:*** 1 Weekly

***Milestone Description:***

Remove miscellaneous trash that blows onto the Public Works Yard.

***Were milestones/measurable goals achieved for this reporting period?*** No

***ADEQ Directed*** No

***Change:***

***Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.***

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Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known. Other departments within the City have helped with this BMP within the Public Works yard.

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

This is dependent upon the new public works personnel that will be responsible for implementation of the program.

***BMP Name:*** 6-4 Staff Training

***Category:*** Training

***Facility Information:***

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

***Personnel Position/Department:*** Public Works

***BMP Description :***

Yearly training for City staff on stormwater pollution prevention.

***Is another government entity responsible for this BMP ?*** No

***Measurable Goals:***

***Start Date:*** 07/01/2018

***Targeted End Date:*** 09/29/2021

***Frequency:*** 1 Annually

***Milestone Description:***

Record number of employees who received stormwater training. (Annual training.)

***Were milestones/measurable goals achieved for this reporting period?*** Yes

***Actual BMP Start Date:*** 12/18/2018

***Date:***

***Provide a description of BMP effectiveness, including metrics used to determine effectiveness.***

Partially- Wastewater Staff are trained annually on stormwater. I am unaware of any training taht took place for City staff on this subject within the reporting period.

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

Main Office

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Southern Regional Office

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***Milestone Description:***

This is dependent upon the new public works personnel that will be responsible for implementation of the program. The City does have a training site where this can be implemented for all employees.

**Question: For Minimum Control Measure 6: Pollution Prevention and Good Housekeeping, Did the program implement any additional BMPs during this reporting period?**

Answer:

***Did the program implement any additional BMPs during this reporting period?*** No

***Provide a summary of compliance with the requirements for Minimum Control Measure 6.***

Due to staffing changes and the COVID19 pandemic its unknown as to if this is was complete for this reporting period. Once staff is able to input data more may be known.

**Question: Was staff training conducted?**

Answer:

No

***Why weren't training events conducted?***

Due to the COVID19 pandemic personnel were furloughed and offices closed. Key personnel have left employment with the City and others have been reassigned and/or are now supervised by new personnel not involved with the Stormwater program. Data input from control measures is seven months behind.

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# CERTIFICATION OF SUBMISSION

**DEBORAH LBREITKREUTZ**

You validated your identity by answering your personal security question and password on myDEQ at **04:03 PM** on **09/30/2020**. At this time, you certified the summary information above by checking that you agreed to the following statement:

## **Certify your submission:**

By checking this box I certify under penalty of law that this submittal was prepared by me, or under my direction or supervision of personnel appropriately qualified to properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I understand that all information submitted to ADEQ is public record unless otherwise identified by law as confidential. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

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