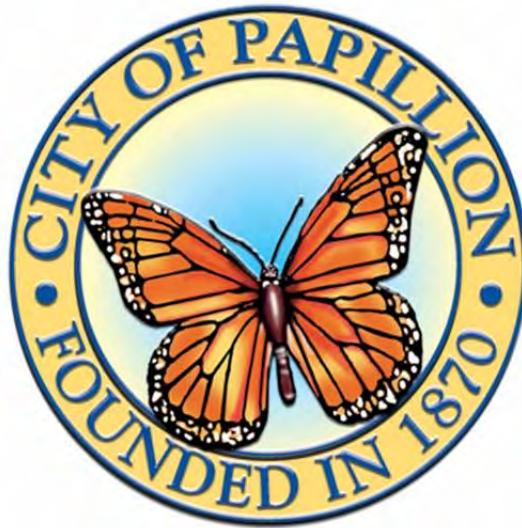


**NPDES PERMIT (NER220000) FOR SMALL  
MUNICIPAL STORM SEWER DISCHARGES  
TO WATERS OF THE STATE  
LOCATED IN DOUGLAS, SARPY, AND  
WASHINGTON COUNTIES  
OF NEBRASKA**

**NPDES PERMIT NUMBER 220003**

**2018 ANNUAL REPORT**



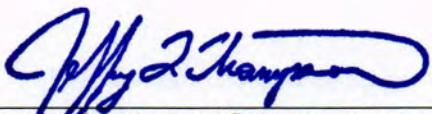
**Submitted by:**

**City of Papillion, Nebraska  
122 East Third Street  
Papillion, NE 68046**

**March 31, 2019**

### Report of Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations. See 18 U.S.C. 1001 and 33 U.S.C 1319, and Neb. Rev. Stat. 81-1508 thru 81-1508.02."



Signature of Authorized Representative or  
Cognizant Official

3/29/19

Date

Jeffrey L. Thompson, PE, CPESC, CFM  
Printed Name

Public Works Director/City Engineer  
Title

## 1. BACKGROUND

On July 1, 2017, the Nebraska Department of Environmental Quality (NDEQ) issued a National Pollutant Discharge Elimination System (NPDES) permit NER210000 for Small Municipal Storm Sewer discharges to waters of the state located in Douglas, Sarpy, and Washington Counties of Nebraska. The co-permittees of the Papillion Creek Watershed Partnership (PCWP) currently authorized to discharge municipal storm water under this permit are Bellevue, Boys Town, Gretna, La Vista, Papillion, Ralston and Sarpy County.

The NPDES permit requires that the co-permittees submit by April 1 each year an Annual Report documenting the status of all the general programs and individual tasks contained in the Storm Water Management Plan (SWMP). This document is being submitted by the City of Papillion to meet that requirement and covers the period from January 1 - December 31, 2018.

## 2. COOPERATIVE AGREEMENT

The Partnership entities entered into an interlocal agreement in 2001 and continuation agreements in 2004, 2009 and 2014 that established a framework for meeting the permit requirements. The 2014 agreement was approved by the following entities Bellevue, Boys Town, La Vista, Papillion, Ralston, Sarpy County, Gretna, the Papio-Missouri Natural Resources District and City of Omaha. These agreements identify the lead organization and the participating partners for each SWMP element and establish a basis for cost-sharing to meet the Phase II permit requirements of the permittees. The SWMP for the permit issued in 2017 was approved on June 28, 2018. The 2018 annual report will address the new SWMP. Activities are reported for the 2018 calendar year, however not all Year 1 Target Goals were completed in 2018. These will be completed no later than June 28, 2019, and all data will be included in the 2019 report.

## 3. PERMITTEE COORDINATION

In 2001, the PCWP began as a planning committee to assist the small MS4 communities in addressing their permit application requirements. The focus of the continuation agreement reached in 2004 was on the implementation of the SWMP as incorporated in the general NPDES permit. The 2009 agreement focused on an overall watershed plan addressing water quality and water quantity for the participating members as well as a renewal of the NPDES permit and implementation of the updated SWMP. The 2014 agreement continues implementation of the watershed plan along with a renewal of the NPDES permit and an updated SWMP. A new permit was effective July 2017; however, the SWMP was not approved until June 28, 2018.

The PCWP has held monthly meetings since August 2001. The meetings help to coordinate activities and identify needs consistent with the goals of the PCWP and implement the NPDES permit SWMP.

## 4. STORMWATER MANAGEMENT PLAN ACTIVITY SUMMARY

### A. Public Education and Outreach

*A.1, 3, & 4. Develop a plan for outreach that defines the goals, objectives, target audience, and distribution process of materials for the public education and outreach program. Year 1 – Develop a 5-year education and outreach plan. Submit the plan to NDEQ with the Annual Report. Years 2-5 – Review and update the plan each permit year and include the revised plan in the annual report.*

The PCWP is developing an outreach plan. The plan will be completed prior to June 28, 2019, the end of Permit Year 1.

Keep Omaha Beautiful and the City of Omaha Stormwater staff assisted the PCWP with distribution of different types of brochures and educational information and materials throughout 2018. Brochure topics include pollution prevention, good housekeeping, pesticide, fertilizer, and household hazardous waste. They were present at community events and outreach activities where 3,694 brochures distributed on various topics. Brochures and educational information were delivered to commercial and public locations around the area and presentations made to local groups. A list of locations and summary of presentations are provided in Attachment A-Distribution of Material and Event Summary for Public Education & Outreach for calendar year 2018.

**This permit requirement has been met.**

*A.2. Maintain and update appropriate messages for targeted residential, construction, and commercial issues. Year 1 – Inventory current outreach materials in each of these target areas and develop new materials as needed. Years 2-5 – Provide copies of new outreach materials in the annual report.*

The City of Omaha Environmental Quality Control Division has developed many outreach materials over the years for use by the PCWP communities. These materials have been inventoried and categorized into the following target areas: residential, construction, commercial, and industrial. In 2018, one new outreach material was created, a field guide for construction site sediment and erosion control. The guide is based on the Omaha Regional Stormwater Design Manual (ORSDM) and describes sediment and erosion control BMPs, provides tips for effective use, and includes local pictures of good and bad BMPs. The flipbooks are being distributed to construction field staff, grading permit site inspectors, and other professionals who are involved with construction site stormwater runoff. An inventory of current outreach materials is provided in Attachment B.

**This permit requirement has been met.**

## B. Public Participation and Involvement

*B.1. Provide opportunities for citizens to comment on new rules, ordinances, and regulations regarding the MS4. On-Going All Years – Post on the (insert jurisdiction) website proposed changes to rules, ordinances, and regulations. Provide information in the annual report on approved changes and input received from the public.*

There were no proposed changes to rules, ordinances, and regulations in 2018.

**This permit requirement has been met.**

*B.2. Create opportunities for citizens to participate in the implementation of stormwater controls. On-Going All Years – Post on the Papillion Creek Watershed Partnership Website opportunities for public involvement in stormwater control related activities.*

The PCWP website, [www.papiopartnership.org](http://www.papiopartnership.org), includes but is not limited to, the contact information for PCWP representatives (including links to the respective PCWP

representative's websites) and the illegal dumping/illicit discharge report form, PCWP meeting minutes, upcoming meetings and outreach opportunities, PCWP permits, past reports, and studies are also available on-line as well as general information about the PCWP and about watersheds, best management practices, and stormwater management in general. Additional items located on the website are the current PCWP interlocal agreement, watershed management plan, implementation plan, and stormwater policies, all of which were adopted by the PCWP coordinated partners in 2014. A link is also included to the City of Omaha's stormwater web site, [www.omahastormwater.org](http://www.omahastormwater.org).

The City of Papillion has a link on its website to the PCWP website at <https://www.papillion.org/quicklinks.aspx?CID=95>.

The City of Omaha has developed and deployed a website, [www.omahastormwater.org](http://www.omahastormwater.org) dedicated to the City's Stormwater Management Program. From the website industries within the PCWP can access the necessary documents to apply for stormwater permits.

Residents can access information from the City of Omaha's website as to how they can improve water quality through actions they take at home. Children's activities are also available on the website. There is public information available on demonstration stormwater best management practices that have been implemented in areas of the city. Additionally, there is an online complaint or comment form available to the public. Attachment C provides the download statistics for the [omahastormwater.org](http://www.omahastormwater.org) website and Omaha Stormwater Facebook Page for 2018. The PCWP held six meetings in 2018, which are open to the public, and the minutes for those meetings are available on the PCWP website at [www.papiopartnership.org](http://www.papiopartnership.org).

Keep Omaha Beautiful, Inc. (KOB) organized 2018 Stream Clean ups. There was a total of 465 cleanup efforts throughout the year. 8,231 volunteers donated 18,321 hours collecting 4,227 bags of litter. In addition to the water courses, parks and trails were also targeted in the cleanup efforts.

KOB also coordinates storm drain marking throughout the Papillion Creek Watershed. KOB continues to utilize a GIS tracking system to better direct the volunteers to areas that do not have storm drains marked. The City of Omaha has approximately 110,000 storm drains, using the GIS system should make tracking those inlets which have been marked or need marking easier to manage. KOB coordinated volunteers throughout 2018 to mark and clean storm sewer inlets. In 2018, 2,465 inlets were marked by 727 volunteers.

The World O! Water Festival was held on September 8, 2018 from 12 PM until 4PM at Wehrspann Lake / Chalco Hills Recreation Area. There were over 50 organizations that participated by handing out information, conducting an activity or providing a demonstration. The approximate number of visitors attending World O! Water in 2018 was 1,600. Information available at the event included water stewardship, recycling, water quality, and water conservation. Activities included a watershed pollution demonstrative model, canoe rides, nature hikes, and science experiments and more.

Additional data is included in Attachment A – Summary of Outreach Activities.

**This permit requirement has been met.**

*B.3. Provide access to information about the City of Papillion SWMP. On-Going All Years – Maintain current SWMP and MS4 annual reports on the Papillion Creek Watershed Partnership Website.*

The current Stormwater Management Plan and the 2017 Annual Report can be found at [www.papiopartnership.org](http://www.papiopartnership.org). The 2018 report will be posted to the website in 2019.

**This permit requirement has been met.**

#### **C. Illicit Discharge Detection and Elimination**

*C.1.a. Maintain a compliance plan or mechanism to follow up on illicit discharges. On-Going All Years – Maintain the compliance procedures per the permit requirements.*

The City of Omaha's compliance plan is titled the Omaha Environmental Enforcement Manual and is included in Attachment D. This manual describes the City's enforcement goals, process and mechanisms, program priorities, enforcement mechanisms and civil penalty policy. No updates were made in 2018. The PCWP utilizes this plan to maintain compliance.

**This permit requirement has been met.**

*C.1.b. Maintain a map showing all known MS4 outfalls and the location of all state-designated waters receiving direct discharges from MS4 outfalls. On-Going All Years – Maintain a continually updated storm sewer system map per the permit requirements.*

Each community in the PCWP sends information to the Douglas or Sarpy County GIS departments where the outfall maps are maintained. The websites for Douglas and Sarpy Counties are <https://www.dogis.org> and <https://maps.sarpy.com/html5viewer/index.html?Viewer=SIMS> respectively.

**This permit requirement has been met.**

*C.1.c. Conduct field screening activities per the permit requirements specifically geared to local TMDL pollutants of concern such as E. Coli. Other parameters will be determined based on the results of a PCE, but could include nutrients, ammonia, BOD, and TPH. On-Going All Years – Annually conduct dry weather monitoring priority outfalls (those that are 72" or greater and/or those with documented illicit discharges within the previous 3 years).*

Dry weather discharges identified, as the outfalls are inspected will be investigated with respect to the source of the discharge. The Physical Characteristics Examination (PCE) will be completed as part of the inspection process and, if there is reason to believe that the discharge is allowable under the stormwater ordinance/regulation, the investigation will be terminated. If the PCE indicates that there may be an illicit connection, a more comprehensive investigation will be undertaken that may involve sampling the discharge, tracing the line upstream to identify potential sources, and questioning potential dischargers. If a potential source is identified, information will be provided regarding the impact to human health and the environment to resolve the problem.

**This permit requirement has been met.**

*C.1.d. Implement procedures to investigate and trace sources of identified illicit discharges to the MS4. On-Going All Years – Document investigations, including date observed, result of investigations, and date closed.*

No trace sources of identified illicit discharges were identified in Papillion in 2018.

*C.1.e. Implement the procedures to remove illicit discharges to the MS4. Document all interactions with potentially responsible parties. On-Going All Years – Use the code enforcement procedures to eliminate unauthorized non-stormwater discharges identified during an investigation.*

No illicit discharges were identified in Papillion in 2018.

**This permit requirement has been met.**

*C.1.f. Identify and address allowable non-stormwater discharges determined to be significant contributors to pollutants. Identify an additional non-stormwater discharges that will not be addressed as illicit discharges. On-Going All Years – Report on any local controls or conditions placed upon exempt non-stormwater discharges and additional identified exempted non-stormwater discharges.*

*C. 2 & 3. Coordinate with adjacent permitted MS4s to report illicit discharges to the appropriate authority having jurisdiction and respond to reports from other MS4s. Year 1 – Develop procedures for coordination with adjacent permitted MS4s. On-Going All Years – Include in the annual report any known illicit discharge reports to and from adjacent MS4s.*

The Omaha Stormwater Program operates a hotline, 402-444-3908, and a reporting form at [OmahaStormwater.org](http://OmahaStormwater.org) to receive complaints from the public regarding stormwater issues. These options for reporting complaints and illicit discharges are promoted through the Papillion Creek Watershed. Complaints received by the Omaha Stormwater Program located in adjacent MS4s are forwarded immediately to them for investigating. Complaints received by adjacent MS4s that are in the City of Omaha limits or its Extra Territorial Jurisdiction (ETJ), are immediately forwarded over. A Memorandum of Understanding has been developed to address illicit discharges that occur in extra-territorial jurisdiction areas or that impact more than one jurisdiction.

A summary of complaints forwarded to adjacent MS4s is included in the table below.

Date	Address	Complaint Type	Adjacent MS4
5/3/2018	4609 Sheridan Rd & 13501 S 47th St	Construction	City of Bellevue
1/17/2018	Hwy 275 near Battle Creek, NE	Dust	NDOT

**This permit requirement has been met.**

*C.4. Maintain written procedures for the IDDE component of the MS4 permit. On-Going All Years – Make available upon request the standard operating procedures developed under this program component.*

Upon request, the City of Papillion will provide a copy of the standard operating procedures developed under this program component.

**This permit requirement has been met.**

*C.5. Receive reports and complaints, internally and from the public, of illicit discharges and illegal dumping into the MS4. Respond to and investigate complaints about spills, dumping, or disposal of materials other than stormwater to the MS4. On-Going All Years – Coordinated with others to resolve complaints. Develop a system to generate reports and track the number of calls per year in regard to spills, dumping, or improper disposal of material to the MS4. Include a count of complaints received and investigation completed in the annual report.*

The City of Omaha continues to maintain a phone line, 402-444-3908, for handling stormwater calls. Clerks are available during regular business hours to handle calls for the City and the PCWP member entities. The clerks answering the hotline are required to complete a form when answering the calls so that all the required information is collected. The form is tied to a database that stores all calls received and provide a mechanism for tracking calls. A representative from the City of Omaha will use the information stored in the database to direct the call to the appropriate PCWP representative or their designee.

There were a total of zero (0) complaints received via the Papio Partnership website ([www.papiopartnership.org](http://www.papiopartnership.org)) or the hotline in 2018 for our jurisdiction. Public complaints on sediment and erosion control can be logged into the erosion website ([www.OmahaStormwater.org](http://www.OmahaStormwater.org)).

The City of Papillion did not receive complaints in 2018.

**This permit requirement has been met.**

*C.6. Develop, implement, and maintain a training program for municipal field staff with respect to IDDE. Year 1 – Develop a strategy which identifies field staff and appropriate levels of training. Years 2-5 – Provide a count of employees which have received training in the annual report.*

Development of a training strategy is ongoing and will be completed prior to June 28, 2019.

**This permit requirement has been met.**

#### **D. Construction Site Runoff Control**

*D.1. Maintain the established program requiring operators of public or private construction activities to comply with local erosion and sediment control requirements. On-Going All Years – Include any updates to code or permit requirements in the annual report.*

The City of Omaha's Environmental Quality Control Division continued to implement the Grading Permit Program for the PCWP in 2018. The Grading Permit Terms and Conditions

were updated early 2018 and were rolled out February 1, 2018 as part of the annual 2018 Sediment & Erosion Control Conference. The updates were made to stay consistent with the NDEQ's Construction Stormwater Permit NER160000 that was issued November 1, 2016. The Grading Permit Terms and Conditions are available at OmahaPermix.com and OmahaStormwater.org.

**This permit requirement has been met.**

*D.2. Maintain a compliance plan or mechanism to follow up on construction site non-compliance. On-Going All Years – Maintain the compliance procedures per the permit requirements.*

The City of Omaha's compliance plan is titled the Omaha Environmental Enforcement Manual and is included in Attachment D. This manual describes the City's enforcement goals, process and mechanisms, program priorities, enforcement mechanisms and civil penalty policy. No updates were made in 2018. The PCWP utilizes this plan to maintain compliance.

**This permit requirement has been met.**

*D.3. Review grading permit applications and maintain a continually updated inventory of all private and public construction sites. On-Going All Years – Include in the annual report the number and type of grading permits reviewed.*

In 2018, there were 50 Phase I grading permits and 104 Phase 2 grading permits issued in the PCWP communities. A breakdown of grading permits by community is shown in Attachment D.

The City of Papillion issued 26 grading permits in 2018.

**This permit requirement has been met.**

*D.4. Maintain the electronic records for inspection of construction sites and enforcement of erosion and sediment control measures. Year 1 – Develop a strategy for site inspections by municipal staff and include in the annual report. On-Going All Years – Inspect construction sites on a regular basis and on a complaint basis. Track the number of sites inspected annually in a database. Initiate enforcement proceedings as appropriate to address violations. Include a summary of inspections completed and enforcement actions taken in the annual report.*

The City of Omaha Stormwater Program is developing a strategy for site inspections by municipal staff and is on track to complete this in year 1 of the permit. EQCD administers the inspection program for Erosion Control, both within the City of Omaha's jurisdiction as well as the Papillion Creek Watershed Partnership's (PCWP) individual member's jurisdiction. The City's Grading Permit Program requires that the owners of active sites assign a Project Inspector to do inspections weekly and after 0.5 inches of rain. In the 2018 calendar year, reports were submitted to Permix by City Inspectors and Project Inspectors for construction sites as per the NPDES Stormwater Discharges from Construction Sites General Permit.

Violations processed in 2018 are referenced in Attachment D as well as a breakdown of permits and inspection reports by community. The table below summarizes PCWP construction inspections for 2018.

	City Inspection Reports	Private Inspection Reports
Phase I Sites (>5 acres)	1,303	8,393
Phase II Sites (<5 acres)	826	4,854
Total	2,129	13,247

**This permit requirement has been met.**

*D.5. Provide training for municipal staff with respect to their assigned duties as it relates to sediment and erosion control from construction activity. One formal training course for inspection staff during their employment with the City and internal training on an as needed basis to maintain consistent reporting among all inspectors. On-Going All Years – Include in the annual report the number of staff and their sediment and erosion control training completed.*

Through the PCWP Interlocal Agreement, the City of Omaha provides construction site inspection services for all grading permits. City of Omaha Environmental Inspectors who conduct inspections for sediment and erosion control must enroll and pass the Local Technical Assistance Program's (LTAP) Erosion and Sediment Control for Installers and Inspectors. The training is a full-day course and includes a test at the end that if passed, the inspector becomes certified. This certification is valid for 5 years. When the certification expires, inspectors enroll for an online course to renew their certification. There are 17 certified inspectors in the City of Omaha's Environmental Quality Control Division (EQCD). A summary of active City inspectors is provided in the table below.

First Name	Last Name	Certification ID#	Recertification Date
Christopher	Anderson	2101	10/4/2022
Casey	Black	848	2/5/2016*
Scott	Boose	1845	1/6/2021
Mark	Ermeling	1979	10/5/2021
Neil	Graybill	1333	1/3/2022
Eric	Grimshaw	1261	12/8/2020
James	Kee Jr.	170	8/26/2019
Carla	Long (Shurter)	1666	1/6/2020
David	Nusser	924	9/12/2021
Matthew	Nusser	1986	10/5/2021
Matthew	O'Connell	2038	2/16/2022
Therese	Pogge	172	9/15/2019
Jennifer	Proescholdt	1987	10/5/2021
Jeffrey	Ryba	1353	9/13/2021
Carol	Sorensen	171	8/12/2019

Andy	Szatko	1278	11/30/2020
Christina	Tisko	1476	9/14/2021

\*Recertified 1/23/19

In April of 2018, EQCD formally included sediment and erosion control training into the regular monthly safety toolbox meetings. Sediment and erosion control topics were discussed periodically at safety meetings prior but are now a formal part of the meeting. Combining these meetings have improved communications with staff and made more efficient use of their time. Sediment and erosion control topics that are covered include review of inspection processes, enforcements, and open discussion to discuss current issues among staff. A summary of 2018 sediment and erosion control training is provided in the table below.

Date	Title	Attendees
4/5/2018	Grading Permits and Complaints	4
8/28/2018	August Safety Toolbox, World O! Water, & EI Grading Permit Training	14
9/25/2018	September EI Training & Safety Toolbox	11
10/23/2018	October EI Training & Safety Toolbox	7
11/27/2018	November Safety Toolbox & EI Grading Permit Inspection Strategy Training	15
12/18/2018	December Safety Toolbox Meeting	8

#### **This permit requirement has been met.**

*D.6. Communicate with the regulated community and other groups affected by the Construction Site Runoff program and provide a mechanism to receive complaints from the public. On-Going All Years – Conduct workshops for developers, builders, site designers, contractors, and municipal staff as determined necessary. Track reports from the public regarding construction sites. Include the number of reports received in the annual report and the permittee's response.*

A Sediment and Erosion Control seminar was held on February 1, 2018 with 284 attendees. This annual seminar is intended to educate the regulated community. The seminar is hosted by the City of Omaha, PMRNRD, Douglas-Sarpy County Extension Office, NDEQ, NRCS, PCWP, and USACE. The seminar provided engineers, developers, and construction companies information on NPDES Phase II regulations, the PCWP's grading permit program and sediment and erosion control BMPs.

The City of Omaha also holds multiple outreach events with the regulated community, including the events listed in the table below. Outreach materials are handed out at these events and participants are encouraged to visit [OmahaStormwater.org](http://OmahaStormwater.org) for additional information and resources. Phone calls, emails, and many other types of communications happen as part of regular job duties where City staff provide information and resources to support sediment and erosion control efforts in the community.

Date	Event Name	# of Attendees	Location	Details/Comments
1/22/2018	Rain Garden Workshop	12	RL Hotel - Omaha	4-hour workshop on design, construction and maintenance of rain and bioretention gardens
2/1/2018	2018 Sediment and Erosion Control Seminar	284	Hilton Hotel Downtown Omaha	Annual seminar to construction industry
2/15/2018	Lamp Rynerson and Associates Lunch-n-Learn Presentation	45	LRA Office	Presented & answered questions about grading permits & post-construction
4/17/2018	NWEA Great Plains Conference	130	La Vista Conference Center	Presentation on GI case studies
5/8/18	Olsson Lunch-n-Learn Presentation	23	Olsson's Omaha Office	Presented & answered questions about grading permits & post-construction
7/16/2018	Ehrhart Griffin & Associates Lunch-and-Learn	17	EGA Office	Grading permit process & management; Permix use
8/1/2018	Terracon Lunch-and-Learn	18	Terracon Office	Presentation on grading permit processes
10/30/2018	Rain Garden Workshop	22	Douglas/Sarpy County Extension Office	4-hour workshop on design, construction and maintenance of rain and bioretention gardens

See BMP 4 in this section for information regarding construction site complaints in 2018.

**This permit requirement has been met.**

#### E. Post-Construction Runoff Control

*E.1. Continue to implement the Post Construction Program as stipulated in municipal code. Periodically update guidance material and develop divergent standards for difficult sites such as linear projects. Update as needed the Omaha Regional Stormwater Design Manual (ORSMD). Year 1 – Develop divergent standards for guidance document and update guidance as needed. Submit standards with the annual report. On-Going All Years – Revise as necessary. Include a summary of revisions in the annual report.*

The PCWP reviewed the Post-Construction guidance manual. The manual is adequate for all anticipated projects. No divergent standards were developed. No changes were made to the manual in 2018.

**This permit requirement has been met.**

*E.2. Review and update, if needed, the standards outlined in the municipal code and ORSDM for consistency with required performance standards as they relate to post-construction stormwater management plans. On-Going All Years – Report on any updates to the municipal code or ORSDM.*

No updates were made to municipal code or ORSDM in 2018.

**This permit requirement has been met.**

*E.3. Maintain an online submittal and review process for site plans, easement and maintenance agreements, as built drawings, deed recordings, and drainage studies. On-Going All Years – Report number of PCSMP projects and the status of their progress in the annual report.*

The Permix software is used for post construction stormwater plan submittals and review. Documents that are included in the PCSMP include a drainage study, proposed plan sheets, applicant certification, maintenance agreement, as-built drawings, BMP certification statement, certification cover sheet, and a certificate of occupancy letter (as-needed). Upon physical completion of the post-construction BMP(s), the PCSMP is recorded with the property deed to ensure long term compliance.

See Attachment E for a summary of PCSMP projects and their status.

**This permit requirement has been met.**

*E.4. Develop SOPs for responding to complaints regarding Post Construction BMPs and a strategy for verifying BMPs are being installed & maintained in perpetuity. Year 1 – Submit SOPs with the annual report. On-Going All Years – Report on any complaints and/or BMPs which have been certified as complete.*

The PCWP is developing a Standard Operating Procedure to respond to complaints about Post-Construction Stormwater BMPs. This SOP will be finalized prior to June 28, 2019. A summary of BMPs that have been certified as complete is included in Attachment F.

**This permit requirement has been met.**

*E.5. Maintain a database that stores information on approved PCSMPs. On-Going All Years – Provide an inventory of certified stormwater control measures installed as part of the PCSMP requirements. Include a count of BMP types as well as any known changes to BMPs in the annual report.*

The Permix software used for post-construction stormwater plan submittal creates a database of BMPs installed as part of the PCSMP requirements. A summary of BMPs installed in 2018 is included in Attachment F.

**This permit requirement has been met.**

*E.6. Inspect sites that are certified by the engineer of record and all sites identified as deficient on a complaint basis. Develop a protocol to bring sites in to compliance. Year 1 – Develop protocol for compliance assistance and inspection strategy. On-Going All*

*Years – Document and maintain inspection records of the certified PCSMP projects as identified in the strategy developed. Document any enforcement actions taken. Summarize activities in annual report.*

A protocol for inspection of BMPs that are certified by the engineer of record and compliance assistance is being developed and will be finalized prior to June 28, 2019.

**This permit requirement has been met.**

## **F. Pollution Prevention/Good Housekeeping for Municipal Operations**

*F.1. Maintain an inventory and map of municipal facilities. Review annually and update if needed. On-Going All Years – Maintain an inventory and map of all municipal facilities.*

The City of Papillion will be updating the inventory and map of municipal facilities prior to June 28, 2019.

**This permit requirement has been met.**

*F.2. Conduct assessments of municipal maintenance facilities and review their municipal; runoff control plans as applicable. Revise plans as needed if facilities expand or reduce activities and implement recommendations based on annual inspections. Year 1 – Develop a strategy to assess municipal facilities and prioritize them based upon a defined set of criteria, include strategy in the annual report. Years 2-5 – Track the number of assessments for municipal facilities based upon the strategy developed in year 1. Include the number of assessments completed, a description of the assessment procedure and any changes in facilities ranking in the annual report.*

The City of Papillion is developing a strategy to assess municipal facilities. The strategy will be completed prior to June 28, 2019.

**This permit requirement has been met.**

*F.3. Continue to implement Good Housekeeping Program for municipal facilities that addresses “high priority” facilities and site-specific SOPs. On-Going All Years – Annually report new, removed, or significantly updated municipal facilities.*

The City of Papillion is developing a strategy to assess municipal facilities. The strategy will be completed prior to June 28, 2019.

**This permit requirement has been met.**

*F.4. Implement practices for maintaining the storm sewer system that includes catch basin maintenance, open channels and other drainage structures, street sweeping, and structural stormwater controls. All maintenance procedures are to be performed such that waste water and waste materials do no enter the MS4. Year 1 – Provide a description of the maintenance programs in the annual report. On-Going All Years – Annually report on Sewer Maintenance activities related to maintain the storm sewer system and changes to any of the maintenance practices.*

City of Papillion staff swept 940 lane miles in 2018.

**This permit requirement has been met.**

*F.5. Provide training for municipal employees in pollution prevention and good housekeeping. Year 1 – Develop a strategy for municipal employee training in pollution prevention and good housekeeping, include strategy in annual report. On-Going All Years – Conduct training events for municipal staff. Include number of employees trained, based on strategy developed in year 1, in annual report.*

The City of Papillion is developing a training strategy. The strategy will be completed prior to June 28, 2019.

**This permit requirement has been met.**

*F.6. Provide educational material to contractors hire to perform maintenance activities on the MS4. Year 1 – Develop materials to provide to contractors and include in the annual report. Years 2-5 – Include in the annual report any new materials or updates to existing materials.*

Evaluation documents for Facility Runoff Control Plans (FRCP) have been developed and templates shared with the members of the PCWP. These templates include a photo checklist, site questionnaire, facility profile sheet, hot spot checklist, photo log and a facility recommended BMP checklist. FRCPs are developed for each facility in the PCWP communities.

**This permit requirement has been met.**

## 5. Fiscal Expenditures

	2017 Expenditures	2018 Expenditures	2019 Planned
<b>Administration</b>			
Partnership Meetings/Coordination			
PCWP	7,000	7,000	23,250
SSWP	19,000	16,000	26,000
<b>Public Education/Outreach</b>			
Upstream	11,108	-	-
Civic Nebraska	-	5,000	5,000
<b>Operation &amp; Maintenance</b>			
Sediment/Erosion Control Program			
Beehive	4,000	4,000	-
Elements XS	-	-	8,000
Material Disposal (Cleanup Days)			

Papillion Sanitation	13,560	15,712	16,000
Sarpy County Landfill	5,548	13,595	14,000
River City Recycling	8,000	10,000	10,000
Creek/Open Channel Maintenance			
Glenwood Hills	3,600	500	500
Lowes Ponds	200	200	200
Halleck RCB	200	200	200
Street Sweeping			
Labor	4,290	5,170	5,000
Maintenance/Fuel (RTA)	7,266	8,756	5,000
Unimproved Street Maintenance			
Husker Chem Sales/Dust Control	6,640	-	-
Bridge Maintenance & Rehab			
Speece Lewis	20,425	6,375	10,000
Sewer Maintenance			
Jochim	21,166	21,630	22,000
Neenah Foundry	1,645	-	2,000
Total Expenditures	\$ 133,648	\$ 114,138	\$ 147,150

## 6. Changes in MS4 Area

There were no changes in the City of Papillion's MS4 Area.

### List of Attachments

Attachment A. Distribution of Brochures and Event Summary for Public Education and Outreach

Attachment B. Inventory of Outreach Materials

Attachment C. OmahaStormwater.org download statistics

Attachment D. Omaha Environmental Enforcement Manual

Attachment E. Grading Permit Summary Report, Grading Inspection Reports, and Violations processed in 2018.

Attachment F. PCSMP Summary Report and List of Certified BMPs.

## Attachment A

## Omaha Stormwater Events

Date	Event Name	Activity Type	# of Attendees	# of Separate Presentations	Location:	Target Audience
1/22/2018	Rain Garden Workshop	Workshop	12	1	RL Hotel	Construction
1/25/2018	Kennedy STEAM Night	Education Booth	125		Kennedy Elementary	Residential
2/1/2018	Sediment and Erosion Control Seminar	Workshop	284	5	Hilton Hotel Downtown Omaha	Construction
2/7/2018	Fontenelle Elementary - GI Toolkit for Schools roll out	Meeting	1		Fontenelle Elementary	Residential
2/7/2018	UNO GI Class - Permeable Pavement	Presentation/Demonstration	25			Community
2/8/2018	2018 Omaha Home Show & Garden Expo	Education Booth	1100		CenturyLink Center	Community
2/15/2018	LRA Lunch-n-Learn Presentation	Presentation/Demonstration	45	1	LRA Office	Commercial
3/8/2018	MORE Nature Night - Rockbrook Elementary	Education Booth	50		Rockbrook Elementary	Community
3/16/2018	Recycle Relay	Education Booth	10	2	Washington Library	Community
4/3/2018	Wheeler Elementary - Stormwater & GI	Presentation/Demonstration	50	1	Wheeler Elementary	Community
4/5/2018	UNO/UNMC Sustainability Expo	Education Booth	50		UNO/CEC	Community
4/10/2018	MORE Nature Night - Adams Elementary	Education Booth	75	1	Adams Elementary	Community
4/11/2018	UNO GI Class - Maintenance & Management	Presentation/Demonstration	25	1	University of Nebraska - Omaha	Community
4/17/2018	MORE Nature Night - Wheeler Elementary	Education Booth	80	1	Wheeler Elementary	Community
4/17/2018	NWEA Great Plains Conference	Conference Presentation	130	1	La Vista Conference Center	Commercial
4/21/2018	UNO GI Tour	Tour	25	1	University of Nebraska - Omaha	Community
4/21/2018	Earth Day	Education Booth	5000		Elmwood Park	Community
5/3/2018	MORE Nature Night - Sunset Hills Elementary	Education Booth	100		Sunset Hills Elementary	Community
5/11/2018	Spring into Summer	Education Booth	250		Benson Park	Community
5/14/2018	ODPA - Leashes at Lauritzen	Education Booth			Lauritzen Gardens	Community
5/15/2018	Omaha Rocks	Education Booth	50		Elmwood Park	Community
5/15/2018	Indian Hill Career Fair	Presentation/Demonstration	120	6	Indian Hill Elementary	Community
5/17/2018	KOB - Chris Stratman	Distribution				Residential

Date	Event Name	Activity Type	# of Attendees	# of Separate Presentations	Location:	Target Audience
5/17/2018	NE Water Leaders Acadamy	Tour	40	1	Spring Lake Park	Community
6/2/2018	SAFE Fest 2018	Education Booth	500	1	The Salvation Army Omaha Kroc Center	Community
6/7/2018	Indian Hill Summer School Class	Presentation/Demonstration	30	1	Indian Hill Elementary	Community
6/12/2018	Indian Hill Summer School Class	Presentation/Demonstration	30	1	Indian Hill Elementary	Community
6/19/2018	Indian Hill Summer School Class	Presentation/Demonstration	30	1	Indian Hill Elementary	Community
6/26/2018	Indian Hill Summer School Class	Presentation/Demonstration	30	1	Indian Hill Elementary	Community
7/12/2018	Aim for the Stars Summer Camp	Presentation/Demonstration	18	1	University of Nebraska at Omaha	Community
7/13/2018	American Solar Challenge	Presentation/Demonstration	200	1	Lewis and Clark Landing	Community
7/16/2018	Ehrhard Griffin & Associates Lunch-and-Learn	Presentation/Demonstration	17	1	EGA Office	Construction
9/8/2018	World O! Water	Presentation/Demonstration	1600	3	Chalco Hills/Wehrspan	Community
9/11/2018	Goldenrod Festival	Education Booth	325	1	Lauritzen Gardens	Community
9/30/2018	Walk for the Animals	Distribution	400	1	NHS	Community
10/1/2018	City of Omaha Environmental Quality Control	Distribution	8	1	City of Omaha MO River RRF	Construction
10/3/2018	UNO ENVN 2010 class presentation	Presentation/Demonstration	15	1	University of Nebraska at Omaha	Community
10/9/2018	Kennedy Project Based Learning Tour/Presentation	Presentation/Demonstration	32	1	Kennedy Elementary	Community
10/23/2018	Kennedy Project Based Learning Open House	Presentation/Demonstration	32	1	Kennedy Elementary	Community
10/23/2018	City of Omaha Public Works Design Division	Distribution	2	1	City of Omaha Downtown Offices	Construction
8/1/2018	Terracon Lunch-and-Learn	Presentation/Demonstration	18	1	Terracon Office	Construction

Date	Event Name	Activity Type	# of Attendees	# of Separate Presentations	Location:	Target Audience
10/30/2018	Christina took for supply	Distribution				Commercial
10/30/2018	Rain Garden Workshop	Workshop	22	1	Douglas/Sarpy County Extension Office	Commercial
11/1/2018	Environmental Inspectors	Distribution			MRWWTP	Construction
12/7/2018	Olsson	Distribution			Olsson's Omaha office	Commercial
12/28/2018	City of Omaha Sewer Maintenance	Distribution			Sewer Maintenance 69th & Q	Construction
<b>Totals</b>			<b>10956</b>	<b>36</b>		
<b>People reached</b>	10,956					
<b>Materials distributed</b>	4,112					

Keep Omaha Beautiful Advertisements & Public Service Announcements

Date	Type	Source	Impressions (digital posts)	Engagement (digital posts)	Calculated Publicity Value if known (free media coverage)	Total # of Spots / Ads / Media Events	Relevant Details/Comments (if applicable)
1/15/2018	Social Media	Facebook	813	52		1	Storm drain labeling & litter cleanup programs
1/24/2018	Social Media	Facebook	275	19		1	Only Rain Down the Drain
2/2/2018	Other	KOB E-News	2,825	116		1	Stormwater pollution & litter prevention
3/1/2018	Other	Girl Scouts Flier	500			1	Litter cleanup/storm drain labeling
4/2/2018	Other	KOB E-News	2,793	175		1	OSC & storm drain marking volunteer opportunities
4/6/2018	Social Media	Facebook	1,929	69		1	Earth Day volunteer cleanup opportunities & storm
4/7/2018	Social Media	Instagram	425	54		1	Earth Day volunteer cleanup opportunities & storm
4/9/2018	Social Media	Facebook	346	23		1	DEA Drug Take Back
4/9/2018	Social Media	Facebook	346	23		1	DEA Drug Take Back
4/11/2018	Social Media	Facebook	2,741	93		1	Earth Day volunteer cleanup opportunities & storm
4/22/2018	TV	WOWT			\$ 689	1	Omaha Spring Cleanup (& extended UTS hours)
4/25/2018	Social Media	Facebook	301	17		1	DEA Drug Take Back
4/29/2018	TV	KMTV			\$ 28	1	Plogging & trail/creek litter
5/9/2018	Social Media	Facebook	662	187		1	Sustainable Spaces rain garden/stormwater
5/9/2018	Social Media	Instagram	425	85		1	Sustainable Spaces rain garden/stormwater
5/27/2018	Social Media	Facebook	457	19		1	UTS
5/27/2018	Social Media	Instagram	479	47		1	UTS
6/4/2018	Social Media	Facebook	617	0		1	Fireworks Cleanup & proper fireworks disposal
6/5/2018	Other	KOB E-News	3,119	430		1	Stream cleanup, glass recycling, PlaNET Saver
6/13/2018	Social Media	Instagram	473	51		1	Sustainable Spaces rain garden/stormwater
6/26/2018	Social Media	Facebook	1,279	19		1	Fireworks cleanups & appropriate disposal
6/26/2018	Social Media	Instagram	444	31		1	Fireworks cleanups & appropriate disposal
7/2/2018	Other	KOB E-News	3,111	126		1	Fireworks disposal, fireworks cleanup, UTS
7/4/2018	Social Media	Facebook	220	7		1	Fireworks cleanups & appropriate disposal
7/4/2018	Social Media	Facebook	676	41		1	Fireworks cleanups & appropriate disposal
7/5/2018	TV	KPTM			\$ 830	1	Fireworks cleanups & appropriate disposal
7/6/2018	Social Media	Facebook	605	23		1	Fireworks cleanups & appropriate disposal
7/6/2018	TV	KPTM			\$ 157	1	Fireworks cleanups & appropriate disposal
7/7/2018	TV	KMTV			\$ 906	2	Fireworks cleanups & appropriate disposal
7/8/2018	Web	KMTV				1	Fireworks cleanups & appropriate disposal
7/16/2018	Social Media	Facebook	4,977	356		1	Recycling & Reuse Guide (including HHW alternativ
7/24/2018	Social Media	Facebook	6,471	310		1	WOW
7/24/2018	Social Media	Instagram	411	30		1	Waterway cleanup
7/26/2018	Social Media	Facebook	947	108		1	Waterway cleanup
7/26/2018	Social Media	Instagram	412	30		1	Waterway cleanup
7/27/2018	Social Media	Instagram	551	44		1	Waterway cleanup
8/1/2018	Other	Girl Scouts E-News	1,475			1	Youth Fall Cleanup/WOW
8/6/2018	Social Media	Facebook	2,759	55		1	WOW
8/7/2018	Other	KOB E-News	3,203	181		1	WOW, volunteer opportunities
8/13/2018	Social Media	Facebook	4,249	208		1	Recycling and stormwater coordinator job posts
8/13/2018	Social Media	Instagram	476	60		1	Recycling and stormwater coordinator job posts
8/14/2018	Social Media	Facebook	588	10		1	Only Rain Down the Drain
8/18/2018	Social Media	Facebook	818	33		1	Stream cleanup
8/18/2018	Social Media	Instagram	377	19		1	Stream cleanup
9/1/2018	Other	Girl Scouts E-News	1,475			1	Youth Fall Cleanup/WOW
9/4/2018	Social Media	Facebook	1,622	26		1	WOW
9/5/2018	Social Media	Instagram	415	21		1	WOW
9/7/2018	TV	KETV			\$ 150	1	WOW
9/8/2018	Social Media	Instagram	392	29		1	WOW
9/8/2018	TV	KETV			\$ 1,887	3	WOW
9/8/2018	TV	WOWT			\$ 3,957	2	WOW
9/8/2018	TV	WOWT			\$ 3,647	2	WOW
9/20/2018	Social Media	Facebook	921	91		1	UTS
9/20/2018	Social Media	Instagram	347	23		1	UTS
9/24/2018	TV	KMTV			\$ 1,212	3	Sustainable Spaces rain garden/stormwater
10/1/2018	Other	Girl Scouts E-News	1,475			1	Litter cleanup/storm drain labeling
10/1/2018	Other	Girl Scouts Flier	500			1	Litter cleanup/storm drain labeling
10/4/2018	Social Media	Facebook	3,399	255		1	UTS
10/10/2018	Other	KOB E-News	3,358	99		1	Tire recycling, stormwater, Leave it on the Lawn
10/22/2018	Social Media	Facebook	1,777	63		1	DEA Drug Take Back
10/30/2018	Social Media	Facebook	1,665	109		1	Sustainable Spaces rain garden/stormwater
10/31/2018	Social Media	Facebook	2,584	98		1	Alternatives to HHW

Date	Type	Source	Impressions (digital posts)	Engagement (digital posts)	Calculated Publicity Value if known (free media coverage)	Total # of Spots / Ads / Media Events	Relevant Details/Comments (if applicable)
11/9/2018	Social Media	Facebook	4,657	24		1	HHW alternatives
12/5/2018	Other	KOB E-News	3,633	241		1	UTS Video
12/5/2018	Social Media	Facebook	11,737	335		1	UTS Video

## Keep Omaha Beautiful Outreach Events

Date	Activity Type	Event Name (if applicable)	Location:	MS4 Target Audience Category	# of Separate Presentations	# of Youth Participants	# of Adult Participants
1/8/2018	Presentation/Demonstration	School Presentation (private)	Boystown (178 Sudyka Dr, 68010)	Community	1	16	4
1/16/2018	Presentation/Demonstration	School Presentation (college)	UNO (6001 Dodge St, 68182)	Community	2	0	36
1/18/2018	Presentation/Demonstration	School Presentation (OPS)	Nathan Hale (6143 Whitmore St, 68152)	Community	1	24	1
1/19/2018	Presentation/Demonstration	School Presentation (OPS)	Nathan Hale (6143 Whitmore St, 68152)	Community	1	22	1
1/26/2018	Meeting Announcement	North Omaha Neighborhood Alliance Meeting	Better Together Campus (3223 N 45th St)	Residential	1	0	32
2/1/2018	Meeting Announcement	South Omaha Neighborhood Alliance Meeting	Kroc Center (2825 Y St, Omaha, NE 68107)	Residential	1	1	34
2/2/2018	Education Booth	Global Health Community Fair	Creighton University (Harper Center, North 20th Street)	Community	1	0	16
2/6/2018	Presentation/Demonstration	School Presentation (private)	Boystown (178 Sudyka Dr, 68010)	Community	1	15	3
2/9/2018	Education Booth	Omaha Home and Garden Show	Centurylink Center (455 N 10th St, 68102)	Community	1	73	100
2/12/2018	Presentation/Demonstration	School Presentation (Catholic)	St. Wenceslaus School (15353 Pacific St, 68154)	Community	1	18	2
2/20/2018	Presentation/Demonstration	Omaha Green Coalition Pecha Kucha	The Slowdown (729 N 14th St, 68102)	Community	1	10	65
2/27/2018	Presentation/Demonstration	Omaha Spring Cleanup Kickoff meeting	Mammel Hall (6708 Pine St, 68106)	Residential	1	3	97
3/2/2018	Presentation/Demonstration	School Presentation (Millard)	Wheeler Elementary (6707 S 178th St, 68135)	Community	4	97	4
3/5/2018	Presentation/Demonstration	School Presentation (private)	Boystown (178 Sudyka Dr, 68010)	Community	1	17	4
3/6/2018	Presentation/Demonstration	Daughters of the American Revolution Chapter Meeting	Hillcrest Grand Lodge (6021 Grand Lodge Ave, 68133)	Community	1	0	39
3/12/2018	Presentation/Demonstration	Girl Scout Meeting	Willowdale Elementary (16901 P St, 68135)	Community	1	14	3
3/19/2018	Presentation/Demonstration	After School Club Presentation (OPS)	South High School (4519 S 24th St, 68107)	Community	1	16	2
3/20/2018	Presentation/Demonstration	After School Club Presentation (OPS)	South High School (4519 S 24th St, 68107)	Community	1	14	3
3/20/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lothrop Elementary (3300 N 22nd St, 68110)	Community	1	19	3
3/22/2018	Presentation/Demonstration	UNO Signature Days of Service	Christie Heights Park (5105 S 37th St)	Community	1	18	4
3/26/2018	Presentation/Demonstration	After School Club Presentation (OPS)	South High School (4519 S 24th St, 68107)	Community	1	15	3
3/28/2018	Presentation/Demonstration	After School Club Presentation (OPS)	South High School (4519 S 24th St, 68107)	Community	1	24	5
3/28/2018	Presentation/Demonstration	School Presentation (OPS)	Northwest High School (8204 Crown Point Ave)	Community	3	80	3
3/29/2018	Presentation/Demonstration	School Presentation (OPS)	Fontenelle Elementary (3905 N 52nd St, 68104)	Community	1	24	1
3/29/2018	Presentation/Demonstration	School Presentation (college)	Metro Community College (5300 North 30th St, 68111)	Community	1	0	17
3/30/2018	Presentation/Demonstration	School Presentation (Westside)	Westgate Elementary (7802 Hascall St)	Community	1	14	1
4/2/2018	Presentation/Demonstration	School Presentation (college)	Metro Community College (5300 North 30th St, 68111)	Community	1	0	14
4/3/2018	Presentation/Demonstration	Bemis Park Neighborhood Association	Augustana Lutheran Church (3647 Lafayette Ave)	Residential	1	0	24
4/4/2018	Presentation/Demonstration	School Presentation (Catholic)	St. Margaret Mary's School (123 N 61st St, 68132)	Community	2	63	1
4/5/2018	Education Booth	UNO/UNMC & Community Sustainability Fair	UNO (6400 South, University Drive Road North, 68182)	Community	1	0	33
4/5/2018	Presentation/Demonstration	School Presentation (OPS)	Fontenelle Elementary (3905 N 52nd St, 68104)	Community	1	24	6
4/9/2018	Presentation/Demonstration	School Presentation (private)	Boystown (178 Sudyka Dr, 68010)	Community	1	15	4
4/9/2018	Presentation/Demonstration	School Presentation (private)	Uta Halee (10625 Calhoun Rd, 68112)	Community	1	6	2
4/10/2018	Presentation/Demonstration	School Presentation (private)	Gethsemani Lutheran School (4040 N 108th St, 68164)	Community	1	24	1
4/10/2018	Presentation/Demonstration	School Presentation (OPS)	Fontenelle Elementary (3905 N 52nd St, 68104)	Community	1	24	3
4/11/2018	Presentation/Demonstration	School Presentation (OPS)	Pinewood Elementary (6717 N 63rd St, 68152)	Community	1	31	6
4/12/2018	Presentation/Demonstration	Growing Up Wild class	TAC building (3215 Cuming St, 68131)	Community	1	0	28
4/13/2018	Presentation/Demonstration	School Presentation (westside)	Westgate Elementary (7802 Hascall St)	Community	1	14	1
4/13/2018	Presentation/Demonstration	School Presentation (private)	House of Montessori (400 N 39th St)	Community	2	30	3
4/15/2018	Presentation/Demonstration	Pranam Seva	Pranam Yoga Shala (148 S 39th St)	Community	1	0	23
4/16/2018	Presentation/Demonstration	School Presentation (OPS)	Miller Park Elementary (5625 N 28th Ave, 68111)	Community	1	15	4
4/18/2018	Flier/Brochure Distribution	Distributing Materials	Archdiocese of Omaha (100 N. 62nd St., 68132)	Community	0	0	0
4/19/2018	Education Booth	NE Scifest (weekend / community)	SAC Museum (28210 W Park Hwy, Ashland, NE 68003)	Community	1	590	36
4/19/2018	Presentation/Demonstration	School Presentation (OPS)	Indian Hill Elementary (3121 U St, 68107)	Community	1	22	2
4/20/2018	Presentation/Demonstration	School Presentation (Westside)	Westgate Elementary (7802 Hascall St)	Community	1	14	1
4/21/2018	Education Booth	Earth Day Omaha	Elmwood Park (802 S 60th St)	Community	1	350	200
4/23/2018	Presentation/Demonstration	School Presentation (OPS)	Castelar Elementary (2316 S 18th St, 68108)	Community	5	117	10
4/24/2018	Presentation/Demonstration	School Presentation (OPS)	Fontenelle Elementary (3905 N 52nd St, 68104)	Community	1	24	1
4/26/2018	Education Booth	Treemendous Trees	Lauritzen Gardens (100 Bancroft St, 68108)	Community	1	600	75
4/27/2018	Education Booth	NE Scifest - Day 1 (school day / students)	Durham Museum (801 S 10th St, 68108)	Community	1	400	33
4/28/2018	Education Booth	NE Scifest - Day 2 (school day / students)	Durham Museum (801 S 10th St, 68108)	Community	1	122	100
5/1/2018	Presentation/Demonstration	School Presentation (Millard)	Morton Elementary (1805 S 160th St, 68130)	Community	1	18	2
5/4/2018	Presentation/Demonstration	School Presentation (Westside)	Westgate Elementary (7802 Hascall St)	Community	1	11	1
5/7/2018	Presentation/Demonstration	School Presentation (private)	Boystown (178 Sudyka Dr, 68010)	Community	1	19	4

Date	Activity Type	Event Name (if applicable)	Location:	MS4 Target Audience Category	# of Separate Presentations	# of Youth Participants	# of Adult Participants
5/8/2018	Presentation/Demonstration	School Presentation (OPS)	3101 Florence Blvd, 68110	Community	2	42	4
5/9/2018	Presentation/Demonstration	Hartman Neighborhood Association Meeting	Mount View Presbyterian Church (5308 Hartman Ave)	Residential	1	0	23
5/10/2018	Presentation/Demonstration	School Presentation (OPS)	Gateway Elementary (5610 S 42nd St, 68107)	Community	4	113	10
5/11/2018	Presentation/Demonstration	School Presentation (Westside)	Westgate Elementary (7802 Hascall St)	Community	1	8	0
5/11/2018	Education Booth	Spring Into Summer	Benson Park (Omaha NE 68104)	Community	1	45	20
5/15/2018	Presentation/Demonstration	Girl Scouts After School Program	Monroe Middle School (5105 Bedford Ave, Omaha, NE 68104)	Community	1	14	1
5/16/2018	Presentation/Demonstration	Presentation/Trash Walk	Liberty Elementary (2021 St Marys Ave, Omaha, NE 68102)	Community	2	24	4
5/16/2018	Presentation/Demonstration	School Presentation (college)	Educational Opportunity Center - Creighton (2002 Burt St, 68102)	Community	1	0	29
5/25/2018	Presentation/Demonstration	Big Brothers Big Sisters End of Year Celebration	BBBS (10831 Old Mill Rd, Omaha, NE 68154)	Community	1	28	32
6/8/2018	Presentation/Demonstration	Boystown Summer Enrichment	Boystown (13727 Flanagan Blvd, 68010)	Community	1	21	6
6/11/2018	Presentation/Demonstration	UNO MavKids Camp	UNO (6001 Dodge St, 68182)	Community	3	70	13
6/11/2018	Presentation/Demonstration	Boystown Summer Enrichment	Boystown (13727 Flanagan Blvd, 68010)	Community	1	8	6
6/12/2018	Presentation/Demonstration	YMCA Youth Corps	YMCA (3010 R St, 68107)	Community	1	5	2
6/14/2018	Presentation/Demonstration	Ripple Glass Summit	Faultless Event Space (1009 W 8th St, Kansas City, MO 64101)	Government/Public	1	2	80
6/17/2018	Presentation/Demonstration	Yoga Rocks the Park	Turner Park (3110 Turner Park, Omaha, NE 68131)	Community	1	5	15
6/18/2018	Presentation/Demonstration	Boystown Summer Enrichment	Boystown (13727 Flanagan Blvd, 68010)	Community	1	9	6
6/21/2018	Presentation/Demonstration	YMCA	YMCA (430 S. 20th St., 68183)	Community	3	65	6
6/25/2018	Presentation/Demonstration	Benson Neighborhood Association	Benson Baptist Church (6319 Maple St, 68104)	Community	1	2	16
6/25/2018	Presentation/Demonstration	Metro Community College	Metro Community College (5300 North 30th St, 68111)	Community	1	0	26
6/26/2018	Presentation/Demonstration	School Presentation (Millard)	Cather Elementary (3030 S 139th St, 68114)	Community	3	80	6
6/27/2018	Presentation/Demonstration	School Presentation (Millard)	Cather Elementary (3030 S 139th St, 68114)	Community	3	80	6
6/27/2018	Presentation/Demonstration	School Presentation (OPS)	Belle Ryan Elementary (1807 S. 60 St, 68106)	Community	3	50	6
6/28/2018	Presentation/Demonstration	School Presentation (OPS)	Belle Ryan Elementary (1807 S. 60 St, 68106)	Community	3	50	6
6/29/2018	Presentation/Demonstration	Boystown Summer Enrichment	Boystown (13727 Flanagan Blvd, 68010)	Community	1	18	7
7/2/2018	Presentation/Demonstration	Boystown Summer Enrichment	Boystown (13727 Flanagan Blvd, 68010)	Community	1	17	6
7/10/2018	Education Booth	UNO Service Learning Academy	UNO (6400 South, University Drive Road North, 68182)	Community	1	0	28
7/13/2018	Presentation/Demonstration	Boystown Summer Enrichment	Boystown (13727 Flanagan Blvd, 68010)	Community	1	18	7
7/16/2018	Presentation/Demonstration	Boystown Summer Enrichment	Boystown (13727 Flanagan Blvd, 68010)	Community	1	18	6
7/20/2018	Presentation/Demonstration	Kids Can	Miller Park (2707 Redick Ave, 68112)	Community	3	64	8
7/23/2018	Presentation/Demonstration	Boystown Summer Enrichment	Boystown (13727 Flanagan Blvd, 68010)	Community	1	22	8
8/1/2018	Education Booth	Werner Park Baseball Game	Werner Park (12356 Ballpark Way, Papillion, NE 68046)	Community	1	70	37
8/2/2018	Education Booth	Boy Scouts Roundtable	Faith Westwood United Methodist (4814 Oaks Ln, Omaha, NE 68137)	Community	1	0	23
8/15/2018	Presentation/Demonstration	Creighton Welcome Week Orientation	Creighton Harper Center (68178, 602 North 20th Street, Omaha, NE 68132)	Community	1	0	208
8/23/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	13	0
8/24/2018	Education Booth	Millard North Service Outreach Day	Millard North High School (1010 S 144th St, Omaha, NE 68154)	Community	1	450	10
8/25/2018	Presentation/Demonstration	Creighton Welcome Week service day	Sustainable Spaces (3101 Florence Blvd,	Community	2	0	68
8/29/2018	Education Booth	UNO Volunteer Fair	UNO (6400 South, University Drive Road North, 68182)	Community	1	0	76
8/30/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	13	0
9/1/2018	Presentation/Demonstration	Eagle Scout Project Kick off	Lynch Park (23rd and Martha, 68108)	Community	1	14	8
9/6/2018	Meeting Announcement	Boys Scouts Roundtable	Maplewood United Methodist Church (3535 Maplewood Blvd, Omaha)	Community	1	12	55
9/6/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	13	0
9/8/2018	Education Booth	World O! Water (Education tables)	Chalco Hills (8901 S 154th St, Omaha, NE 68138)	Community	1	267	133
9/8/2018	Education Booth	World O! Water (KOB info tables)	Chalco Hills (8901 S 154th St, Omaha, NE 68138)	Community	1	33	101
9/10/2018	Presentation/Demonstration	Boy Scout Pack 866	Swanson Elementary School (8601 Harvey St, Omaha, NE 68114)	Community	1	35	18
9/11/2018	Education Booth	Goldenrod Festival	Lauritzen Gardens (100 Bancroft St, 68108)	Community	1	512	25
9/13/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	13	1
9/20/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	13	1
9/25/2018	Presentation/Demonstration	School Presentation (OPS)	Sherman Elementary (5618 N 14th Ave, Omaha, NE 68110)	Community	1	25	2
9/27/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	8	1
9/28/2018	Presentation/Demonstration	Creighton Law School Day of Service	Creighton Law School (2133 Cass St., Omaha, NE 68183)	Community	1	0	64
10/2/2018	Presentation/Demonstration	School Presentation (OPS)	Chandler View Elementary (7800 S 25th St, Bellevue, NE 68147)	Community	1	17	3
10/4/2018	Education Booth	Fiest of St. Francis	Creighton University (North 20th Street)	Community	1	0	7
10/4/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	12	0
10/5/2018	Education Booth	Teacher Night	Durham Museum (801 S 10th St, 68108)	Community	1	4	296

Date	Activity Type	Event Name (if applicable)	Location:	MS4 Target Audience Category	# of Separate Presentations	# of Youth Participants	# of Adult Participants
10/5/2018	Presentation/Demonstration	School Presentation (OPS)	Mount View Elementary (5322 N 52nd St, Omaha, NE 68104)	Community	1	38	5
10/6/2018	Education Booth	Lights On for Youth	UNO Sapp Fieldhouse (6001 Dodge St, Omaha, NE 68182)	Community	1	300	48
10/8/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Howard Kennedy Elementary (2906 N 30th St, Omaha, NE 68111)	Community	1	12	2
10/9/2018	Presentation/Demonstration	School Presentation (private)	Legacy School (6860 N 166th Ave, Omaha, NE 68116)	Community	1	11	3
10/9/2018	Presentation/Demonstration	School Presentation (private)	Legacy School (6860 N 166th Ave, Omaha, NE 68116)	Community	1	26	5
10/10/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Bancroft Elementary (2724 Riverview Blvd, Omaha, NE 68108)	Community	1	14	2
10/11/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	11	0
10/15/2018	Presentation/Demonstration	School Presentation (Westside)	Oakdale Elementary (9801 W Center Rd, Omaha, NE 68124)	Community	1	22	2
10/15/2018	Presentation/Demonstration	School Presentation (Millard)	Russell Middle School Montessori (5304 S 172nd St, Omaha, NE 68132)	Community	2	46	9
10/16/2018	Presentation/Demonstration	School Presentation (Westside)	Oakdale Elementary (9801 W Center Rd, Omaha, NE 68124)	Community	1	23	2
10/16/2018	Presentation/Demonstration	School Presentation (OPS)	Lothrop Elementary (3300 N 22nd St, 68110)	Community	1	18	3
10/22/2018	Presentation/Demonstration	After School Club Presentation (Elkhorn)	Spring Ridge Elementary (17830 Shadow Ridge Dr, Omaha, NE 68130)	Community	1	23	2
10/23/2018	Presentation/Demonstration	School Presentation (Millard)	Millard North High School (1010 S 144th St, Omaha, NE 68154)	Community	2	45	1
10/25/2018	Presentation/Demonstration	MCC ELL class	Metro Community College (3020 S. 24th St)	Community	1	0	22
10/25/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	6	0
11/1/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	7	0
11/8/2018	Education Booth	UN Foundation - Health & Wellness Fall Festival	Askarben Village (2285 South 67th Street Suite 200)	Community	1	0	47
11/8/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	6	0
11/13/2018	Education Booth	Girl Scout Volunteer Enrichment Conference	Messiahe Lutheran Church (5015 S 80th St)	Community	1	0	45
11/15/2018	Presentation/Demonstration	After School Club Presentation (OPS)	Lewis and Clark Middle School (6901 Burt St, Omaha, NE 68132)	Community	1	3	0
11/15/2018	Presentation/Demonstration	School Presenation (Millard)	Millard North High School (1010 S 144th St, Omaha, NE 68154)	Community	2	44	1
<b>Totals</b>					163	6124	2830
<b>People reached</b>	9,117						
<b>Materials distributed</b>	6,803						



## KOB's Efforts Related to Stormwater 2018 Report

### Household Hazardous Waste

**AGREEMENT:** KOB shall distribute brochures provided to them by the City of Omaha or developed by KOB regarding the proper disposal of household hazardous waste (HHW) and promote the use of the HHW facility, UnderTheSink. KOB will document the distribution outlets as well as the number and type of brochures distributed.

#### RESULTS:

- **Brochures & Door Hangers** – KOB staff distributed a total of 2,196 *Preparing Yourself for UnderTheSink and Water Pollution Comes In Many Forms* brochures (last year = 2,059). We also coordinated volunteers who distributed 5,288 bilingual “Only Rain Down the Storm Drain” educational door hangers, which highlight HHW and UnderTheSink (last year = 2,550). In total, 7,484 HHW-related brochures/materials were distributed, which is an increase of 62% from last year. Brochures were primarily provided to adult participants attending KOB’s school-based and community outreach events/presentations. Educational door hangers were provided to residents living near storm drains that were marked. It is also worth noting that in 2018, KOB developed a more image/graphics-based version of the UnderTheSink brochure.
- **UnderTheSink Video & Photos** – In November, KOB also developed a video about how to appropriately prepare for and drop off household hazardous waste at UnderTheSink. The video was released in December and has already been viewed 284 times. In addition, KOB hired a professional photographer to take various photos of the facility and HHW to use for future educational efforts.
- **Tracking File** – A full list of distribution outlets and dates, along with the type and number of brochures passed out, is included in the [2018 Tracking Google Document for EQC](#).

### World O! Water

**AGREEMENT:** KOB shall assist with the planning, coordination, promotion, and evaluation of the World O! Water event, which engages the public on issues related to water conservation, pollution, and recreation. KOB’s role will include helping with advertising, recruiting and coordinating volunteers, securing new event partners and vendors, reserving equipment for the event, coordinating waste reduction efforts, and surveying event attendees.

#### RESULTS:

- **Event Support** – From February through the September 8th event date, KOB staff assisted the City of Omaha with planning, coordinating, and promoting the World O! Water (WO!W) event. This included reserving equipment, recruiting/coordinating 86 volunteers, securing food sponsors and event partners, and ensuring recycling opportunities.
- **Attendance** – Due to volunteers experiencing challenges with our counting device, we were unable to confirm the number of attendees. However, we estimate approximately 1,400 to 1,600 participants attended, representing 32 different zip codes. Last year, we estimated that 2,000 participants attended the event.
- **Feedback Survey Results** – KOB conducted an intercept survey with participants leaving the event. Results indicated:
  - 98.5% were satisfied with the event (82% very satisfied, 16.5% satisfied)
  - 97% claimed that they learned something new and/or valuable at the event
  - 94% reported that they found the event extremely beneficial or very beneficial in helping them/their family understand ways to prevent water pollution and/or conserve water
- **Advertising & Media Coverage** – Given the diversified marketing approach (which included English/Spanish bilingual promotional materials and radio ads), respondents reported hearing about the event via many different channels, especially social media and online calendars. The Omaha World-Herald & two local TV stations also advertised the event.
- **Waste Reduction & Recycling** – KOB helped reduce waste at the event by deploying recycling/trash stations in the food area and making portable event recycling units available throughout the event grounds. After providing lunch to an estimated 1,000 people, only two bags of trash were produced in the food area.

## Marking Storm Inlets

**AGREEMENT:** KOB shall organize the marking of storm inlets with discs warning that illegal dumping is prohibited and that storm drains are connected to open bodies of water. KOB will recruit, train, and coordinate volunteers to perform the markings and distribute educational door hangers to area residents regarding how to prevent water pollution. KOB will document the number of storm inlets marked, the locations and the year the markings occurred, the number of educational door hangers distributed, and the results of the related online assessment survey. KOB will also track the number of volunteers involved and total number of volunteer hours completed.

### RESULTS:

- **Discs** – KOB volunteers placed “No Dumping / Drains to Waterways” discs on 2,465 storm drains (an increase of 30% from last year’s record of 1,903 drains). Volunteers also cleaned out 340 additional drains that already had discs. It is important to note that KOB transitioned to a more durable and expensive disc this year to ensure the longevity of the markers.
- **Door Hangers** – As noted in the *Household Hazardous Waste* section, KOB volunteers distributed 5,288 bilingual “Only Rain Down the Storm Drain” educational door hangers, which doubled last year’s total of 2,550.
- **Community Survey Results** – In addition to encouraging people to never dump anything down a storm drain, the educational door hangers highlight simple actions that residents can take to prevent stormwater pollution. The door hangers also advertise an incentive (i.e., monthly gift certificate drawing) for completing an online assessment. The results of the online survey for 2018 include the following:
  - 100% of respondents accurately indicated why it is important to never dump anything down a storm drain
  - 94% of respondents accurately identified potential stormwater pollutants
  - Regarding the likelihood of adopting specific, new actions to prevent stormwater pollution, the percentage ranged from 85% of respondents indicating they are likely or very likely to sweep any fertilizer on the street back into their yard to 23% of respondents indicating they are likely or very likely to purchase/build a rain barrel to collect runoff from their roof
- **Volunteers** – 727 volunteers (549 youth and 178 adults) were involved in the Only Rain Down the Storm Drain program this year, providing a total of 1,498 hours of community service. This is a decrease from last year’s record (734 volunteers and 1,955 hours of service); however, due to improved program efficiency, these volunteers marked more drains and distributed more door hangers than any past year.
- **Service Learning & Video** – KOB incorporated service-learning activities/sessions for the volunteers with most of the storm drain marking events. In addition, our Only Rain Down the Storm Drain video was viewed by volunteers and the public a total of 2,214 times in 2018. This video highlights why it is important to prevent stormwater pollution and provides training for volunteers regarding how to safely and appropriately apply discs and distribute door hangers.
- **Tracking File** – KOB staff updated the City’s GIS system with the marked storm drains. The [2018 Tracking Google Document for EQC](#) also notes the locations of the marked storm drains, the date they were marked, and additional information about volunteers (e.g., organizations involved).

## Public Awareness Communications

**AGREEMENT:** KOB shall develop public awareness communications that promote stormwater protection and educate the community about the impacts that specific human activities have on water quality. KOB will document the number of announcements, the type of media, the specific topic addressed, and the dates that the announcements were made.

### RESULTS:

- **Social Media & E-Newsletters** – KOB developed and paid for boosted Facebook/Instagram posts and digital advertisements covering a variety of topics and events related to HHW & UnderTheSink, appropriate disposal of fireworks waste, the World O! Water festival, expired/unused medication collection opportunities, and various actions to prevent stormwater pollution. In addition, KOB sent out a monthly e-newsletter to our distribution list covering various stormwater pollution and water quality topics and events. In total, these posts, ads, and e-newsletters achieved 98,577 impressions and 5,549 engagements (last year = 27,834 impressions and 1,454 engagements).
- **Videos** – In November, KOB developed a video about how to appropriately prepare for and drop off household hazardous waste at UnderTheSink. The video was released in December and has been viewed 284 times already. In addition, our Only Rain Down the Storm Drain instructional video was viewed 2,214 times over the course of 2018.
- **Partner Ads & Radio Spots** – KOB also created and paid for digital/printed advertisements connected to partner organizations' e-newsletters and hard-copy newsletters (e.g., Girl Scouts Spirit of Nebraska), which promoted the Only Rain Down the Storm Drain program and World O! Water. Furthermore, KOB staff promoted stormwater pollution prevention and World O! Water via an English/Spanish radio advertisement that was aired 60+ times.
- **Website** – Over the course of year, KOB's Only Rain Down the Storm Drain webpage, which links to the Omaha Stormwater website, received 523 views. KOB's specific World O! Water page, which links with the official event site, received 202 views.
- **Media Coverage** – In addition to paid advertisements, KOB helped obtain free media coverage by KIOS radio and local television stations regarding KOB's rain garden projects, Omaha Spring Cleanup (extended UnderTheSink hours), World O! Water, appropriate disposal of firework waste, and how litter impacts our neighborhoods and waterways. The estimated publicity value of this coverage equaled \$24,584
- **Tracking File** – The [2018 Tracking Google Document for EQC](#) notes additional details about paid advertising/outreach and free media coverage (e.g., date of the advertising or media coverage).

## Litter Cleanups Near Dam Sites & Streams

**AGREEMENT:** KOB shall recruit and coordinate volunteers to collect litter near streams and dam sites, as well as other public areas that have storm water management features (green infrastructure) or a body of water nearby. This will also entail supporting and tracking formal groups that are interested in officially adopting a green infrastructure area and assisting with regular cleanup and maintenance of the site. KOB will document the areas addressed, the number of volunteers involved, the total number of volunteer hours complete, the dates of the cleanup activities, and the number of bags of litter collected.

### RESULTS:

- **Number of Cleanups** – KOB volunteers conducted 465 litter cleanups in 2018, eclipsing last year's record of 414. Out of the 465 litter cleanup events that KOB volunteers conducted this year, 229 of the cleanups involved a lake/dam site (e.g., Zorinsky Lake Park) or a park/trail in close proximity to a water body (e.g., Seymour Smith Park, Keystone Trail, etc.). The cleanups at lake sites and near water bodies exceeds last's year tally of 199.
- **Volunteers** – 4,661 volunteers (2,227 youth and 2,434 adults) participated in these 229 litter cleanups, constituting a 79% increase from last year's total of 2,604 volunteers.
- **Service Hours & Number of Bags** – These volunteers completed 10,715 hours of community service and collected 2,615 bags of litter (trash & recycling) from the noted areas, which also significantly exceeds last year's totals (6,671 hours of service and 1,823 bags of litter).
- **Tracking File** – The [2018 Tracking Google Document for EQC](#) notes additional details about KOB's litter cleanups for the year, including date, location, organization involved, etc.

## School-Based Educational Activities/Presentations

**AGREEMENT:** KOB shall conduct age-specific educational activities with youth in Omaha schools regarding the topics of water conservation, water quality, and storm water management. KOB will document the date and location of activities as well as the number of activities conducted, the participants involved, and the percentage of activities that integrate service learning.

### RESULTS:

- **Participants & Service Learning** – KOB conducted 70 presentations/activities in area schools related to stormwater management and pollution prevention (last year = 105). 2,488 participants were involved (1,771 youth and 717 adults). In 2018, we decided to primarily work with teachers/schools that were open to incorporating service learning with our educational offerings (versus conducting one-off presentations that aligned with a teacher's curricular objectives but did not incorporate a service element). Research has shown that kinesthetic-based activities that incorporate community service are much more beneficial from a learning perspective. Consequently, we had a reduction in the overall number of presentations/activities (specifically a decrease in one-off presentations/activities that did not include service-learning elements), but the percentage of our presentations/activities that incorporated service learning (i.e., storm drain marking and/or litter cleanups) increased dramatically from 27% in 2017 to 80% this year.
- **Student Assessments** – Per a pre/post test, students showed significant improvement in knowledge gained about stormwater pollution and prevention (39% pre-test to 84% post-test). In addition, via our unique "postcard pledge" evaluation method, 90% of students demonstrated correct behavioral application. Specifically, students were able to note and draw specific actions on a postcard, which they pledged to adopt in order to help prevent stormwater pollution.
- **Teacher Feedback** – Regarding teacher feedback, 97% of teacher respondents indicated KOB's educational activities were very or extremely beneficial to meeting their curricular objectives and advancing student learning. In addition, 87% of teachers indicated there were likely to conduct additional, related activities using KOB-provided resources. Please note that the aforementioned data for students and teachers is combined, reflecting both KOB's stormwater-related educational efforts as well as our activities focused on litter/waste prevention & recycling.
- **Tracking File** – The [2018 Tracking Google Document for EQC](#) notes additional details about KOB's school-based education efforts connected to stormwater management & pollution prevention (e.g., presentation date, location, etc.).

## Community-Based Educational Activities/Presentations

**AGREEMENT:** KOB shall conduct presentations at community outreach events that educate citizens about the City of Omaha's Stormwater Program and how to prevent water pollution. KOB will document the type and number of presentations conducted, the estimated number of participants involved, and the percentage of activities that integrate service learning. KOB will also track the date that the presentation was conducted and the location and name of each event.

### RESULTS:

- **Presentations & Participants** – KOB conducted 32 presentations and education booths throughout the community related to stormwater pollution prevention (last year = 32). A total of 2,275 participants were exposed to these educational presentations/booths (1,086 youth & 1,189 adults).
- **Service Learning** – Approximately 25% of the presentations incorporated a service-learning component (last year = 19%).
- **Tracking File** – The [2018 Tracking Google Document for EQC](#) notes additional details about KOB's community outreach efforts connected to stormwater pollution prevention (e.g., event date, location, etc.).

## Additional Activities

In addition to the aforementioned, Keep Omaha Beautiful collaborated with the Omaha Stormwater Program and several other partners to transform a vacant lot (owned by the City) located at 3101 Florence Boulevard into a community asset. This project focuses on incorporating basic stormwater management features and educational elements. The project was initiated in 2017 with major work and improvements being completed this year. In 2018, a demonstration rain garden was incorporated into the property. Two area schools, KOB, and community partners have already used the site for after-school educational programming. In addition, KOB worked with a contractor to remove the traditional turf and seed the area with a drought-tolerant, low-maintenance lawn mix that incorporates small native/pollinator flowers. This low-input and draught-tolerant alternative lawn will serve as a demonstration project for area residents. Several educational signs were added to explain this non-traditional lawn and approach.

## 2018 Photos



Volunteers install "no dumping / drains to waterways discs"



Photos of UnderTheSink for outreach/educational efforts



Litter cleanups next to waterbodies



Volunteers at World O! Water



Volunteers plant a rain garden on a revitalized vacant lot



Service-learning activities (storm drain marking) with school youth

Inlet Marking Activities

Date(s) of Service	Location Description [Starting Address]	Organization [Group #]	# of Drains Marked	# of Door Hangers Distributed	Total # of Adult Volunteers	Total # of Youth Volunteers	Hours for the Event	Total Volunteer Hours	# of Trash Bags Collected	# of Recycling Bags Collected
March - June	Applewood Heights [6338 S 104th St. 68127]	Individual	5	75	2	0	2	4	0	0
3/22/2018	Christie Heights Park	UNO Signature Day of Service	100	115	4	23	4	108	15	8
4/5/2018	southeast of Fontenelle Elementary	Fontenelle Elementary 4th grade	21	108	6	24	1.5	45	4	0
4/17/2018	Near South High	Partnership 4 Kids [9B]	12	75	2	14	1	16	3	0
4/10/2018	Near South High	Partnership 4 Kids [10A]	15	7	3	7	1	10	4	0
4/11/2018	Various Northwest Omaha areas	Church of Jesus Christ Latter Day Saints	267	221	8	40	2	96	8	0
4/17/2018	southeast of Fontenelle Elementary	Fontenelle Elementary 4th grade	20	111	4	21	1.5	37.5	4	0
4/18/2018	Near South High	Partnership 4 Kids [10B]	8	56	3	18	1	21	4	0
4/23/2018	Near South High	Partnership 4 Kids [9A]	8	58	2	10	1	12	7	0
April & May	Central Park Elementary	Dream's Central Park Elementary	25	0	13	52	2	130	0	0
6/15/2018	108th & Harrison/ Q Street	Burton Family	32	92	1	4	2	10	1	0
6/12/2018	Neighborhood Action and Fact neighborhood	YMCA Youth Corps	73	74	1	6	3	21	3	0
6/13/2018	Neighborhood Action and Fact neighborhood	YMCA Youth Corps	62	34	1	5	3.5	21	3	0
6/14/2018	Neighborhood Action and Fact neighborhood	YMCA Youth Corps	51	42	1	6	2.5	17.5	3	0
6/15/2018	144th and Blondo area	Boystown Summer Enrichment Program	9	32	6	8	2	28	1	0
6/22/2018	144th and Pacific area	Boystown Summer Enrichment Program	9	66	7	17	2	48	4	0
6/8/2018	132 and Cumming area	Boystown Summer Enrichment Program	23	123	6	18	2	48	3	0
5/23/2018	Area around 156 and blondo & other northwest areas	Eagle Run Ward-LDS Church	257	112	10	15	1.5	37.5	5	0
6/29/2018	156th and pacific area	Boystown Summer Enrichment Program	18	97	6	25	2	62	3	0
7/6/2018	108th and Center	Boystown Summer Enrichment Program	39	89	4	10	2	28	2	0
7/9/2018	108th and Center	Boystown Summer Enrichment Program	47	86	6	16	1	22	2	0
7/11/2018	Hartman Avenue Neighborhood Association	Immanuel United Methodist Church	109	93	8	5	4	52	18	0
7/13/2018	156th and Pacific area	Boystown Summer Enrichment Program	37	84	5	18	2	46	3	0
7/20/2018	Around Miller Park	Kids Can	16	51	2	8	1	10	1	0
7/20/2018	Around Miller Park	Kids Can	10	25	2	7	1	9	1	0
7/20/2018	Around Miller Park	Kids Can	14	38	2	7	1.5	13.5	1	0
7/20/2018	Blondo and 156th area	Boystown Summer Enrichment Program	42	137	5	21	2	52	2	0
7/21/2018	Hartman Avenue Neighborhood Association	Lamp Rynearson	110	60	7	1	8	64	2	0
7/27/2018	Stonybrook	Boystown Summer Enrichment Program	53	103	6	20	2	52	2	0
July	North of I-680 and East of Highway 75	Uta Halee Roots and Shoots Club	16	100	1	6	4	28	4	0
August	Various Southwest Omaha areas	Water's Edge Church	88	150	5	5	3	30	5	0
9/1/2018	Deer Park	Eagle Scout Project	698	1837	8	14	6	132	0	0
9/10/2018	Around Swanson Elementary	Cub Scout pack 866	55	224	18	35	1.5	79.5	7	0
9/20/2018	Around Lewis and Clark Middle School	Trash to Treasure club	15	41	2	8	1	10	1	0
9/27/2018	Around Lewis and Clark Middle School	Trash to Treasure club	6	51	2	7	1	9	2	0
9/29/2018	Westmont neighborhood	Girl Scout troop 48129	20	70	2	5	2	14	1	0
10/8/2018	Around Montessori Middle School - 5304 S. 172	Montessori 7-8 grade	75	551	7	43	1.5	75	9	0
		TOTAL	2,465	5,288	178	549	82.0	1,498.5	138	8

## Attachment B

Official Name to Use	Title on Piece	Residential	Commercial	Construction	Industry	Developed by
Landscape Brochure	Keep It Clean On Your Golf Course or Landscape Projects!	X	X			OSW
Stormwater & Dust Control Brochure	Stormwater & Dust Control	X	X	X		OSW
Water Pollution Brochure	Water Pollution Comes In Many Forms	X	X	X		OSW
Rain Barrel Brochure	Building A Rain Barrel	X	X			OSW
Storm Drain Awareness Brochure	Keeping Pollution Out Of Our Storm Drains	X	X			OSW
Concrete Brochure	Best Management Practices for Concrete Masonry and Ready Mix Professionals				X	OSW
Pressurewashing Brochure	Take Some Pressure Off Our Environment				X	OSW
Metal Fabrication Brochure	Shape Your Plans to Control Wastewater				X	OSW
Proper Paint Disposal Brochure	Know Your Role in Protecting The Environment	X	X			OSW
Restaurant Brochure	Keep It Clean At Your Restaurant!		X			OSW
Outdoor Event Brochure	Keep It Clean At Your Outdoor Event!		X			OSW
LUPs Brochure	Linear Underground Projects & Stormwater Best Management Practices			X	X	OSW
10 Important Things Flyer	10 Important Things To Remember On The Job Site		X	X		OSW
Pet Waste Flyer	Some Things Are Better Not Left Behind!	X				OSW
Rain Garden Fact Sheet	Rain Gardens	X				OSW
Bioretention Garden Fact Sheet	Bioretention Systems		X			OSW
Bioswale Fact Sheet	Bioswales and Filter Strips		X			OSW
Green Roof Fact Sheet	Green Roofs	X				OSW
Downspout Disconnection Fact Sheet	Downspout Disconnections	X				OSW
Permeable Pavement Fact Sheet	Permeable Pavement		X	X		OSW
Rain Harvesting Fact Sheet	Rain Harvesting	X				OSW
Soil Conditioning Fact Sheet	Soil Conditioning					OSW
Storm Drain Fact Sheet	Storm Drain					
Bioretention Manual	Bioretention Gardens		X	X		OSW
Sustainable Landscapes Manual	Sustainable Landscapes		X	X		OSW
OmahaPlants.com Postcard	Omahaplants.org	X	X	X		OSW
Grass Clipping Door Hanger	Properly Dispose of Grass Clippings and Yardwaste	X	X			OSW
Rain Barrel Door Hanger	Omaha's Rain Barrel Program	X				OSW
OSW Frisbees		X				OSW
Pet Waste Bag Dispensers		X				OSW
WOW! Activity Books	WOW! Activity Books	X				OSW
WOW! Crayon Boxes	WOW! Crayon Boxes	X				OSW
City of Omaha Environmental Field Guide	City of Omaha Environmental Field Guide		X	X		CSO
Automotive UTS		X		X		SW/Recycling
Guide to HHW		X				SW/Recycling
Housing Dangerous Products		X				SW/Recycling
How to Discard Your Unused Medications		X				SW/Recycling
OmaGro		X	X	X		SW/Recycling
Used Motor Oil, Tires, etc.		X				SW/Recycling
Pollution Sources Around Your House		X				SW/Recycling
Prepare Yourself for UTS		X				SW/Recycling
Recycling Paint UTS		X				SW/Recycling
Illegal Dumping		X				SW/Recycling
Get the Point (Medical HHW)		X				SW/Recycling
UTS Drop-off Locations		X				SW/Recycling
Proper Paint Disposal		X				SW/Recycling
Clean Water Team Certificate	Clean Water Team Certificate	X				OSW
Little Steps. Big Impact. Brochure		X				OAQ
Little Steps. Big Impact. Index Card		X				OAQ
SEC Flip Book				X		OSW
World O! Water patches		X				OSW

OSW	Omaha Stormwater Program
OAQ	Omaha Air Quality Program
SW/Recycling	Omaha Solid Waste & Recycling Programs
CSO	Omaha CSO Program

## Attachment C

Omaha Stormwater Website			
2018 Month	Users	Page Views	Sessions
January	497	1,572	716
February	479	1,754	690
March	482	1,521	706
April	561	1,723	832
May	527	1,504	721
June	444	1,333	652
July	543	1,546	766
August	454	1,511	698
September	393	1,072	560
October	476	1,476	691
November	386	1,172	566
December	428	1,406	622
<b>Totals</b>	<b>5,670</b>	<b>17,590</b>	<b>8,220</b>

Omaha Plants Website			
2018 Month	Users	Page Views	Sessions
January	59	117	64
February	84	245	92
March	83	214	96
April	115	369	135
May	97	404	113
June	49	104	54
July	67	231	73
August	243	429	263
September	62	169	75
October	99	304	123
November	79	219	87
December	103	151	107
<b>Totals</b>	<b>1,140</b>	<b>2,956</b>	<b>1,282</b>

Stormwater Facebook Page		
2018 Month	Total Post Reach	Total Impressions
January	2,723	4,258
February	1,055	1,885
March	885	1,428
April	2,914	4,457
May	748	1,212
June	4,357	6,097
July	754	1,362
August	1,421	3,611
September	745	2,462
October	362	509
November	551	845
December	33	52
<b>Totals</b>	<b>16,548</b>	
<b>Total Posts</b>		

Total Reach 2017	Total Reach 2016
269	55,109
621	99,574
5,548	11,601
4,857	4,945
2,916	4,945
2,787	1,916
12,851	2,057
2,636	756
2,265	2,636
5,967	1,709
3,368	2,265
1,851	4,900
45,936	5,967
	2,559
	3,368
	492
	791
	189,409

## Attachment D

# Omaha Environmental Enforcement Manual

## **Enforcement Goals, Delegation:**

The City's environmental enforcement goals are to:

- Reduce the risk to human health and the environment
- Correct existing violations and deter future violations
- Prevent or have cleaned up pollution and minimize waste
- Preserve the integrity of the regulatory structure

To accomplish this the City will assure a high level of compliance, and strive for timely discovery and correction of significant compliance problems. This manual was written in order to maximize resources and ensure the effective and consistent enforcement of the various regulations.

It is very important in enforcement to understand that every enforcement action the City takes must have supportive power set out in the Federal State and/or City statutes. To carry out the policies of the administrative branch of Government the Legislature has granted numerous powers and responsibilities to the City.

The Nebraska Statute # 84-901 et seq... governs various aspects of administrative Environmental Law, such as the adjudication of cases and judicial review of the City actions. *Agencies in their decision-making and enforcement cannot be arbitrary or capricious or disregard the law that applies to their actions.*

The City can exercise its enforcement powers in administrative, civil and / or criminal proceedings, or can refer cases to the NDEQ or EPA. The exercise of this authority is discretionary. The City also has informal and indirect enforcement options available. These include seeking voluntary compliance through warning communications (Faxes, e-mails, etc...) and compliance assistance to provide a violator an opportunity to return to compliance. It is important to keep in mind that the City's statutes and regulations are part of a larger system of environmental law that includes federal and state court decisions, policies, and guidance. The

City has the power to enact and enforce laws and regulations that meet minimum federal criteria. In many cases the City has become the primary permitting and enforcement authority.

The EPA and NDEQ negotiate with the City through permits, work-plans and delegation Memorandums on how the agencies will work together. The EPA and NDEQ retain the right to take enforcement actions independently of the City, but defer to the City in most cases if the City's action has been timely and appropriate.

### **Process and Mechanisms**

The primary goal of enforcement is compliance. A strong enforcement program establishes credibility that when violations are identified, a return to compliance is achieved and, if appropriate, penalties are obtained. The enforcement strategy and priorities developed by the City are implemented through regular inspections and complaint investigation activities. The enforcement program strives for compliance, prosecuting violators in as systematic and uniform manner as possible, while retaining enough flexibility to make adjustments based on the particular case.

The various program managers make the final decisions on the issuance of administrative orders, referrals to the Law Department, and settlement. The City staff in recommending enforcement action should consider the same factors that effect the managers' ultimate decision.

These considerations require the exercise of professional judgment and discretion in determining the most appropriate response. Some of the points to be considered during the review are:

- The severity of the violation in terms of its environmental impact; the degree of variance from the standards; the impact of the violation upon the integrity of the program under consideration.
- The enforcement history of the entity involved in terms of past violations and demonstration of good faith.
- Whether the violation can be corrected through improved operation and maintenance and, if so, will correction be lengthy? Has the problem already been corrected?
- Consideration of "Fairness and Equity." Is the requirement reasonable? Was it imposed with complete information? Is the City treating facilities with similar violations in the same

manner? Have events occurred beyond the control of the violator, which have resulted in the violation?

### **Program Priorities**

Violations are classified in terms of their importance to the regulatory schemes and whether pollution is likely to result. Other factual considerations, such as whether the violations are chronic, the violator is cooperative or recalcitrant, or the extent of the deviation must be evaluated on a case-by-case basis.

Prompt and timely communication is the key to an effective enforcement program. Timeliness equates to importance in the eyes of the violator, regulatory community, public, and courts. Prompt communication ensures that evidence is gathered and presented while fresh and improves agency credibility.

Situations involving an emergency or imminent and substantial endangerment to public health and welfare or the environment should be given highest priority and the enforcement accelerated.

### **Discovery of violations**

The City discovers violations in a variety of ways, including but not limited to, report reviews, compliance inspections, complaint investigations, and referrals from other agencies. Once a violation has been determined, they should be documented in an inspection report or memorandum as soon as possible, and filed in the company or complaint file.

#### **Inspections:**

Typically most site inspections occur as a result of routine, program-specific compliance inspections. When the City receives a complaint of a possible violation, the City staff should

document all of the information on a complaint form. The name of the complainant is confidential, but may be disclosed in an enforcement proceeding or if compelled by a court.

### **Entry / Access**

An inspector, upon arriving at a facility, source, or site should attempt to locate the owner, operator, or agent in charge, and identify him or herself, show his or her credentials, and explain the reason for the inspection. Nebraska Statute authorizes the inspector “to enter and inspect, during reasonable hours, any building or place, except a building designed for and used exclusively for a private residence.” Statute also allows a representative of the Director to enter and inspect any contaminant source with the consent of the person or persons in control.

An inspector may sign a login sheet, but cannot sign a sheet, which purports to hold the source harmless in the event of injury to the inspector regardless of the facility’s negligence. It is the facility’s right to refuse entry or access to records for that or other reasons, but if this should occur the inspector should inform the source that that is a violation, and leave the facility. The inspector should contact their supervisor. The supervisor should contact the Law Department to obtain an inspection and search warrant. Nothing prohibits an inspector from viewing the property from a location where the public has access, such as a roadway or adjacent property, with permission of the owner.

### **Evidence;**

As a general rule, photographs should begin with the general area and then move in on the area that portrays the violation itself. At hearing or trial, photographs are most often used to illustrate the inspector’s or another’s testimony. Photographs are usually admissible as a form of non-verbal testimony. The photograph should be a good, fair, and accurate depiction of the object or scene at the relevant time. If videotape is used, only the voice of the person taping the video should be recorded.

### **Field Notes/sketches/diagrams**

The field log should contain only relevant, objective observations and remarks. The major benefit to a field log is that it may be used latter in court or administrative hearing to “refresh” the inspector’s memory of events. However, the decision to retain or discard field log notes must be consistent within the program.

When asking people information about a matter under investigation or in taking written statements, the inspector should focus on the basic questions of who, what, where, when, why, and how. If a person appears to have done an illegal act under the direction or order of another person, the inspector should find out who gave the order or direction. Inspectors should avoid intimidating people since a less confrontational approach usually elicits more information.

The inspector should also be aware of the records or documents that are required to be filed with the Department, such as weekly erosion control reports, semi annual air compliance reports, emission inventories, discharge monitoring reports, biennial hazardous waste reports and Title III reports. These documents may provide support for a determination as to the extent of harm that may result from a violation.

### **Samples**

When samples are collected, the inspector should give a receipt to the facility representative, describing the sample(s) obtained. The sample shall be collected in a proper container, labeled with time, date, facility, sample collector, point of collection, type of sample, etc... The sample collector shall maintain a chain of custody form on the sample, which indicates when and to whom a sample is transferred. There must be no “broken link” in the chain of custody where the sample may be unknowingly tampered with. Once the results of the samples are reviewed, a copy of the results should be sent to the facility representative, unless otherwise directed by the Law Department.

### **Inspection Reports.**

The central purpose of an inspection report is to clearly, accurately, and objectively communicate the factual information gathered during the inspection to the reader. It should be written as if the reader had no knowledge of the operation, or the facts outside of the report. The inspector should avoid any opinions, erroneous conclusions, inferences, or interpretations in the report. A good inspection report strengthens the credibility of the inspector as a witness.

Inspection reports should be written as soon as possible after the inspection, and filed. This helps to assure that the facts are recorded accurately while the events are fresh in the inspectors mind. An inspection report must make clear what actions are required of the facility, the inspector, or their supervisor.

After the report is written, a letter should be sent to the facility representative with a copy of the inspection. This is a courtesy, and it keeps them clearly informed of their compliance status, and if non-compliance was found during the inspection, it is a clear record of the violation and what actions, or timeframes were established to bring the facility back into compliance.

### **Enforcement:**

The “Date of Discovery” is an important date to highlight with the report, this date establishes the statutory date that the Law Department has to bring legal action, or the action is barred. During pending enforcement action, all discussions with the violator should, if possible, be coordinated first through the Law Department, unless otherwise instructed by the attorney.

The inspector or their supervisor should prepare any “Letter of Warning”. The program manager should prepare and sign “Notices of Violation”. For civil penalty actions or actions for injunctive relief, the manager will prepare an initial contact letter, that may be signed by the attorney, to send to the violator. This letter acknowledges to the source that the matter has been referred to the Law Department with the recommendation that enforcement action be taken. It will identify the violations or reference the LOW & NOV previously sent. It will outline the civil penalties, or injunctive relief deemed appropriate by the agency to settle the matter without litigation.

Settlement agreements are considered to be confidential, and any questions on an ongoing enforcement should be referred to the Law Department.

### **Penalty Policy:**

The assessment of penalties for violations of environmental statutes, regulations, and permits provides incentives to comply with these requirements and services as a deterrent to further violations. The City's policy in seeking penalties is to ensure that penalties are:

1. Assessed in a fair, consistent, and equitable manner.
2. Appropriate to the circumstances of the violation
3. Sufficient to remove any economic benefit or other financial incentive to non-compliance
4. Sufficient in severity to deter further non-compliance by the violator and others similarly situated
5. Resolve any outstanding environmental problems quickly.

### **Penalty Compliance Workbooks:**

There are EPA, NDEQ guidance on assessment of the size of a penalty. These workbooks should be used as a general guide in assessing a penalty. The factors used in evaluation the penalty are:

#### *1. Statutory Factors*

- Degree and extent of violation
  - Release or potential release
  - Nature of violation
- Size of the operation
- Duration of the violation
- Economic Benefit

#### *Mitigating Factors*

- Response measures taken by the violator

- Compliance History
- Ability to pay

Injunctive relief

- Fish Kill
- Wastewater Treatment cost
- Sewer line replacement

**Enforcement Mechanisms.**

It is important to provide the violator with the opportunity to voluntarily come into compliance prior to referring a violation to the Law Department for enforcement. The purposes of the various stages of notices are to document the violations that have been observed and alert the violator to the consequences for failing to comply.

**Voluntary Compliance**

The City's first course of action is to pursue correction of the violation through voluntary compliance, unless an emergency exists. Documentation of this step is essential. This is typically done less formally, through Faxes, or e-mails. The violation should be clearly outlined, and the timeline for submitting a voluntary compliance schedule clearly stated, typically not more than 10 working days. Some cases will warrant enforcement action regardless of whether the violator voluntarily returns to compliance. The City can make the decision to forgo voluntary compliance efforts.

**Letter of Warning**

If voluntary compliance is not successful, or the violator has a history of non-compliance on the same issue, the City should send a “Letter of Warning”. This letter should identify the specific violation(s), with citations, such as 40 CFR 61,145(b)(i), that has occurred and, when necessary, the required action to be taken to correct the violation. The “Letter of Warning” should require the violator to submit a written response with a compliance schedule within a specific number of

days, generally not more than thirty (30) days. The letter should state that failure to respond, or continued violation will result in referral to the Law Department with the recommendation of enforcement action (fine). Attach a copy of the specific regulation violated to this LOW. These LOW are always sent by certified mail, establishing the date of receipt of the information.

**“Notice of Violation”**

A “Notice of Violation” is a legal document that may be issued by the Program Manager whenever he or she has reason to believe that a violation of the City laws, regulations, or permit requirements has occurred. The “NOV” is a written complaint that specifies:

- 1) The provisions of the law, regulations, or permit alleged to be violated.
- 2) The facts alleged to constitute the violation thereof, and
- 3) The corrective action to be taken within a reasonable time necessary to achieve compliance.

The City does not have the authority to impose penalties in a “NOV”. Therefore, a “NOV” is the appropriate vehicle to impose compliance schedules for improved operation and maintenance, capital improvements, installation of pollution control equipment, remedial actions, or any other actions necessary to achieve compliance.

A “NOV” can include a penalty calculation, which if agreed to and paid by the alleged violator through a voluntary consent order, would be acceptable in lieu of the City seeking judicial action. Advantages to accepting a “NOV” settlement over a judicial action are that a “NOV” is usually faster and therefore requires fewer resources. It also allows the Department more control of the conduct and progress of the action, rather than relying on Judicial Decisions.

**Voluntary Consent Order:**

These are voluntary, negotiated, written legal documents between the City and the violator that regulate any matter within the City’s jurisdiction. They are signed by both the Director, or his representative, and a representative of the violator and are equally binding on both. They are frequently used when a violator agrees to come into compliance and is willing to make a written

commitment in good faith. These agreements may be negotiated before a NOV is issued, or as a result of a NOV.

If a compliance provision in a Voluntary Consent Order, agreement or stipulation is missed, unless otherwise agreed, this is a violation of a final order of the Director and the matter may be referred to the Law Department with a recommendation for further action.

### **Permit Denial, Revocation or Modification**

If a chronic violation occurs at a site, a permit may need to be denied, revoked, or modified. Nebraska Statute provides that any person who is denied a permit by the director or who has one revoked or modified shall have the opportunity for an administrative hearing. The Public Works Director usually chairs all Administrative Hearings. The request for a hearing must be filed within thirty days of the permit action. After the hearing the director shall make his decision known. The permit holder may appeal the director's final decision in court.

### **Civil Action**

If the City has exhausted all administrative alternatives, it may seek to impose civil penalties for a violation, the director may refer the matter to the Law Department for prosecution. In order for the Law Department to determine if there is sufficient legal merit to justify a civil or criminal proceeding, the program managers must develop a Litigation Report that should include basic factual information about the violation(s) and the violator(s), a description and analysis of the legal elements necessary to prove the statutory, regulatory, order or permit violations, the documentation on the potential penalties to which the violator may be subject, injunctive relief to which the City is entitled, and any potential weakness in the case or affirmative defenses and any suggested resolution of the matter.

In practice the City and the defendant in a civil action may negotiate a settlement of the matter. Typically, this settlement is memorialized in a consent decree that is filed with the court. A

consent decree may also include compliance requirements in addition to payment of civil penalties. Violation of a consent decree may be pursued in court.

**Criminal Cases;**

State law establishes criminal liability for many of the same violations subject to civil penalties, if they are committed “knowingly and willingly”. In order to prevail in a criminal action, the City must prove each element of the case “beyond a reasonable doubt”, which is a higher standard of proof than a civil action. Evidence gathering in a criminal case is more restrictive, and the Police Department or State Patrol should provide assistance with witness investigation.

**City of Omaha  
CIVIL PENALTY POLICY  
Copied after:  
EPA's CLEAN WATER ACT Civil Penalty Policy**

Before the filing of the Notice of Violation (NOV), the City will use the following guidelines to determine the minimum amount the City will accept in settlement for counts based on violations of the erosion or dust regulations. This amount, along with the appropriate worksheet and a supporting rationale, should be included in the enforcement-confidential portion of the case file. After a complaint is filed, as the City receives more relevant information regarding liability and penalty issues, the City should adjust its settlement figure accordingly, documenting the rationale for the changes.

*The bottom-line figure resulting from application of this civil penalty settlement policy and the specific calculation that led to it are not public. Each is privileged, enforcement-confidential information. It is work product developed for negotiation purposes and should not be shared with administrative judges, respondents or defendants, or the public.*

This policy itself, however, is public and not confidential. In calculating the bottom-line settlement figure, the City should assume that all the allegations in the complaint will be successfully proven, except to the extent this policy specifically allows for the incorporation of litigation considerations into the penalty calculation. The subjective aspects of the various penalty factors should be applied conservatively in determining the settlement bottom-line because that figure represents the minimum the Agency will accept in settlement, which may be less than the penalty amount that the City considers otherwise ideally suited to the violation. The City may, of course, republish this policy to clarify the newly adjusted settlement amounts.

- The seriousness of the violation or violations;
- The degree of culpability involved;
- The nature, extent, and degree of success of any efforts of the violator to minimize or mitigate the effects of the discharge;
- Any history of prior violations.

### **STEP 1: SERIOUSNESS**

The seriousness of a violation depends, in part, on the risk posed to the environment and the public as a result of the violation. Risk can encompass the coverage area of the violation, the likelihood of a spill, the sensitivity of the environment, and the duration of the violation. The coverage area of the violation, which also contributes to the seriousness of the violation, depends on the erodible area covered, the existence and adequacy of sediment containment, the degree and nature of the violations of relevant requirements, and the duration of the violation. The sensitivity of the environment can be characterized by considering the potential environment impact from a worst-case discharge at the site.

**Step 1.a:** Apply matrix. Determine an initial figure from the following table. Within each range, the City should exercise discretion, considering capacity and extent of noncompliance only, since other considerations are incorporated in later steps.

Extent of Noncompliance	Less than 1 acre	1 acre to 5 acres	5 acres to 10 acres	More than 10 acres
Minor	\$50 to 100	\$75 to \$175	\$125 to \$250	\$225 to \$350
Moderate	\$110 to \$175	\$175 to \$275	\$250 to \$375	\$350 to \$450
Major	\$175 to \$225	\$275 to \$325	\$375 to \$450	\$450 to \$500

Use the following criteria to determine the extent of noncompliance:

*Minor Noncompliance.* Cumulatively, the violations have only a minor impact on the ability of the respondent to prevent or respond to worst-case erosion or dust violation through the development and implementation of a compliance plan.

Minor noncompliance: Failure to have GR2 inspections on site in a timely manner; failure to submit required report online in a timely manner; failure of reports to reflect minor changes in BMP.

*Moderate Noncompliance.* Cumulatively, the violations have a significant impact on the ability of the respondent to prevent or respond to worst-case erosion or dust violation through the development and implementation of a compliance plan.

Moderate Noncompliance: Site work inconsistent with BMP; Failure to update BMP or reflect major changes; Failure to amend plan after rainfall or work practices show the plan to be inadequate; Failure to submit information of a control measure failure.

*Major Noncompliance.* Cumulatively, the violations essentially undermine the ability of the respondent to prevent or respond to worst-case erosion or dust violation through the development and implementation of a compliance plan.

Major Noncompliance: No BMP submitted; Work started prior to permit issuance; inadequate or incomplete plan resulting in major environmental or citizen harm; failure to maintain equipment and/or personnel to implement BMP/dust control measure resulting in hazardous conditions; intentional or known violations.

**Step 1.b:** Adjust the amount determined from the matrix to reflect the potential environmental impact of a worst-case discharge. Choose the most serious applicable category.

*Major Impact.* A discharge would likely have a significant on human health/safety, an actual or potential effect on a receiving lake or wildlife due to factors such as proximity or adequacy of containment. Upward adjustment of 25-50%.

*Moderate Impact.* A discharge would likely have a significant effect on storm sewers or receiving stream or vegetation due to factors such as proximity to water or adequacy of containment. Upward adjustment of up to 25%.

*Minor Impact.* No adjustment.

**Step 1.c:** Adjust the amount from **Step 1.b** to account for the duration of the violation. Determine the number of weeks that the violation continued. For each week, add one half of one percent to the amount from Step 1.b (e.g., if the violation continued for 32 weeks, increase the amount from the previous step by 16%) up to a 30% maximum.

## **STEP 2: CULPABILITY**

Consider the degree to which the respondent should have been able to prevent the violation, considering the sophistication of the respondent, the resources and information available to them, and any history of regulatory staff explaining to the respondent legal obligations or notifying the respondent of violations. Depending upon the degree of culpability, the city may increase the amount from STEP 1 by as much as 75%.

## **STEP 3: MITIGATION**

This policy requires that in assessing a penalty the City must consider the “nature, extent, and degree of success of any efforts of the violator to minimize or mitigate the effects of the discharge”. Though a violation of the regulations increases the threat of a discharge rather than actually causing a discharge, this factor can be taken into account by considering how quickly the violator comes into compliance, thereby mitigating the threat of a discharge. The City should use the following guidelines:

When the violator comes into compliance before being notified of violation by regulatory staff orally or in writing, reduce the amount from **STEP 2** by up to 25%.

When the violator, after notification of violation, comes into compliance within a reasonable time period not exceeding six weeks: No adjustment.

This is a downward adjustment only because any failure to come into compliance promptly after being informed of the violation is accounted for in **STEP 2** (Culpability).

## **STEP 4: HISTORY OF PRIOR VIOLATIONS**

Adjust the amount from **STEP 3** if the respondent has a relevant history of violations within the past five years. Consider violations of erosion and dust regulations, the BMP or reporting requirements, and any violation of an environmental statute that relates to the respondent's ability to prevent or mitigate a violation. Related violations, for example, could include certain operation and maintenance violations that indicate a respondent's inattention to pollution control requirements. Relevant violations at any other facility under common ownership or control should be considered under this step. Violations include admitted violations (such as reports or other required self-reporting), adjudicated violations, findings of violations by the City, NDEQ, EPA or other agencies that have not been withdrawn or overturned by a reviewing authority, and cases that were settled by consent and involved the payment of a penalty (whether or not liability was admitted). If there is a history of such violations, the City may increase the **STEP 3** amount by up to 100%, depending on the frequency and severity of such past violations.

Omaha Environmental Quality Control  
Supplemental Environmental Project Policy

In the settlement of environmental enforcement cases in Omaha, the City requires that violators resolve the violation, change standard operational procedures to avoid future non-compliance, and pay a civil penalty; in certain instances “Supplemental Environmental Projects” and their environmental and community benefits may be part of the settlement; the primary purpose of the SEP policy is to obtain environmental and/or public benefits that may not otherwise occur, in the community impacted by the violation. SEPs are offered as an opportunity to contribute to the community in lieu of paying a penalty, and to help the defendant / respondent understand that their action has had an impact on the community as a whole, and is therefore offered to first time offenders only.

The environmental programs administered by the City have penalty assessment criteria used in determining an appropriate penalty. These policies establish an appropriate initial settlement offer to avoid the time and cost of a court hearing where appropriate. These policies have been established with consideration of the economic benefit to the violator, the seriousness of the violation, and any prior history of violations. Penalties deter violations and level the playing field, while the use of SEP's add an additional role of securing the advantage environmental or public benefits. The penalty calculation worksheets from the appropriate program are used to determine the Initial Settlement offer, without the influence of a SEP;

The primary goal of the City’s Environmental regulations is the avoidance or reduction of pollution, followed in order by the responsible recycling of pollutants, then the proper disposal of pollutants;

The Environmental Quality Control Division of the City of Omaha Public Works Department reviews SEP's with the following criteria:

1. The City of Omaha evaluates the types of settlement cases where SEP's would be appropriate, the types of projects that are acceptable, and the penalty mitigation that is allowed;
2. The City of Omaha uses this SEP policy is part of that evaluation process, and is typically only considered for first time violators;
3. All else being equal, the final settlement penalty cost will be lower for a violator who agrees to perform an acceptable SEP compared to one who does not agree to perform a SEP;
4. The City of Omaha encourages the use of SEP's that are consistent with this policy, and recognizes that SEP's may not be appropriate in settlement of all cases, but they are an important part of the City’s environmental enforcement program;
5. SEP's that have an educational or pollution prevention aspect are preferred, and would be given preference in consideration;

The Environmental Quality Control Division determines that a SEP is qualified only if the SEP meets the following criteria;

1. The SEP is a project that has environmental benefits, that the violator is not otherwise legally obligated to perform;
2. The SEP cannot be inconsistent with any Environmental Statutes;
  - 2.1. The SEP must advance an environmental objective of the statutes the enforcement action is based on.
  - 2.2. The SEP must reduce the likelihood of similar violations, or:
    - 2.2.1. Reduce the consequence on the public or the environment that was impacted by the violation, or
    - 2.2.2. Reduce the overall risk to the public or the environment affected by the violation;
3. The SEP should affect the Public or the environment in the Omaha Metropolitan area;
4. The City retains the right to oversee a SEP and ensure that it is implemented pursuant to the provisions of the settlement offer, and retains legal recourse if the SEP is not adequately performed;
5. The City may not play any role in managing or controlling the funds that are to provide for the SEP;
6. The SEP can not be used to satisfy a City statutory obligation, and can not provide the City with additional resources to support activities that are covered by budgetary obligations, e.g. a SEP cannot buy a computer for City personnel use;
7. The SEP cannot be used to extend an existing City contract;

There are several broad categories of projects that qualify as SEP's; these are:

1. Environmental Restoration & Protection: a restoration project is one that enhances or restores a natural environment, or a man-made environment in the Omaha Metropolitan area;
  - 1.1. Help protect the environment from actual or potential damage or improve the overall condition of the ecosystem; OR
  - 1.2. The protection of endangered species or their habitat; OR
  - 1.3. Augment another environmental restoration project with recreational improvements such as hiking & bicycling trails, or information signage not already earmarked for the project;

- 1.4. Remediation of pollution of man made environments, like community centers, may include the removal of asbestos, lead paint, or contaminated soils;
2. Environmental Compliance Promotion: These projects can be contracted to experts to develop and implement the compliance promotion project and shall provide training, or outreach to other parts of the community to;
  - 2.1. Achieve and maintain compliance with the regulatory requirements;
  - 2.2. Go further than the regulations and reduce pollution beyond legal requirements;
  - 2.3. Promote the same environmental program as the violation;
3. Public Health: a project to provide diagnostic, preventative and /or remedial components of health care to the population potentially harmed, including but not limited to, epidemiological data, examinations, or medical treatment;
4. Pollution Prevention: a project that targets the reduction at the source so that the amount of pollution entering into the atmosphere or waste stream is reduced;
5. Pollution Reduction: is a project which results in a decrease in the amount or toxicity of any pollutant in a waste stream or released into the environment (e.g. offsite recycling of waste collected and used as raw material for another products);
6. Other projects that do not fit into one of the above categories may be considered if they have environmental merit, and are consistent with the rest of the SEP goals;

The City of Omaha uses the above criteria to determine if a SEP is qualified, and excludes the following from SEP consideration;

1. Projects done for private gain;
2. Projects that the defendant / respondent would be required to do under any rule or regulation;
3. Projects that the respondent would directly benefit from;
4. Projects where the City needs to contribute significant resources to assure completion;

In a settlement where the defendant / respondent agree to a SEP, the SEP amount has to be calculated to;

1. Exceed any known economic benefit from the non-compliance activity;
2. Be at least 75% of the total agreed upon initial settlement offer;

The defendant / respondent shall submit a settlement agreement that accurately describes the SEP and provides reliable and objective means to verify that the defendant / respondent completes the project, including clear benchmarks that can be tracked and reported, and can be completed in a timely manner while having community benefit.

The settlement agreement shall outline a requirement that the defendant / respondent pay a stipulated penalty of at least 75% to 150% of the initial settlement amount originally proposed, depending on the degree of completion and the monies spent, if the SEP outlined in the settlement agreement is not completed, or is only partially completed.

The defendant /respondent may only publicize his involvement in the results of the SEP if it is prominently stated that the SEP was taken as a part of a settlement of an environmental enforcement action.



## Attachment E

Grading Permit Summary Report										
Report generated 2/26/2019 12:54 pm										
Reporting Period: 1/1/2018 through 12/31/2018										
Report ran by Andy Szatko										
Jurisdiction	Active Permits	Permits Issued	Phase 1 Permits Issued	Phase 2 Permits Issued	Site Inspections Submitted	Phase 1 Site Inspections Submitted	Phase 2 Site Inspections Submitted	City Inspections Submitted	Phase 1 City Inspections Submitted	Phase 2 City Inspections Submitted
Bellevue	45	6	2	4	828	605	223	128	81	47
Bennington	0	0	0	0	0	0	0	0	0	0
Boys Town	0	0	0	0	0	0	0	0	0	0
Gretna	35	12	5	7	809	647	162	140	112	28
Douglas County	7	1	1	0	39	39	0	0	0	0
La Vista	36	8	2	6	831	526	305	169	111	58
Omaha	470	98	26	72	9,416	5,291	4,125	1,138	598	540
Papillion	92	19	9	10	2,299	1,796	503	387	291	96
Ralston	2	0	0	0	42	0	42	1	0	1
Sarpy	56	10	5	5	1,112	792	320	166	110	56
TOTAL	743	154	50	104	15,376	9,696	5,680	2,129	1,303	826



## Attachment F

Attachment F  
PCSMP Summary Report and Certified BMPs

<b>Papillion PCSMP Projects Reviewed in 2018</b>	<b>Count</b>	<b>BMPs Certified in Papillion in 2018</b>	<b>Count</b>
Bioretention System	6	Bioretention System	3
Constructed Wetland	0	Constructed Wetland	0
Disconnected Impervious Cover	0	Disconnected Impervious Cover	0
Extended Dry Detention Basin	9	Extended Dry Detention Basin	6
Filter Strip	0	Filter Strip	0
Grassed Swale	0	Grassed Swale	0
Green Roof	0	Green Roof	0
Infiltration Trench	0	Infiltration Trench	0
Level Spreader	0	Level Spreader	0
Manufactured System	2	Manufactured System	0
Other (flow-based)	0	Other (flow-based)	0
Other (volume-based)	3	Other (volume-based)	0
Permeable Pavement	0	Permeable Pavement	0
Permeable Pavers	0	Permeable Pavers	0
Rain Barrel/Cistern	0	Rain Barrel/Cistern	0
Rain Garden	2	Rain Garden	5
Retention Wet Ponds	1	Rain Garden	5
Roof Drain Filters	0	Retention Wet Ponds	0
Sand Filter	0	Roof Drain Filters	0
Soil Conditioning	0	Sand Filter	0
Subsurface Storage	3	Subsurface Storage	0
Vegetated Bioswale	0	Vegetated Bioswale	0
	<b>26</b>		<b>19</b>
<b>Report ran 1/15/19 by Andy Szatko</b>			