

**DATE:** October 5, 2020

**TO:** Clean Water Services Advisory Commission Members and Interested Parties

**FROM:** Mark Jockers, Government & Public Affairs Director

**SUBJECT: REMINDER AND INFORMATION FOR OCTOBER 14, 2020,  
CWAC MEETING**

This is a reminder that a Clean Water Services Advisory Commission (CWAC) meeting is scheduled for **Wednesday, October 14, 2020**.

In support of best practices for preventing the spread of the coronavirus, CWS has adopted the following format for the October meeting:

- The meeting will be held virtually using the Webex platform.
  - Webex offers the option to connect to video, slides and audio via a device with internet access, or an audio-only connection through any telephone line.
  - CWAC members should watch for an email containing Webex connection details.
  - Interested parties should register for this meeting by October 13 by following the instructions on the [website](#).
- The meeting will begin at 5:30 p.m. Please plan to establish your connection to the meeting 10-15 minutes before the start time to allow the meeting to begin promptly.
- Dinner will not be provided.

The CWAC meeting packet will be mailed to Commission members on Monday, October 5, and posted to the [CWAC section](#) of the Clean Water Services' website.

Please call or send an email to Stephanie Morrison (morrison@cleanwaterservices.org; 503.681.5143) by October 13 to advise about your attendance at this meeting.

Enclosures in this packet include:

- October 14 Meeting Agenda and Materials
- September 9 Meeting Notes

**Clean Water Services Advisory Commission**  
**October 14, 2020**

**AGENDA**

**5:30 p.m.      Welcome & Introductions**

**5:35 p.m.      Review/Approval of Meeting Notes of September 9, 2020**

**5:40 p.m.      NPDES Permit Approach and Principles**

Staff will provide an overview of permit elements and the District's proposed approach and principles for permit revisions.

- Bob Baumgartner, Regulatory Affairs Director

Requested action: *Informational*

**6:10 p.m.      Stormwater Management Plan Public Input Update**

Staff will provide an update on the input received. The opportunity to provide public comment regarding the District's Stormwater Management Plan and the Pollutant Load Analysis is part of the District's preparation to submit an application for renewal of the NPDES permit in early December. District staff will review comments prior to submitting the application.

- Bob Baumgartner, Regulatory Affairs Director
- Roger Dilts, Water Resources Analyst

Requested action: *Informational*

**6:20 p.m.      Invitation for public comment**

**6:30 p.m.      Announcements**

**6:35 p.m.      Adjourn**

**Next Meeting: November 11, 2020**

## NPDES Permit Renewal

CWAC Meeting  
Bob Baumgartner, Regulatory Affairs Director  
October 14, 2020



## WHAT DOES AN NPDES PERMIT DO?

Protects water quality by regulating pollutants discharged into waters of the U.S. The permit:

- Authorizes the discharge of pollutants
- Establishes effluent limits
- Requires self-monitoring and reporting
- Regulates industrial pretreatment
- Regulates biosolids
- Regulates water reuse
- Specifies penalties and compliance schedules



## EVOLUTION OF CLEAN WATER ACT IMPLEMENTATION

Technology-based  
(1970s and 1980s)



Water quality-based  
(1990s-2000s)



Watershed-based

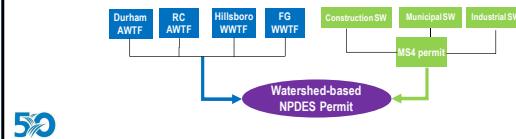


Integrated Approaches



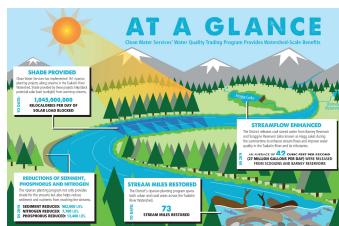
## WATERSHED-BASED NPDES PERMIT

- Permits for four WWTFs and municipal stormwater program
- Bubbled loads for TSS, ammonia, phosphorus
- New discharge and natural treatment system
- Includes water quality trading for temperature



## CWS WATER QUALITY ACHIEVEMENTS

- Trading/temperature control
- Watershed actions
- Forest Grove natural treatment
- Bubbled loads
- Ammonia flow based
- Reuse native wetland plants
- High purity water
- Mercury minimization



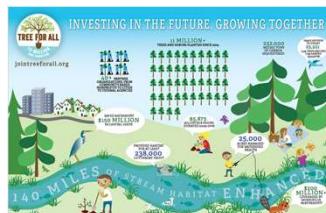
## GOALS FOR NEW NPDES PERMIT

- Maintain investment in infrastructure
- Provide for growth and development
- Advance watershed approach
- Eliminate reconsideration issues
- Enhance effective compliance monitoring
- Build innovative stormwater to ecosystems strategy
- Transition to Integrated Planning



## INTEGRATED PLANNING: NPDES

- Long-term guide for compliance and infrastructure **investments**, rather than a compliance and enforcement tool
- Describes goals and objectives for enhancing the ecology and water quality in the Tualatin River Watershed
- Describes actions to work toward those goals and challenges to address
- Identifies areas to work with DEQ to achieve goals to help guide regulatory and permitting actions
- Helps communicate to DEQ and EPA
- Integrates stakeholder input, builds public knowledge, and partnership.



## PERMIT RENEWAL THEMES

- Watershed enhancement
- Resource recovery
- Partnership with DEQ
- Innovation and research
- Resiliency, growth and climate
- Pollution prevention
- Adaptive management



## RESOURCE RECOVERY

- Expand water reuse program
  - Native seed and plant production
  - Direct consumption crop
- Wetland restoration
- Environmental enhancement
  - Wet meadows, riparian areas
- Biosolids beneficial use
- Environmental services



## WATER “FIT FOR PURPOSE”

- Discharge for irrigation
  - Limits for beneficial use
  - Administrative process
- Pure Water
  - It's just water
- Industrial reuse



## SUSTAINABLE TREATMENT

- Biological phosphorus control
  - Update phosphorus TMDLs
  - Flow management
  - Environmental outcomes
- Temperature management
  - Flow management
  - Temperature TMDL update
- Basin standards
  - Equivalent CBOD/TSS
  - Supporting natural treatment
  - Expanding natural treatment Hillsboro



## ADAPTIVE HOLISTIC STORMWATER MANAGEMENT

- Upland controls, riparian and stream corridor enhancement
- Sub-basin strategies
- Real-time control
- Climate change resiliency
- CMOM, integrated projects infrastructure and enhancement



## POLLUTION PREVENTION: EMERGING POLLUTANTS

- Proactive approach
  - Mercury minimization
  - Temperature minimization
  - PFAS chemicals
  - Reuse (fluoride, molybdenum, COVID-19)
- Initial plans



## DEQ PERMIT ISSUANCE PROCESS: ONCE EVERY FIVE YEARS

Current NPDES Permit Issued 2016

↓  
CWS Permit Application (12/1/2020)

↓  
DEQ Draft Permit and Fact Sheet Development  
Effluent Limits/Monitoring & Reporting  
Standard Conditions/Special Conditions

↓  
DEQ Public Notice and Public Comments

↓  
DEQ Permit Issuance (5/31/2021)?



## PERMIT APPLICATION PROCESS

- Five applications
  - Four plants
    - ❖ Many forms for EPA and DEQ
    - ❖ Plant and sewershed area specific
    - ❖ Projections on growth capacity
  - Stormwater MS4
  - Implementation plans
    - ❖ Trading
    - ❖ Reuse
    - ❖ Biosolids
    - ❖ Industrial pretreatment
    - ❖ Mercury minimization
  - Supporting documents
    - ❖ Studies
    - ❖ Monitoring data
    - ❖ Outfall assessment

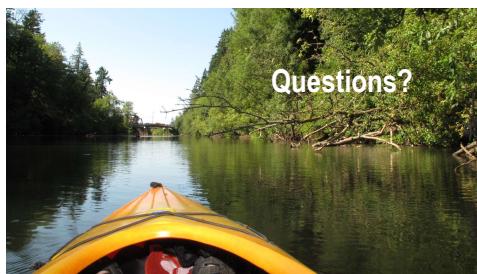


## NEXT STEPS

- Discussion with DEQ
  - TMDL
  - Integrated planning
  - Policy and rules
- Permit application
- Specific details
- Supporting documentation
- DEQ permit process?



Questions?



## **Clean Water Services Advisory Commission**

**Date:** September 9, 2020

**Location:** The meeting was conducted on Webex

### **MEETING NOTES**

#### **Attendance**

Attending the meeting from CWAC:

- Tony Weller (Homebuilder-Developer), Commission Chair
- Andy Duyck (District 4/Willey)
- Art Larrance (At-Large/Harrington)
- Matt Wellner (Homebuilder-Developer)
- Molly Brown (District 2/Treece)
- Nafisa Fai (District 1/Schouten)
- Terry Song (Business)
- Sherilyn Lombos (Cities/nonvoting)
- Diane Taniguchi-Dennis (Clean Water Services Chief Executive Officer/nonvoting)

Absent:

- John Jackson (Agriculture)
- Lori Hennings (Environmental)
- Mike McKillip (District 3/Rogers), Commission Vice Chair
- Stu Peterson (Business)

Attending the meeting from Clean Water Services:

- Mark Jockers, Government & Public Affairs Director
- Bob Baumgartner, Regulatory Affairs Director
- Gerald Linder, General Counsel
- Joy Ramirez, Environmental Services Supervisor
- Roger Dilts, Water Resources Analyst
- Ryan Sandhu, Field Operations Supervisor
- Nora Curtis, Utility Operations & Services Managing Director
- Stephanie Morrison, Office Manager
- Chris White, Public Involvement Coordinator
- Shannon Huggins, Public Involvement Coordinator
- Jody Newcomer, Technical Editor & Communications Specialist

Attending the meeting from the public:

- Dale Feik, Chair of Washington County Citizen Action Network and Project Director of Hillsboro Air & Water

### **1. CALL TO ORDER**

Tony Weller called the meeting to order at 5:35 pm.

Ms. Morrison announced the meeting is being recorded and recognized all attendees. She reviewed the features and functions of the Webex platform.

Mr. Jockers welcomed Sherilyn Lombos as the new City Representative.

## **2. REVIEW/APPROVAL OF MEETING NOTES**

There were no comments regarding the notes from the meeting on August 12, 2020. The notes were approved.

## **3. NONDOMESTIC WASTE ORDINANCE: INPUT SUMMARY AND DISCUSSION**

- Bob Baumgartner, Regulatory Affairs Director
- Joy Ramirez, Environmental Services Supervisor
- Roger Dilts, Water Resources Analyst

CWS is revising the nondomestic waste ordinance to bring all nondomestic waste ordinances and rules into one package, reduce confusion and eliminate inconsistencies. The ordinance will address nondomestic waste that discharges into the sanitary system and may need to be regulated to protect human health, infrastructure or the environment. Nondomestic waste can contain industrial chemicals, pesticides, rags, paint, excessive oil and grease. Domestic waste comes from bodily processes or household activities.

Mr. Baumgartner outlined the changes in the new ordinance, which clarifies regulation of nondomestic wastes and hauled wastes and expectations for industrial discharges. The ordinance also improves protection from damaging discharges. For example, CWS can seek compensation if an industry damages any part of the collection system. The ordinance will incorporate provisions of the federal dental mercury program and clarify the process for permit applications and modifications. It also will simplify the enforcement process.

The public comment period ended on Sept. 1 and there were no new comments since the CWAC meeting on August 12.

Staff will add language to the ordinance in response to public comments:

- Allow CWS to impose maintenance frequency requirements when necessary to ensure proper maintenance for fats, oil and grease.
- Add permitting of temporary discharges, such as draining swimming pools, to incorporate existing CWS procedures.
- Modify definition of “disruption” to include impacts that impair the District’s ability to implement beneficial use of biosolids and recycled water to address substances that currently lack water quality standards or other regulatory limits.

The ordinance does not change permit conditions, but conditions could change due to program process improvement. CWS is also required by its NPDES permit to update Local Limits, which could affect permit conditions.

CWS is still evaluating options for maximum penalties. The process for deterrence includes technical assistance, warnings, civil penalties, permit compliance conditions, compliance orders, cost recovery, or suspending or revoking permits. CWS uses the tools available to get the best outcome, which is a proper pretreatment system.

Mr. Dilts showed how a monetary penalty would be calculated under the new ordinance. Factors include magnitude, impact, fault, history and economic benefit. CWS will create guidance to help customers calculate penalties.

Staff is revising the draft based on public input and will discuss with DEQ in September. Staff will present the ordinance to the Board of Directors in November and submit to DEQ in December.

## **QUESTIONS, COMMENTS**

**I don't want to see a one-size-fits-all remedy for FOG because every food service establishment has different needs depending on menu, equipment, size of restaurant. How do you determine how often a pretreatment system needs to be cleaned?**

You noted many of the factors that influence how frequently a pretreatment system needs to be cleaned. We also consider the different kinds of pretreatment systems, how much grease builds up and when it's released. We've improved our ability to monitor the collection system and we work closely with cities in the service area.

**I think a video that shows what you want a system to look like and what you don't want it to look like would be helpful to everyone in the food and beverage industry.**

Great idea. We'll reach out to our communications staff.

**I'm sure everyone wants to comply; a video could help.**

**What percentage of discharge is nondomestic waste?**

About a third of the flow at the Rock Creek facility is from industrial waste. At Durham, about 5 percent is industrial waste; it's 1-3 percent at Hillsboro and Forest Grove.

**The 5 percent at Durham doesn't seem significant.**

Durham has some heavy industry and a lot of commercial discharge, which isn't regulated as much as industrial discharge. Rock Creek receives most of the heavy industrial waste in the area. Forest Grove receives primarily domestic waste.

## **4. STORMWATER MANAGEMENT PLAN PUBLIC INPUT**

- Bob Baumgartner, Regulatory Affairs Director
- Roger Dilts, Water Resources Analyst

The NPDES permit requires a 30-day public comment for the Stormwater Management Plan and Pollutant Loads Reduction Analysis prior to submitting an application for a permit renewal. CWS will provide an opportunity for public comment for the Stormwater Management Plan and the Pollutant Load Analysis from mid-September through mid-October. This time frame will allow CWS staff to review comments prior to submitting the permit by Dec. 2.

The process is somewhat circular. CWS seeks public input, then submits the plan to DEQ. DEQ will go through the permitting process, which requires CWS to update its Stormwater Management Plan, again, based on changes to the permit.

CWS links the Stormwater Management Plan to its annual stormwater report, which provides some latitude for making changes to the stormwater program. Public input helps CWS understand how its policies align with public interests.

The Stormwater Management Plan has eight components, or Best Management Practices, with goals and tracking measures to evaluate their implementation. The BMPs are implemented by staff in Regulatory Affairs or Utility Operations and Services to make sure CWS reduces the discharge of pollutants in stormwater to the maximum extent practicable as required by the permit.

The Pollutant Load Reduction Analysis summarizes how well CWS is managing some of the pollutants that DEQ has identified as problematic. CWS is meeting the allocations for total phosphorus and bacteria. The allocations are being met in most places for total suspended solids. There are some issues with dissolved oxygen levels in some streams, so it's important to integrate stormwater control, stream restoration and habitat improvement. A holistic approach is necessary to recover streams, which is a step beyond controlling stormwater. CWS wants to focus the discussion on broader environmental control rather than just stormwater control.

The public comment period is Sept. 14 through Oct. 13. Staff will review comments with CWAC at the Oct. 14 meeting. CWS will submit proposed changes to the BMPs with the annual stormwater report by Nov. 1.

## QUESTIONS, COMMENTS

There were no questions or comments.

## 5. LEAF PROGRAM UPDATE

- Ryan Sandhu, Field Operations Division Manager

The Board of Directors approved CWAC's recommended changes to the CWS Leaf Program on June 4, 2019. Significant changes will be implemented this fall including the discontinuation of the curbside pickup program and the expansion of the leaf drop days.

Last year at this time CWS notified affected customers that the program would change in fall 2020. The changes include:

- Discontinuing curbside leaf pickup, which impacts about 10,000 customers of the 70,000 CWS directly serves.
- Promoting use of yard debris bins in conjunction with Washington County solid waste haulers.
- Increasing number of leaf drop days and participating locations. CWS is partnering with Beaverton and Hillsboro school districts to add locations.
- Continuing enhanced storm patrol to clean catch basins before storms. CWS will focus on areas that no longer have curbside service. Staff wants to understand the impact changes to the leaf drop program have on localized flooding.
- Continuing routine street sweeping.

CWS coordinated with Beaverton and Hillsboro school districts to add leaf drop sites on school properties. In August, staff sent a reminder to 10,000 customers about the discontinuation of curbside services and prepared staff to track and respond to inquiries. Staff is also preparing for public outreach to all customers and providing regular updates to the Board.

Mr. Sandhu demonstrated the Lucity software used to track leaf program calls. In planning leaf drop sites, staff tried to find sites near neighborhoods that had received leaf pickup service. The program is considerably larger than past years. He also shared some of the planning and outreach materials.

In past years, CWS operated two sites from 8 a.m. to 4 p.m. on two weekends. In 2020, CWS will operate three sites from 9 a.m. to 3 p.m. on six weekends from Oct. 31 through mid-December, quadrupling the number of leaf drop opportunities. That schedule aligns closely with the traditional curbside pickup schedule, which usually started the last week of October and finished in mid-December.

CWS will save money on the leaf program, even with the additional drop sites. CWS had been overstaffed at leaf drop sites. In 2019, CWS spent \$115,000 to operate leaf sites on two weekends. In 2020, CWS will adjust staffing and expects to spend \$165,000 to operate leaf sites on six weekends. That amount is higher than previous years to operate drop sites, but it's a significant decrease for the entire leaf program. The cost of curbside service alone in 2019 was \$260,000.

CWS is trying to ensure customers have options and the Board has the tools to respond to complaints. Staff probably will return to CWAC early next year to give a summary of the program.

## **QUESTIONS, COMMENTS**

**I got the letter and read it. On Next Door, someone in the Rock Creek area is coordinating groups for leaf removal.**

We're encouraged to hear that people are finding ways to get rid of leaves.

**Could you give me some context of the areas that had leaf pickup?**

The curbside leaf program was offered to about 10-15 percent of the CWS service area. It was originally prioritized to areas with more tree growth and leaves. Changes to the program were driven by the inequity of the system and that it was financially unsustainable.

CWS runs its leaf program within its service boundary in urban unincorporated Washington County. Each of the cities in the service area run leaf programs and have latitude to create their own programs and take different approaches. Some cities work with garbage haulers to provide additional yard debris bins. Some provide curbside service, run leaf drop days or a combination.

### **I've never use the leaf drop locations. How does it work?**

CWS crews will help unload leaves. Some sites will have backhoes and excavators. Given the physical distance recommendations this year, CWS might recommend people stay in their vehicles this year and crews will unload leaves.

### **6. PUBLIC COMMENT (2 minutes)**

Mr. Feik said he contacted Mr. Baumgartner and requested the audit documents from EPA that factored into the decision to update the nondomestic waste ordinance needed. Mr. Baumgartner said CWS has not received the documents. It's possible the auditors will return for site inspections, but at this point staff is relying on discussion with the auditor in the exit interview.

Mr. Feik asked if the public will be able to review the audit documents or a summary before the ordinance goes through the public process. Mr. Baumgartner says he does not know when he will get the documents.

CWS would like to implement updates to the pretreatment program before the end of the year.

Mr. Linder said public records requests should be made in writing. [The process is posted on the CWS website.](#)

### **7. ANNOUNCEMENTS**

- The Board appointed two new members. Sherilyn Lombos, the Tualatin city manager, is the new Cities Representative. Joe Gall, the Sherwood city manager, is the alternate Cities Representative. Jan Wilson, the executive director the Tualatin Riverkeepers, was appointed to the Environmental position.
- The Tualatin Riverkeepers Gala is Sept 26. Bob Baumgartner is being honored with the Green Heron award.
- We continue to recruit for the agricultural position.
- The next CWAC meeting is October 14, 2020.

### **8. ADJOURNMENT**

Mr. Weller adjourned the meeting at 7:10 p.m.

## NONDOMESTIC WASTE ORDINANCE: INPUT SUMMARY AND DISCUSSION

September 9, 2020

CWAC Meeting  
Bob Baumgartner, Regulatory Affairs Director  
Joy Ramirez, Environmental Services Supervisor



### STATUS

- Briefed Board, received charge to work with our Clean Water Services Advisory Commission on the public process
- CWAC presentations: May 13, August 12, September 9
- Outreach to environmental, business, government organizations
- Talked with environmental, industry and community representatives
- On website for public review. Comment deadline September 1, 2020. (<http://cleanwaterservices.org/for-business-industry/pretreatment/regulating-nondomestic-discharges/>)



### REMINDER: WHAT'S IN THE ORDINANCE

- Definitions
- Discharge limitations
- Pretreatment & hauled waste
- Waste discharge permit requirements
- Permit modifications & transfers
- Enforcement: penalties, orders & hearings



### CHANGES

- Clarifies regulation of nondomestic wastes
- Clarifies rules on hauled wastes
- Clarifies applicability of discharge prohibitions
- Improves protection from damaging discharges
- Incorporates provisions of federal dental mercury program
- Clarifies permit application procedures and requirements
- Clarifies process for permit modification
- Allows administrative extension of expired permits
- Enforcement and appeal procedures improved and clarified



### COMMENTS RECEIVED

- Are penalties (\$5,000/day per violation) high enough to deter noncompliance?
- Please provide the ability to require minimum maintenance schedules on FOG (fats, oils, greases) treatment systems
- Please provide for regulation of chlorinated discharges (pools, etc.)
- How will risk to human life caused by prohibited discharges be monitored?
- How will emerging pollutants that are not currently regulated be addressed in the ordinance?
- The ordinance is well-written, clear and easy to understand



### INPUT FROM INDUSTRIES

- Individual notifications sent to current permitted industries
- Feedback received:
  - Will the draft ordinance change my permit classification?
  - Will the permit change?
  - As an industry new to the area, this transparency is helpful



## STAFF RESPONSE TO PUBLIC COMMENTS

- Adding language:

- Allowing CWS to impose maintenance frequency requirements when necessary to ensure proper maintenance for FOG.
- Embracing permitting of temporary discharges (e.g., draining swimming pools, testing water systems) to incorporate existing CWS procedures.
- Modifying definition of "disruption" to include impacts that impair the District's ability to implement beneficial use of biosolids and recycled water to address substances that currently lack water quality standards or other regulatory limits.



## STAFF RESPONSE TO COMMENTS (CONTINUED)

- Ordinance does not change permit conditions
  - Permit conditions may change due to program process improvement
  - Local Limits will be updated as required by our NPDES permit
- Maximum penalties, evaluating options
  - Ordinance 27 at \$25,000/day
  - Subsequent RO and internal guidance \$5,000/day
  - Updating penalty matrix



## ENFORCEMENT AND DETERRENCE

- Technical assistance
- Warnings
- Civil penalties
- Permit compliance conditions
- Compliance orders
- Cost recovery
- Suspend or revoke permits

	Year	Total (also flow)	Significant Users
	2019	\$93,700	\$550 (3)
	2018	\$19,655	\$650 (10)
	2017	\$64,700	\$2,785 (17)
	2016	\$52,440	\$1,075 (6)
	2015	\$73,655	\$1,400 (3)



## PENALTY ALTERNATIVES AND RECOMMENDATION

- Retain maximum \$5,000/day per violation
- Escalating maximum penalty
  - \$5,000/day per violation for first penalty
  - \$25,000/day per violation for subsequent penalty notice
- Establish \$25,000/day per violation
- **Recommendation:** \$5,000/day per violation



## NEW ORDINANCE MONETARY PENALTY EXAMPLE

- Dumping 50 gallons highly corrosive industrial waste into sanitary
  - *Magnitude ranking:* degree of deviation from standards (1 to 15): 13
  - *Impact ranking:* degree of impact on environment or District systems (0-10): 9
  - *Fault ranking:* accidental, negligent or intentional (0, 5, 15): 15
  - *History ranking:* compliance history of violator (0-10): 0
  - *Economic benefit:* violator cost avoided through the violation: \$700 haz waste disposal
  - *Penalty=*  $[\$100 \times (13+9+15)] + \$700 = \$3,700 + \$700 = \$4,400$
  - **CWS can also pursue recovery of costs for damages**



## NEXT STEPS

- Adjust draft ordinance based on public input
- Discuss with DEQ - September
- Present to Board - November
- Submit to DEQ - December
- Provide final version to CWAC - Nov/Dec



## PUBLIC PROCESS SCHEDULE



## CWAC ACTIONS

- Provide input on staff response to public comments
- Provide additional input
- Recommend:
  - Proceeding with process to meet with DEQ to evaluate for consistency with state and federal requirements
  - Presenting to the Board for approval



## THANK YOU



CleanWater Services  
50 years

## STORMWATER MANAGEMENT PLAN & POLLUTANT LOAD REDUCTION BENCHMARKS: PUBLIC COMMENT

September 9, 2020

CWAC Meeting  
Bob Baumgartner, Regulatory Affairs Director  
Roger Dilts, Water Resources Analyst - Regulatory



### BACKGROUND

- The NPDES permit requires CWS to provide the public 30 days to comment on:
  - Stormwater Management Plan (SWMP)
  - Stormwater Pollutant Loads Analysis
- We are applying for a permit renewal in early December



### AWKWARD PROCESS

- Public process prior to submittal
- DEQ will not respond to input
- DEQ will draft permit, hold public process
- Final permit
- Permit will instruct changes to the SWMP
- Require updates to the SWMP
- Require submittal to DEQ



### AWKWARD PROCESS

- DEQ's permit renewal approach requires the permittee to continue operating under the *current* SWMP until a new one is approved under the new permit. Therefore, the proposed SWMP will never be implemented.
- However, CWS may also revise its current SWMP prior to permit expiration by submitting proposed changes with the annual report in November.
- These changes update the SWMP to reflect completion of required items and sunset the school LIDA program and *will* be in effect until a new SWMP is approved under the renewed permit.



### SWMP

- Best Management Practices (BMPs), with goals and tracking measures to evaluate implementation
  - Illicit Discharges
  - Industrial and Commercial
  - Construction Sites
  - Education and Outreach
  - Public Involvement
  - Post-construction and Retrofits
  - Pollution Prevention for Municipal Operations
  - Operation and Maintenance



### POLLUTANT LOAD REDUCTION ANALYSIS

- Total Phosphorus
  - Waste Load Allocations achieved
- Total Suspended Solids
  - WLA being met most places
  - Lower Tualatin sub-basin is not achieving WLA
  - Water quality standards for oxygen not met
  - Continue our integrated approach, including SWMP programs, riparian restoration, flow enhancement and hydromodification
- Bacteria
  - Waste Load Allocations being met – benchmarks not needed



## POLLUTANT LOAD REDUCTION BENCHMARKS - BACKGROUND

- For water quality limited stream
- Status of actions



## SCHEDULE



## THANK YOU



## CLEAN WATER SERVICES LEAF PROGRAM UPDATE

September 9, 2020  
CWAC Meeting  
Ryan Sandhu / Utility Operations & Services



## CLEAN WATER SERVICES LEAF PROGRAM UPDATE

### • Today's Purpose

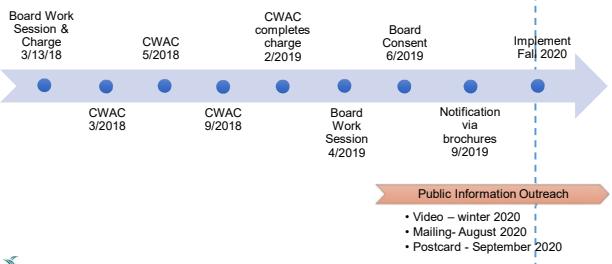
- Update the Clean Water Services Advisory Commission on the status of Board-approved changes to the Leaf Program

### • Desired Outcomes

- CWAC is updated and informed of the status of Leaf Program changes



## CWAC AND BOARD: TIMELINE & MAJOR TASKS



## BOARD APPROVED CHANGES

- Discontinue District's curbside leaf pickup;
- Promote use of yard debris bins;
- Increase the number of leaf drop days and participating locations;
- Continue enhanced storm patrol; and
- Continue routine street sweeping



## WHAT HAVE WE BEEN DOING?

- Spring 2020: Plan fall 2020 leaf drop days
- August 2020: Letter to curbside customers
- Summer/Fall 2020:
  - Prepare call takers for customer calls, track and respond to inquiries
  - Logistics with school districts for additional leaf drop sites
  - Prepare for public outreach on expansion of leaf drop days
- Provide ongoing updates to the Board on progress



## LEAF PROGRAM RELATED CUSTOMER CALL TRACKING

### Leaf Program Calls



- Total Leaf Program Calls (All Calls Ever) (168)
  - 2019 Leaf Season Calls (160)
    - 2020 Leaf Program Change Comments (52)
    - Customer Request / Problem (non-specific) (28)
    - Storm Blockage / Flooding / Overflow (7)
    - Surface Debris / Leaves (73)
  - 2020 Leaf Season Calls (8)
    - + 2020 Leaf Program Change Comments (7)
    - + Customer Request / Problem (non-specific) (1)



### LEAF PROGRAM RELATED CUSTOMER CALL TRACKING

lucity

2020 Leaf Season Calls

Request #	Status Text	Loc Address	Loc Street Name	Responder	Recorded Date	Category	Category Text	Problem
20-000430	Completed	20397	BW SNOVER ST	SHANNON	09/27/2020	2901	Leaf Program	2005
20-000419	Completed	2959	NW 144TH AVE	SARAH S	09/29/2020	2901	Leaf Program	2031
20-000411	Completed	18950	NW BANDON CT	SHANNON	09/21/2020	2901	Leaf Program	2031
20-000408	Completed	18955	NW AURORA ST	JANI	09/20/2020	2901	Leaf Program	2031
20-000401	Completed	18953	JAMES V		09/19/2020	2901	Leaf Program	2031
20-000399	Completed	20389	BW ROCK CT	SARAH S	09/19/2020	2901	Leaf Program	2031
20-000393	Completed	18990	NW METOLIUS DR	SHANNON H	09/17/2020	2901	Leaf Program	2031
20-000392	Completed	13485	NW NORTHRUP ST	SHANNON H	09/17/2020	2901	Leaf Program	2031

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### LEAF DROP PLANNING

Event #	Date	Large Sites		Sites				Central	Total	
		Aloha HS	Murray HS	Westview HS	Hazeldale Elementary	Indian Hills Elementary	Meadow Park			Cedar Park Middle School
1	31-Oct	x				x			x	3
2	1-2-Nov		x							3
3	14-Nov			x	x					3
4	21-Nov	x				x			x	3
5	28-Nov									0
6	5-Dec		x		x			x		3
7	12-Dec			x						3
	Total	2	2	2	2	2	2	2	0	18

• Building web map - [Leaf Drop Sites](#)

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### LEAF DROP DAY PLANNING MAP

Leaf Drop Site Dates

- 10/31 & 11/21
- 11/7 & 12/5
- 11/14 & 12/12
- City of Beaverton
- Leaf Pick-up Boundaries

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### ENHANCED STORM PATROL MAP

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### THANK YOU/QUESTIONS?