



THE CITY OF
Litchfield Park

Stormwater Management Program

To fulfill requirements in the
Small Municipal Separate Storm Sewer System (MS4)
General Permit AZG2016-002

August 2017

(Subject to City Council revision and approval during regular scheduled council meeting set for September 20, 2017)

TABLE OF CONTENTS

| | |
|---|----|
| Introduction | 3 |
| Stormwater Management Program | 3 |
| Receiving Waters | 3 |
| Mapping | 3 |
| Water Quality Standards | 4 |
| Annual Updates | 4 |
| Responsible Personnel | 4 |
| SWMP Availability | 4 |
| Enforcement | 4 |
| 1. Public Education and Outreach on Stormwater Impacts | 5 |
| TABLE 1.1 Public Education and Outreach: BMPs and Measurable Goals | 5 |
| TABLE 1.2 Public Education and Outreach: Additional Information | 8 |
| 2. Public Involvement/Participation | 9 |
| TABLE 2.1 Public Involvement/Participation: BMPs and Measurable Goals | 9 |
| TABLE 2.2 Public Involvement/Participation: Additional Information | 11 |
| 3. Illicit Discharge Detection and Elimination | 11 |
| TABLE 3.1 Illicit Detention and Elimination: BMPs and Measurable Goals | 11 |
| TABLE 3.2 Illicit Detention and Elimination: Additional Information | 13 |
| 4. Construction Site Stormwater Runoff Control | 13 |
| TABLE 4.1 Construction Site Stormwater Run-Off Control: BMPs and Measurable Goals .. | 13 |
| TABLE 4.2 Construction Site Stormwater Run-Off Control: Additional Information | 15 |
| 5. Post Construction Stormwater Management in New Development and Redevelopment . | 16 |
| TABLE 5.1 Post Construction Stormwater Management in New Development and | |
| Redevelopment: BMPs and Measurable Goals | 16 |
| TABLE 5.2 Post Construction Stormwater Management in New Development and | |
| Redevelopment: Additional Information | 18 |
| 6. Pollution Prevention/Good Housekeeping for Municipal Operations | 18 |
| TABLE 6.1 Pollution Prevention/Good Housekeeping for Municipal Operations: BMPs | |
| and Measurable Goals | 18 |
| TABLE 6.2 Pollution Prevention/Good Housekeeping for Municipal Operations: Additional | |
| Information | 19 |
| Qualifying State or Local Program | 20 |
| Sharing Responsibility | 20 |
| Reviewing and Updating the SWMP | 20 |
| Monitoring | 20 |
| Annual Reports | 20 |
| Exhibit (A) Organizational Chart | |

Introduction

The City of Litchfield Park's Stormwater Management Plan (the "Plan") is designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act. The Plan specifically considers the six minimum control measures outlined in the Arizona Department of Environmental Quality ("ADEQ") General Permit AZG2016-002 (the "General Permit") for small municipal separate storm sewer systems ("MS4s").

The Best Management Practices ("BMP") presented here have been proposed because they address the minimum control measures, are appropriate for the City of Litchfield Park's Stormwater system, are measurable, are anticipated to make improvements in the City's stormwater quality and are achievable. The following planned activities are categorized by the six minimum control measures. For each BMP, the appropriate measurable goals are delineated along with a schedule, where appropriate, including a start date and the status.

The City of Litchfield Park was incorporated in 1987. The City has an area of 3.3 square miles with a population of 5476 residents. Over 90 percent of the available land in the City is developed and only a small portion of the remaining lands can be developed. The City does not own or operate a water treatment facility or sewerage disposal system. The City has a very small staff and operates with a small budget. The Public Works Director or designee will be designated to oversee the Stormwater Management Program for the City of Litchfield Park.

Stormwater Management Program

The City has reviewed its current stormwater practices and has revised its Plan, to address the requirements of reducing, to the maximum extent practicable, and pollutants discharged from outfalls owned or operated by the City. The revised Plan follows criteria in the General Permit, providing the information requested and including the BMPs for each minimum control measure.

Receiving Waters

The City discharges to the Agua Fria River. The section of the Agua Fria River to which the City discharges is not an Impaired, Not-Attaining or Outstanding Arizona Waters (OAW). Four outfalls discharge to the receiving water.

Mapping

The City has completed the mapping as required by Section 5.1.b of the General Permit. The map will be updated as storm sewer systems and/or outfalls are added to or deleted from the system.

Water Quality Standards

The City has no discharges that cause or contribute to the exceedance of an applicable surface water quality standard.

Annual Updates

The City will review and re-evaluate its SWMP annually. All BMPs will be evaluated for effectiveness in accordance with Section 8.0 of the General Permit.

Responsible Personnel

Each BMP listed in the City's Notice of Intent also identifies the individual(s) or department responsible for ensuring compliance with the stated BMP.

SWMP Availability

The City's SWMP is available for public viewing during normal business hours at the City Hall and the City Library.

Enforcement

The City's legal enforcement authority is set forth in the City of Litchfield Park Municipal Code, Chapter 9, Article 9-5 Public Nuisances. In addition, the City is developing an Enforcement Response Plan ("ERP") that outlines the procedures the City will follow to enforce its stormwater code.

1. Public Education and Outreach on Stormwater Impacts

| TABLE 1.1 | | | | |
|---|---|--|-------------------------|-----------------------------|
| Public Education and Outreach: BMPs and Measurable Goals | | | | |
| Permit Condition | BMP | Measurable Goal(s) | Start Date | Status |
| 6.4.1 | Collect brochures, fact sheets and other educational materials from federal, state, local agencies or other MS4 web sites. | City staff will contact agencies and review web pages, as deemed necessary, to ensure that the most current information is available. Agency contacts and review of Web page will be conducted at a minimum on a quarterly basis. Targeted audience: commercial and residential. | Previously implemented. | Ongoing with annual updates |
| 6.4.1.1 | Distribute information to the general public and to specific targeted audiences such as restaurants, service stations, homeowner associations, homeowners, etc. | City staff will collect and post public service brochures with other posted public notices in locations such as: the City Library, the City's website, and City Hall. Quarterly, the Public Works Director will ensure public service brochures are posted in the City library and the City Hall lobby. Quarterly, the City Clerk will update the City website. The Public Works staff will hand deliver brochures to the commercial audience by August 31, 2017. In the event of a residential code violation, staff will hand deliver along with the notice of violation, a stormwater brochure. Targeted audience: commercial and residential. Number of brochures will be tracked and reported annually. | Previously implemented. | Ongoing with annual updates |

TABLE 1.1
Public Education and Outreach: BMPs and Measurable Goals

| Permit Condition | BMP | Measurable Goal(s) | Start Date | Status |
|------------------|--|---|-------------------------|---------------------------------------|
| 6.4.1.1 | Respond to verbal or written public inquiries, comments or concerns about illicit disposal of wastes, etc., and/or requests for information. | Targeted audience: commercial, construction and residential. Meetings will be held as needed, and responses to written inquiries will be timely sent. Track number of inquiries and report annually. | Previously implemented. | Ongoing. |
| 6.4.1.1 | Provide educational materials to the general public and City employees. | The Public Works Director or designee will be responsible to oversee employee training, collection of educational materials, distribution of educational materials and creation of a library for the materials. Report number of participants annually. | Previously implemented. | Future classes will be held annually. |
| 6.4.1.2 | City will modify any ineffective messages or distribution techniques. | Corrected information will be provided to commercial, residential, and/or construction entities as needed. Report annually. | Previously implemented. | Ongoing with annual updates |

**TABLE 1.1
Public Education and Outreach: BMPs and Measurable Goals**

| Permit Condition | BMP | Measurable Goal(s) | Start Date | Status |
|-------------------------|--|--|-------------------------|------------------------------|
| 6.4.1.2 | Define what is illicit and illegal dumping. | On an annual basis, the City will train public employees on illicit discharges, construction site management, and good housekeeping practices. City employees are trained on how to educate the residential, commercial and construction sectors. Include sign-in sheets in annual report. | Previously implemented. | To be held annually. |
| 6.4.1.2 | At public meetings, explain the hazards of illegal dumping and illicit discharges on water quality and public health and safety, and the need to reduce or eliminate sediment and erosion. | The Public Works Director or designee will be the contact to handle public inquiries. The Public Works Director or designee will review the information from the public and determine the appropriate response. Targeted audience: Residential, construction managers, development community, and commercial entities. Track number of inquiries and report annually. | Previously implemented. | Ongoing. |
| 6.4.1.2 | In press releases, describe the impacts of improper disposal of household chemicals. | City staff will collect public relations materials on illicit discharge programs developed by Phase I communities and EPA and select appropriate materials for use in Litchfield Park. Targeted audience: residential. In 2017, the Public Works Director will post an educational storm water article in the community newsletter. Article will be included in the annual report. | Previously implemented. | Ongoing with annual updates. |

| TABLE 1.1 | | | | |
|---|---|---|-------------------|----------------------|
| Public Education and Outreach: BMPs and Measurable Goals | | | | |
| Permit Condition | BMP | Measurable Goal(s) | Start Date | Status |
| 6.4.1.4 | City will file its annual report as required by the permit and will include the information required in Part 6.4.1.4. | The report will be filed annually with ADEQ and made available to the public upon reasonable request. | September 2017. | Annually thereafter. |

| TABLE 1.2 |
|--|
| Public Education and Outreach: Additional Information |
| Plan |
| <p>The general population will be made aware of what hazardous materials are, the proper disposal of chemicals and household products such as, but not necessarily limited to, paints, solvents, pesticides and animal waste. Informational materials will be developed for the residential and non-industrial business interests prevalent in the community and will be distributed by City staff and volunteers under the guidance of the Public Works Director or designee.</p> <p>Public education is an important element for which the City will work to review stormwater services and programs, building a five-year program plan for a comprehensive approach to drainage. During that time, the City will feature periodic articles on hazardous materials, illicit and illegal dumping and the effects of pollution on washes, streams and the Agua Fria River. Articles will be included on pollution in the local newsletter, a published monthly newsletter distributed throughout the City. The City will focus on several key messages in the first five-year period of the permit. These will include:</p> <ul style="list-style-type: none"> A. Communicate to the community what are hazardous materials. B. Communicate to the community how the hazards of illegal dumping and illicit discharges affect water quality and public safety. C. Communicate to the community the importance of site controls for construction activities and advise them on how they can report concerns to the City for follow up. D. Communicate NPDES permit requirements and internal operations for pollution prevention to City staff. E. Communicate to the community, in English and Spanish, what hazardous materials are and the impacts of improper use and disposal of household chemicals, landscape products and trash. |

**TABLE 1.2
Public Education and Outreach: Additional Information**

Plan

The specific target audiences such as residential and commercial developers/operators, restaurants, service stations and/or homeowners associations were selected because they are representative of the character and make-up of the community.

Targeted audiences, which represent business activities within the community, will be made aware of hazards and costs of improper disposal of construction wastes, sedimentation and erosion, cooking grease, gasoline spills, etc., as appropriate to the industry. Audiences are identified above in the Best Management Practices listed in the identified program. They were chosen because they are mandated in other parts of the General Permit or because they represent the potential for the greatest support from the general public.

- The General Public: The City will provide information on hazardous materials and the importance of protecting the quality of stormwater using existing information and communication tools. As necessary and feasible, information will be provided in Spanish as well as English.
- The Development Community: The City will focus efforts on educating the development community on new development regulations and stormwater quality with materials developed specifically for the development community. As the Construction Site Runoff and Post-Construction Runoff Control programs are adopted, the City will continue to educate the development community on the specific program requirements.
- Public Employees: The employees of the City are ambassadors to the community and will continue to be important conduits of information. They will receive training and information on illicit discharge as well as appropriate good housekeeping strategies.
- Targeted pollutants: The education plan will specifically target illegal dumping, floatables that include trash, household hazardous waste, and dumping of illicit pollutants. The City will also address sediment from construction site runoff along with other construction wastes.

2. Public Involvement/Participation

**TABLE 2.1
Public Involvement/Participation: BMPs and Measurable Goals**

| Permit Condition | BMP | Measurable Goal(s) | Start Date | Status |
|-------------------------|--|---|-------------------------|---------------|
| 6.4.2 | Comply with public notice requirements for | The City will issue public notice of meetings and opportunities for | Previously implemented. | Ongoing. |

**TABLE 2.1
Public Involvement/Participation: BMPs and Measurable Goals**

| Permit Condition | BMP | Measurable Goal(s) | Start Date | Status |
|---------------------|---|---|--|-----------|
| | any newly created or revised ordinances, public meetings of the City Council to discuss the permit and future renewals, annual report review with the City Council and any significant changes to the proposed program over the life of the permit. | participation in the development and implementation of the permit program and revisions or updates to the SWMP. Report annually. | | |
| 6.4.2.1 and 6.4.2.2 | Solicit public input into the SWMP; and enlist assistance and input from HOAs. | Prior to the submittal of the Annual Report or adoption of revisions to the SWMP, the City Council will hold public hearings to receive public input. HOAs will be educated to help in the monitoring of the stormwater collection systems and outfalls. HOA members will have contact information to notify the City of potential violations. Number of meetings will be reported annually. | Previously implemented. 04/2017 | Ongoing. |
| 6.4.2.3 | As appropriate, the City will include in its annual report the information required in Part 6.4.2.3. | The report will be filed annually with ADEQ and made available to the public upon reasonable request. | 09/2017 | Annually. |

TABLE 2.2
Public Involvement/Participation: Additional Information

| Plan |
|--|
| The City is committed to involving the general public in the development and implementation of its SWMP. BMPs identified for this control measure outline a program involving public input of the Plan as well as opportunities to engage the public in volunteer activities. The City recognizes the benefits of direct involvement in the City’s stormwater program by its citizens. It is the City’s experience that many residents are dedicated to providing input to the City on a wide range of issues and are willing to serve as volunteers. The City intends to comply with all state and local public noticing requirements with regard to public hearings and all other stormwater related activities using current practices. |
| The City has long established procedures for making the public aware of involvement and participation opportunities within the community. These opportunities are published in posted notices and newspapers. The City business meetings are open to the public and the public can attend and voice comments on the proceedings. All relevant public comments are considered. In some instances, the public is invited to apply to a committee or commission so that the citizens’ ideas and voices can be provided to the elected officials. Interested applicants may apply in writing. Applicants are interviewed by appropriate City staff and selected based on specific criteria. |
| The City will involve the public through open meetings/public hearings, during which time the City will receive and consider public comments. |
| The City will provide a copy of the Stormwater Management Plan in the Litchfield Park Municipal Library and at City Hall for the public access. In addition, copies will be provided upon request. |

3. Illicit Discharge Detection and Elimination

TABLE 3.1
Illicit Discharge Detection and Elimination: BMPs and Measurable Goals

| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
|--|---|---|------------|--------|
| 6.4.3.2 (erroneously identified in permit as 6.4.1.5) | Public Works Department will conduct follow-up inspections of identified or suspected illicit discharges. | Two follow-up inspections within six months will be conducted. Number of inspections will be reported annually. | 04/2017 | |
| 6.4.3.4 | Public Works Department will establish a program to address and track the success of its IDDE program. | The program will be developed and made available to applicable City staff. Track outfalls inspected; and report annually. | 04/2017 | |

**TABLE 3.1
Illicit Discharge Detection and Elimination: BMPs and Measurable Goals**

| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
|------------------------|--|--|-------------------|---|
| 6.4.3.5 and 6.4.3.10 | The City will train staff in the detection, identification, and how to address and eliminate illicit discharges. | Training will be conducted annually and new employees will be trained within 30 days of hire. Report annually. | 04/2017 | Annually thereafter, with new employees trained within 30 days of hire. |
| 6.4.3.8.a | Dry weather screening will occur after a storm event that resulted in a discharge from the storm sewer system. | The monitoring will occur at least 72 hours after the described storm event. Same will be reported annually. | 04/2017 | |
| 6.4.3.8.b | Public Works Department has identified 4 outfall to be monitored for stormwater discharges. | Monitoring will be conducted pursuant to 6.4.3.8(b); two monitoring events will be conducted during each wet season or as soon as practicable after the storm or discharge event. Same will be reported annually. | 04/2017 | |
| 6.4.3.9 | The City will track the success of the IDDE program. | The City will track the number of ID, response time from detection to resolution, and enforcement action taken, if any. Same will be reported annually. | 04/2017 | |
| 6.4.3.11 | In the event the Public Works Department, during inspections or as otherwise notified, identifies a violation, the Department will involve Code Enforcement staff to pursue offending person/entity. | Coordination between the Public Works Department and Code Enforcement will occur regularly. Notification to the offending party will be timely provided. And, follow up with the offending party will timely occur to ensure compliance. Number of notifications and follow-up communications will be reported annually. | 04/2017 | |

| TABLE 3.1 | | | | |
|---|--|--|-------------------|---------------|
| Illicit Discharge Detection and Elimination: BMPs and Measurable Goals | | | | |
| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
| 6.4.3.11 | Public Works Department will maintain a list of facilities discharging without an AZPDES/NPDES permit. | During pre-construction and/or permitting meetings, facilities will be required to disclose its compliance with AZPDES/NPDES permits. Number of those not in compliance will be reported annually. | 04/2017 | |

| TABLE 3.2 |
|--|
| Illicit Discharge Detection and Elimination: Additional Information |
| Plan |
| The program envisioned by the City will define and prohibit illicit discharges into the City's stormwater system. Educational efforts for the public and City staff related to the hazards of illegal discharges and improper waste disposal are included in the Public Education and Pollution Prevention/Good Housekeeping Minimal Control Measures. |

4. Construction Site Stormwater Run-off Control

| TABLE 4.1 | | | | |
|--|--|---|-------------------|---------------|
| Construction Site Stormwater Run-Off Control: BMPs and Measurable Goals | | | | |
| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
| 6.4.4.2.b | The City will create and maintain an inventory of construction activity as required in Part 6.4.4.2(b). | The inventory will be updated as needed and located in the Community Development Department. Construction activity will be reported annually. | 04/2017 | |
| 6.4.4.2.c and 6.4.4.5 | Inspection frequency of construction sites will be determined based on the phase of each construction site, its proximity to an impaired, non- | Frequency of inspections will be determined by staff after consideration of the BMP relative to the construction site. Number of inspections will be reported annually. | 04/2017 | |

**TABLE 4.1
Construction Site Stormwater Run-Off Control: BMPs and Measurable Goals**

| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
|------------------------|--|---|-------------------|---|
| | attaining water or Outstanding AZ Water, size of the site, and the history of non-compliance. | | | |
| 6.4.4.2.a&e | Appropriate enforcement action under the City's Code will be taken in the event a violation is noted during an inspection. | Timely enforcement will occur consistent with City Code and other enforcement procedures. Reported annually. | 04/2017 | |
| 6.4.4.2.f and 6.4.4.4 | Public Works Director will provide information regarding BMP for sediment and erosion control at construction sites; such information will include, at a minimum, that set forth is Part 6.4.4.2(f) of the Permit. | The information will be provided during the plan review meeting between the construction site operator and the Community Development Manager. Number of meetings will be reported annually. | 04/2017 | |
| 6.4.4.2.g | Public Works Director will provide information regarding waste control at construction sites; such information will include, at a minimum, that set forth is Part 6.4.4.2(g) of the Permit. | The information will be provided during the plan review meeting between the construction site operator and the Community Development Manager. Number of meetings will be reported annually. | 04/2017 | |
| 6.4.4.3 | The City will train staff in the policies and procedures for the proper | Training will be conducted annually and new employees will be trained within 30 days of hire. | 04/2017 | Annually thereafter, with new employees trained within 30 days of hire. |

| TABLE 4.1 | | | | |
|--|--|---|-------------------|---------------|
| Construction Site Stormwater Run-Off Control: BMPs and Measurable Goals | | | | |
| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
| | implementation of the construction stormwater program to ensure staff has the knowledge, skills, and abilities to carry out their assigned duties. | Reported annually. | | |
| 6.4.4.4 | Public Works Director or designee will timely consider and/or respond to inquiries, comments, complaints, or concerns provided by the public regarding violations or suspected violations of erosion and sediment control best management practices. | Responses, if necessary, will be provided timely. And, if required, inspections of the identified construction site will be timely conducted. Number of complaints, responses, and inspections will be reported annually. | 04/2017 | |

| TABLE 4.2 |
|---|
| Construction Site Stormwater Run-Off Control: Additional Information |
| Plan |
| <p>The City has in place policies to control erosion and sedimentation from new developments and development of existing sites, affecting one acre or more as defined by Permit, to the maximum extent practicable. The City currently requires construction site developers and operators to submit a SWPPP that includes BMPs for management of the construction site during construction and post construction. The City uses a checklist to assess the developer's or contractor's plans. No construction permits will be issued until plans are submitted, reviewed and approved. Upon proof that the applicant has submitted a NOI to ADEQ or EPA, then a construction permit will be issued by the City.</p> |
| <p>The City will review all new development plans for compliance with the construction site management and technical guidance materials. The City ordinance will require new development affecting one acre or more of land to obtain approval of their plan for erosion and sediment control as well as control of other wastes prior to beginning land disturbing activities. The City will discuss with developers their obligation to apply for coverage under the Construction General Permit prior to the</p> |

| TABLE 4.2 | |
|---|--|
| Construction Site Stormwater Run-Off Control: Additional Information | |
| Plan | |
| City approving the construction site management control plan. | |
| The City will develop policies and procedures for an on-going construction site inspection and enforcement program. Inspectors will be trained in construction site management. The City will receive and consider all comments from all public meetings. A list of measurable goals and dates for the initiation of activities and the achievement of the goals are specified. Presently, the City has in place a process to review new Construction Site Plans, Grading/Drainage Plans and SWPPP's. Permits will not be issued until the SWPPP has been submitted, reviewed and approved. Construction on projects will be halted through a "Stop Work Order" or a "Cease and Desist Order", if the SWPPP is not in place at the start of construction. The Public Works Director or designee is responsible for overseeing the construction site activities. | |
| The City has in place a routing for all new construction projects. The City requires all new construction to have in place a Storm Water Pollution Prevention Plan ("SWPPP") and a Grading/Drainage Plan. These plans require review by the City Engineer or designee prior to any permits being issued. If construction begins prior to any permits being issued, the project will have a "Stop Work Order" placed on it. If work continues, City ordinances will be enforced. Violations may be subject to penalties and fines. | |

5. Post Construction Stormwater Management in New Development and Redevelopment

| TABLE 5.1 | | | | |
|--|--|--|-------------------|---|
| Post Construction Stormwater Management in New Development and Redevelopment: BMPs and Measurable Goals | | | | |
| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
| 6.4.5, 6.4.5.1, and 6.4.5.4 | The City will establish and train staff on the policies and procedures necessary to ensure the effective long-term operation and maintenance of post-construction stormwater BMPs, including structural and non-structural | Training will be conducted annually and new employees will be trained within 30 days of hire. Reported annually. | 04/2017 | Annually thereafter, with new employees trained within 30 days of hire. |

| TABLE 5.1 | | | | |
|--|---|---|-------------------|---------------|
| Post Construction Stormwater Management in New Development and Redevelopment: BMPs and Measurable Goals | | | | |
| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
| | BMPs. | | | |
| 6.4.5.2 | Public Works Director will provide information regarding BMP for post-construction stormwater controls. | The information will be provided during the plan review meeting between the construction site operator and the Community Development Manager. Number of meetings will be reported annually. | 04/2017 | |
| 6.4.5.3 | The City will create and maintain an inventory of post- construction BMPs as required in Part 6.4.5.3. | The inventory will be updated as needed and provided to the construction community and developers as necessary. Reported annually. | 04/2017 | |

| TABLE 5.2 |
|--|
| Post Construction Stormwater Management in New Development and Redevelopment: Additional Information |
| Plan |
| The program will include a plan review for new development and redevelopment. The City will research appropriate post-construction run-off management strategies for new and redevelopment projects and tailor them to the City of Litchfield Park. |
| Compliance procedures are specified in the City’s Stormwater Ordinance, Title 15, Chapter 15.15.070. These procedures apply to new development and redevelopment, and may change depending upon updates from the City Council. The Public Works Director reviews, approves and permits all new construction projects, including the SWPPP. The Code Enforcement Officers will monitor for code violations. |
| The City’s policies include a mandatory pre-construction meeting. During this pre-construction meeting, City staff will distribute SWPPP and BMP publications. These meetings routinely include explanations of the City’s policies and procedures prior to the start of construction activities. |

6. Pollution Prevention/Good Housekeeping for Municipal Operations

| TABLE 6.1 | | | | |
|---|---|--|-------------------------|----------------------|
| Pollution Prevention/Good Housekeeping for Municipal Operations: BMPs and Measurable Goals | | | | |
| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
| 6.4.6 | The City has developed a checklist to be used during facility inspections to ensure stormwater controls are in place to prevent pollution discharges from the MS4. | The checklist has been developed and is used during all municipal facility inspections. Inspections occur monthly. Number of inspections will be reported annually. | Previously Implemented. | Ongoing. |
| 6.4.6 | The City will review and revise as needed policies and documents to address pollution prevention that includes municipal maintenance activities, schedules and inspection procedures. | The City staff will meet to discuss current applicable documents and procedures as well as establishing the priorities for facility assessments. Such meeting will be held annually. | 09/2017 | Annually thereafter. |
| 6.4.6.a | City developed an inventory of discharging municipal operations. The City possesses no municipal discharging facilities. | Inventory will be reviewed and reported annually. | 09/2017 | Ongoing. |
| 6.4.6.b.c and d | City has developed a schedule for the inspection of municipal facilities. | The inspection schedule has been developed and will be updated on a regular basis. Inspections occur monthly; and, if warranted, will occur | 09/2017 | Ongoing. |

| TABLE 6.1 Pollution Prevention/Good Housekeeping for Municipal Operations: BMPs and Measurable Goals | | | | |
|---|---|--|------------------------|---------------------------|
| Permit Citation | BMP | Measurable Goal(s) | Start Date | Status |
| | | more frequently. Number of inspections will be reported annually. | | |
| 6.4.6.f | Training on good housekeeping, pollution prevention, and City procedures for operations and maintenance activities will be provided to staff as needed. | New employees will be trained within 30 days of hire. Training will be held and reported annually. Training updates will also occur as needed. | 09/2017 | To be provided as needed. |
| 6.4.6.g | The City will develop procedures for maintenance and inspection of structural and non-structural controls to reduce floatables, trash, etc. | City will track, and report annually, the frequency of inspections and maintenance required. | 09/2017 | |
| | Street sweeping is done by City staff. | Street sweeping is conducted based on the following schedule: Arterials: Every 3 weeks Residential: Every 2 weeks Special Cycle streets: Weekly | Previously Implemented | Ongoing. |

| TABLE 6.2 Pollution Prevention/Good Housekeeping for Municipal Operations: Additional Information |
|--|
| Plan |
| The City will develop and implement an employee training program for: <ul style="list-style-type: none"> • Individuals who apply chemicals or work with chemicals in their daily activities, to ensure appropriate practices are followed to reduce or eliminate the risks of polluting stormwater run-off. • Individuals involved in roadway and drainage maintenance to address appropriate strategies |

for run-off protection.

- Individuals who maintain public facilities to address practices appropriate to water quality and pollution prevention.

Qualifying State or Local Program

The City of Litchfield Park has developed best management practices in response to the need to apply for a Municipal Stormwater Discharge Permit. The City is not aware of any qualifying local or state programs that would address the requirements of the Small MS4 General Permit.

Sharing Responsibility

The City will have the responsibility to implement all measures within the SWMP.

Reviewing and Updating the SWMP

The City will review the SWMP in June of each year starting in June 2018. The City will also evaluate the implementation status of the SWMP components, as well as, the effectiveness of each component or combination of components. The City will determine how the SWMP needs to be revised, if at all. If the SWMP requires revisions, the City will notify ADEQ of any additions. If components of the SWMP need to be replaced, the City will submit to ADEQ the proposed revisions with an explanation of why the practice is ineffective and why the replacement is expected to achieve goals of the management practice.

Monitoring

The City will evaluate program compliance; the appropriateness of identified BMPs and progress towards achieving identified measurable goals. The City's storm sewer systems flow to the Agua Fria River. At this time, a Total Maximum Daily Load ("TMDL") has not been established for this receiving water. Also, the Agua Fria River is not listed on the Arizona 303(d) list. Therefore, the City will not sample and analyze the discharge from the Small MS4 at this time.

Annual Reports

The City will submit an annual report to ADEQ by September 30th of each year.