



# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



1110 West Washington Street Phoenix, Arizona 85007  
(602) 771-2300 [www.azdeq.gov](http://www.azdeq.gov)

## Small MS4 Annual Report

**ID #: AZSM65766**

**MS4 Name: TOWN OF MARANA MS4**

**Reporting Period: 01-Jul-2020 To 30-Jun-2021**

### Main Office

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# Annual Report Summary

## Company Information

**Name :** TOWN OF MARANA  
 11555 W CIVIC CENTER DR  
 MARANA  
 AZ , 85653

**Question:** During this reporting period, was additional land annexed into the regulated MS4 area?

Answer: Yes

**Total Area Annexed into the MS4 Since the Last Annual Report:** 42 acres

**Were Best Management Practices (BMPs) fully implemented in the annexed area?** No

No BMPs were implemented. The land is privately owned and will be developed.

**Question:** Is stormwater sewer mapping 100 percent complete?

Answer: Yes

**Provide the description of the measurable goal:**

**Question:** Is outfall mapping 100 percent complete?

Answer: Yes

**Number of outfalls mapped:** 28

**Provide the description of the measurable goal:**

**Question:** Is identification of receiving waters information 100 percent complete?

Answer: Yes

**Provide the description of the measurable goal:**

**Question:** Has an Illicit Discharge Detection and Elimination (IDDE) enforcement authority or other regulatory mechanism been established?

Answer: Yes

Name	Title/Code/Citation	Effective Date	Inactive Date
Town of Marana Council	Title 17-16 of the Town Code	01/15/2016	

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**Question: Has a Construction Site Stormwater Runoff enforcement authority or other regulatory mechanism been established?**

Answer: Yes

Name	Title/Code/Citation	Effective Date	Inactive Date
Town of Marana Council	Title 17-16 of the Town Code	01/15/2016	

**Question: Has a Post-Construction Stormwater Management enforcement authority or other regulatory mechanism been established?**

Answer: Yes

Name	Title/Code/Citation	Effective Date	Inactive Date
Town of Marana Council	Title 17-16 of the Town Code	01/15/2016	

**Question: For each receiving water, provide a brief description of the overall effectiveness of the BMP implemented to reduce the discharge of pollutants.**

Answer:

**Receiving Water:** Santa Cruz River-CANADA DEL ORO - HUC 15050303

**Type :** Impaired/Non-attaining

**Outfall Details**

Sr.No.	Outfall or Field Screening Point	Outfall Name/Number	Latitude	Longitude
1	Outfall	Library	32.346181	-111.090819

**Has a sampling and analysis(SAP) been developed and implemented for this receiving water?** Yes

**Impairments:**

**TMDL Applicable:** No

**Paramaters :**

AMMONIA NITROGEN~E COLI COLONY (CFU)~

**BMP Info**

BMP	Impairments	Receiving Water
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Brochures	E COLI COLONY (CFU)	
Website		Santa Cruz River-CANADA DEL ORO - HUC 15050303
Student Outreach	E COLI COLONY (CFU)	
Dry weather monitoring		Santa Cruz River-CANADA DEL ORO - HUC 15050303
Illicit Discharge Reporting		Santa Cruz River-CANADA DEL ORO - HUC 15050303
Facilities Maintenance	E COLI COLONY (CFU)	

***Provide a narrative of BMP effectiveness, including qualitative and quantitative indicators, in addressing pollutant discharge to this receiving water.***

The brochures have not been effective. Few citizens take them. They will remain available for citizens, but they will not be included as a BMP. The website continues to be the primary way that citizens learn about the impairments to the Santa Cruz River. It is unclear how citizens use the information posted to reduce pollutant discharge, but it will continue to be a BMP since it is readily available to most citizens. In-person student outreach has been difficult during the pandemic. It will continue to be a BMP since the message of picking up pet waste is relatable to school age kids. The Town will look for different ways to engage with students. Facilities maintenance at public parks is a good way to address E.coli in the Santa Cruz River. Town staff conducts regular upkeep of park grounds to reduce the amount of animal waste that gets into stormwater runoff.

**Question: For each BMP in the Minimum Control Measure 1: Public Education and Outreach, what was completed during this reporting period?**

Answer:

**BMP Name:** Brochures

**Category:** Brochures

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

***BMP Description :***

Develop brochures for target audiences that have the greatest potential to impact the storm drainage system

***Is another government entity responsible for this BMP ?*** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

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**Targeted Audience:** Automotive, food service, pool builders, industrial industries, general public  
**Frequency:** 1 Annually

**Milestone Description:**

Have brochures available at the main offices for the Town of Marana

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**  
Brochures were available for the entire reporting period at all main offices for the Town. Only 1 brochure was taken during the reporting period.

**Provide a summary of activities planned for next reporting period**  
**BMP does not apply for next reporting period:** Yes

**Milestone Description:**

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**BMP Name:** Student Outreach

**Category:** School Event

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Develop stormwater pollution prevention presentation for school age children

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Targeted Audience:** Students **Frequency:** 4 Annually

**Milestone Description:**

Document the number of students presented to each year.

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed Change:** No

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to Covid-19, opportunities for in-person presentations were cancelled for all of 2020 and 2021. The Town added some stormwater activity sheets for kids to the website, and is working on producing a video to post on the website that teachers can show their students.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town is going to develop a stormwater video and post it on the website so that teachers can show it to their students.

**BMP Name:** Website

**Category:** Webpage

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Have a website for stormwater pollution prevention

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Targeted Audience:** Citizens **Frequency:** 1 Annually

**Milestone Description:**

Town of Marana website has a portion dedicated to stormwater and stormwater pollution prevention

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

The Town of Marana website is always available to anybody with a computer. This means that access to stormwater information is available whenever someone needs it. The website is updated with the most recent copies of the Construction General Permit and the Town of Marana Stormwater Management Plan.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

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Continue to keep the website updated and add new material as it comes up.

**Question: Minimum Control Measure 1: Public Education and Outreach, Did the program implement any additional BMPs during this reporting period?**

Answer:

***Did the program implement any additional BMPs during this reporting period?*** No

***Provide a summary of compliance with the requirements for Minimum Control Measure1.***

Given the presence of Covid-19, public outreach has been severely limited. Reaching out to new audiences other than students will be part of the 2021-2022 reporting period. Due to the lack of interest, the stormwater brochures will remain out for citizens to take, but no new brochures will be printed.

**Question: For each BMP in the Minimum Control Measure 2: Public Involvement and Participation, what was completed during this reporting period?**

Answer:

***BMP Name:*** Access to SWMP

***Category:*** Public Involvement

***Personnel Position/Department:*** Environmental Project Manager/Engineering Department

***BMP Description :***

Provide access to the SWMP on the Town of Marana website

***Is another government entity responsible for this BMP ?*** No

***Measurable Goals:***

***Start Date:*** 07/01/2018

***Targeted End Date:*** 09/29/2021

***Frequency:*** 1 Annually

***Milestone Description:***

Annually make sure that stormwater information on the Town's website is current

***Were milestones/measurable goals achieved for this reporting period?*** Yes

***Actual BMP Start Date:*** 07/01/2018

***Provide a description of BMP effectiveness, including metrics used to determine effectiveness.***

The Town of Marana's SWMP is available for viewing on the Town's website. There is a link to an email address where people can send comments and concerns about the Town's stormwater program.

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

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The Town will continue to maintain the stormwater portion of the website. Content will be reviewed annually to make sure that it is up to date and relevant.

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**BMP Name:** Public SWMP Review

**Category:** Public Involvement

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

***BMP Description :***

Annually provide the public an opportunity to review and comment on the SWMP

***Is another government entity responsible for this BMP ?*** No

**Measurable Goals:**

***Start Date:*** 07/01/2018

***Targeted End Date:*** 09/29/2021

***Frequency:*** 1 Annually

***Milestone Description:***

Use social media and the My Marana app to solicit comments from the community on the SWMP

***Were milestones/measurable goals achieved for this reporting period?*** Yes

***Actual BMP Start Date:*** 07/01/2018

***Provide a description of BMP effectiveness, including metrics used to determine effectiveness.***

The Town of Marana's website is accessible through traditional computer methods, but also by using a mobile application called My Marana. Both methods of accessing the Town's website allow for the viewer to make comments on the Town's SWMP.

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

The Town will set up a log to record the comments received from citizens regarding the SWMP.

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**BMP Name:** Town participation

**Category:** Public Involvement

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

***BMP Description :***

Town staff will participate in local and regional stormwater programs, workshops, and advisory committees.

***Is another government entity responsible for this BMP ?*** No



**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 4 Annually

**Milestone Description:**

Record dates, times, and topics of meetings attended

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Town of Marana staff has been attending ADEQ's stakeholder meetings for the re-issuance of the Phase 2 MS4 General Permit and ADEQ's Waters of the State stakeholder meetings, as well as meetings with the Pima Association of Governments regarding stormwater issues.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana will continue to have staff attend meetings, workshops, or other types of stormwater events.

**Question: For Minimum Control Measure 2: Public Involvement and Participation, Did the program implement any additional BMPs during this reporting period?**

Answer:

**Did the program implement any additional BMPs during this reporting period?** No

**Provide a summary of compliance with the requirements for Minimum Control Measure2.**

Even with the Covid-19 pandemic, the Town was able to attend many stakeholder meetings. Getting the public involved in stormwater issues can be difficult, but hopefully the increased information on the Town's website and the ease of being able to email comments to Town staff will encourage citizens to get involved.

**Question: For each BMP in the Minimum Control Measure 3: Illicit Discharge Detection and Elimination Program, what was completed during this reporting period?**

Answer:

**BMP Name:** Training

**Category:** Staff Training

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Train field staff on how to identify illicit discharges and establish protocol for reporting discharges

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Implement training procedure for field staff

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Due to Covid-19 pandemic, the staff training that was done was an electronic presentation that went out to all Town employees. Employees watched the presentation and then answered questions about the content.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

With employees able to have in-person meetings, the Town of Maran will work towards conducting training sessions with departments that work out in the field or in areas with the potential to spot or prevent illicit discharges.

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**BMP Name:** Storm Sewer Mapping

**Category:** Implement IDDE Program

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Prepare and maintain stormwater inventory map

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

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Review stormwater sewer map and verify that any newly acquired outfalls in the urbanized area have been added to the map.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

No new outfalls needed to be mapped within the reporting period. Any annexed areas did not have outfalls within them.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana will continue to track new areas annexed into our jurisdictional area and assess them for any discharges to the MS4. Appropriate outfalls will be added to the mapping system as well as the outfall inspection list.

**BMP Name:** Dry weather monitoring

**Category:** Dry Weather Screening

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Each of the Town's outfall points will be monitored once per year. The inspection will be conducted at least 72 hours after a storm event.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Keep a list of each outfall and the date that it was inspected. Also have information sheets to record any illicit discharge.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

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Outfall inspections were conducted throughout the reporting period so that different locations could be inspected at different times of the year. No illicit discharges were detected.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The outfalls will be conducted in the same manner except for that the time of year for each outfall inspection will change.

**BMP Name:** Illicit Discharge Reporting

**Category:** Written IDDE Procedures

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Have a procedure for receiving, addressing, and recording illicit discharge reports from the public

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 100 Percent per year

**Milestone Description:**

Illicit discharge reports will be recorded and investigated.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

The Town of Marana did receive two reports of illicit discharges during the reporting period. Both were regarding sediment track-out from industrial sites and were responded to within the day of the report. Effectiveness is measured by how long it takes to respond to the report.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana has verified that information regarding how to report illicit discharges is on the website and up to date. All reports will be addressed within the day they are made when practicable.

**BMP Name:** Monitoring

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**Category:** Wet Weather Monitoring

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Visual inspection of 5 outfall locations during rain events

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 4 Annually

**Milestone Description:**

Inspect 5 of the mapped outfall points and make observations

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

Due to the lack of rainfall during the reporting period along with the Covid-19 pandemic, no analytical monitoring was done. Now that labs are opened back up, getting samples analyzed will be much easier.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

Stormwater will still be monitored with a goal of two samples for both the summer and winter periods.

**Question: For Minimum Control Measure 3: Illicit Discharge Detection and Elimination Program, Did the program implement any additional BMPs during this reporting period?**

Answer:

**Did the program implement any additional BMPs during this reporting period?** No

**Provide a summary of compliance with the requirements for Minimum Control Measure3.**

All of the BMPs outlined in control measure 3 will carry over to the next reporting period. Dry weather monitoring, training and giving citizens the opportunity to report illicit discharges is on track and the 2021-2022 reporting period has already gotten off to a better start in terms of opportunities for analytical monitoring.

**Question: Were staff trained in IDDE Awareness and Response?**

Answer:

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Yes

Sr.No.	Date of Training Event	Training Subject	Number of Employees Trained	Frequency of Training
1	08/01/2020	Stormwater Pollution Prevention	200	Annually

**Question: Minimum Control Measure 1: Illicit Discharge Detection and Elimination Program, Provide the details of the Illicit Discharge Detection and Elimination (IDDE) incidents that occurred during this reporting period.**

Answer:

**Number of IDDE incidents reported in this reporting period: 2**

**Number of IDDE incidents responded to in this reporting period: 2**

Sr.No.	Enforcement Actions	Enforcements Issued	Enforcements Resolved	Enforcements Unresolved
1	NOV	0	0	0
2	NOC	2	2	0
3	Stop Work	0	0	0
4	Admin Order	0	0	0
5	Admin Fines	0	0	0
6	Civil Penalties	0	0	0
7	Criminal Action	0	0	0
	Total	2	2	0

**Question: Were there any unpermitted discharges to the MS4?**

Answer: No

**Question: Were any samples collected to characterize illicit discharge(s) in this reporting period?**

Answer: No

**Number of Illicit Discharges Sampled are:** No illicit discharges were present for sampling.

**Question: For each BMP in the Minimum Control Measure 4: Construction Activity Stormwater Runoff Control, what was completed during this reporting period?**

Answer:

**BMP Name:** SWPPP review and Inspections

**Category:** Control Wastes

**Personnel Position/Department:** Stormwater Inspector/Environmental Project Manager/Engineering Department

**BMP Description :**

Require all SWPPPs to contain information regarding how they will contain wastes on site during construction. Will inspect construction sites for proper waste containment and disposal.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 100 Percent per year

**Milestone Description:**

Review all SWPPPs submitted for private and public projects. Inspect all projects 1 acre or greater or part of a larger common plan of development.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

13 SWPPPs were reviewed for compliance with Town of Marana Stormwater Ordinance requirements. These were all of the SWPPP submitted and reviewed for compliance prior to the issuance of a grading permit.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana will continue to require a SWPPP that conforms to the requirements of the Town Code Stormwater chapter. The Town will review all SWPPPs for compliance prior to the issuance of a grading permit.

**BMP Name:** Project inspections

**Category:** Inspections

**Personnel Position/Department:** Stormwater Inspector/Engineering Department

**BMP Description :**

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Inspect construction projects greater than 1 acre or part of a common plan of development to ensure compliance with the Town Code

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018  
**Targeted End Date:** 09/29/2021  
**Frequency:** 100 Percent per year

**Milestone Description:**

Conduct inspections of active construction sites and record results

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Town of Marana staff inspected 15 active construction sites during the reporting period. Inspection findings were recorded, with no penalties given out.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana will continue to inspect all construction sites for compliance with the Town Code Stormwater chapter. The Town has procedures in place in case there are deficiencies.

**BMP Name:** Preconstruction Meetings

**Category:** Construction Operator Training

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Conduct preconstruction meetings to discuss the BMPs called out in the SWPPP for sediment and erosion control and make sure that the contractor is aware of the requirements to follow these BMPs.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018  
**Targeted End Date:** 09/29/2021  
**Frequency:** 100 Percent per year

**Milestone Description:**

Attend preconstruction meetings for all private and public projects required to have a SWPPP

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**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

15 preconstruction meetings were held during the reporting period where SWPPP plans were discussed to make sure the contractor was aware of the Town's requirements.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana continues to attend all pre-construction meetings to discuss what the requirements are and how to best achieve those.

**BMP Name:** Inspection Enforcement

**Category:** Erosion/ Sediment Control

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Develop standard operating procedure for inspections including enforcement procedures. Include language in Town Code that addresses the ability to impose sanctions in the event of non-compliance.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Review SOPs and Town Code for necessary updates

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

The Town of Marana Town Code Stormwater chapter includes language that outlines sanctions that can be imposed if sites are not in compliance with that chapter. There is a standard operating procedure that outlines the procedure for site inspection.

**Provide a summary of activities planned for next reporting period**

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**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana is working on a more explicit description of what constitutes a violation, tiers of violation severity, and an escalating level of sanctions based on violation severity.

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**BMP Name:** Grading Plan Review

**Category:** Site Plan Review

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Require all grading plans for projects greater than 1 acre or part of a larger common plan of development be reviewed and accepted for coordination with project SWPPP

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 100 Percent per year

**Milestone Description:**

Review all grading plans submitted for private and public projects

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

51 different grading and improvement plans were reviewed during the reporting period. This was all of the grading/improvement plans that were submitted to the Town of Marana for construction. Plans were reviewed against the project footprint of the SWPPP to verify that all necessary areas were covered.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana will continue to review all improvement and grading plans to ensure that all projects that are required to submit SWPPPs to the Town for review, do and that those SWPPPs conform to all requirements of the Town Code Stormwater chapter.

**Question: For Minimum Control Measure 4: Construction Activity Stormwater Runoff Control, Did the program implement any additional BMPs during this reporting period?**

Answer:

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**Did the program implement any additional BMPs during this reporting period?** No

**Provide a summary of compliance with the requirements for Minimum Control Measure4.**

The Town of Marana continues to work with developers, engineers and contractors through plan review, preconstruction meetings and site inspections. The Town will continue to perform these tasks in order to limit pollution in construction stormwater runoff.

**Question: Were any construction activity operator training events conducted?**

Answer:

Yes

Sr.No.	Date of Training Event	Training Subject	Number of Employees Trained	Frequency of Training
1	07/01/2020	Stormwater Pollution Prevention	4	Monthly

**Question: Minimum Control Measure 4: Construction Activity Stormwater Runoff Control, Provide the details of the construction activity complaints and inspections that were conducted during this reporting period.**

Answer:

- Number of active construction sites in this reporting period:** 15
- Has an inspection frequency been developed and implemented?** YES
- Number of active construction sites inspected at least weekly:** 0
- Number of active construction sites inspected at least one time every six months:** 0
- Number of active construction sites inspected at least monthly:** 0
- Number of active construction sites inspected at least annually:** 15
- Number of construction activity complaints that were resolved or responded to:** 0
- Number of active construction sites not inspected:** 0
- Number of construction activity complaints received in this reporting period:** 0
- Number of active construction sites that required re-inspections in this reporting period:** 2

Sr.No.	Enforcement Actions	Enforcements Issued	Enforcements Resolved	Enforcements Unresolved
1	NOV	0	0	0

2	NOC	0	0	0
3	Stop Work	0	0	0
4	Admin Order	0	0	0
5	Admin Fines	0	0	0
6	Civil Penalties	0	0	0
7	Criminal Action	0	0	0
	Total	0	0	0

**Question: For each BMP in the Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment, what was completed during this reporting period?**

Answer:

**BMP Name:** Maintenance

**Category:** O&M Procedures

**Personnel Position/Department:** Operations and Maintenance Staff

**BMP Description :**

Use the inventory system to keep track of maintenance of Town post-construction stormwater features

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 100 Percent per year

**Milestone Description:**

Have a searchable inventory system that captures when maintenance activities are done on Town post-construction stormwater features

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

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The Town of Marana utilizes the Cartegraph system to inventory and track post-construction stormwater features. As those features are maintained, information regarding the maintenance activity is logged within the system. The system is very effective on helping the Town stay on top of feature maintenance and projecting large scale maintenance projects.

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

The Town of Marana will continue to utilize Cartegraph to keep track of all existing stormwater features as well as any new features that the Town installs or takes over.

***BMP Name:*** Grading Plan Reviews

***Category:*** Site Plan Reviews

***Personnel Position/Department:*** Environmental Project Manager/Engineering Department

***BMP Description :***

Require grading plans for projects to prevent or minimize impacts to water quality from post construction stormwater runoff

***Is another government entity responsible for this BMP ?*** No

***Measurable Goals:***

***Start Date:*** 07/01/2018

***Targeted End Date:*** 09/29/2021

***Frequency:*** 100 Percent per year

***Milestone Description:***

Review grading plans

***Were milestones/measurable goals achieved for this reporting period?*** Yes

***Actual BMP Start Date:*** 07/01/2018

***Provide a description of BMP effectiveness, including metrics used to determine effectiveness.***

The Town of Marana stormwater staff reviewed all private and public grading plans for compliance with the Town Code Stormwater chapter and the ADEQ Construction General Permit when applicable. 51 plans were reviewed within the reporting period.

***Provide a summary of activities planned for next reporting period***

***BMP does not apply for next reporting period:*** No

***Milestone Description:***

The Town of Marana will continue to review all grading and improvement plans for private and public projects to verify compliance with the Town Code Stormwater chapter and the ADEQ Construction General Permit when applicable. The grading plans are matched against the SWPPP plan sheets to make sure that all disturbance areas are included in the SWPPP.

---

**BMP Name:** Inventory

**Category:** Inventory

**Personnel Position/Department:** Operations and Maintenance Staff

**BMP Description :**

Implement a searchable inventory system of all post construction structural stormwater control measures that discharge in the MS4

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 100 Percent per year

**Milestone Description:**

Have a searchable inventory system

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

The Town of Marana did not have a searchable inventory for private post-construction stormwater features. A procedure and program is being developed by the Town in order to capture this information.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana will have a process in place to capture all private post-construction stormwater features that will discharge to the MS4.

---

**BMP Name:** Post Construction Controls

**Category:** Structural/Non-Structural BMP

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

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Review grading plans for post-construction features that will reduce pollutants in stormwater that leaves the site

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 100 Percent per year

**Milestone Description:**

Review all grading plans that require a SWPPP

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2019

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

The Town of Marana has reviewed all grading/improvement plans looking for how stormwater flows pre-construction and post-construction across the site. The nature of the development will is also considered to make sure that post-construction features are appropriate for the site. The Town reviewed 51 plans during the reporting period.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

The Town of Marana will continue to review all grading and improvement plans to verify that post-construction controls will not have a negative effect for future stormwater flow and that all necessary post-construction features are in place to prevent pollution leaving the site as much as practicable.

**Question: For Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment, Did the program implement any additional BMPs during this reporting period?**

Answer:

**Did the program implement any additional BMPs during this reporting period?** No

**Provide a summary of compliance with the requirements for Minimum Control Measure5.**

The Town of Marana has not been tracking private post-construction stormwater features that discharge to the MS4 like required by the Small MS4 permit. A program is being developed in order to capture that information so that illicit discharges can be tracked better and so that maintenance that may effect the MS4 can be tracked.

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**Question: Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment, Provide the details of the Post-Construction Stormwater controls used during this reporting period**

Answer:

**Number of sites that required Post-Construction Stormwater controls in this reporting period:** 0

**Number of Post-Construction Stormwater controls inspected in this reporting period:** 0

Sr.No.	Enforcement Actions	Enforcements Issued	Enforcements Resolved	Enforcements Unresolved
1	NOV	0	0	0
2	NOC	0	0	0
3	Stop Work	0	0	0
4	Admin Order	0	0	0
5	Admin Fines	0	0	0
6	Civil Penalties	0	0	0
7	Criminal Action	0	0	0
	Total	0	0	0

**Question: For each BMP in the Minimum Control Measure 6: Pollution Prevention and Good Housekeeping, what was completed during this reporting period?**

Answer:

**BMP Name:** Inspections

**Category:** Inspections

**Facility Information:**

Marana Operations Center

Marana Regional Airport

Parks and Recreation

**Personnel Position/Department:** Stormwater Inspector/Engineering Department

**BMP Description :**

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Perform regular inspections at Town facilities that have high potential for pollutant discharge

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Quarterly

**Milestone Description:**

Record inspection results for inspections

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Town of Marana staff conducted inspections of our Operations Center, Parks and Recreation Facility and Regional Airport. None of these facilities discharge to the MS4, but they were inspected for general good housekeeping BMPs regarding things such as storage of chemicals, trash containment and equipment maintenance.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

Staff is working to create a new inspection form that is more detailed to the types of activities that happen at each facility. Additional facilities such as some of the parks will be added to the list of facilities to be inspected.

**BMP Name:** Staff Training

**Category:** Training

**Facility Information:**

Marana Operations Center

Marana Regional Airport

Parks and Recreation

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Train staff on general stormwater pollution prevention procedures

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

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**Start Date:** 07/01/2018  
**Targeted End Date:** 09/29/2021  
**Frequency:** 1 Percent per year

**Milestone Description:**

Utilize video training to have all Town employees learn about basic stormwater pollution prevention procedures. The number of staff that take the training will be captured.

**Were milestones/measurable goals achieved for this reporting period?** No

**ADEQ Directed** No

**Change:**

**Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.**

A change in Town procedures has meant that the normal stormwater training that has been provided to staff in the past was not done during this reporting period.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

Stormwater staff will have to utilize other methods to get the stormwater pollution prevention message out to employees. Options include the internal daily email blasts and posters in common areas.

**BMP Name:** Facilities Inventory

**Category:** Inventory

**Facility Information:**

- Marana Regional Airport
- Marana Operations Center
- Parks and Recreation

**Personnel Position/Department:** Stormwater Inspector/Engineering

**BMP Description :**

Create inventory and inspection priority ranking for Town facilities

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018  
**Targeted End Date:** 09/29/2021  
**Frequency:** 100 Percent per year

**Milestone Description:**

Have all Town facilities, including those not permitted under the MSGP, inventoried and ranked according to inspection priority.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Stormwater staff has developed an inventory of Town facilities based on their proximity to the Santa Cruz River, their potential to discharge, and the severity of the potential discharge.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

Stormwater staff will continue to add new facilities to the list ranked on the same criteria as those currently on the list.

---

**BMP Name:** Maintenance Schedule

**Category:** Maintenance Schedule

**Facility Information:**

Marana Operations Center

Marana Regional Airport

Parks and Recreation

**Personnel Position/Department:** Facilities Maintenance Staff

**BMP Description :**

Facilities will be inventoried and assessed to determine what controls they may need and prioritize the installation of those controls.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 100 Percent per year

**Milestone Description:**

Controls are installed at all facilities with the potential to discharge pollutants.

**Were milestones/measurable goals achieved for this reporting period?** Yes

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**Actual BMP Start** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

During site inspections, any additional controls that may be needed are brought to the attention of the facility supervisor. Effectiveness is based on how well the supervisors reply to the inspection results. Supervisory staff has been responsive to comments made during inspections.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

Stormwater staff will continue to do regular inspections to determine if there are facilities in need of additional controls.

---

**BMP Name:** O&M Maintenance

**Category:** O&M Procedures

**Facility Information:**

Marana Operations Center

Marana Regional Airport

Parks and Recreation

**Personnel Position/Department:** Environmental Project Manager/Engineering Department

**BMP Description :**

Identify and catalog all pollution prevention structures and infrastructure at municipal facilities. Implement an inspection and maintenance schedule for these features.

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 1 Annually

**Milestone Description:**

Provide an inspection and maintenance report for these features.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start** 07/01/2018

**Date:**

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

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Stormwater structures for municipal facilities have been captured in the Town's Cartegraph system. This system also tracks any maintenance done on these structures.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

Stormwater staff wants to work with other departments to identify possible projects to maintain and enhance stormwater features. Project implementation will be subject to funding limits.

**BMP Name:** Facilities Maintenance

**Category:** Maintenance Activities

**Facility Information:**

Marana Operations Center

Marana Regional Airport

Parks and Recreation

**Personnel Position/Department:** Facilities Maintenance Staff

**BMP Description :**

Utilize Cartograph system to track maintenance activities on stormwater controls

**Is another government entity responsible for this BMP ?** No

**Measurable Goals:**

**Start Date:** 07/01/2018

**Targeted End Date:** 09/29/2021

**Frequency:** 100 Percent per year

**Milestone Description:**

The Town keeps an inventory of all stormwater controls on Town property. This inventory includes a database of when the structure was maintained and what type of work was done.

**Were milestones/measurable goals achieved for this reporting period?** Yes

**Actual BMP Start Date:** 07/01/2018

**Provide a description of BMP effectiveness, including metrics used to determine effectiveness.**

Post construction stormwater controls on public property continue to be cataloged using the Cartegraph system. This system also keeps track of inspections and maintenance done on each stormwater feature.

**Provide a summary of activities planned for next reporting period**

**BMP does not apply for next reporting period:** No

**Milestone Description:**

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Staff will continue to utilize the Cartegraph system.

**Question: For Minimum Control Measure 6: Pollution Prevention and Good Housekeeping, Did the program implement any additional BMPs during this reporting period?**

Answer:

***Did the program implement any additional BMPs during this reporting period?*** No

***Provide a summary of compliance with the requirements for Minimum Control Measure6.***

Stormwater staff completed inspections on Town facilities that met the criteria for inspection. Criteria includes things such as materials kept on site, proximity to the Santa Cruz River, and exposure to stormwater. During these inspections, any ideas for additional stormwater controls are noted and brought to the attention of the facility supervisor. Stormwater staff is going to start including the facility inspections in the Town's Cartegraph system so that they can become part of the data in the tracking system.

**Question: Was staff training conducted?**

Answer:

No

***Why weren't training events conducted?***

The typical training program that was used in the past will no longer be used to train the general Town staff. A new method of training will need to be developed.

# CERTIFICATION OF SUBMISSION

**PAULA S BLUEMER**

You validated your identity by answering your personal security question and password on myDEQ at **10:12 AM** on **09/22/2021**. At this time, you certified the summary information above by checking that you agreed to the following statement:

## **Certify your submission:**

By checking this box I certify under penalty of law that this submittal was prepared by me, or under my direction or supervision of personnel appropriately qualified to properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I understand that all information submitted to ADEQ is public record unless otherwise identified by law as confidential. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

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