

EPA MS4 PROGRAM COMPLIANCE INSPECTION - Multnomah County, Oregon

May 14-15, 2013

Pre Inspection Questionnaire and Records Request - Compiled by Roy Iwai, Water Quality Program, Multnomah County Land Use and Transportation

Program Management/Kick-off Meeting						
Item No.	Document(s)/Data Requested	Document/Data Provided (please select Yes/No)	Formal Title(s) of Document(s) Provided and Date/Version	Department Responsible for Document(s)	Web Link to Document(s) Provided (Yes/No; please provide web address information)	Data Entry/Additional Information Regarding Requested Item (Comments/Notes)
1	Stormwater Management Program (SWMP) Plan (Version currently operating under)	Yes	Multnomah County Stormwater Management Plan - National Pollutant Discharge Elimination System (NPDES) Municipal Separate Stormwater System (MS4) Permit - April 2011	Community Services - Land Use and Transportation Division	http://web.multco.us/sites/default/files/roads/documents/mc_swmp_april_2011.pdf	
2	MS4 Annual Report (most recent Reporting Year)	Yes	Multnomah County NPDES MS4 Phase I Permit - Stormwater Management Program: Annual Report 2012 - Permit Year 17	Community Services - Land Use and Transportation Division	https://web.multco.us/sites/default/files/roads/documents/npdes_2012_report.pdf	The electronic copy included in the packet contains the NPDES Annual report, environmental monitoring data, and the Sandy/Willamette TMDL report.
3	Program organizational chart and/or a description of the departments and personnel involved in the implementation of your MS4 program and their responsibilities	Yes	Facilities & Property Management Organizational Chart and Land Use & Transportation Organization Chart - 4/8/13	Community Services - Land Use and Transportation Division; County Assets - Facilities and Property Management		
4	Map of the permitted area and receiving waters, basins, and segments, including any TMDL or 303(d) listed waters	Yes	Multnomah County NPDES Permit Areas and Watersheds - April 2013; Multnomah County Arterials and Collector Roads in NPDES Area - April 2013	Community Services - Land Use and Transportation Division		
5	Any formal "interagency" agreements with other entities/local governments for implementation of your MS4 programs (e.g., memoranda of understanding)	Yes	Gresham NPDES IGA 2011; Regional Coalition IGA 2010; First Amendment to Intergovernmental Agreement to Transfer Land Use Planning Responsibilities - (Urban Planning Area Agreement) - 2005; Westside Pocket Agreement 2010 and Contract Amendment No.13 for Westside Maintenance, 2011; Expansion of Service Authority for Unified Sewage Agency of Washington County - Multnomah County Resolution #89-43	Community Services - Land Use and Transportation Division		
6	MS4 Annual Expenditure (most recent Fiscal Year)	Yes	Multnomah County NPDES MS4 Phase I Permit - Stormwater Management Program: Annual Report 2012 - Permit Year 17	Community Services - Land Use and Transportation Division	https://web.multco.us/sites/default/files/roads/documents/npdes_2012_report.pdf	Annual Report 2012, page 22
7	MS4 Budget (most recent Fiscal Year)	Yes	Multnomah County NPDES MS4 Phase I Permit - Stormwater Management Program: Annual Report 2012 - Permit Year 17	Community Services - Land Use and Transportation Division	https://web.multco.us/sites/default/files/roads/documents/npdes_2012_report.pdf	Annual Report 2012, page 22
8	Primary MS4 Funding Source	Yes	Multnomah County NPDES MS4 Phase I Permit - Stormwater Management Program: Annual Report 2012 - Permit Year 17	Community Services - Land Use and Transportation Division	https://web.multco.us/sites/default/files/roads/documents/npdes_2012_report.pdf	Annual Report 2012, page 22
9	Number of Major MS4 Outfalls (Indicate Estimated or Measured)	Yes	Multnomah County - Illicit Discharge Detection and Elimination Program - July 2012	Community Services - Land Use and Transportation Division		

Illicit Discharge Detection and Elimination						
Please Provide a Description of the Departments/Divisions Involved in Program Element and Brief Description of Responsibilities:						
Item No.	Document(s) Requested	Document Provided (please select Yes/No)	Formal Title(s) of Document(s) Provided and Date/Version	Department Responsible for Document(s)	Web Link to Document(s) Provided (Yes/No; please provide web address information)	Additional Information Regarding Requested Item (Comments/Notes)
10	Ordinance(s) or regulatory mechanism(s) prohibiting non-stormwater discharges to the MS4	Yes	Multnomah County - Legal Authority to Implement NPDES MS4 Phase I Permit - 2010	Community Services - Land Use and Transportation Division		
11	Documentation of illicit discharge complaints or referrals and illicit discharge response and investigation activities.	No				No incidents have occurred since program was developed.
12	Documentation of procedures implemented to prevent, contain, respond to and mitigate spills to the MS4.	Yes	Multnomah County - Illicit Discharge Detection and Elimination Program - July 2012	Community Services - Land Use and Transportation Division		
13	Inventory of reported incidents of illicit discharges/connections/spills and resolution (most recent Reporting Year)	Yes	Multnomah County NPDES MS4 Phase I Permit - Stormwater Management Program: Annual Report 2012 - Permit Year 17	Community Services - Land Use and Transportation Division		
14	Employee/maintenance personnel training plan/program, records and syllabus pertaining to IDDE (most recent Reporting Year)	No				IDDE program is managed by the Water Quality Program, and all inspections are conducted by the Water Resources Specialist, staff to the Water Quality Program.
15	At time of audit, provide onsite demonstration of storm drain system mapping tools. Emphasize layers/mapping that informs the MS4 program activities (e.g., storm drain system, structural controls, outfalls, receiving waters, municipality connection points, etc.)	No				Drainage system mapping tools will be demonstrated during office visit.
16	List of priority locations in MS4 system	Yes	Multnomah County - Illicit Discharge Detection and Elimination Program - July 2012	Community Services - Land Use and Transportation Division		
17	Identification process for priority locations for dry-weather inspection activities	Yes	Multnomah County - Illicit Discharge Detection and Elimination Program - July 2012	Community Services - Land Use and Transportation Division		
18	Documentation of annual dry-weather inspection activities including identified priority locations (most recent Reporting Year)	Yes	IDDE Dry Weather Screening Data	Community Services - Land Use and Transportation Division		
19	Documentation of Enforcement Response (ERP) Plan or similar document	Yes	Multnomah County - Illicit Discharge Detection and Elimination Program - July 2012	Community Services - Land Use and Transportation Division		
20	Example/case file of an illicit discharge incident where enforcement was used (ideally full extent of enforcement authority)	No				No incidents have occurred since the program was developed.
21	Documentation of pollutant parameter action levels and examples where they have triggered further investigation to identify sources of illicit discharges	Yes	Multnomah County - Illicit Discharge Detection and Elimination Program - July 2012	Community Services - Land Use and Transportation Division		No incidents have occurred since the program was developed.

Pollution Prevention for Municipal Operations						
Please Provide a Description of the Departments/Divisions Involved in Program Element and Brief Description of Responsibilities:						
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22	Map/inventory of the City facilities and properties within the permitted area (e.g., road maintenance facilities, stockpile sites, storage and material handling areas, etc.)	No				The County does not operate any Road Maintenance facilities in the NPDES permit area.
23	Example Facility Stormwater Pollution Prevention Plan (SWPPP) document—EPA Inspection Team may select additional sites at the time of the inspection	No				The County does not operate any Road Maintenance facilities in the NPDES permit area.
24	List of all municipal facilities that treat, store or transport municipal waste, not already covered under an individual permit, that are owned or operated by the City	No				The County does not operate any Road Maintenance facilities in the NPDES permit area.
25	Records of City facility/yard inspections conducted for storm water purposes (most recent Reporting Year)—EPA Inspection Team may select specific sites at the time of the inspection	No				The County does not operate any Road Maintenance facilities in the NPDES permit area.
26	Documentation of practices, policies and procedures to reduce pollutants on City-owned lands including: parks, fleet and building maintenance facilities, transportation systems and fire-fighting training facilities.	Yes	Multnomah County Road Maintenance and Operations Manual - October 2012; Multnomah County, Oregon, Facilities and Property Management Policy and Procedure - Storm Water Management Policy Number FPM-ENV15, 2002;	Community Services - Land Use and Transportation Division; County Assets - Facilities and Property Management		
27	Maintenance standards and records of inspections and maintenance of City facilities including: pipes and culverts, catch basins, inlets, and ditches (Examples from current Permit term)	Yes	Multnomah County Road Services - Catch Basin and Street Sweeping Frequency Criteria	Community Services - Land Use and Transportation Division		We will discuss the progress of this project with maps and data during the site visit.
28	Documentation of practices, policies and procedures to reduce pollutants discharged from public streets, roads, and highways, including as a result of deicing activities.	Yes	Multnomah County Stormwater Management Plan - National Pollutant Discharge Elimination System (NPDES) Municipal Separate Stormwater System (MS4) Permit - April 2011	Community Services - Land Use and Transportation Division		
29	O & M employee training plan/program, records, and syllabus pertaining to pollution prevention/good housekeeping (most recent Reporting Year)	No	Multnomah County's RMOM Field Guide - Routine Road Maintenance Best Management Practices	Community Services - Land Use and Transportation Division		We will discuss the Multnomah County RMOM program during the site visit. Both the Field Guide and the relationship to the full RMOM will be discussed.
30	Documentation for a management program to control and minimize the use and application of pesticides, herbicides and fertilizers on City property.	Yes	Multnomah County - Integrated Vegetation Management Plan For Right-of-Ways - August 2009; Multnomah County Dept of County Assets - Facilities and Property Management Division, Policy and Procedure - Fertilizer, Herbicide, and Pesticide Management Policy ENV-17	Community Services - Land Use and Transportation Division; County Assets - Facilities and Property Management	http://web.multco.us/sites/default/files/roads/documents/ivm.final_.2009.pdf	
31	Documentation of a program to prevent or control the release of materials related to fire-fighting training activities.	No				The County does not have a fire department.
32	Documentation feasibility assessment of City owned flood control projects for retrofitting pollutant removal capabilities.	No				The County will complete a Stormwater Retrofit Strategy by November, 2014.

Construction Site Runoff Control						
Please Provide a Description of the Departments/Divisions Involved in Program Element and Brief Description of Responsibilities:						
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33	Map/inventory of current active construction sites in the permitted area showing location (differentiating City sponsored from private projects)	Yes	Multnomah County Construction Sites in the NPDES Permit Area - April 2013			
34	All construction-related ordinances and regulatory mechanisms pertaining to erosion, sediment, and waste control	No				This document will be available during the visit to Multnomah County offices.
35	Requirements for construction site operators to prevent or control non-stormwater waste (such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste)	No				This document will be available during the visit to Multnomah County offices.
36	Example erosion prevention and sediment control site plans	No				This document will be available during the visit to Multnomah County offices.
37	Procedures for erosion prevention and sediment control site plan review considering potential water quality impacts (including checklists used for reviews)	No				This document will be available during the visit to Multnomah County offices.
38	Construction BMP Manual or standards	No				This document will be available during the visit to Multnomah County offices.
39	Procedures for site inspection of erosion prevention and sediment control plan control measures	No				This document will be available during the visit to Multnomah County offices.
40	Construction inspection field checklist	No				This document will be available during the visit to Multnomah County offices.
40	Construction inspection records and documentation (most recent Reporting Year)—EPA Audit Team will select specific sites at the time of the audit	No				This document will be available during the visit to Multnomah County offices.
40	Documentation of Enforcement Response (ERP) Plan or similar document	No				This document will be available during the visit to Multnomah County offices.
40	Example/case file of a construction site issue where enforcement of ordinance was used (ideally full extent of enforcement authority)	No				This document will be available during the visit to Multnomah County offices.

