

TMDL Implementation - Mercury

City of Independence: TMDL Implementation Tracking Matrix							
Pollutant: Mercury							
SOURCE <i>What sources of this pollutant are under your jurisdiction?</i>	STRATEGY <i>What is being done, or what will you do, to reduce and/or control pollution from this source?</i>	HOW <i>Specifically, how will this be done?</i>	FISCAL ANALYSIS <i>What is the expected resource need? Are there existing resources budgeted? If not, where will the resources come from?</i>	MEASURE <i>How will you quantitatively or qualitatively demonstrate successful implementation or completion of this strategy?</i>	TIMELINE <i>When do you expect it to be completed?</i>	MILESTONE <i>What intermediate goals (not compliance points) do you expect to achieve, and by when, to know progress is being made?</i>	STATUS <i>Include summary and date.</i>
Mercury Measure #1A	Pollution Prevention and Good Housekeeping for Municipal Operations	Clean roadways and storm system	Stormwater Utility Fund	Include descriptive summary of approx. roads and storm system cleaning summary	Completed and ongoing	Implement asset management and work order system to begin tracking workflow; Maintain records for tons of material disposed, catch basins cleaned, and lineal feet of pipe cleaned each year.	Biweekly street sweeping, 276 catch basins cleaned, 2405 ft of storm lines cleaned from Dec 2021 to Oct 2022.
Mercury Measure #1B	Pollution Prevention and Good Housekeeping for Municipal Operations	Ensure city owned or operated facilities with industrial activity identified in DEQ's 1200-Z Industrial Stormwater General Permit have coverage under this permit.	Stormwater Utility Fund	Include a descriptive summary of activity in annual report	Completed and ongoing	Maintain records for activities to meet program requirements and include a descriptive summary of activity in annual	Maintenance of city facilities, ICC/PW Shops, Library & Museum.
Mercury Measure #1C	Pollution Prevention and Good Housekeeping for Municipal Operations	House water quality materials on Public Works Reports and Resources The City of Independence Oregon - Official Website	Stormwater Utility Fund	Provide weblink in annual report to illustrate programs such as tree protection, leaf program	12/31/2023	Quarterly check in and review of Public Works webpage.	Information on city website in Parks & Recs and Public Works pages
Mercury Measure #2A	Public Education and Outreach	Add information on hazardous waste on City website, City Hall front counter, and water quality	Stormwater Utility Fund	Provide weblink to at least one web page with information and describe fact sheet at front counter; Describe other weblink	Completed and ongoing	Monitor materials at front counter and restock as needed; At least one web page with information and one fact sheet at front counter.	Stormwater mgmt. brochure at front counter and on city website with weblinks to county info

Mercury Measure #2B	Public Education and Outreach	Review complaints or concerns reported on-line and target education and outreach to developers, contractors, and community as needed.	Stormwater Utility Fund	Review and document in TMDL report annual number of stormwater information sent out by website, email, or mailings to address complaints or concerns.	Started September 2022 and ongoing annually.	Post links to Polk County Stormwater Resources and EPA NPS pages. Add targeted links as needed to Stormwater Management Page.	Links on city website on Public Works page to county stormwater resources and EPA NPS page.
Mercury Measure #3A	Public Involvement and Participation	Public input during the Stormwater Master Plan update	Stormwater System Development Charges	Sign in sheet at public meetings and collection of written comments.	Completed and ongoing activity. Goal is for adoption of master plan in 2025.	Public notification of draft master plan documents for review and comment once project is underway.	Upcoming Stormwater Master plan meeting and Open House in FYE 24-25
Mercury Measure #3B	Public Involvement and Participation	TMDL plan and progress reports will be posted on a publicly accessible website.	Stormwater Utility Fund	Annual report weblink for plan and reports	Updated information on website on or before Nov 30, 2022. Annual updates thereafter.	Post Plan and reports on webpage.	TMDL Plan Update on city website
Mercury Measure #4A	Illicit Discharge Detection and Elimination	Develop and maintain a current map of stormwater conveyance system. 1. System map and digital inventory must include the location of outfalls and an outfall inventory, conveyance system and stormwater control locations. 2. For digital - Describe mapping standards in the TMDL plan or other city document.	Stormwater Utility Fund	City currently has a paper map from the 2005 Stormwater Master Plan. Goal is to transfer this data into a new asset management system in 2023 followed by an update as part of the Stormwater Master Plan Update in 2024.	Mar 3 2024 and ongoing	Anticipate starting development of a digital map in 2023.	Awaiting Stormwater map
Mercury Measure #4B	Illicit Discharge Detection and Elimination	Prohibit non-stormwater discharges into the stormwater conveyance system through enforcement of an ordinance or other legal mechanism, including appropriate enforcement procedures and actions to ensure compliance.	Stormwater Utility Fund	Provide report of any violations and resolution as part of annual TMDL report.	Mar 3 2024 and ongoing	Anticipate tracking of code violations quarterly or as needed with code compliance committee.	No report of any violations per qtr.
Mercury Measure #4C	Illicit Discharge Detection and Elimination	Develop and maintain a procedure or system to document all complaints or reports of illicit discharges into and from the stormwater conveyance system.	Stormwater Utility Fund	Track through IndyWorks and asset management system.	Completed and ongoing	Currently tracking through IndyWorks and anticipate tracking resources and manhours to resolving complaints.	Future complaints will be track in new Asset Management system

Mercury Measure #4D	Illicit Discharge Detection and Elimination	Ordinance defines the range of illicit discharges it covers, including those discharges that are conditionally allowed, such as groundwater and lawn watering discharges.	Stormwater Utility Fund	Adoption of updated stormwater ordinance.	Mar 3 2024 and ongoing	Anticipate development of language as part of Stormwater Master Plan update.	Master Plan budgeted for FY 23-24 with code updates.
Mercury Measure #4E	Illicit Discharge Detection and Elimination	Maintain industrial users list. Monitor discharge complaints.	Stormwater Utility Fund	Periodic Industrial Users Survey and number of code violations	Completed and ongoing	Update Stormwater Master Plan by 2025 and municipal stormwater code by 2027.	In FY 23-24 budget
Mercury Measure #5A	Construction Site Runoff Control	Refer project to DEQ site, or the appropriate DEQ agent, to obtain NPDES 1200-C Construction Stormwater Permit coverage for construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres).	Stormwater Utility Funds/Private Development Funds	Track through plan approval and issuance of Public Works Permit. Review Code and Public Works Design Standards periodically.	Completed and ongoing	Enforce design standards adopted by IMC Chapter 26. prohibiting issuance of Public Works Permit without proof of active 1200-C permit.	All new developments reminded of 1200C requirements.
Mercury Measure #5B	Construction Site Runoff Control	Through ordinance or other regulatory mechanism, require construction site operators to complete and implement an Erosion and Sediment Control Plan for construction project sites in its jurisdictional area that result in a minimum land disturbance of 21,780 square feet (one half of an acre) or more, and are not already covered by a 1200-C permit. Require erosion and sediment controls, and waste materials control from initial clearing through final	Staff time/Private Development Funds	Notify developer of requirement to comply with Public Works Standards and Public Works Permit requirements. Issue stop work order on projects not in compliance with standards and permit requirements.	Sept 3 2025	Goal is to notify development representatives during pre-construction meeting of requirement to comply with DEQ rules and DEQ inspectors.	Notify developers/builders of erosion and settlement requirements
Mercury Measure #5C	Construction Site Runoff Control	Develop, implement and maintain a written escalating enforcement and response procedure for all qualifying construction sites. The procedure must address repeat violations through progressively stricter response, as needed, to achieve compliance.	Staff time	Document violations in inspection reports. Notify DEQ representative of observed non-compliance. Withhold building permits until conditions are met.	Sept 3 2025	Goal is to Review code and coordinate with Stormwater Master Plan and Public Works Standards.	Update code in FY 23-24
Mercury Measure #5D	Construction Site Runoff Control	Add information on stormwater and erosion to the City website and City Hall front counter	Stormwater Utility Funds	Provided information on website and fact sheets at front counter	Completed and ongoing	Review code and Public Works Standards periodically for compliance.	Be the solution to water pollution brochure on front counter & website

Mercury Measure #6A	Post Construction Site Runoff for New Development and Redevelopment	Development code (Subchapter 54) contains landscaping requirements	Construction Through Private Development Funds. Ongoing O&M through the property owner for private developments and Stormwater Utility Funds for Public Improvements.	Planning and Building Department's to enforce code requirements and track the number of violations	Completed and ongoing	Review code and coordinate with Stormwater Master Plan and Public Works Standards	Update code in FY 23-24
Mercury Measure #6B	Post Construction Site Runoff for New Development and Redevelopment	By ordinance or other mechanism, DMA must require for project sites discharging stormwater that create/replace 10,890 square feet (1/4 acre) or more of new impervious surface area: (A) Use stormwater controls at all qualifying sites. (B) Site-specific stormwater management approach targeting natural surface/predevelopment hydrological function through installation and long-term O&M of stormwater controls. (C) Long-term O&M of stormwater controls at project sites that are under the ownership of a private entity. The DMA must target natural surface/predevelopment hydrologic function to retain rainfall on-site and minimize discharge of precipitation with stormwater controls that infiltrate/evapotranspire stormwater. If unable to retain, rainfall/runoff from impervious surfaces on-site, the remainder must be treated prior to discharge with structural stormwater controls. Stormwater structural controls should remove at least 80 percent of the	Construction Through Private Development Funds. Ongoing O&M through the property owner for private developments and Stormwater Utility Funds for Public Improvements.	Planning and Building Department's to enforce code requirements and track the number of violations	Sept 3 2025	Review code and coordinate with Stormwater Master Plan and Public Works Standards	Update code in FY 23-24. All development required to meet water quality for impervious area greater than 10k