

NPDES PERMIT (NER220008) FOR SMALL MUNICIPAL STORM
SEWER DISCHARGES TO WATERS OF THE STATE LOCATED IN
DOUGLAS, SARPY, AND WASHINGTON COUNTIES OF NEBRASKA

NPDES PERMIT NUMBER 220008

2020 ANNUAL REPORT

Submitted by:

City of Gretna
204 N. McKenna Avenue
Gretna, Nebraska 68028

March 30, 2021

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	Date
Michael D. Evans	Mayor
_____	_____
Printed Name	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 Gretna to meet that requirement and covers the period from January 1-December 31, 2020.

2. COOPERATIVE AGREEMENT

The Partnership entities entered into an interlocal agreement in 2001 and continuation agreements in 2004, 2009, 2014, and 2019 that established a framework for meeting the permit requirements. The 2019 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. This report covers the second half of permit year 2 and the first half of permit year 3.

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 2019 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 outreach plan was reviewed and deemed sufficient. No updates were made.

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 2020. Brochure topics include pollution prevention, good housekeeping, pesticide, fertilizer, and household hazardous waste. They were present at community events and outreach activities where 2,291 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. COVID-19 had a significant impact on education and outreach in 2020 with virtually all in-person events from March through the end of the year cancelled. In addition, staff quarantines, limited in-person interactions, and overall lack of opportunities negatively impacted education and outreach efforts. Adapting to online and virtual outreach efforts took some time but collaborating with other community organizations for virtual workshops and using the Omaha Stormwater Program websites has helped make sure efforts continued through 2020. A total of 1,408 items were downloaded from OmahaStormwater.org. A list of locations and summary of presentations, both in-person and virtual, are provided in Attachment A-Summary of Outreach Activities for calendar year 2020.

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. An inventory of current outreach materials is provided in Attachment B. No new outreach materials were developed, but existing digital files have been added to the list. These can be found at OmahaStormwater.org.

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 City of Gretna’s 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 2020.

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, 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 2019. A link is also included to the City of Omaha’s stormwater web site, www.omahastormwater.org.

The City of Gretna has a link on its website to the PCWP website at:
<http://gretnane.org/155/Public-Works-Department>

The City of Omaha has developed and deployed a website, 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 A provides the download statistics for the omahastormwater.org website and Omaha Stormwater Facebook Page for 2020. The PCWP held six meetings in 2020, which are open to the public, and the minutes for those meetings are available on the PCWP website at www.papiopartnership.org.

Keep Omaha Beautiful, Inc. (KOB) organized 2020 Stream Clean ups. There was a total of 630 cleanup efforts throughout the year. 3,332 volunteers donated 7,223 hours collecting 3,607

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 2020 to mark and clean storm sewer inlets. In 2020, 4,017 inlets were marked by 138 volunteers.

Due to COVID-19, the annual World O! Water festival was held as a virtual, online event at <https://www.worldwater.org/activities/>. Various groups and organizations provided water-related videos, activities, coloring pages, and other resources for kids and adults. The resources remain posted on the website. 600 people accessed some part of the website.

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 Gretna 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 2018 Annual Report can be found at www.papiopartnership.org. The 2020 report will be posted to the website in 2021.

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. This manual describes the City's enforcement goals, process and mechanisms, program priorities, enforcement mechanisms and civil penalty policy. 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.

The City of Gretna has a link on its website at: <http://gretnane.org/DocumentCenter/View/1302/Gretna-Storm-Sewer-Utility-Map-Jan-2018-PDF> for MS4 outfall locations.

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.

The City of Gretna’s Public Works Department personnel respond and investigate inquiries regarding trace sources of identified illicit discharges. No trace sources of illicit discharges were identified in Gretna in 2020.

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.

The City of Gretna’s Public Works Department personnel implement the procedures regarding the elimination of unauthorized non-storm water discharges per the City Code. No unauthorized non-stormwater discharges were identified in Gretna in 2020.

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.

There were to no non-stormwater discharges determinations made in 2020.

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 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
8/20/2020	13424 Chandler Rd.	Illicit Discharge	City of La Vista

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 Gretna 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) or the hotline in 2020 for our jurisdiction. Public complaints on sediment and erosion control can be logged into the erosion website (www.OmahaStormwater.org).

There were to no illicit discharges and illegal dumping into the MS4 made in 2020.

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.

A strategy for training municipal field staff has been developed. A copy of the strategy is included in Attachment E. Due to COVID-19, the City did not perform any training to municipal field staff with respect to IDDE.

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 (EQCD) continued to implement the Grading Permit Program for the PCWP in 2020. No updates were made to code or permit requirements in 2020.

Additionally, communities in Sarpy County have experienced urban growth in areas outside the Papillion Creek Watershed. As these areas are outside of what EQCD manage through the Papillion Creek Watershed Partnership agreement, the Southern Sarpy Watershed Partnership (SSWP) was formed in 2016. In 2020, the SSWP contracted for inspections in Southern Sarpy County to maintain the established program.

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. This manual describes the City’s enforcement goals, process and mechanisms, program priorities, enforcement mechanisms and civil penalty policy. No updates were made in 2020. The PCWP and SSWP utilize 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 2020, there were 58 Phase I grading permits and 87 Phase 2 grading permits issued in the PCWP and SSWP communities. A breakdown of grading permits by community is shown in Attachment C.

The City of Gretna issued 14 grading permits in 2020.

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 developed a strategy for site inspections by municipal staff. 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 2020 calendar year, reports were submitted to Permixon by City Inspectors and Project Inspectors for construction sites as per the NPDES Stormwater Discharges from Construction Sites General Permit. Communities in the SSWP follow the same guidelines but utilize a contractor to conduct site inspections.

Violations processed in 2020 are referenced in Attachment D as well as a breakdown of permits and inspection reports by community. The table below summarizes PCWP and SSWP construction inspections for 2020.

	City Inspection Reports	Private Inspection Reports
Phase I Sites (>5 acres)	1,473	11,480
Phase II Sites (<5 acres)	866	6,041
Total	2,339	17,521

Grading Permit	Project Name	Illicit Discharge	Complaint Type	Enforcement Action Taken
GRE-20170502-4099-GP1	Aspen Creek North	No	Sediment & Erosion	Letter of Warning
GRE-20200506-5401-GP1	Mackling Property	No	Sediment & Erosion	Letter of Warning

Additional violation information is included for areas in Southern Sarpy County in Attachment E.

Grading Permit	Project Name	Illicit Discharge	Complaint Type	Enforcement Action Taken
GRE-20161021-3837-GP1	The Estates of Wynwood	No	Sediment & Erosion	Letter of Warning

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 15 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	1/23/2024
Mark	Ermeling	1979	10/5/2021
Neil	Graybill	1333	1/3/2022
Eric	Grimshaw	1261	12/8/2020
James	Kee Jr.	170	9/24/2024
Charla	Long (Shurter)	1666	9/24/2024
David	Nusser	924	9/12/2021
Matthew	Nusser	1986	10/5/2021
Therese	Pogge	172	9/24/2024
Jennifer	Proescholdt	1987	10/5/2021
Jeffrey	Ryba	1353	9/13/2021
Carol	Sorensen	171	9/24/2024
Andy	Szatko	1278	11/30/2020
Blake	Wagner	3055	9/24/2024

In 2020, EQCD continued to incorporate sediment and erosion control training into the regular monthly safety toolbox meetings. Topics that are covered include review of inspection processes, enforcements, and open discussion to discuss current issues among staff. A summary of 2020 sediment and erosion control training is provided in the table below.

Date	Title	Attendees
1/28/2020	Inspector Training & Safety Toolbox	12
2/10/2020	City Construction & CSO Inspections	3
2/25/2020	Inspector Training & Safety Toolbox	12
3/24/2020	Inspector Training & Safety Toolbox	14
4/28/2020	Inspector Training & Safety Toolbox	12
6/2/2020	Inspector Training & Safety Toolbox	5

Date	Title	Attendees
6/23/2020	Inspector Training & Safety Toolbox	6
7/28/2020	Inspector Training & Safety Toolbox	9
8/25/2020	Inspector Training & Safety Toolbox	11
9/22/2020	Inspector Training & Safety Toolbox	9
9/29/2020	FRCP Training – Under the Sink	5
9/30/2020	FRCP Training – Oma-gro Compost	3
10/20/2020	Outfall Screening Training	3
10/27/2020	Inspector Training & Safety Toolbox	5
11/24/2020	Inspector Training & Safety Toolbox	9
12/22/2020	Inspector Training & Safety Toolbox	5

In addition to the EQCD inspectors, the SSWP uses a contractor to complete construction site inspections. The inspectors used in 2020 and their qualifications are included in Attachment E.

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 6, 2020 with 310 attendees. This annual seminar is intended to educate the regulated community. The seminar is hosted by the City of Omaha, P-MRNRD, Douglas County, and the PCWP. 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 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. See Attachment A for a full list of outreach events.

Date	Event Name	# of Attendees	Location	Details/Comments
1/9/2020	EGA Grading Permit & PCSMP Training	12	EGA Office	Provide training & Q&A for grading permits & post-construction

Date	Event Name	# of Attendees	Location	Details/Comments
1/14/2020	Olsson SEC Presentation	10	Marriott Courtyard, La Vista	Present on Omaha specific SEC topics & info during Olsson day-long internal meeting
1/14/2020	TD2 Designers Grading Permit & PCSMP Training	30	TD2 Offices	Provide training & Q&A for grading permits & post-construction
1/16/2020	TD2 Inspectors Grading Permit & PCSMP Training	12	TD2 Offices	Provide training & Q&A for grading permits & post-construction
2/6/2020	Sediment & Erosion Control Seminar	310	DC Centre	Annual seminar to construction industry
1/9/2020	EGA Grading Permit & PCSMP Training	12	EGA Office	Provide training & Q&A for grading permits & post-construction

See BMP 4 in this section for information regarding construction site complaints in 2020.

Issue Address	Illicit Discharge	Complaint Type	Enforcement Action Taken
Royal View - 204 th Street	No	Sediment & Erosion	Request for Voluntary Compliance - Verbal

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 (ORSDM). 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 City of Omaha’s guidance document for post-construction is titled *City of Omaha Post Construction Stormwater Management Planning Guidance* and was developed in July 2009 and updated in August 2015. This document is used by all PCWP communities. In 2019, the document was reviewed by the Omaha Post-Construction Engineer Reviewer as well as Reviewers in the Papillion Creek Watershed Partnership jurisdictions and the design community to solicit feedback on the document. Updates incorporated into the document as a result of this review includes the following:

- Example of a good drainage study report
- Certificate of Occupancy hold letter
- Post-Construction BMP inspection forms
- Updated text to clarify “no adverse impact”

The document is available on the City’s website OmahaStormwater.org and OmahaPermix.com. No divergent standards were developed. No changes were made to the manual in 2020.

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 2020.

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 F 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 City of Gretna has developed a protocol for responding to complaints regarding Post Construction BMPs.

A summary of BMPs that have been certified as complete is included in Attachment G.

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 2020 is included in Attachment G.

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 into 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 has been developed.

The City of Gretna City Engineer performed 33 routine compliance site inspection trips which covered approximately 43 construction sites within the City's jurisdiction.

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 Gretna has a link on its website for a inventory and map of municipal facilities at: <http://gretnane.org/DocumentCenter/View/1302/Gretna-Storm-Sewer-Utility-Map-Jan-2018-PDF>

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 Gretna has developed a strategy to assess municipal facilities. In Permit Year 2 (June 2019-June 2020) 7 assessments were completed.

The City has compiled a GIS database of all facilities to allow for inspection record keeping and assessment ranking to prioritize maintenance activities. The City performed maintenance on 7 specific areas during the 2020 calendar year.

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.

There were no changes to the City’s municipal facilities in 2020. The City continues to update the storm sewer database with any new systems, removed or updated facilities.

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 wastewater 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.

The streets were swept two times in 2020 by an independent company.

The City performed major maintenance activities at Northridge subdivision (Sycamore Drive east end of pavement), Highway 6 (ditches from OPPD south to Nebraska Crossing Drive, R&R Acres Industrial (R&R Road at curve to 220th Street), Fairview Road (ditch east of Highway 6), 204th Street storm outlet (Safarik Acres Lot 1), Michael Drive (north ditch outlet near BNSF Railroad).

City’s Street Department provides routine monitoring of storm sewer systems and reports all maintenance items to the Public Works Director.

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.

During Permit Year 2 (June 2019-June 2020) City of Gretna completed the following training activities per the training strategy: Due to COVID-19, the City did not perform any training to municipal employees with respect to SWPPP and good housekeeping. The City anticipates being able to offer training in the upcoming year to the municipal employees related to pollution prevention and good housekeeping practices.

This permit requirement has been met.

F.6. Provide educational material to contractors hired 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.

No updates were made in 2020.

This permit requirement has been met.

5. Fiscal Expenditures

The City of Gretna annual expenses for 2020 were in the magnitude of \$10,000 for materials with all labor performed by the City own forces. The expenses included materials for rip-rap stone, stabilization fabric, seed and rolled erosion blanket.

6. Changes in MS4 Area

There have been no changes in the MS4 area in 2020.

List of Attachments

Attachment A. Summary of Outreach Activities

Attachment B. Inventory of Outreach Materials

Attachment C. Grading Permit Summary Report

Attachment D. Grading Permit Enforcement Summary

Attachment E. SSWP Contractor Report

Attachment F. PCSMP Summary Report

Attachment G. PCSMP List of Certified BMPs

Attachment A

Attachment B

Attachment C

Attachment D

Attachment E

Attachment F

Attachment G

Attachment H

Attachment I

Attachment J

Attachment K

Attachment L