



# California Regional Water Quality Control Board Los Angeles Region



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December 10, 2002

Sally Coleman  
Manager, Stormwater Quality Section  
Ventura County Flood Control District  
800 South Victoria Avenue  
Ventura, CA 93009-1600

Certified Mail  
Claim No. 7001 1140 0002 0364 8599

Dear Ms. Coleman:

### COMMENTS ON THE ANNUAL REPORT FOR THE VENTURA COUNTYWIDE STORMWATER QUALITY MANAGEMENT PROGRAM RECEIVED OCTOBER 3, 2002, PURSUANT TO MONITORING AND REPORTING PROGRAM CI 7388; NPDES PERMIT NO. CAS004002

On October 3, 2002, we received the Annual Report for Permit Year 1, Reporting Year 8 (Report), submitted to the Regional Board pursuant to Monitoring and Reporting Program CI 7388 as part of the Ventura County Municipal Storm Water NPDES Permit (Permit). We have reviewed the Report and have the following comments and suggestions for improvement:

This Report is much improved over the Annual Report from last year (reporting year 7). Most of our comments on the previous report have been addressed, with exceptions outlined below.

We find that the following areas were not adequately addressed by the report:

#### Program Management

Your Report must provide "an assessment of the effectiveness of Ventura County Storm Water Management Plan...and impacts on beneficial uses" (part 1.B.3). Although (as in last year's report) relative compliance with Permit requirements was discussed there is still no effective linkage to potential water-quality benefits. You did make the statement "measurable changes in water quality are not likely within the Permit term". However, this statement was not further explained or substantiated, and no prospective evaluation was offered.

This section of the Report also does not describe the Program's compliance record, or explain why some Co-permittees failed to attain the 90% performance goals given in the Stormwater Management Program (SMP). Future annual reports need to address this concern.

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### Programs for Industrial/Commercial Businesses

- We appreciate your submittal of the Industrial/Commercial Facilities Database (appended to the Report). However, the developed database needs a field to include the name of a contact person.
- More information needs to be provided in future reports for additional target businesses identified in the annual report, such as mobile car washing services, pressure washing services, water purification companies, and commercial equestrian facilities. Such information shall include number of such facilities, their location, operations and pollutants of concern at the facilities.
- It appears that the City of Santa Paula has not trained any staff targeted under this program for two years. Please provide an explanation and schedule for training of Santa Paula staff. It is to be recalled that Santa Paula's industrial/commercial program was noted deficient during the first Ventura Countywide Storm Water Program audit.

### Programs for Construction Sites

We appreciate the listing of total enforcement actions and proportions of the type of enforcement. In the future please provide the number and type of enforcement actions for construction sites, for each Co-permittee.

### Programs for Planning and Land Development

- The report indicates that Simi Valley has conditioned only 27% of the projects that are SQUIP eligible. The report does not provide an explanation for this, nor does it indicate when the remaining 63% of projects would be fully conditioned. A report providing an explanation and timeline is due by **January 30, 2003**.
- Future reports need to address maintenance follow-up issues by creating a database of BMPs where they are currently lacking, and by reporting percentage of BMPs followed-up for maintenance in each reporting year. As you know, this is one of the concerns that were revealed during the audits of the program.

### Programs for Illicit Discharge and Illegal Connection Control

We think the targeted outreach under this program (providing educational materials to those issued a building or encroachment permit, and to facilities with repeated IC/ID problems) is an effective approach.

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In the future please provide the numbers and type of enforcement under this program for each Co-permittee. We also found that the database entries lacked details regarding the type of follow up taken in a particular case, and that the numbers of reportings and follow-up may not match those listed in the Report.

### Public Agency Activities

The County of Ventura did not report the predominant types and likely sources of trash removed from catch basin inlets. Please include such information in future annual reports.

The City of Oxnard has not yet developed or implemented Storm Water Pollution Control Plans for three corporate maintenance yards. A response providing an explanation and timeline for the preparation of the documents is due by **January 30, 2003**.

### Storm Water Management Program Budget

As discussed at the October 2002 management meeting, storm water program budget reporting is lacking in many significant areas. As agreed at the meeting, co-permittees need to immediately establish a sub-committee to standardize budget reporting. This action should prevent the reporting of untrue statements such as monitoring expenses for some co-permittees where this is not applicable.

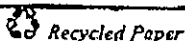
### Storm Water Monitoring Program

We appreciate the efforts expended to improve the Monitoring Report (which we received on July 15, 2002) and the monitoring section in this Report. Most of our comments on the July Monitoring Report were addressed in your response letter dated September 26, 2002. However, we still have concerns over the following issues:

- We had requested that you provide us with a professional opinion on the most sensitive species for toxicity testing. According to Southern California Coastal Water Research Project (SCCWRP's) letter to you dated 11/26/02, it appears that the sea urchin fertilization test is more sensitive to some trace metals (e.g., Cu, Cd, Zn), while the silverside test using *Menidia beryllina* is more sensitive to ammonia and some pesticides. Therefore, since both classes of pollutants have been detected in your past analyses, we encourage you to use both species to evaluate storm water toxicity in your program.
- We understand the time constraints for laboratory and data analysis of dry weather samples. We also agree that March sampling would not be representative of dry weather flows. For clarification: for the remainder of this Permit term, we expect that all wet weather data will

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be evaluated and presented in the July Monitoring Reports, and the only new data presented and analyzed for the October Annual Reports will be from dry weather sampling.

- You must ensure that remaining QA/QC issues are resolved.
- In the Data Analysis Conclusion (10.9.3), the Report discusses the exceedances of water quality objectives for total metals. The Report stated, "The EPA has determined that dissolved metals are more toxic than total metals and it is unclear whether exceedances of total metals objectives would have significant benefits on aquatic life." Los Angeles County, as part of the Storm Water Monitoring Coalition (SMC), is developing a project to create a methodology for toxicity testing of suspended solids in storm water. To work toward understanding the relative impact of the dissolved and particle-bound fractions of these pollutants, we suggest that Ventura County participate in this project as a member of the SMC.

#### Ventura River Watershed Bioassessment

It seems the Ventura River bioassessment was successfully conducted as a joint effort between staff from Ventura County, and the Sustainable Land Stewardship Institute, with a significant volunteer effort. These data provide an assessment of the previously undocumented baseline habitat conditions in the Ventura River Watershed, and may identify areas impacted by humans, by Matilija Dam, and by cattle grazing.

We expect that you will review these comments and incorporate them into the next Annual Report to be submitted by October 1, 2003.

Sincerely,



Ejigu Solomon, Chief  
Ventura Storm Water Unit

cc: Bruce Fujimoto, State Water Resources Control Board  
Ventura MS4 co-permittees

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