

Stormwater Management Program for the City of East Liverpool

Ohio EPA Facility Permit Number 3GQ00142*BG

126 West 6th Street
East Liverpool, OH 43920

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1. Introduction and Document Purpose

The City of East Liverpool, OH (City) operates a small Multiple Separate Storm Sewer System (MS4) and has recently obtained coverage from the Ohio Environmental Protection Agency (EPA) to discharge stormwater under National Pollutant Discharge Elimination System Permit (NPDES) number OHQ000004 (Permit). The purpose of this document is to present the City’s planned Stormwater Management Program (SWMP) under Part III of the permit.

This document addresses each of the six Minimum Control Measures (MCMs) described in Part III, Section B of the Permit and outlines the City’s planned Best Management Practices (BMPs) to implement the MCMs and reduce discharge of pollutants from the MS4 to maximum extent practicable (MEP). The current SWMP is a three-year program that intends to have the MCMs implemented over the next three years.

This document will be reviewed and updated annually, as needed, as part of the annual reporting required per the Permit. Changes to the SWMP may be made at any time provided the City follows the requirements of Permit Part III, Section D.

1.1. Non-Applicability of TMDL Requirements

Stormwater runoff in East Liverpool is collected in pipes, ditches, and local creeks, and ultimately directed to the Ohio River. To our knowledge, none of the receiving water bodies have an established Total Maximum Daily Load (TMDL). Confirmation of the area drainage basins will be completed as part of the work described in this document. For now, this SWMP has been prepared assuming TMDL-specific requirements do not apply.

1.2. Permit Management Organization

The City of East Liverpool is responsible for permit compliance, and the City has contracted with AWR Engineering, LLC (AWR) for assistance in creating and managing the MS4 permit program and activities. AWR will lead the permit program and activities with support and assistance from the City, as needed. The City’s Table of Organization is provided below.

Table 1: Table of Organization

Name	Organization and Title	Permit Role	Contact Information
David Dawson	City of East Liverpool, Service/Safety Director	Responsible Manager	P: 330-386-6584 E: d.dawson@eastliverpool.com
William Cowan	City of East Liverpool, Planning Director	Permit Coordinator	P: 330-385-5394 E: Planningdirector@eastliverpool.com
Janie Dusel	AWR Engineering, LLC, President	Consultant Permit Manager & Primary Point of Contact	P: 740-206-7706 E: jdusel@awr-eng.com

2. Stormwater Management Minimum Control Measures

The six MCMs outlined in the Permit are:

1. Public Education and Outreach
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The City's planned BMPs for addressing each of these MCMs are outlined in this section of the SWMP.

2.1. Public Education and Outreach

Each of the planned BMPs for Public Education and Outreach are discussed below. Because Public Education and Outreach is closely tied to all permit activities, some of the BMPs listed here are also supporting other MCMs, as identified.

2.1.1. BMP: MS4 Website

Relevant MCMs: Primarily 1 & 2; Also supporting 3 through 6

Description: The City, in partnership with AWR, will develop an MS4 website for the City. The new MS4 website will provide a platform for public education, communication, and permit activities. The website will be used to share information about MS4 management activities, share and receive feedback from the public on various MS4-activities and documents (e.g. the SWMP, the rate structure analysis, various factsheets, the stormwater infrastructure mapping, etc.) share information about the importance of stormwater management, and serve as a platform for facilitating plan reviews of storm-water related submittals that will be implemented as part of the MCMs.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The website will be created in the first half of 2022 and will be maintained and updated throughout the duration of the SWMP. The email sign-up list and the number of website views will be examined periodically as metric for how many people the website is reaching.

Responsible Persons: Janie Dusel will be responsible for website development and management for 2022 through November 2024.

Rationale for Success: A website dedicated to communication regarding the MS4 is expected to be a good first step in connecting with a wide range of community stakeholders including homeowners, businesses owners, and other agencies.

2.1.2. BMP: Stormwater Factsheet

Relevant MCMs: 1 and 2

Description: The City and AWR will develop a stormwater factsheet that presents what stormwater is and why stormwater management is important for the East Liverpool community. The factsheet will be one letter-sized paged and will be developed with graphics and text geared toward the local community. The factsheet will be shared via the MS4 website and the City's Facebook page (see Sections 2.1.1 and 2.1.3)

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The factsheet will be created in 2022 and shared across multiple platforms. The MS4 team can monitor the number of views and respond to any questions received about the content.

Responsible Persons: Janie Dusel will be responsible for factsheet development and distribution.

Rationale for Success: Because MS4 management and associated stormwater activities are new to the City, a factsheet is a good introduction for the community about why new stormwater programs and requirements will be developed in the coming months and years. It will also start to prepare them for potential changes to the stormwater utility rates that may occur in the coming year.

2.1.3. BMP: Facebook Posts

Relevant MCMs: Primarily 1 & 2; Also supporting 3, 4, and 5

Description: The City and AWR will develop several posts to be shared on the City's Facebook page about MS4 and stormwater activities in the City. These posts are expected to cover the following topics/information:

- Sharing the stormwater factsheet (See Section 2.1.2)
- Sharing information about upcoming field data collection in support of infrastructure mapping (See Section 2.3.2)
- Sharing the completed SWMP and Rate Study ones those documents are complete
- Sharing an online survey regarding household sewage (see Section 2.3.1)
- Sharing a brochure discussing illicit discharge (See Section 2.1.5)
- Sharing the SWPPP program/ordinance (See Section 2.4.1)
- Sharing the new stormwater treatment program/ordinance along with associated design guidance (See Sections 2.5.1, 2.5.2, and 2.5.3)

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The posts will be created throughout the duration of this SWMP and will provide a second method for information sharing, beyond the MS4 website. The City and AWR can monitor views and interactions with the post and respond to questions, as needed.

Responsible Persons: Janie Dusel will be responsible for developing the content for the Facebook posts. The Planning Director will be responsible or coordinating with City staff to publish the posts.

Rationale for Success: The City currently has 13,000 followers on their Facebook page, and this is expected to be a good way to reach a larger audience.

2.1.4. BMP: Online Survey Regarding Household Sewage

Relevant MCMs: 1, 2, and 3

Description: The City and AWR will develop an online-based community survey regarding handling of household sewage and the discharge of sewage to a sanitary sewer. The objective will be to determine how familiar the community is with sewage versus stormwater and if most households know where their sewage discharges. This information will help identify potential household sewage discharging to the storm sewer as well as help craft the Illicit Discharge Ordinance to be applicable to the local community. The online survey will be shared via Facebook.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The online survey results can be reviewed to determine how many people participated, and the information obtained from the survey can be examined for usefulness. We will offer entry to win a prize (such as a gift card to a local business) to help encourage participation, with a winner selected at random.

Responsible Persons: Janie Dusel will be responsible for creating and distributing the survey and coordinating the prize with support from The Planning Director, as needed.

Rationale for Success: The online survey will be created in 2023. It will be short and easy to follow, and is expected to be a good first step in determining how to best manage illicit discharge within the City and determine what (if any) other types of projects or programs might be needed.

2.1.5. BMP: Illicit Discharge Brochure

Relevant MCMs: 1, 2, and 3

Description: The City and AWR will create a brochure discussing illicit discharge. The brochure will discuss how to avoid illicit discharges on a household level. The brochure will be electronic, and will consist of one or two letter-sized pages developed with graphics and text geared toward the local community.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The brochure will be created in 2023 and will be shared across multiple platforms. The MS4 team can monitor the number of views/interactions and respond to any questions that are shared about the content.

Responsible Persons: Janie Dusel will be responsible for creating and distributing the brochure.

Rationale for Success: The brochure will be structured to be short and easy to follow, and is expected to be a good first step to determine how to best support illicit discharge management within the City and determine what (if any) other types of projects or programs might be needed.

2.2. Public Involvement/Participation

Our planned BMPs for Public Involvement and Participation are generally integrated into most of the BMPs in support of other MCMs. The five MCMs listed in Section 3.1 have a Public Involvement/Participation Component, as do the BMPs discussed in the following Sections:

- 2.3.3 Illicit Discharge Ordinance
- 2.3.5 Illicit Discharge Training
- 2.4.2 SWPPP Training for Local Contractors and City Staff
- 2.5.1 Stormwater Treatment Ordinance
- 2.5.2 Develop Stormwater Treatment Guidance
- 2.5.3 Green Infrastructure Community Project

2.3. Illicit Discharge Detection and Elimination

Each of the planned BMPs in support of Illicit Discharge Detection and Elimination are discussed below. The BMPs discussed in this section have been developed based on the expectation that the greatest risk of illicit discharge in East Liverpool is related to household sewage connections to the storm sewer system.

2.3.1. BMP: Online Survey Regarding Household Sewage

Please see Section 2.1.4 for a description of the BMP.

2.3.2. BMP: Infrastructure Mapping

Relevant MCMs: 3

Description: The City and AWR will develop both hard copy and digital GIS-based mapping of the storm sewer system within the City limits. This mapping will focus specifically on hard infrastructure such as pipes, storm sewer structures, and outfalls. The mapping will be created through a combination of desktop analysis and field data collection to determine the location, type, and flow direction (connectivity) of the infrastructure. Field location work will utilize a combination of GPS and visual observations. As a result, horizontal accuracy will be approximate. The mapping will be limited to infrastructure within rights-of-way; infrastructure on privately owned parcels is not included. This work will also include delineating the drainage basins contributing surface water runoff to the City's MS4 system and to each mapped outfall based on a combination of field observations and LiDAR data. Documentation will be developed for each GIS-based product.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: Infrastructure mapping will be completed in 2022. The field work will be completed in the spring/summer and the mapping and GIS work will follow in the late summer/fall. The mapping will then be revisited in 2024 and updated as needed to reflect changes or make additions. This BMP will result in maps and associated GIS files of the City's MS4 system. The deliverables will be available for the public via the MS4 website.

Responsible Persons: Janie Dusel will be responsible for the infrastructure mapping.

Rationale for Success: Understanding the location and connectivity of the existing MS4 system is a critical first to successfully identifying and eliminating illicit discharges.

2.3.3. BMP: Illicit Discharge Ordinance

Relevant MCMs: 3

Description: The City and AWR will develop an ordinance that prohibits illicit (non-stormwater) discharge to the storm sewer system. The ordinance will be developed considering relevant existing ordinances and permits, the results of the public survey regarding household sewage, and the requirements of the Permit.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The Ordinance will be established in 2023, following the public survey discussed in Section 2.1.4.

Responsible Persons: Janie Dusel will draft the ordinance language. The Planning Director will be responsible for coordinating creation of the ordinance through the City Council process.

Rationale for Success: This ordinance is needed for Permit compliance to ensure the City has authority to prohibit illicit discharge.

2.3.4. BMP: Dry Weather Screening

Relevant MCMs: 3

Description: The City and AWR will complete dry weather screening upstream of one or more stormwater outfalls to identify the potential for illicit discharges to the storm sewer. Dry weather screening will occur during the summer months. We will identify locations where dry weather screen is expected to be feasible and will install flow depth instrumentation (or similar based on the type of structure). Following the end of the dry weather season, data from the instrumentation will be downloaded and correlated to rainfall data from a local rain gage. Flow during dry weather will be recorded and examined to determine potential causes.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: Dry weather screening will occur in 2023 and 2024, after the Infrastructure mapping is complete and the Illicit Discharge Ordinance is in place. This activity will result in data to help detect illicit discharge, specifically household sewage.

Responsible Persons: Janie Dusel will be responsible for completing the dry weather screening.

Rationale for Success: This ordinance is needed for Permit compliance to help locate and eliminate illicit discharges related to household sewage.

2.3.5. Illicit Discharge Training

Relevant MCMs: 1 and 3

Description: The City and AWR will provide a training course for City staff regarding illicit discharges. The objective of the training will be help all City staff understand what an illicit discharge is, why it is prohibited, and ways to identify/avoid illicit discharges. The training can be extended to include the general public, if desired by the City.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: This training is planned for 2023, after the illicit discharge survey has been completed, the ordinance is in place, and the infrastructure mapping is available. The training will use sign-in sheets to track attendance.

Responsible Persons: Janie Dusel will be responsible for preparing training materials and providing the training. The Planning Director will be responsible for coordinating with City staff for attendance.

Rationale for Success: Understanding illicit discharge and why it's a problem is important for better managing it. This training will be good step for the City to help staff across many departments understand and identify an illicit discharge if they encounter one.

2.4. Construction Site Stormwater Runoff Control

Each of the planned BMPs in support of Construction Site Stormwater Runoff Control are discussed below.

2.4.1. Construction Site Ordinance, Plan Review, and Community Portal

Relevant MCMs: 4

Description: The City and AWR will develop a local ordinance regarding management of pollutants from construction sites. The ordinance will require submittal and City-approval of a Stormwater Pollution Prevention Plan (SWPPP) for construction projects that disturb more than one acre of land. The ordinance will be developed in cooperation with existing State and county SWPPP requirements. Per the requirements of the Permit, the ordinance will also set thresholds for onsite inspection requirements and will outline enforcement actions and penalties for noncompliance.

The City and AWR will also create and implement a plan review process for submittal and review of the SWPPPs. This will include development of forms and/or checklists to aid users in the development of the SWPPP as well as references to existing BMP documents that outline control measures that are applicable for East Liverpool. User will submit their plan reviews per the new MS4 website.

Also per the Permit requirements, the City and AWR will set up a way for the public to report SWPPP violations that they may notice. This will be done through the MS4 website.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The SWPPP ordinance, plan review program, and community reporting portal will be developed in 2023. Each plan review or report can be counted and used to determine if the new process is successful.

Responsible Persons: Janie Dusel will draft the ordinance language, and The Planning Director will be responsible for coordinating creation of the ordinance through the City Council process.

Janie Dusel will be responsible for developing and assisting with implementation of the plan review process and for developing the community reporting portal. The Planning Director will be responsible for City staff coordination needed for implementation and permit issuance.

Rationale for Success: The ordinance, plan review process, and community reporting portals are needed for Permit compliance to help minimize pollutant travel from construction activities.

2.4.2. SWPPP Training for Local Contractors and City Staff

Relevant MCMs: 1, 2, and 4

Description: The City and AWR will provide a training to local contractors and City staff regarding the new SWPPP ordinance and associated plan review process and forms. The objective of the training will be to familiarize contractors and City staff with the importance of controlling pollutants from construction sites, SWPPP procedures, requirements, and resources.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: This training is planned for 2023, after the construction discharge ordinance is in place, and the plan review process is established. The training will use sign-in sheets to track attendance.

Responsible Persons: Janie Dusel will be responsible for preparing training materials and providing the training. The Planning Director will be responsible for coordinating with City staff for attendance.

Rationale for Success: This training will be a good step for helping local contractors and City staff understand construction related pollutants, SWPPPs, and the new plan review procedures.

2.5. Post-Construction Stormwater Management in New Development and Re-Development

Each of the planned BMPs in support of Post-Construction Stormwater Management are discussed below.

2.5.1. Stormwater Treatment Ordinance

Relevant MCMs: 5

Description: The City and AWR will develop an ordinance that requires post-construction management of stormwater discharges for projects that disturb one acre or more of land. The City and AWR will identify activities and facilities that can be used to meet this requirement and will outline enforcement actions and penalties for non-compliance. The ordinance will also outline requirements to ensure the actions or facilities are maintained even if the property changes ownership.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The Stormwater Treatment Ordinance will be developed in 2024.

Responsible Persons: Janie Dusel will draft the ordinance language and the Planning Director will be responsible for coordinating creation of the ordinance through the City Council process.

Rationale for Success: The ordinance, plan review process, and community reporting portals are needed for Permit compliance to help minimize pollutant travel from post-construction activities.

2.5.2. Develop Stormwater Treatment Guidance

Relevant MCMs: 1, 2, and 5

Description: The City and AWR will develop guidance for meeting the new stormwater treatment ordinance. This will include design handouts (or similar) of stormwater treatment facilities and methods that are expected to work well in East Liverpool. Design guides will be based on approaches used nationwide and will focus on structural and non-structural Green Infrastructure methods. The design guides will be shared via the MS4 website.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The Stormwater Treatment Guidance will be developed in 2024 and shared across multiple platforms.

Responsible Persons: Janie Dusel will be responsible for developing the stormwater treatment guidance.

Rationale for Success: Easy to follow stormwater treatment guidance developed specifically for East Liverpool is expected to lesson confusion regarding post-construction stormwater treatment and promote implementation.

2.5.3. Develop Stormwater Treatment Plan Review

Relevant MCMs: 5

Description: The City and AWR will develop and implement and a plan review process for demonstrating compliance with the new Stormwater Treatment Ordinance. The plan review process will be set up through the new MS4 website. This work will also include setting up a process for onsite inspections after construction or implementation of the onsite control measures is complete.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The Stormwater Treatment Plan Review process will be developed and implemented in 2024.

Responsible Persons: Janie Dusel will be responsible for developing and assisting with implementation of the plan review process. The Planning Director will be responsible for City staff coordination needed for implementation and permit issuance.

Rationale for Success: A Plan Review process for post-construction stormwater controls will help the City encourage and require the use of post-construction stormwater controls where applicable.

2.5.4. Green Infrastructure Community Project

Relevant MCMs: 1, 2, and 5

Description: The City and AWR will work with local schools and/or businesses to identify opportunities for a community green infrastructure project, such as a rain garden. Ideally, the facility design and construction would become part of a local class room learning opportunity. Assuming an opportunity and funding can be identified, the City and AWR will coordinate with local schools and/or businesses to select the site, share relevant details, provide rain garden education, look for material donations, provide design guidance, and coordinate facility construction. This is intended to make the Green Infrastructure facility a community project, and provide hands-on education about the importance of stormwater management and the function of Green Infrastructure.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The Green Infrastructure Community Project process will be developed and implemented in 2024.

Responsible Persons: Janie Dusel will be responsible for developing the project concept, encouraging the community to participate, and coordinating project activities.

Rationale for Success: A Green Infrastructure community project is intended help raise awareness of the importance of Green Infrastructure, provide education regarding stormwater and the use of Green Infrastructure, and create a successful project that can be used as an example for future projects.

2.6. Pollution Prevention/Good Housekeeping for Municipal Operations

Each of the planned BMPs in support of Pollution Prevention/Good Housekeeping for Municipal Operations are discussed below.

2.6.1. Review City Maintenance and Good Housekeeping Practices

Relevant MCMs: 6

Description: AWR will work with City staff (including the Planning Director, Maintenance personnel, etc.) to review the City's current practices for handling trash, vehicular fluids, road/sideway salts, roadside debris (including dead animals), fertilizer, and insecticides. AWR will gain an understanding of how these materials are utilized and disposed off and will identify any deficiencies or areas of potential improvement related to water quality and potential contamination. Recommendations will be provided in a follow up email or memorandum to the Planning Director for consideration and potential implementation.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The Review of City Maintenance and Good Housekeeping Practices will occur in 2023. It will result in a summary of existing issues and recommendations for correction.

Responsible Persons: Janie Dusel will be responsible for completing the review and providing recommendations. The City's Service-Safety Director will be responsible for implementation of recommendations.

Rationale for Success: Review of current City practices for handling potential stormwater contaminants is expected to help create safe handling practices and avoid future contamination or illicit discharges from City operations.

2.6.2. Good House Keeping Training

Relevant MCMs: 1, 2, and 6

Description: The City and AWR will provide a training to City staff regarding the findings and recommendations resulting from the good house keeping practices BMP. The objective of the training will be help City staff understand how proper handling of materials can help eliminate pollution of stormwater and receiving waters. The specific operations and departments to be included in the training is to be determined, but is expected to include maintenance personnel, landscape workers, etc.

Legal Authority: The City of East Liverpool has the legal authority to implement this BMP.

Measurable Goals: The Good Housekeeping Training will occur in 2023 after completion of the Review City of Maintenance and Good Housekeeping Practices. Attendance will be tracked using sign-in sheets.

Responsible Persons: Janie Dusel will be responsible for preparing training materials and providing the training. The Planning Director will be responsible for coordinating with City staff for attendance.

Rationale for Success: Review of current City practices for handling potential stormwater contaminants is expected to help create safe handling practices and avoid future contamination or illicit discharges from City operations.

3. SWMP Schedule

An expected schedule for implementation of each BMP is provide in Table 2.

Table 2: SWMP Schedule

SWMP Section	Activity	Relevant MCMs	Targe Completion/ Implementation Date
2.1.1	MS4 Website	All	Summer 2022
2.1.2	Stormwater Factsheet	1, 2	Summer 2022
2.1.2	Share Stormwater Factsheet via Facebook and Web	1,2	Summer 2022
2.3.2	Infrastructure Mapping	3	Summer/Fall 2022
2.1.3	Facebook Post Re: Field work for Infrastructure Mapping	1,2,3	Summer 2022
All	Share SWMP (Web and Facebook)	1, 2	Summer 2022
2.1.4	Online Survey Regarding Household Sewage	1, 2, 3	Spring 2023
2.3.3	Illicit Discharge Ordinance	3	Spring/Summer 2023
2.3.4	Dry Weather Screening	3	Summer 2023 and 2024
2.3.5	Illicit Discharge Training	3	Summer/Fall 2023
2.4.1	Construction Site Ordinance, Plan Review, and Community Portal	2, 4	Summer/Fall 2023
2.4.2	SWPPP Training for Contractors and City Staff	1, 2, 4	Fall/Winter 2023
2.6.1	Review City Maintenance and Good Housekeeping Practices	6	Spring/Summer/Fall 2023
2.6.2	Good House Keeping Training	1, 2, 6	Fall/Winter 2023
2.5.1	Stormwater Treatment Ordinance	5	Spring 2024
2.5.2	Develop Stormwater Treatment Guidance	5	Spring/Summer 2024
2.5.4	Green Infrastructure Community Project	1, 2, 5	Summer 2024
2.5.3	Develop Stormwater Treatment Plan Review	5	Summer/Fall 2024
2.3.2	Update Infrastructure Mapping	3	Summer/Fall 2024