

APPENDIX A

Stormwater Management Program (SWMP) - Measurable Goals

The city's Stormwater Management Program (SWMP) shall detail the approach and processes necessary to achieve the following measurable goals. The city shall keep systems in place and maintain records adequate to demonstrate compliance with Appendix A provisions. Where optional (i.e., 'menu') choices are provided, Glendale may choose between options during each specific year of the permit without modification of this permit. Progress on the following goals shall be reported each year in the annual report.

At a minimum, Glendale shall implement each of the following provisions:

I. PUBLIC EDUCATION AND OUTREACH

Glendale shall provide outreach and education to the general public on stormwater program issues and requirements. The SWMP shall include details of the outreach strategy that shall run the full term of the permit.

- A. Measurable Goal:** At a minimum, provide public education and outreach to at least one (1) target group on one (1) of the topics listed below during each year of the permit. Report in the annual report the outreach approach selected, the topic, the target group and an estimated number of participants reached.

Target Group

General Public
Residential Community
Home Owners
HOAs
Schools
Landscape Professionals

Topics

- Post-construction ordinances and long-term maintenance requirements for permanent stormwater controls
- Stormwater runoff issues and residential stormwater management practices, which may include any of the following topics:
 - Proper drainage of pools
 - Proper disposal of medication
 - Home repairs
 - Landscaping/yard maintenance/water conservation
 - Residential fats, oils, and grease disposal
 - Vehicle washing
 - Household cleaning
 - Other topics aimed to educate residents about stormwater
 - Rainwater catchments
- Potential water quality impacts of application of pesticides, herbicides and fertilizer and control measures to minimize runoff of pollutants in stormwater and any application permitting requirements
- Potential impacts of animal waste on water quality and the need to clean up and properly dispose of pet waste to minimize runoff of pollutants in stormwater
- Illicit discharges and illegal dumping, proper management of non-stormwater discharges, and to provide information on reporting spills, dumping, and illicit discharges

- Spill prevention, proper handling and disposal of toxic and hazardous materials, and measures to contain and minimize discharges to the storm sewer system
- Installation of catch basin markers or stenciling of storm sewer inlets to minimize illicit discharges and illegal dumping to the storm sewer system
- Proper management and disposal of used oil

B. Measurable Goal: At a minimum, provide business sector education/outreach to at least one (1) target group on an appropriate topic listed below during each year of the permit. Report on the annual report the outreach approach selected, the topic, target group and an estimated number of participants reached.

<u>Target Group</u>	<u>Topics</u>
Development	• Planning ordinances and grading and drainage design standards for stormwater management in new developments and significant redevelopments
Community	
Construction Site Operators	• Municipal stormwater requirements and stormwater management practices for construction sites
Entertainment Venues	• Illicit discharges and proper management of non-stormwater discharges
Restaurants	• Spill prevention, proper handling of toxic and hazardous materials, and measures to contain and minimize discharges to the storm sewer system
Targeted Sources or Types of Businesses (industrial or commercial)	• Proper management and disposal of used oil and other toxic materials, including practices to minimize exposure of materials/wastes to rainfall and minimize contamination of stormwater runoff
	• Stormwater management practices, pollution prevention plans, and facility maintenance procedures
	• Stormwater management practices for specific business sectors

II. PUBLIC INVOLVEMENT AND PARTICIPATION

A. Measurable Goal: Glendale shall implement at least one (1) of the following to provide fundamental support to the city's SWMP:

- Provide the opportunity to involve the public in the city's stormwater management program and to encourage public participation in monitoring and reporting spills, discharges, or dumping within their communities (such as facilitation of neighborhood watch groups) once per year.
- Provide the public an opportunity to participate in the city's stormwater management program, such as voluntary litter control activities (e.g., facilitation of Adopt-A-Wash, Adopt-A-Park, and Adopt-A-Street litter control activities) or voluntary erosion control projects. Maintain and support program as a regular ongoing activity.
- Provide the public with a household hazardous waste program to facilitate proper disposal of used oil, antifreeze, pesticides, herbicides, paints, and other hazardous and toxic materials by city residents (such as scheduled household hazardous waste collection events or operation of full-time disposal facilities) at least two (2) times per year.

B. Measurable Goal: The city shall provide and publicize a reporting system to facilitate and track public reporting of spills, discharges or dumping to the storm sewer system (i.e. stormwater hotline, web page, etc.) on a continuous basis.

- C. **Measurable Goal:** No later than one (1) year from the effective date of this permit the current SWMP and latest annual report shall be posted on the city's website.

III. ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

The SWMP shall detail the components and implementation of Glendale's illicit discharge detection and elimination (IDDE) program to include the following elements:

A. MUNICIPAL EMPLOYEE TRAINING

1. Training to educate and update inspectors and stormwater field staff on detecting, investigating, and identifying illicit discharges, De Minimis discharges, and other sources of non-stormwater discharges (i.e., field screening procedures, sampling methods, field measurements).

Measurable Goal: The city shall provide new employee training at least one (1) time per year and provide refresher training for existing employees directly involved with stormwater management activities at least once every two (2) years. In the event there are no new employees in a given period, the city shall sufficiently document in the annual report that no new employees were hired or retained during said period.

2. Training to educate staff with no direct stormwater responsibilities (e.g., street sweepers, road maintenance crews, etc.) on identifying and eliminating illicit discharges. Training shall also include practices for reporting non-stormwater discharges to appropriate personnel.

Measurable Goal: The city shall develop stormwater pollution awareness training within one (1) year and present the training to select groups of staff annually thereafter.

B. SPILLS

Some city-owned facilities that are included in this section may be permitted under the Multi-Sector General Permit (MSGP) or another AZPDES permit. In this case, the specific permit shall govern.

1. The city shall implement control measures at municipal facilities to prevent spills which may contact stormwater.

Measurable Goal: Each municipal facility, that handles, stores, or otherwise uses hazardous materials, where any single container exceeds five (5) gallons, shall have site-specific materials handling and spill response procedures. The procedures shall be developed within one (1) year of permit issuance and submitted with the first annual report. After the procedures are developed, a facility assessment will be conducted at each of these facilities at least biennially during the permit term to ensure that these procedures are in place and effective.

2. The city shall properly handle, store, transport, and dispose of used oils and other toxic materials and wastes associated with municipal operations and facilities, including practices to minimize exposure of these materials to precipitation.

Measurable Goal: The city shall maintain policies and procedures to address the handling, storage, transport, and disposal of used oils and other hazardous or toxic materials that are associated with municipal operations and facilities that may have a potential to discharge. A committee shall review the policies and procedures within the first year of permit issuance and at least once every two (2)

years thereafter. The review committee shall include a person with stormwater expertise to provide feedback relating to any potential stormwater concerns.

C. MAJOR OUTFALLS as defined by 40 CFR 122.26 and Field Screening Points

1. The city shall maintain an inventory or map of all major outfalls and of other field screening points (if applicable) identified by the city as priority for illicit discharges or other non-stormwater flows.
2. The city shall conduct ongoing dry weather field screening of outfalls. Field screening includes:
 - Visual inspection for flow, trash, suds, odors, etc.
 - Field sampling when significant flow is observed for chemical indicator parameters.
 - Re-inspection and sampling within 24 hours, if flow is still present.

The IDDE field screening program shall be further detailed in the SWMP.

D. INSPECTIONS of outfalls:

Measurable Goal: The city shall inspect the following 'priority' outfalls once each year:

- All outfalls that discharge to an impaired or outstanding Arizona water (OAW) or other perennial water;
- All outfalls that have been a source of illicit discharge in the past five (5) years (unless the source has been eliminated, or has been shown not to be a major source of pollutants); and
- All outfalls identified as priority by the city [see III (C) (1) above] for illicit discharges or other non-stormwater flows.

Measurable Goal: At a minimum, the city shall inspect a minimum of 20 percent of the remaining (i.e., non-priority) major outfalls each year so that all outfalls are inspected at least once every five (5) years. [Note: The city currently has identified 61 locations where stormwater discharges (outfalls) from Glendale's MS4]. The city shall document inspections, findings and report evidence of non-stormwater flows, and follow-up actions taken by the city.

- E. INVESTIGATION** – The city shall investigate reported potential illicit discharges and identified dry weather flows to identify source(s). Investigation may include discharge sampling, data collection and research, and storm sewer inspections and other appropriate techniques. The city shall develop criteria to determine if dry weather flows contain illicit connections or discharges, and shall implement a program to effectively make such determinations. The criteria shall be documented in the SWMP.

Measurable Goal: The city shall respond to at least 90 percent of all reported illicit discharges to the MS4.

Measurable Goal: The city shall initiate investigation of at least 80 percent of potential illicit discharges identified by field screening, public reporting or other detection methods within three (3) business days of the date of detection or report. However, investigation of obvious wastewater discharges (such as sewage, sudsy water, colored waters, etc.) that are flowing at the time of inspection shall be initiated immediately upon detection.

- F. ILLICIT DISCHARGE ELIMINATION** – The city shall take timely and appropriate action to eliminate identified sources of illicit discharges to the stormwater system, including escalating enforcement response, when necessary to terminate illicit discharges.

Measurable Goal: Initiate corrective action including enforcement mechanism(s) as necessary, to eliminate: 1) illicit discharges the city has identified to date that are not yet resolved within 120 days of permit issuance, and 2) any new illicit discharges detected within 60 days of identification of source. However, sources that are fully investigated and that the city determines do not contain significant levels of pollutants are not subject to these timeframes for mitigation. In this event, the city shall maintain documentation of the investigation, sampling, and reasons for determining that such discharges do not contain significant levels of pollutants.

- G. COMPLIANCE ACTIVITIES / ENFORCEMENT** – The city shall develop and implement enforcement procedures that incorporate escalating actions for violations of municipal stormwater requirements, ordinance or code identified during inspections.

Measurable Goal: The city shall develop a stormwater-specific ordinance(s) within the first year of permit issuance.

Measurable Goal: Within the first two (2) years of permit issuance the city shall develop a stormwater-specific Enforcement Response Plan (ERP), resolving all violations. Following implementation, at least 80 percent of all cases handled under the ERP shall be satisfactorily resolved within one (1) calendar year of the original enforcement action.

IV. MUNICIPAL FACILITIES POLLUTION PREVENTION / GOOD HOUSEKEEPING PRACTICES

A. MUNICIPAL EMPLOYEE TRAINING

The city shall develop training programs designed to teach staff about potential sources of stormwater contamination and ways to minimize the water quality impact of municipal activities, such as park and open space maintenance, fleet and building maintenance, construction and land disturbances, and storm drain system maintenance.

Measurable Goal: Provide new employee training at least one (1) time per year and provide refresher training for existing employees directly involved in these activities at least once every two (2) years. Specific staff to be trained for each topic is to be identified in the SWMP. Training shall include:

1. Proper street repair and road improvement practices to minimize discharges to the storm sewer system.
2. Specific procedures and spill management practices to prevent or minimize spills or discharges to the storm sewer system.
3. Proper handling, storage, transportation, and disposal of used oil and other toxic and hazardous materials and wastes to prevent spills, exposure to rainfall, and contamination of stormwater runoff.
4. Water and sanitary sewer system maintenance and repair practices to minimize discharges.
5. Stormwater management practices and pollution prevention plans for municipal stormwater inspectors. Training shall include information on the Glendale city ordinance(s) related to stormwater, and may also include other stormwater discharge regulations and permit requirements.

In the event there are no new employees in a given period, the city shall sufficiently document in the annual report that no new employees were hired or retained during said period to support why training was not conducted.

B. MUNICIPALLY-OWNED AND OPERATED FACILITIES – Some city-owned facilities that are included in this section may be permitted under the MSGP or another AZPDES permit. In these cases, the specific permit shall govern. The city shall, however, develop an internal process to determine facilities that may require coverage under the MSGP or alternative permits, and maintain an inventory or other tracking mechanism of such sites.

1. The city shall develop and maintain an inventory, list, database, or map of facilities owned or and operated by the MS4 that have a potential to discharge pollutants to waters of the U.S. This information shall include the name and address of the facility, the operational status (open/closed), latitude/longitude, facility contact, the Standard Industrial Classification (SIC) code(s) which best reflects the services provided by each facility, and a brief description of activities that may result in a discharge of pollutants. These include, but are not limited to, the following types of facilities:

- City parks, golf courses, and other recreational facilities; (where landscape maintenance, herbicide, pesticide, and fertilizer application, and waste management are implemented);
- Public swimming pools (pool maintenance/repair and chemical storage);
- Water treatment plants;
- Public septic systems (sanitary waste handling);
- Fire stations and other city fleet maintenance facilities (vehicle washing and maintenance, chemical handling, waste storage);
- POTWs and sludge handling areas; and
- Material and waste storage and processing facilities, including oil collection facilities.

Measurable Goal: The city shall develop an inventory, database, list, or map of facilities described above within one (1) year after the date of permit issuance. The process for developing, review and update of this information on a periodic basis shall be described in the SWMP.

2. The city shall review the potential pollutants and other factors of risk at such facilities and prioritize them for an on-site review to determine if they have a potential to cause a substantial pollutant load (i.e., identify 'higher risk' facilities) to the MS4.

Measurable Goal: Develop a system to review and prioritize the municipal facility inventory [IV.B. 1] and include it in the SWMP. The city shall complete the prioritization process by the end of year two (2) of the issuance date of this permit.

Factors that will be considered for purposes of prioritization include:

- Quantity and location of materials used and/or stored at the facility
- Potential for exposure to stormwater
- Potential to discharge a substantial pollutant load to the MS4 or to waters of the U.S.

Facilities that are already covered under the MSGP or other AZPDES permits will be ranked as low priority for consideration under this permit.

C. INSPECTIONS – The city shall perform the following:

1. **MS4 Drainage System Components** – The city shall identify priority areas of the MS4 based on system history, and shall perform routine visual monitoring of those identified MS4 system components to identify the presence of illicit discharges, excess sediment, litter, debris, or other pollutants (including floatables) that may obstruct flow or be transported in

stormwater, and to determine maintenance needs. (Note: Such components may include drainage/infiltration channels, washes, roadside drainage structures (i.e. linear systems) and retention and detention basins.)

Measurable Goal: The city shall define areas of the MS4 drainage system that are a priority for inspection, based on system history, and other factors that shall be identified in the SWMP. These priority areas shall be inspected at least once each year.

2. Municipal Facility Inspections – The city shall inspect each 'higher risk' municipal facility (see IV.B.1) and shall also recommend repair or maintenance of control measures, as necessary, or other pollution prevention activities with the goal of improving the quality of stormwater discharged from the site.

Measurable Goal: Inspect each of the 'higher risk' facilities biennially beginning in year three (3) of the permit term. If any of the above are permitted under the MSGP, completion of the annual Comprehensive Site Inspection required by that permit will satisfy this provision.

Measurable Goal: The city shall identify municipal facilities inspected each year in the annual report and provide comment whether improvements were needed. The city shall initiate a plan to implement any recommended improvements within three (3) months of the inspection and set a schedule for implementation. The city shall maintain a system for tracking the status of improvements and date(s) of implementation.

D. SYSTEM MAINTENANCE – The city shall:

1. Address maintenance needs identified as deficient by inspections, monitoring, or other reporting including:
 - Maintenance and cleaning of municipal drainage/infiltration channels, ditches, washes and roadside drainage structures to minimize the discharge of pollutants from the drainage system, including litter and debris control.
 - Maintenance and cleaning of municipal retention and detention basins to minimize the discharge of pollutants from the drainage system, including litter and debris control.
 - Maintenance and cleaning of municipal streets used for stormwater conveyance, street/roadway catch basins, and storm drain inlets to minimize the discharge of pollutants from the drainage system.

Measurable Goal: Evaluate drainage system maintenance priorities and update the monitoring schedule at least once each year. The city shall report the type and amount (i.e., number of catch basins, number of linear street miles) of the system cleaned each year in the annual report.

2. Sweep municipal streets and roads, and roads and parking areas in city parks, recreational areas, and city facilities as needed to minimize the accumulation and transport of sediment and litter to the storm sewer system.

The sweeping program and rationale for sweeping frequency shall be described in the SWMP. The MS4 shall provide information about sweeping activities in the annual report each year.

Measurable Goal: Evaluate street sweeping priorities and update the street sweeping schedule at least once a year. Report the amount (e.g., pounds, tons, gallons, cubic yards, or number of loads) of materials collected from street and lot sweeping in the annual report.

- E. MUNICIPAL SYSTEM MAPS** – The city shall prepare and routinely update maps of the MS4 system. The stormwater data is maintained as an ESRI ArcSDE feature class, projected to Arizona Central State Plane NAD 83. The Geographic Information System (GIS) layers show where stormwater runoff is routed in response to a storm event. The stormwater system map(s) shall include at a minimum the following information:

Measurable Goal: The city shall maintain and update stormwater system maps, including the following information which is to be provided in the fourth year annual report:

1. Linear Drainage Structures
 - a) Lines showing the location of all stormwater system pipes and the direction of stormwater flow.
 - b) Lines showing the location of all streets used for stormwater conveyance and the direction of stormwater flow.
 - c) Lines showing other linear stormwater conveyance structures (channels, floodways, etc.) and the direction of stormwater flow.
2. Storm Drain Inlets and Catch Basins
Points showing the locations of all storm drain inlets and catch basins.
3. Outfalls
Points showing the location of all major outfalls.
4. Detention/Retention Basins
Points or polygons layer showing the locations of all identified city-owned retention and detention basins that are connected to the municipal stormwater conveyance system (i.e., that receive drainage from or discharge to a stormwater conveyance).
5. Jurisdictional MS4 Boundary
Lines or polygons showing the jurisdictional boundaries of the MS4, including any new land annexations during the permit term.
6. Locations of Discharges to Waters of the United States
Lines or polygons showing the location (and name) of any river, canal, lake, or named wash that may receive stormwater discharges from the MS4. Any waterbody listed as an outstanding Arizona water (OAW) (A.A.C. R18 -11-112) or an Impaired Water (Arizona's 303[d] and other impaired water list[s]), shall be clearly identified.

Measurable Goal: The city shall incorporate mapping of the following items no later than the fourth (4th) year annual report:

1. Outfalls
 - a) Polygons showing the land uses within each drainage area associated with each of the major outfalls.
 - b) Polygons showing the drainage area associated with each of the major outfalls.
2. Detention/Retention Basins
Polygons showing the drainage area associated with each city-owned retention/detention basin that is connected to the municipal stormwater conveyance system (i.e., that receive drainage from or discharge to a stormwater conveyance).
3. Area Drainage Management Plan
 - a) The city shall update the Area Drainage Management Plan in conjunction with the Maricopa County Flood Control District. This work will include identification of flow

rates from identified sub-basins to evaluate flood hazards which could potentially lead to stormwater contamination.

- b) The GIS mapping system will be modified to include updated and/or corrected information (such as outfalls, inlets, retention basins, etc.) identified in the findings of the Area Drainage Management Plan.

V. INDUSTRIAL AND COMMERCIAL SITES (Non-Municipally Owned)

- A. **MUNICIPAL EMPLOYEE TRAINING** – Training to educate and update city inspectors on stormwater management practices and control measures for facilities subject to inspection. Training shall include information on requirements for stormwater discharges associated with industrial and commercial activity.

Measurable Goal: The city shall provide new employee training at least one (1) time per year and shall provide refresher training for existing employees directly involved in these activities at least once every two (2) years. In the event there are no new employees in a given period, the city shall sufficiently document in the annual report that no new employees were hired or retained during said period.

Measurable Goal: The city shall provide Enforcement Response Plan (ERP) training for new employees at least one (1) time per year and shall provide refresher training for existing employees directly involved in these activities at least once every two (2) years.

- B. **INVENTORY** – Glendale shall maintain the following information:

Industrial and Commercial Facility Inventory (Non-Municipal)

The city shall develop and maintain an inventory, list, or database of known industrial and commercial facilities, including the facility locations and a brief description of facility activities (i.e., automobile service and repair facilities, salvage yard, etc.). In developing the required inventory the city shall consider the following sources:

1. Industrial facilities identified in 40 CFR 122.26(d)(2)(iv)(C);
2. Industrial facilities subject to MSGP requirements, including those facilities that have submitted for a no exposure exclusion; and
3. Other industrial and/or commercial sources (or categories of sources) the city determines are contributing a substantial pollutant loading to the MS4.

Measurable Goal: Maintain a system to collect and update this information on a routine basis. The SWMP shall describe the process used to develop and maintain this inventory.

- C. **INSPECTIONS** – To identify and eliminate potential discharges of pollutants to the system, to verify implementation and maintenance of stormwater management practices in compliance with municipal ordinances, and to confirm permit coverage to discharge stormwater associated with industrial activity, as applicable to specific industrial facilities.

Measurable Goal: At a minimum, the city shall inspect 100 facilities identified in V.B. annually, including re-inspections, as necessary. The annual number of inspections may include municipally-owned facilities, consistent with IV.C.2. The SWMP shall describe the inspection and prioritization program. The number of inspections completed each year shall be documented in the annual report.

Measurable Goal: Glendale shall evaluate alternatives for enhancing the industrial and commercial stormwater program with a goal of increasing field presence through increasing interaction with commercial and industrial facilities through outreach or other innovative measures. The city shall also develop a system of prioritizing inspections with focus on facilities with higher potential to cause stormwater pollution. The revised SWMP shall outline an approach to evaluate program alternatives and re-prioritizing efforts. Progress toward this initiative shall be reported in the 4th year annual report.

- D. COMPLIANCE ACTIVITIES / ENFORCEMENT** – The city shall implement an effective compliance and enforcement program that incorporates escalating actions for violations of municipal stormwater requirements, ordinance or code.

Measurable Goal: The city shall develop and implement a comprehensive Enforcement Response Plan (ERP) within two (2) years of the effective date of this permit. The plan shall include timeframes for corrective actions and compliance with the city ordinance(s).

Measurable Goal: Following implementation of the ERP, the city shall resolve 80 percent of all cases handled under the ERP within one (1) calendar year from the original enforcement action.

VI. CONSTRUCTION SITES

A. MUNICIPAL EMPLOYEE TRAINING

Measurable Goal: Glendale shall provide new city employee training at least one (1) time per year and shall provide refresher training for existing employees directly involved in these activities at least one time every two (2) years. In the event there are no new employees in a given period, the city shall sufficiently document in the annual report that no new employees were hired or retained during said period. Training shall include the following:

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|--|--|
| Review Staff with
Stormwater Responsibilities | <ul style="list-style-type: none">● Grading and drainage design standards● Plan review procedures● Municipal ordinances related to stormwater and construction● Requirements for structural and non-structural control measures on construction sites, such as erosion and sediment controls● Post-construction stormwater controls |
| Inspection Staff with
Stormwater Responsibilities | <ul style="list-style-type: none">● Municipal ordinances related to stormwater and construction● Requirements for structural and non-structural control measures on construction sites, such as erosion and sediment controls● Construction control measures maintenance requirements● Inspection procedures● Enforcement procedures |

- B. INVENTORY** – The city shall develop an inventory, list, database, or map of construction projects that submit for plan review or approval by the city.

Measurable Goal: Complete a comprehensive inventory within one (1) year. The inventory shall be routinely maintained and updated.

C. PLAN REVIEW AND APPROVAL – For construction projects that will result in a land disturbance of one (1) acre or more (and those that disturb less than one (1) acre that are part of a larger common plan of development), the city shall:

1. Review plans for new development and redevelopment (such as grading and drainage plans). The review shall verify conformance with the city's requirements for stormwater, erosion and sediment control prior to issuing construction approvals or authorizations.
2. Require a copy of the ADEQ authorization document for non-municipal construction projects (as required by municipal stormwater requirements or ordinances or state stormwater requirements) to be submitted prior to issuing construction approval or authorization.

Measurable Goal: Review at least 80 percent of plans. Report number of plans submitted and the number reviewed each year in the annual report.

D. INSPECTIONS – Glendale shall inspect projects to determine whether effective erosion and sediment controls are in place, and verify conformance with the city's stormwater requirements and approved construction plans.

Measurable Goal: Inspect the active construction sites that are identified in the inventory (VI.B) at least semi-annually until final stabilization is established. Report the number of sites inspected each year in the annual report.

E. POST-CONSTRUCTION CONTROLS – The city shall inspect projects in the post-construction phase to determine if controls are adequate.

Measurable Goal: The city shall inspect at least 80 percent of sites that have received city permits within one (1) year after construction has been completed to determine the effectiveness of site stormwater controls. The city shall report the number of sites that receive post-construction inspections and an assessment of the effectiveness of post-construction stormwater controls in the annual report.

F. COMPLIANCE ACTIVITIES / ENFORCEMENT – The city shall implement an effective compliance and enforcement program that incorporates escalating actions for violations of municipal stormwater requirements, ordinance or code.

Measurable Goal: Within two (2) years of permit issuance, the city shall develop an effective compliance and enforcement program for resolution of stormwater violations at construction sites and for post-construction stormwater controls. Once developed, the city shall follow the enforcement program, including timeframes for all violations. The city shall document areas of non-compliance and follow-up actions taken by the city to achieve compliance.