Ventura Countywide Stormwater Quality Management Program

2009-2010 Permit Year

Ventura Countywide Stormwater Quality Management Program Annual Report

Camarillo
County of Ventura
Fillmore
Moorpark
Ojai
Oxnard
Port Hueneme
Santa Paula
Simi Valley
Thousand Oaks
Ventura
Ventura County Watershed Protection District

December 15, 2010

Prepared Under the Direction of:

Gerhard Hubner, Deputy Director,
Ventura County Watershed Protection District

Arne Anselm, Water Quality Manager

Tommy Liddell, Water Resources Specialist IV

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Executive Summary

This Annual Report discusses the Permittees' Permit compliance activities for the period of July 1, 2009 to June 30, 2010. It is intended to include a description of all activities conducted during the reporting period to show compliance and the efforts made to improve water quality in Ventura County by the Permittees. The purpose of this report is to comply with NPDES Permit No. CAS004002/Order No. 10-108 (Permit), which requires an Annual Storm Water Report submitted by December 15 of each year.

This Annual Report was prepared with the cooperation and assistance of the Ventura Countywide Permittees who contributed the information and data regarding their various programs. The Permittees cooperate through the Program to ensure information and workloads are shared, economy of scales achieved and a better Countywide Stormwater Quality Management Program is created. The Permittees through implementation of various comprehensive program elements, have strived for compliance with all requirements of the Permit.

The organization of the Report reflects the organization of the Permit containing a section on each element:

2. Program Management,

3. Public Information and Participation,

4. Industrial/Commercial Facilities Programs,

5. Planning and Land Development Programs,

6. Development Construction Programs,

7. Public Agency Activities,

8. Illicit Discharges and Illegal Connections Elimination,

9. Stormwater Quality Monitoring.

New in this Annual Report are the Performance Standards for specific Permit requirements identified in each section along with the Permittees' status on achieving that standard. Permit compliance cannot be directly inferred solely by these Performance Standards as the complete efforts of the Permittees is not reflected in the metric. Rather, the information is for the Permittees to gage their efforts and identify areas of needed improvement. Since this is early in the Permit term the effective date of many of the Performance Standards identified were not during this reporting period, so many are marked as "in progress".

The Program has adopted a method for assessing program effectiveness based on the approach developed by the California Stormwater Quality Association (CASQA). Each of the six Program Elements contains various Control Measures. Each Control Measure consists of a series of Performance Measures. Performance Measures are identified to document the progress of implementation and to measure the effectiveness of implemented BMPs. As the Permittees implement the new Permit future reports will address the need for Program changes.

Current Program Effectiveness Measurements show the Program is effective in the first two outcome levels of documenting efforts and raising awareness. As implementation of the Permit continues improvements in the ability to measure the other outcome levels of changing behavior and reducing pollutant loads can be accurately measured. Ultimately, a trend of improvement in water quality will be identified through the Program's monitoring program.

Notable accomplishments made by the Permittees and the Program over this reporting period include:

- Adoption of a Program Mission Statement;
- New Annual Report format developed in conjunction with Regional Board staff with over 50 Performance Measures identified and included;
- Submittal of a revised Technical Guidance Manual for new and significant re-development including a significant stakeholder process;
- Development and distribution of Retail Partnership BMPS brochures;
- Implementation of the Youth Outreach Education campaign;
- Drafting of a five year Implementation Agreement ensuring continued Permittee cooperation countywide;
- Authorization by Public Works Directors for Management Committee members to vote on budgets issues;
- Submittal of each Permittee's storm drain maps to the Regional Board;
- Installation of new telemetry and sampling equipment and the monitoring of seven new major outfall locations for a total of 11 new monitoring locations;
- Participation in the Statewide Coastal Cleanup Day Event at over 24 different beaches and inland waterways, and the 10th highest number of volunteers out of the 30 counties that reported;
- Active support for the SB 346 legislation to remove copper from brake pads, signed by the Governor.

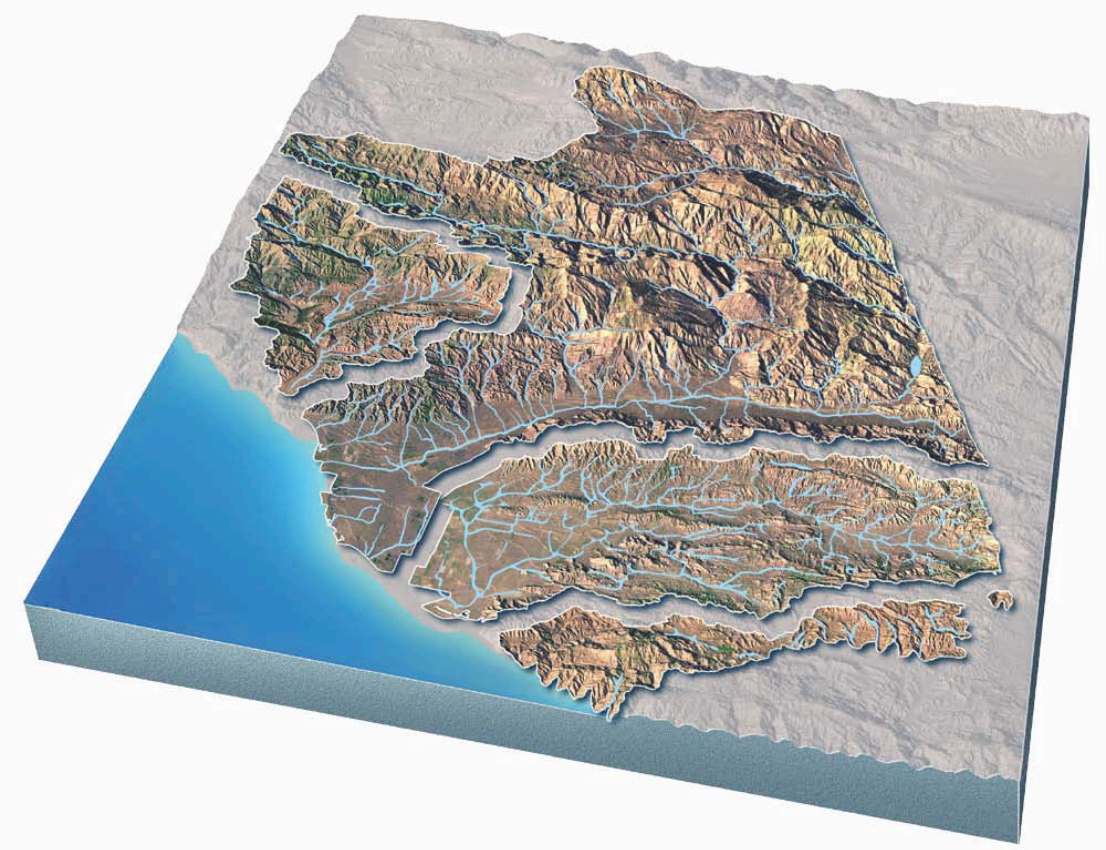
In summary, the Permittees are aggressively moving forward with the implementation of the new Permit. Each program element has a subcommittee working to develop needed forms, protocols and procedures to ensure future permit compliance. The programs, methods and this report are continually being refined to improve effectiveness, apply lessons learned, identify and address additional sources of stormwater pollutants, and therefore water quality. Future program activities will include finalizing the Technical Guidance Manual for Land Development and initiating an off-site compliance program for developments that have technical infeasibilities. More immediate improvements to water quality may be made through upcoming the illicit connection screening and storm drain mapping programs, and the usefulness of the outfall monitoring data generated for each Permittee from the monitoring program.

1 Introduction

The Watershed Protection District (Principal Permittee), the County of Ventura and the incorporated cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks, (each a Permittee and collectively known as Permittees) operate municipal storm drain systems and discharge stormwater and urban runoff pursuant to the countywide NPDES permit (Board Order No. 10-0108 or Permit). This Permit, administrated by the Los Angeles Regional Water Quality Control Board (RWQCB), requires an Annual Storm Water Report and Assessment (Annual Report) submitted by December 15th of each year.

The first stormwater permit for Ventura County was adopted in 1994 and included all ten cities, the County and the Watershed Protection District. On July 27, 2000 a second permit was adopted that included logical and incremental increases in the requirements. That five-year permit was on administrative extension until May 7, 2009, when Board Order 09-0057 was adopted. That permit became effective on August 7, 2009 and was not technically in effect for the first month of this permit year, however the Permitees started work on implementing the conditions of the new Permit immediately. For reporting purposes all stormwater program efforts from July 1, 2009 through June 30, 2010 are included in this report.

After the May 7, 2009 adoption of the permit the Regional Board announced it was rescinding the permit to hold a new adoption hearing. On July 8, 2010 Order No. R4 2010-0108 was adopted with minor changes. The 2010 Permit replaced the order adopted in 2009 in its entirety, and all references to the Permit in this report refer to that order.



Ventura County Watersheds

1.1 PURPOSE AND ORGANIZATION OF REPORT

The primary purpose of this report is to document the Permittees' continued efforts to improve water quality and comply with the Permit. Since the Permit did not require a Stormwater Management Plan this report will also serve as way to represent and define the Permit's requirements and the effort required to meet them. Finally, program effectiveness assessment of implementation of the permit requirements will be examined and potential areas for improvement identified.

The organization of the report reflects the organization of the Permit. Each section contains a review of the permit requirements, the Permittee's program activities in that area and detailed descriptions of the efforts put forth in the 2009-2010 permit year:

- **Program Management - Section 2.0** – Roles and responsibilities of the Permittees and committees, and a program budget report.

- **Public Information and Public Participation Program - Section 3.0** Results and effectiveness of pollution prevention education and outreach programs.

- **Industrial Commercial Business Program - Section 4.0 –** Inspection, education and enforcement activities directed at effectively prohibiting non-stormwater discharges from businesses and industrial sites in order to reduce stormwater pollution to the maximum extent practicable.

- **Planning and Land Development Program - Section 5.0** Efforts to minimize the impact of new development and significant redevelopment on stormwater quality through using Low Impact Development site design and water quality treatment BMPs.

- **Development Construction Program - Section 6.0** - Site practices, stormwater pollution prevention plans and inspections to ensure the protection of stormwater quality to the maximum extent practicable.

- **Public agencies Activities Program - Section 7.0** Efforts to remove pollutants from MS4s and eliminate the adverse effects that municipal activities may have on water quality

- **Illicit Discharge and Illegal Connections Ellimination Program - Section 8.0** Status of the tools, control measures and responses established to eliminate non-permit authorized discharges and connections to the storm drain system.

- **Water Quality Monitoring Program - Section 9.0** A summary and analysis of the monitoring results from the Permit year. Includes a report describing efforts that are currently being implemented and additional BMPs that will be implemented to prevent or reduce any pollutants that are causing or contributing to the exceedance of WQSs.

1.1.1 Major Program Accomplishments

Notable accomplishments that occurred during the reporting period include:

- Adoption of a Mission Statement;

- New Annual Report format developed in conjunction with Regional Board staff with over 50 Performance Measures identified and included;

- Submittal of a revised Technical Guidance Manual for new and significant re-development including a significant stakeholder process;
- Development and distribution of Retail Partnership BMPS brochures;
- Development of Youth Outreach Plan;
- Implementation of the Youth Outreach Education campaign;
- Drafting of a five year Implementation Agreement ensuring continued Permittee cooperation countywide;
- Authorization by Public Works Directors for Management Committee members to vote on budgets issues;
- Submittal of each Permittee's storm drain maps to the Regional Board;
- Installation of new telemetry and sampling equipment and the monitoring of seven new major outfall locations for a total of 11 new monitoring locations;
- Participation in the Statewide Coastal Cleanup Day Event at over 24 different beaches and inland waterways, and the 10th highest number of volunteers out of the 30 counties that reported;
- Active support for the SB 346 legislation to remove copper from brake pads, signed by the Governor;
- Program improvement through a detailed program efficiency audit of the Principal Permittee;
- Regional TMDL participation;
- Southern California Coastal Water Research Project (SCCWRP) participation;
- Cooperation and commitment to SCCWRP to aid in a hydromodification effects study;
- Cooperation and commitment to the Stormwater Monitoring Coalition of Southern California to a Low Impact Development Guidance and Training Project for Southern California;
- CASQA participation;
- Calleguas Creek Watershed Management Plan participation;
- Ventura River Watershed Council participation;
- Integrated Regional Water Management Plan (IRWMP) Participation.

1.2 PROGRAM EFFECTIVENESS ASSESSMENT

The 2009-2010 Annual Report documents the Program's comprehensive stormwater quality program that addresses a wide range of activities. Various Permittee Departments cooperate in implementing different parts of the Program under their control. Each of the six Program Elements contains various Control Measures. Each Control Measure consists of a series of Performance Measures. Performance

Measures are identified to document the progress of implementation and to measure the effectiveness of implemented BMPs.

The Program has adopted a method for assessing program effectiveness based on an approach developed by the California Stormwater Quality Association (CASQA). The effectiveness assessment is more comprehensive than past assessments and addresses the major stormwater program areas and activities. As illustrated below, there are six outcome levels for the effectiveness assessment. The outcome levels represent ways in which the effectiveness of the program can be determined, even if it is intermediate[1].

Outcome levels help to categorize and describe the desired results of the Program Elements and related Control Measures. Pursuant to the 2007 CASQA guidance, outcomes for stormwater programs have been categorized into six levels, as shown in Figure 1-1. As illustrated in the Figure below, there are six outcome levels for the effectiveness assessment. The outcome levels help to categorize and describe the desired results or goals of the program.

Outcome Level	Description
6	Protecting Receiving Water Quality
5	Improving Runoff Quality
4	Reducing Loads from Sources
3	Changing Behavior
2	Raising Awareness
1	Documenting Activities

Figure 1-1 Effectiveness Assessment Outcome Levels

Within each individual section (starting with Chapter 3), the effectiveness assessment identifies the outcome level(s) achieved, as well as any program modifications that have been identified because of the assessment. In future annual reports, the effectiveness assessment will be expanded and modified as necessary in order to report out on key items.

Some important points to remember about these effectiveness assessments include:

- The ability of a stormwater program to assess an outcome level tends to become progressively more difficult as you assess higher outcome levels (levels 4-6). This is because the higher outcome levels assess the impact that the SWMP has on water quality, which requires a much more robust dataset over an extended period of time.

[1] California Stormwater Quality Association, *Municipal Program Effectiveness Assessment Guidance*, May 2007.

- Outcome levels 1-3 (and sometimes 4) are typically assessed using program management data, whereas outcome levels 4-6 are assessed using physical and/or water quality monitoring data.

- Each program element can be assessed at one or more outcome levels based on the data and information available.

In future annual reports, the effectiveness assessment will be expanded and modified as necessary in order to report out on key items.

2 Program Management

2.1 PROGRAM IMPLEMENTATION

2.1.1 Mission Statement

To improve the focus and guide the actions of the program a mission statement was adopted by the Management Committee. Its purpose is to identify the overall goal, provide a sense of direction, and guide decision-making. It provides the framework or context within which the Program's strategies are guided. The Program's mission statement is below:

The Ventura Countywide Stormwater Quality Management Program, established in 1992 between the ten Cities, the County and District, works cooperatively on a regional basis to ensure compliance with the countywide Stormwater Permit through the development and implementation of an integrated, effective and fiscally responsible stormwater quality management program with the objective of protecting, maintaining and improving water quality in Ventura County for the common benefit of its residents and the environment..

2.1.2 Program Implementation

In 1992 the concept of a single countywide NPDES MS4 Stormwater Permit (Permit) was implemented in Ventura County. This began with the initial Report of Waste Discharge and the authorization to use the Watershed Protection District's Benefit Assessment to finance the activities and requirements. Subsequently, on June 30, 1992, the District (as the Permit's Principal Permittee) entered into four separate District-zone-based implementation agreements with the ten Ventura County cities and the unincorporated areas of the county (the Permittees). Collectively, these four agreements are known as the Implementation Agreement for the Ventura Countywide Stormwater Quality Management Program. The Implementation Agreement identified the responsibilities of the parties to the Permit and set forth the methodology for using the District's Benefit Assessment financing to fund the NPDES Stormwater Program in their respective jurisdictions.

With the adoption of the second NPDES Permit, the Principal Permittee Program activities, responsibilities, and associated costs increased significantly. The District could no longer solely shoulder these fiscal obligations without assistance from the Permittees. In response, the Permittees' Public Works Directors created a subcommittee to research the historical documentation from the District's Benefit Assessment Reports and draft a new implementation agreement.

In FY 2007-2008, the first amendment to the agreement was approved to address this needed cost-sharing by amending the original agreement. In FY 2008–2009 and 2009-2010, the second and third amendments to the original agreement were approved to continue this needed cost-sharing.

The additional program costs for the Principal Permittee and Permittees associated with the 2010 NPDES Permit prompted further effort among the Public Works Directors to equitably share the increased costs. The result of that effort was a new NPDES Implementation Agreement to replace the original agreement and amendments.

The Agreement defines the fiscal responsibilities (expenditures and contributions) of all collective parties with respect to the current Permit. It formalizes the Permittees' commitment to cooperate and to mutually fund an integrated Program for protecting and improving water quality in Ventura County.

2.2 PERMITTEE RESPONSIBILITIES

The responsibilities of the Principal Permittee and Permittees are defined within the Permit and the Implementation Agreement. These roles and responsibilities are outlined below.

2.2.1 Principal Permittee

The role of the Principal Permittee is similar to the other Permittees with the addition of certain overall programmatic and facilitation responsibilities. These responsibilities are not to ensure the compliance of the Permittees as the Principal Permittee has no regulatory authority over the Permittees. The responsibilities outlined in the Permit include the following:

- Coordinate and facilitate activities necessary to comply with the requirements of the Permit
- Coordinate Permit activities among Permittees and act as liaison between the Permittees and the Regional Water Board on permitting issues
- Provide for countywide consistency and program coordination
- Provide technical and administrative support for committees that will be organized to implement this Order and its requirements
- Convene the Committee Meetings constituted pursuant to Permit, upon designation of representatives
- Participate in the County Environmental Crimes Task Force
- Provide resources for the collection, processing and submittal to the Regional Water Board of monitoring and annual reports, and summaries of other reports required under this OrderEstablish uniform data submittal format and develop an Electronic Reporting Program
- Participate in water quality meetings for watershed management and planning, including Southern California Stormwater Monitoring Coalition (SMC)
- Participate in the Southern California Storm Water Monitoring Coalition (SMC) Southern California Regional Bioassessment Monitoring Program
- Compile and make available on the internet a list of the general public reporting contacts
- Implement a Public Information and Participation Program (PIPP)
- Develop a strategy to educate ethnic communities through culturally effective methods
- Submit a plan to provide outreach in lieu of the school curriculum

In addition to responsibilities identified in the Permit the Principal Permittee also performs the following for the benefit of the Program

- Prepare communications, regulatory reports and submissions to the Regional Board
- Provide Regional Representation for the Program and forward information to the Permittees
- Arrange for public access and review of Program plans and documents
- Secure services of consultants as necessary
- Implement activities of common interest to the Program
- Develop/prepare/generate all materials and data common to all Permittees

- Update Permittees on RWQCB and US Environmental Protection Agency (USEPA) regulations, and

- Convene all Management Committee and Subcommittee meetings.

2.2.2 Permittees

- Each Permittee is responsible for implementing the NPDES Stormwater Program and Permit compliance within their jurisdiction. The main responsibility of each Permittee can be identified as follows:

- Comply with the requirements of this Order and any modifications thereto through implementation within its jurisdiction of the various stormwater management programs outlined in the Permit

- Coordinate among its internal departments and agencies, as necessary, to facilitate the implementation of the requirements of this Order applicable to such Permittees in an efficient and cost-effective manner

- Participate in intra-agency coordination (e.g., Planning Department, Fire Department, Building and Safety, Code Enforcement, Public Health, Parks and Recreation, and others) necessary to successfully implement the provisions of the Permit

- Prepare and submit all reports or requests of information to the Principal Permittee in a timely fashion.

- Review, comment on and approve Program budgets, plans, strategies, management programs and monitoring programs developed by the Principal Permittee or any subcommittee;

- Establish and maintain adequate legal authority;

- Take appropriate enforcement actions as necessary within its jurisdictions to ensure compliance with applicable ordinances;

- Respond to/or arrange for response to emergency situations, such as accidental spills, leaks, illicit discharges/illegal connections, etc., to prevent or reduce the discharge of pollutants to the storm drain systems and waters of the U.S. within its jurisdiction;

- Conduct inspections of and perform maintenance on municipal infrastructure within its jurisdiction;

- Conduct and coordinate any surveys and source identification studies necessary to identify pollutant sources and drainage areas; and

- Participate in the Management Committee

2.3 MANAGEMENT ACTIVITIES

2.3.1 Management Committee

The NPDES Management Committee is the Principal forum for directing the Program's development and implementation. This Committee is attended by senior staff from all Permittee agencies and meets monthly to assure Program continuity. Committee members have been authorized by their Director of Public Works as Management Committee Voting Representatives with the authority to approve Principal Permittee's budget and/or modifications. If no Representative is authorized, then the Directors of Public

Works are responsible for voicing their opinion at meetings when these items are on the agenda. In addition to budgeting and program direction, this committee also periodically evaluates the need to create ad hoc committees or workgroups to develop tools and accomplish the objectives of the NPDES Stormwater Program. Although it is no longer mandated that Permittees attend the meetings participation in the Management Committee as necessary is a specific requirement of the Permit. Permittee participation in the NPDES Management Committee is presented in Performance Standard 2-1.

Participate in intra-agency coordination including Committee and Subcommittee Meetings to facilitate the implementation of the Permit			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 2-1

2.3.2 Subcommittees

The Subcommittees provide a forum for discussion of particular program elements and are attended by the staff with the appropriate expertise from each Permittee. These meetings create a more uniform approach and regional consistency to program management countywide. This helps create a level playing field for businesses and residents countywide. More importantly it allows the Permittees to learn from each other. This is very beneficial for the smaller agencies which do not have at their disposal the resources available to the true Phase 1 (population over 100,000) cities. The subcommittees were created at the very beginning of the program and have continued to meet and evolve over the years. Subcommittee activities over this Permit Year have been devoted identifying new Permit requirements and developing programs for compliance. Each subcommittee focuses on specific permit requirements and implementation programs. These generally follow the program sections of the permit, but the subcommittees do incorporate the whole permit in their analysis and integrated program development. The subcommittees and their principal program responsibilities are listed below. This list does not include any ad hoc, special project or working groups that may have been formed by the Management Committee or from a logical outgrowth of the subcommittees.

Residential/Public Outreach Subcommittee

Helps guide and approve the Principal Permittee's countywide outreach program and regional message consistency for the stormwater public education program efforts. Using information on pollutants learned from the monitoring program and 303(d) lists this committee selects specific Pollutants of Concern to target each year and decides on the best methods of outreach and public education to create a change in behavior.

Business and Illicit Discharge Control Subcommittee

Oversees the development of the model industrial/commercial and illicit discharge/illegal connections programs. Countywide consistency is created by developing inspection forms and sharing techniques and methods of identifying and educating businesses and industries targeted for inspections. Industry and business specific outreach material is also developed to be used

countywide by all permittees. Illicit discharge identification and responses are included at every meeting and discussed. Enforcement experiences are shared to further the education of inspectors countywide.

Planning and Land Development Subcommittee

Planners and development engineers work together to provide regional tools for design, review and conditioning of new development and redevelopment projects, and promote regional consistency in their application. Guidance and training are developed for the development community for the implementation of stormwater management control measures in the countywide. The guidelines developed are intended to improve water quality and mitigate potential water quality impacts from new development and significant redevelopment.

Construction Subcommittee

Regional consistency for inspections and enforcement are provided by developing model inspection checklists and identifying solutions to common problems. Information on the State General Construction Permit issues, training requirements and opportunities are shared and disseminated to the construction community.

Public Infrastructure

Assists municipalities in the protection of MS4s through the removal of pollutants and the development of model municipal activities programs, corporate yard inspections, and integrated pesticide management programs. Identify solutions to of infrastructure mapping and other permit requirements.

The Permit requires Permittee participation in the subcommittees as necessary; the Permittees have been very involved in subcommittees this permit year including stepping up to the chair position on four of the five subcommittees. The value of the subcommittees to improve staff knowledge and abilities, achieve economies of scale and provide regional program consistency is known by the Permittees; It is recognized that the increased effort in the subcommittees will be reflected by improvement in staff, resources and the overall program.

2.3.3 Other Regional Committees/Work Groups

Many of the Permittees additionally participate in various watershed management advisory groups. These groups include: the Ventura County Integrated Resources Water Management Plan (IRWMP), Ventura River Watershed Planning Committee, Santa Clara River Watershed Committee, Wetlands Recovery Project, Calleguas Creek Watershed Management Committee, Matilija Dam Ecosystem Restoration Study, Channel Islands Beach Park Action Plan for Improving Water Quality, Malibu Creek Watershed Management Committee and Technical Advisory Committee, Steelhead Restoration and Recovery Plan, Beach Erosion Authority for Clean Oceans and Nourishment (BEACON), Southern California Coastal Water Research Project (SCCWRP), Stormwater Monitoring Coalition of Southern California (SMC), and the Ormond Beach Task Force. These watershed and regional groups focus their activities and discussions on specific concerns such as water quality, habitat restoration and flood control, as well as short, medium and long-term solutions to improve water quality.

2.3.4 Management Framework – Program Implementation

Program development occurs through the countywide and watershed management frameworks., At a jurisdiction level the Permittees have formally identified which departments and staff have responsibility for implementation of each program elements within their jurisdictions. It may be necessary for the responsibility to be formally documented through Memorandums of Understanding or other tools. Smaller agencies tend not to require such formal agreements between departments, and in some cases the

staffing is so low there may be only a few people who are involved in the implementation of all aspects of the stormwater program.

2.3.5 Legal Authority

Although adequate legal authority existed for most potential pollutant discharges at the inception of the stormwater program in 1994, the Permittees determined that a Model Stormwater Quality Ordinance should be developed to provide a more uniform countywide approach and to provide a legal underpinning to the entire Ventura Countywide NPDES Stormwater Program.

Ensure that its Stormwater Quality and LID Ordinances authorize enforcement of all requirements of the Permit? (by July 8, 2012)			
	Yes	*No*	*In Progress*
Camarillo			☑
Ventura County	☑		
Fillmore	☑		
Moorpark		☑	
Ojai	☑		
Oxnard			☑
Port Hueneme			☑
Ventura			☑
Santa Paula			
Simi Valley			☑
Thousand Oaks			☑
Watershed Protection			☑

Performance Standard 2-2

Legal counsel statement of necessary legal authority to comply with the Permit through ordinances and/or municipal code modifications? (by July 8, 2012)			
	Yes	*No*	*In Progress*
Camarillo			☑
Ventura County			☑
Fillmore	☑		
Moorpark			☑
Ojai			☑
Oxnard			☑
Port Hueneme			☑
Ventura			☑
Santa Paula			
Simi Valley			☑
Thousand Oaks			☑
Watershed Protection			☑

Performance Standard 2-3

Subsequently, all of the Permittees adopted largely similar versions of the model Stormwater Quality Ordinance. With the adoption of the Order No. 10-0108 the municipal ordinances must be updated by July 8, 2012. The Permittees led by the Cities of Camarilllo and Moorpark have already begun the process of drafting a model ordinance which when adopted by each agency will authorize the Permittees to enforce all requirements of the Permit.

Enforcement of the current ordinance and the detection, investigation and elimination of discharges undertaken by the Permittees during 2009/10 are described further in Section 8. In addition to prohibiting un-permitted discharges, the Stormwater Quality Ordinance in conjunction with the conditions of land development provides for requiring BMPs on new development and significant redevelopment.

Stormwater quality ordinances have been adopted in each Permittees' jurisdictions as indicated in Table 2-1, as stated above the requirement to update these ordinances to be able to enforce the new permit is required by July 8, 2012.

Table 2-1

Ordinance Adoption Dates

Co-permittee	Adopted Date	Amendment Date
Camarillo	3/25/1998	
County of Ventura	7/22/1997	
Fillmore	12/8/1998	
Moorpark	12/3/1997	
Ojai	2/9/1999	
Oxnard	3/24/1998	
Port Hueneme	4/1/1998	2/1/2001
San Buenaventura	1/11/1999	
Santa Paula	11/16/1998	
Simi Valley	7/23/2001	3/24/2009
Thousand Oaks	9/14/1999	

Table 2-1 Ordinance Adoption Dates

2.3.6 Watershed Protection District Stormwater Program Representation

To stay informed of new science and regulations and gain economies of scale through regional efforts the Principal Permittee represents the Permittees by participating in the following organizations and associations:

California Association for Stormwater Agencies (CASQA)

The California Association of Stormwater Quality Agencies originally formed as an advisory body to the State Water Resources Control Board (SWRCB) on stormwater quality program issues is now a 501 (c)(3) non-profit organization. CASQA membership is composed of a diverse range of stormwater quality management organizations and individuals, including cities, counties, special districts, industries, and consulting firms throughout the state. A large part of its mission is to assist stormwater quality programs in California to learn collectively from the individual experiences of its members, learn from the mistakes and provide awareness of regional and state issues. Since its inception in 1989, CASQA has evolved into the leading organization in California dealing with stormwater quality issues.

Southern California Coastal Water Research Project (SCCWRP)

The Southern California Coastal Water Research Project (SCCWRP) is a joint powers agency formed by fourteen agencies through a unique partnership between municipalities that discharge treated wastewater to the ocean, stormwater agencies, and regulators that oversee dischargers. Members work together to develop a solid scientific foundation for coastal environment management in southern California. SCCWRP's mission is to gather the necessary scientific information so that member agencies can effectively and cost-efficiently protect the Southern California coastal and marine environment. In addition, SCCWRP's mission is to ensure that the data it collects and synthesizes effectively reaches decision-makers, scientists and the public.

California Coalition for Clean Water (CCCW)

The California Coalition for Clean Water (CCCW) is an alliance of local governments and public agencies, labor, agriculture, business, housing and development interests working together towards the development and implementation of water quality standards that protect water quality while balancing economic and social needs of local communities and the state. CCCW's mission is to assist the

California Regional Water Quality Control Boards and SWRCB to adopt and implement sound water quality standards that reflect the intent and spirit of state and federal clean water laws.

National and Global Organizations

As Principal Permittee, the Watershed Protection District (District) participated jointly with SCCWRP and various other federal and international organizations such as the Society of Environmental Toxicology and Chemistry (SETAC). SETAC is a nonprofit, worldwide professional society comprised of individuals and institutions engaged in the study, analysis, and solution of environmental problems. SETAC's mission is to support the development of principles and practices for protection, enhancement and management of sustainable environmental quality and ecosystem integrity.

SETAC promotes the advancement and application of scientific research related to contaminants and other stressors in the environment, education in the environmental sciences, and the use of science in environmental policy and decision-making.

Southern California Agencies

Beginning in 2003, the District began participating in the Storm Water Advisory Team (SWAT) meetings. SWAT was created by stormwater-regulated agencies who believed that coordination amongst the regulated community would be beneficial to not only providing a unified voice to the Regional Board but would also encourage regional consistency in pollution prevention efforts. Meetings have not been held recently, but as the need arises the group is able to address issues such as TMDL development, pending permit regulations, and regional monitoring strategies and other opportunities.

2.4 FISCAL ANALYSIS

The Permittees have committed significant resources to permit compliance, reducing stormwater pollution and improving the water quality in Ventura County. This Section presents a summary of the costs anticipated for the coming permit year by the Permittees in developing, implementing and maintaining programs in order to comply with permit requirements. Also included is information on the different funding sources used by the Permittees to ensure that resources are available for permit compliance. Since each permittee shares in the cost of the principal program the total cost to each Permittee is the sum of those *shared* costs and their *individual* costs. However, in the grand total of all costs, including the Principal Permittee, these costs are not included to avoid the error counting them twice.

2.4.1 Program Costs for Permit year 2009/10

In 2009/10 the projected cost of the activities undertaken by the Permittees implementing the stormwater program within their jurisdictions were estimated to be 31,910,727. This is a large increase over the budgets under the previous permit due to new programs, monitoring equipment and studies required. For FY 2010-2011 the estimated costs for all permittees' expenses are much less at approximately 16 million.

With the new permit, costs of the Principal Program have increased significantly. The majority of this was due to the large increase in monitoring, but also the first year of the permit required new materials for businesses and land development communities. Cost for the Permittees implementation also increased significantly.

Document the costs to implement the stormwater program for Permit Year 2009/2010			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 2-4

Estimate the costs to implement the stormwater program for Permit Year 2010/2011.			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 2-5

Annual Report Section	Camarillo	County of Ventura	Fillmore	Moorpark	Ojai	Oxnard	Port Hueneme	Ventura	Santa Paula	Simi Valley	Thousand Oaks	VCWPD	Principal Permittee
II. Program Management	$197,811	$162,312	$22,179	$28,898	$12,000	$132,095	$50,000	$225,000		$214,273	$160,000		$562,680
III. Public Outreach	$11,066	$17,984	$29,495	$10,680	$4,000	$17,294	$5,000	$50,000		$56,843	$160,000	$0	$187,301
IV. Industrial/ Commercial	$61,940	$341,225	$9,570	$23,800	$4,000	$185,998	$5,000	$100,000		$107,859	$105,000	$0	$21,495
V. Planning and Land Development	$76,924	$200,731	$53,893	$75,000	$6,000	$91,404	$5,000	$375,000		$31,294	$90,000	$0	$308,467
VI. Construction	$75,262	$49,000	$15,662	$75,000	$6,000	$180,894	$5,000	$50,000		$193,933	$42,000		$3,140
VII. Public Agency Activities	$		$		$	$0					$1,530,000		$1,570
Operations and Maintenance	$232,190	*	$123,779	$25,700	$12,000	$467,809	$109,000	$320,000		$774,520	$243,000	$1,500,000	
Municipal Street Sweeping	$255,000	*	$75,175	$109,900	$48,000	$525,000	$79,750	$40,000		$311,721	$Private		
Fleet and Public Agency Facilities (Corporate Yards)	$5,426	*	$101,791		$5,500	$33,581	$5,000	$7,000		$59,568	$800,000		
Landscape and Recreational Facilities	$11,670	*	$0		$3,500	$8,179	$354,700	$40,000		$3,641	$L&L Districts (not a part of NPDES)		
Capital Costs	$150,000	*	$0		$12,000	$390,000	$60,000	$50,000		$64,087	$500,000		
VIII. Illicit Discharges/ Connections	$83,126	$75,968	$29,495			$85,058	$5,000	$222,000		$242,560	$76,000		$18,966
Monitoring Program	$0**		$15,000		$2,000	$29,144		$0		$6,500	$0	$0	$1,110,176
Principal Permittee Program	$120,000	$290,000	$0	$50,000	$10,000	$148,812	$30,000	$185,000		$213,000	$255,000	$1,000,000	
TMDLs	$129,000	$1,158,342		$34,000	$10,500	$74,028	$10,000	$45,000		$352,000	$290,000		
Other	$				$	$0	$11,000	$10,000		$135,028	$0	$210,000	$50,000
Total	$1,409,415	$2,295,562	$476,039	$432,978	$135,500	$2,369,296	$734,450	$1,719,000	$0	$2,766,827	$4,251,000	$2,710,000	$2,263,795

Table 2-2 Agency Annual Budget Update for Stormwater Management Program - Fiscal Year 2010-2011

2.4.2 Fiscal Resources

Each Permittee prepares a stormwater budget annually and allocates resources to be applied to the stormwater program. An effective stormwater program must be integrated within the entire management structure of a permittee, because of this it transcends divisions and departments and a so stormwater programs are not always uniquely identified in budgets, but rather integrated into the ongoing programs. Table 2-2 presents the projected stormwater budget for each Permittee for Fiscal Year 2009/10 and Figure 2-1 shows how the countywide budget is divided among the various programs. As expected, there is some variability between the stormwater program budgets reported by the Permittees, even if normalized by population or geographic size. This variability is due in part to the accounting practices utilized by each Permittee and the allocation of activity costs amongst programs implemented by each Permittee. Variability is most significant in capital improvements, which are usually very large and costly projects that may be TMDL driven or assisted by grant funding. These projects do not represent ongoing program costs, but rather investments in infrastructure to help reduce stormwater pollution into the future.

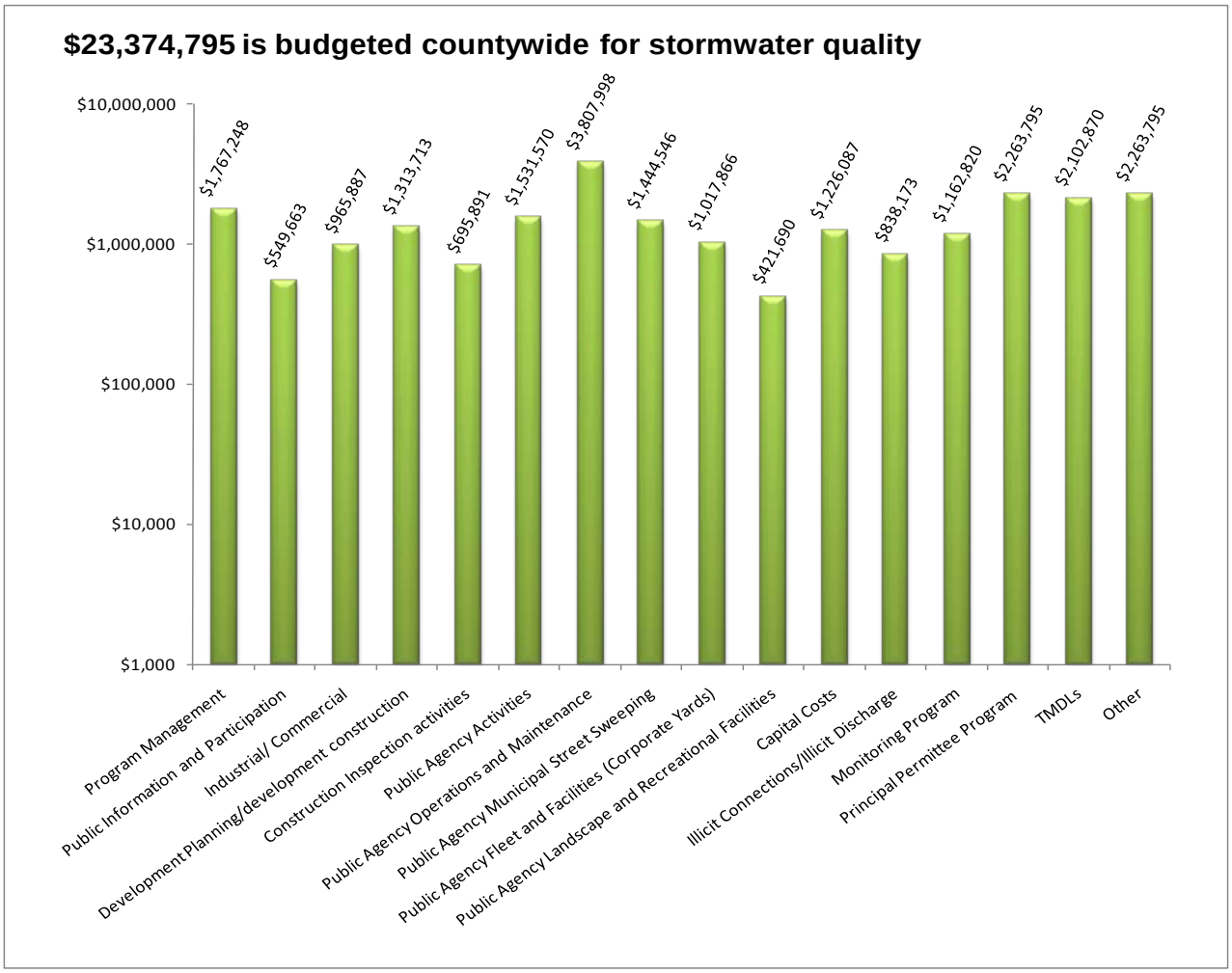


Figure 2-1 Countywide Budget FY 2010-2011

The Permittees vary significantly in their jurisdictional area and population (Table 2-3), which may explain some differences in resources dedicated to various program areas; another difference is that some Permittees have privatized streets weeping and the annual costs are being born by the solid waste rate payers. Yet, a review of the annual budgets produces some nominal findings. As expected, total stormwater budgets trend upwards as population and service area increases. However, increased population doesn't always directly translate into increased revenue available for the program. Seeking new revenue sources to provide the needed resources to comply with the legal requirements of the Permit is an ongoing effort of the permittees.

Ventura County Statistics		
Co-permittee	**Population**	**Area (Sq. Mi.)**
Camarillo	65,453	19.93
County of Ventura	92,063	23.6
Fillmore	15,000	3.2
Moorpark	37,576	12.44
Ojai	7,487	4.4
Oxnard	189,847	26.9
Port Hueneme	22,887	4.5
Ventura	106,744	32.7
Santa Paula	29,121	4.6
Simi Valley	126,329	42
Thousand Oaks	128,000	55

Table 2-3 Permittee Population and Area

2.4.3 Funding Sources

Funding sources to implement the stormwater program, including programs that have been in place long before the permit requirements but are now relied upon to ensure permittees meet permit objectives, include both general and specific funds, taxes, maintenance and user fees and grants. Efforts to monitor, cleanup or otherwise improve stormwater quality by volunteer groups like Ventura Coastkeeper who's efforts can be considered to help implement some stormwater program elements are not included as no fiscal value is attributed to these contributions. However, permittee efforts to support volunteer groups in their endeavors are included.

The funding sources used by the Permittees include: Watershed Protection District Benefit Assessment Program, General Fund, Utility Tax, Separate Tax, Gas Tax, Special District Fund, Others (Developer Fees, Business Inspection Fees, Sanitation Fee, Fleet Maintenance, Community Services District, Water Fund, Grants and Used Oil Recycling Grants).

All Permittees except the City of Moorpark gave authorization to use the Watershed Protection District's Benefit Assessment to finance the activities and requirements. This was done through watershed based Implementation Agreements for the Ventura Countywide Stormwater Quality Management Program. The Implementation Agreements identified the responsibilities of the parties to the Permit and set forth the methodology for using the District's Benefit Assessment financing to fund the NPDES Stormwater Program in their respective jurisdictions.

The Agreements have been amended over the years and with the new permit a new effort to secure a long term agreement was initiated. The result was a five year Implementation Agreement with all Permittees to replace the original agreement. The Agreement defines the fiscal responsibilities (expenditures and contributions) of all collective parties with respect to the current Permit. It formalizes the Permittees' commitment to cooperate and to mutually fund an integrated Program of protecting and improving water quality in Ventura County. The five year time frame was designed to mirror the term of the permit. As new permits are written and adopted for Ventura County these agreements will be reviewed, revised and renewed.

3 Public Information and Public Participation

3.1 OVERVIEW

The purpose of the Public Outreach Program Element is to inform the public (increase knowledge) regarding the impacts of urban stormwater runoff and introduce steps the public can take (change behavior) to reduce pollutants from everyday activities. In addition, helping the public understand the problems associated with urban stormwater runoff can help build support for the stormwater program.

The Public Outreach Program Element is designed to implement and evaluate a comprehensive short- and long-term public education campaign that will inform the community about how our actions may adversely impact urban stormwater discharges and, subsequently, the local water bodies.

Public Education is an essential part of a municipal stormwater program because changing public behavior can create a real reduction in pollutants. When a community has a clear understanding of where the pollution comes from, how it can affect them and what they can do to stop it, they will be more likely to support the program, change their own practices and help educate others.

The Permittees are building upon the many successes of the current program. Early in the program, the Permittees identified key elements crucial to establishing a successful outreach campaign. These elements include:

- Watershed Awareness
- Public Awareness Surveys
- Identification of general and specific goals of the program
- Identification of target audiences and key messages for those audiences
- Development of program strategies and plan overview
- Pollution prevention program using a unified “brand name”
- Development of a watershed based outreach program
- Identification of opportunities to reach out to regulatory agencies
- Development of a model public education/public participation strategy for localization at the Permittee level
- Development and implementation of a school-aged children education outreach program
- Development and implementation of food facilities outreach program materials
- Development and implementation of automotive facilities outreach program materials
- Development and implementation of industrial facilities outreach program materials

3.2 CONTROL MEASURES

The Permittees have developed several Control Measures and accompanying performance standards to ensure that the Public Outreach Program requirements found in the Permit are met and provide information for optimizing the Program.

The Public Outreach Program Control Measures are organized to be parallel to the organization of the Permit and consist of the following:

PO	Control Measure
PO1	Public Reporting
PO2	Public Outreach Implementation
PO3	Youth Outreach and Education
PO4	Business Outreach
PO5	Effectiveness Assessment

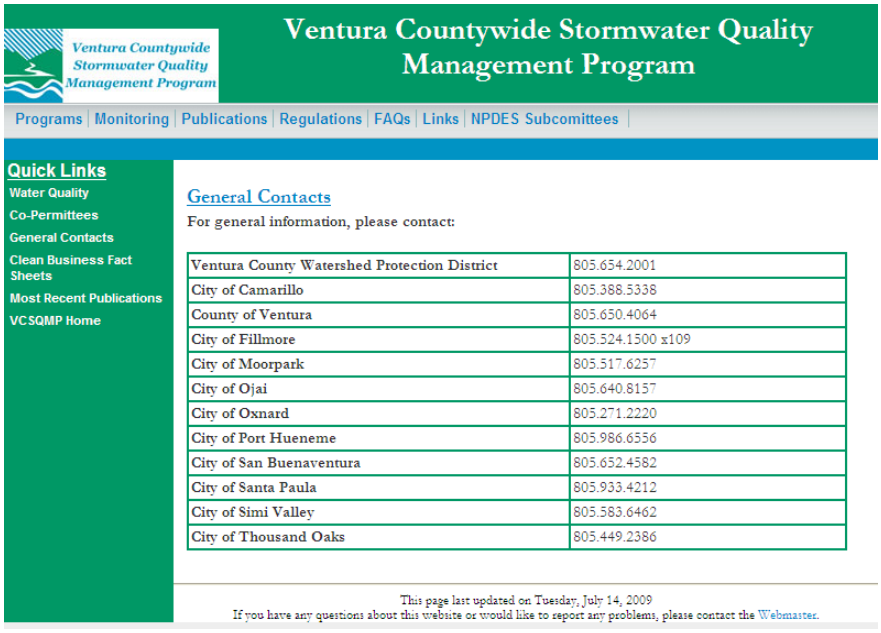
Table 3-1 Control Measures for the Public Outreach Program Element

3.3 PO1 – PUBLIC REPORTING

The purpose of this Control Measure is to identify staff to serve as contact persons and to operate and advertise public hotline numbers to facilitate public reporting of observed water pollution problems. This Control Measure also ensures that through the hotlines, complaint information is forwarded to the appropriate contacts for follow-up and/or investigation.

3.3.1 Identify Staff to Serve as Contact Persons for Public Reporting

Permittees have identified staff to serve as the contact person for public reporting, in many cases more than one staff member will serve in this capacity to ensure that someone is always available. Designated staff members are provided with relevant stormwater quality information, including program activities and preventative stormwater pollution control information.



Screen shot of Program website

Identify staff who will serve as the contact person(s) for public reporting of water pollution problems			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore			
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 3-1

3.3.2 Maintain Public Reporting Hotline Numbers

The Permittees have two types of phone numbers for the public: one for general stormwater information and one for reporting water pollution problems. The latter number is used by the public to report illicit discharges or illegal dumping into the storm drain system, faded or missing catch basin markers, and other observed water pollution problems. In some cases this number is also used to clogged catch basin inlets, but there may be another number for that as well. Staff is also available to provide general stormwater information.

Public reporting information has been listed in the government white pages of the local phone book (Due *by July 8, 2011*)			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 3-2

Once a water pollution complaint is received, staff responds within 24 hours to illicit discharges and within 21 days to illicit connections. For illicit discharges and illegal connections, staff follow the process outlined in Section 8 (Illicit Discharges/Connections). Additional summary information regarding use of the hotlines for reporting illicit discharges or illegal connections is provided in Section 8. During the Permit term, the Permittees will create and implement a web-based reporting form for reporting illegal discharges and illicit connections (see Control Measure ID1).

Public reporting information has been listed in the government white pages of the local phone book (Due *by July 8, 2011*)			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 3-3

3.3.3 Promote/Publicize Public Reporting Hotline Numbers/Contact Information

Contact information for reporting water pollution complaints for all Permittees is updated as necessary and published in the government pages of the local phone book and other appropriate locations. In addition, this contact information is available at several Permittee web sites.

Promote and publicize contact information for public reporting in public information media, such as the government pages of the telephone book and web sites			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 3-4

Program or Permittee	Web site URL
Ventura Countywide Stormwater Quality Management Program	http://www.vcstormwater.org/contacts.html
Community for a Clean Watershed	http://cleanwatershed.org/MAIN%20PAGES/Contacts.htm
Watershed Protection District	http://www.vcstormwater.org/contacts.html
County of Ventura	http://www.vcstormwater.org/contacts.html
City of Camarillo	www.ci.camarillo.ca.us
City of Fillmore	www.fillmoreca.com
City of Moorpark	http://www.vcstormwater.org/contacts.html
City of Ojai	http://www.vcstormwater.org/contacts.html
City of Oxnard	http://www. Publicworks.cityofoxnard.org
City of Port Hueneme	http://www.vcstormwater.org/contacts.html
City of Ventura	www.cityofventura.net/departments/publicworks/waterresources/stormwater
City of Santa Paula	http://www.vcstormwater.org/contacts.html
City of Simi Valley	http://www.simivalley.org/environmnetalcompliance
City of Thousand Oaks	http://www.toaks.org/faqs/categoryqna.asp?id=7#275

Table 3-2 Web Sites Listing Contact Information for Public Reporting

3.4 PO2 – PUBLIC OUTREACH IMPLEMENTATION

The Public Outreach Implementation Control Measure provides that outreach be conducted with the residential community and general public to inform these audiences of the impacts of urban stormwater runoff and introduce steps they can take to reduce pollutants in stormwater runoff. Such outreach communicates to the Permittees' residents and visitors the importance of stormwater quality protection and pollution prevention as it relates to the protection of the local water bodies.

The performance standards comprising this Control Measure include the following:

- Work with Watershed Groups to Develop Effective Public Education Methods
- Educate Ethnic Communities
- Make Five (5) Million Stormwater Quality Impressions per Year
- Storm Drain Inlet Markers and Signage Discouraging Illegal Dumping
- Educational Materials
- Conduct Mixed Media Campaigns
- Maintain and Update the Countywide Stormwater Web Site
- Community Events
- Pollutant-Specific Outreach

3.3.4 Work with Existing Local Watershed Groups

There are four watersheds in urbanized Ventura County: Malibu Creek, Calleguas Creek, Santa Clara River and the Ventura River. Each of these watersheds has a watershed organization developed to work together to identify problems and reach consensus on solutions. The Program is involved with these groups and plans to accomplish this permit requirement through that effort.

Work with existing local watershed groups or organize watershed Citizen Advisory Groups/Committees to develop effective methods to educate the public about stormwater pollution? (by July 8, 2011)			
	Yes	No	In Progress
Ventura Countywide Stormwater Quality Program			☑

Performance Standard 3-5

3.3.5 Educate Ethnic Communities

The Permit requires the Principal Permittee to develop and implement a strategy to educate ethnic communities through culturally effective methods. The Program has previously performed focus groups on Ventura County residents who speak Spanish at home. The information gained through this effort helped the Program understand what needs to be communicated to Spanish speakers and where that communication will be most effective.

To reach the significant Hispanic community in Ventura County, many elements of each campaign throughout the year were created in Spanish. This included the BMP poster as well as transit shelter and radio ads, each of which ran in Spanish media. Using a media mix of Spanish newspaper, radio and transit shelters, Spanish language advertising accounted for 21.6% of the annual media impressions: 1,290,350. (This figure does not include the BMP poster.)

Spanish language gardening and pesticide bus shelter posters

Develop and implement a strategy to educate ethnic communities through culturally effective methods? (by July			
	Yes	No	In Progress
Ventura Countywide Stormwater Quality Program	☑		

Performance Standard 3-6

Conduct stormwater pollution prevention public service			
	Yes	No	In Progress
Ventura Countywide Stormwater Quality Program	☑		

Performance Standard 3-7

3.3.6 Make Five (5) Million Stormwater Quality Impressions per Year

Of the Permit year the Program conducted a comprehensive stormwater pollution prevention advertising campaign. Media plans were negotiated with the goal to maximize target reach and frequency on a limited and fractionized budget. This was particularly true this year when the budget needed to stretch to cover several audiences. To amplify total market penetration, the adult and youth campaigns were scheduled either concurrently (fall) or in quick succession (spring), to take advantage of any overlap in the audiences. In addition, attention was paid to geographical distribution throughout Ventura County as well as adequate coverage in the Latino market. theAgency was able to consistently obtain low rates and significant bonus elements, including bonus radio commercials, and outdoor billboards.

For the three campaigns in the 2009 – 2010 year, the Community for a Clean Watershed media plan achieved a total of 5,962,234 gross impressions broken out as follows:

Timing	Campaign	Gross Impressions	Youth Impressions	Spanish Impressions
Fall 2009	Coastal Cleanup Day	1,201,678		105,000
Fall 2009	Green Waste and Youth	2,325,088	460,187	454,400
Dec 09-April 10	Transit Shelter Overrun	435,670		318,150
Spring 2010	Pesticide and Youth	1,969,889	287,440	412,800
Fiscal Year	cleanwatershed.org	29,909		
Total		5,962,234	747,627	1,290,350

Table 3-3 Community for a Clean Watershed Gross Impressions

Collaboratively, the Permittees continued to execute a variety of outreach activities to fulfill various components of the NPDES permit. The 2009-10 year's efforts included the following key initiatives, which were created and implemented through theAgency, a full service marketing firm located in Ventura County.

Of particular note was the new effort targeted to students in Kindergarten through 12th grade. This component, which was directed in part by the information revealed in last year's web survey findings, effectively reaches this important target audience. Through cost-efficient use of local media, this audience will have the opportunity to see/hear the Watershed message multiple times, thus having the potential to create long-term awareness and impact.

Make a minimum of 5 million impressions per year to the general public related to stormwater quality, with a minimum of 2.5 million impressions via newspaper, local TV access, local radio and/ or internet access.			
	Yes	No	In Progress
Ventura Countywide Stormwater Quality Program	☑		

Performance Standard 3-8

Fall 2009: Two new campaigns were launched in October/November 2009. Running in tandem to build total awareness, they spanned five weeks.

Adult – Green Waste--A new 30-second television spot brought back the animated couple from the pesticide commercial, this time with an overgrown yard which was washed away into the storm drain and eventually to the beach. In an entertaining way, "Shouldn't have done that" demonstrates that green waste is toxic when rain and sprinklers carry it into the Watershed. The :60 radio was a hard-hitting message, packed with a general Watershed definition and reminder about obvious toxins before specifically zeroing in on what yard waste is, how it gets into the storm drain and how many ways it can be destructive. Transit Shelters and mall posters featured an animated gardener while the online banner was a miniature version of the TV spot.

Frames from "Shouldn't have done that" TV Spot

English Bus Shelter Poster

Publicity: Fall 2009

In addition to paid media in support of the fall campaign, two press releases ran in the local newspaper's "Eye on the Environment" column. On October 25, 2009, "Take Action to Keep the Watershed Clean" enumerated various pollutants of concern, explained how they are harmful to the Watershed and gave practical, easy solutions on how residents can make a difference. "Same yard waste can be beneficial or harmful" (depending on the choices you make) ran on November 21, 2009, educating residents on the benefits of using yard waste as compost versus the harmful results of raking the same yard waste into the gutter – and therefore down the storm drain.

May 2010: Adult - Pesticide

Piggy-backing on the youth campaign and timed to coincide with the spring planting season, the Community for a Clean Watershed ran a five-week pesticide campaign utilizing television and radio campaign elements from past year's creative arsenal. The animated "More, Better" television commercial graphically demonstrated how using too much pesticide runs into the storm drains, eventually making it into the Watershed, adversely affecting plants and animals. The radio spot was a humorous adaptation of the television ad, featuring the two animated characters as they defend their house against garden pests and inadvertently poison the watershed. An animated web banner corresponded with both broadcast media while the transit shelters took a more direct approach showing a snail and telling residents "Don't kill an ocean just to keep pests out of your garden."

Frames from pesticide TV commercial

Frame from web banner

Radio Interviews/Publicity: Spring 2010

Two radio stations included interviews as value-add for the Spring 2010 campaign. Each interview was a minimum of five minutes and included general information on the Watershed, how storm drains are used and specific facts on both pesticide and yard waste best practices for homeowners.

Camarillo

- Cleaned Calleguas Creek (from Upland Rd. to Adolfo Rd.) as part of the annual Coastal Cleanup Day, 9/21/09; over 430 volunteers removed 1,634 lbs. of trash and 326 lbs. of recyclables.
- Cleaned natural barranca/creek off Mission Oaks Park as part of annual Coastal Cleanup Day, 9/21/09; over 190 volunteers removed 344 lbs. of trash and 151 lbs. of recyclables.
- The City of Camarillo Coastal Cleanup Day webpage received 653 hits
- Two volunteers removed 20lbs of trash from the natural barranca/creek off Mission Oaks Park, 4/24/10
- Stormwater Pollution Prevention booth at City of Camarillo Earth Day event on 4/17/2010.
- Published the following articles in the City of Camarillo Cityscene Newsletter
- "It's a Slippery Slope to Water Pollution- But You Can Stop It"- 9/09
- "Your Car, Your Health, Our Waterways- What They Have in Common"- 9/09
- "Thank You 2009 Coastal Cleanup Day Volunteers"- 11/09
- "Your Yard, Your Watershed… Your Actions Matter"- 1/10
- "Think Before You Drain"- 3/10
- "Only Rain Should Enter the Storm Drain"- 5/10
- "Even Your Dog Wants To Do the Right Thing"- 5/10
- Utility Bill Insert sent out to city residents regarding 2009 Coastal Cleanup Day and information on Stormwater Pollution Prevention (8/09)
- A Coastal Cleanup Day PSA was ran on the City of Camarillo TV station and reached approximately 12,000 contacts.
- City booth at Earth Day event at the Camarillo Community Gardens distributed Stormwater Pollution Prevention information, Coastal Cleanup Day 2010 information and Watershed Protection Tips for: Gardeners, Pet Owners and Car Owners to approximately 200 contacts. (4/10)

Moorpark

- The City participated in Coastal Cleanup Day on September 19, 2010. Approximately 54 volunteers attended the City's site at Villa Campesina Park. The volunteers removed an estimated 300 pounds of trash from six miles of the Arroyo Simi. Information about the cleanup had been provided to the local school district prior to the event. A press release and webpage announcement also encouraged participation.
- The City has staff at special events to present NPDES info. FY 09/10 included Coastal Cleanup Day, Moorpark Country Days, and Moorpark "Kids Day in the Park."
- Mass mailing includes the City's quarterly newsletter that went to approximately 13,200 households.
- In FY 09/10, the City did NPDES messages in three quarters. NPDES messages were also mailed in three solid waste bill inserts to 8,008 households each time.
- For younger children, the City has a coloring book about water conservation. The coloring books include information about keeping the waterways clean.
- Moorpark Library and City Hall lobby has the Community For A Clean Watershed's Protection Tips brochures.

Ojai

- Brochures on watershed protection are available in the Public Works office.
- Provide list of volunteer activities for debris clean-up. (including Libbey Park and Nordhoff Cemetery)

- Periodic contact with volunteer groups such as Lion's Club, Rotary Clubs, and school organizations.
- Provide information at "Ojai" Day activity (Oct 2009) and help inform residents of need to be aware of BMP's.
- Ojai Day – Annual city celebration – public works has booth with awareness handouts.
- Creek Cleanup day – Sep, 25, 2010 – Trash pick up in a few local creeks in Ojai and Oak View.

Oxnard

- Ventura Coast Keeper has organized and conducted events in Oxnard such as the J Street Drain Trash Clean Up which occurred on 11/22/09.
- Many residents of the Oxnard Community also participated in Coastal Cleanup Day at the Ormond Beach Wetlands and Silverstrand Beach.
- During FY 2009/2010 the City of Oxnard engaged in public education outreach activities designed to promote environmental awareness, stormwater pollution prevention and discourage/identify illicit discharges to the MS4.
- In addition to mass media and utility billing inserts, the city was represented at several community outreach events.
- The City of Oxnard stormwater mass media impressions were provided through the following;
    - July '09 City Works Newsletter-55,000
    - Coastal Cleanup Day Utility BillI insert-55,000
    - Ventura County Star Recycle oil and HHW add-507,000
    - Vida-Recycle oil and HHW-63,000
- The City of Oxnard stormwater outreach contacts were provided at the following community events;
    - America Recycles Day-nov.15, 2009 -250
    - Earth Day Plaza Park-April 10, 2010 -3,000
    - Compost Workshop-April24, 2010 -30
    - Children's Water Science Exploratorium-June 10, 2010 – 1,550

Port Hueneme

- Information was handed out at our community beach festival. The City also mails out to each business and household a community contact and information magazine which carries a stormwater message along with contact information to learn more about stormwater pollution and advising about vcstormwater.org

Thousand Oaks

- Community Cleanup Day—The City of Thousand Oaks sponsored a collection event of waste materials on June 12th. At the event, over 1600 residents brought 126 tons of trash, 39 tons of green waste; 36 tons of concrete, 13 tons of pounds of miscellaneous electronic components; 25,882 pounds of video monitors; 10.3 tons of paper from document shredding.
- Coastal Cleanup Day—On 9/19/09, 405 volunteers joined together to collect trash from about 7 miles of channel and their banks in and around Borchard Park in Thousand Oaks. This effort removed 1035 lbs. of litter and debris and about 187 pounds of recyclable materials. A brief presentation was given to participants to describe how trash is a pollutant that impairs beneficial uses of the creeks.
- Freeway Ramp and Interchange Collection Program (Adopt-A-Highway)—From July 1, 2009 to June 30, 2010, about 14,000 pounds of trash and debris were removed from 13 freeway on-ramps and exits and one freeway interchange in the City of Thousand Oaks.
- City of Thousand Oaks Household Hazardous Collection Program—Eleven household hazardous waste collection days were sponsored over the 2009-2010 fiscal year. On average, each month 365 residents brought in 34,600 pounds of waste materials including household chemicals such as fertilizers, cleaning chemicals, paints, insecticides, electronics, used motor oil, and unused pharmaceuticals to each collection event.

- Amgen Earth Day and Energy Conservation Fair—On April 22, 2010, Amgen Corporation hosted this event to raise awareness about excessive energy use and surface water quality issues. About 2,000 Amgen employees attended the event. The City of Thousand Oaks gave participants recycled products and answered questions about poster displays about sources and remedies to surface water contamination caused by urban runoff. Additionally, participants were also given informational brochures on recycling and stormwater topics.
- The City of Thousand Oaks sponsored an Arbor Earth Day event on April 24, 2010. Representatives from the City's Resource Division offered attendees a chance to spin a wheel and answer questions about water conservation, solid waste control and storm water impacts. Correct answers were rewarded with a gift. Informational brochures on these topics were provided. More than 5,000 people attended.

Children using the Enviro-scape

- Home Depot Family Days 12/5/10 and 3/13/10—Stormwater outreach staff showed how pollutants are transported from streets to storm drain and then creeks using a watershed model. About 30 people watched the demonstration on each occasion.
- Free Landfill Disposal Day—The City of Thousand Oaks sponsored a day that allowed residents to dispose of solid waste to the Simi Valley Landfill without charge. At this event 63 tons of trash, 39 tons of green waste, 36.8 tons of concrete and 62.9 tons of construction demolition debris were received at the landfill.
- Conejo Open Space Conservation Agency, COSCA, Trail Education Days—On April 28, about 22 fifth-grade students were led on informational tours into Thousand Oaks's Wildwood Park natural area. During the hike, the children were taught about topics in ecology including urban runoff impacts to park creeks.
- Public Works Week—May 18,19,and 20 in 2010—About 20 Conejo Valley schools brought more than 800 children and about 180 adults to see examples of the activities and equipment that are used to by the City of Thousand Oaks to maintain its infrastructure. For stormwater quality management, a table-sized model depicting a watershed was sprinkled with simulated pollutants such as cinnamon (sediment) and food colorings (fertilizer and pesticide) in the model's mock residential section. Children participated by simulating rain with spray bottles and saw these suggestive pollutants contaminate the creeks and lake.
- Utility Bill Inserts— Promotional inserts for Household Hazardous Waste Collection Christmas tree recycling and Free Landfill Disposal Day were distributed during 8-week cycles from September to December of 2009. Additionally, Community Clean-up Day and Coastal Clean-up Day were advertised via utility bill inserts in August 2009 and June of 2010, respectively. Multiple mailings were made during this fiscal year cycle totaling about 220,000 inserts.
- Print ads in fiscal year 2009-2010 were run in the local newspaper, the Ventura County Star. Information was shared with residents about House Hold Hazardous Waste Collection Program. The ad ran throughout the year with a weekly circulation of 85,000. At 5% of the average circulation, this amounts to 221,000 impressions.
- Thousand Oaks stormwater personnel made presentations centering on water quality issues from urban runoff at the following public schools: 1) Westlake High School Earth Science Club,

1/29/10, 25 students attended; Newbury Park High School, 2/26/10, 2-geoscience classes, 60 students attended; Conejo Valley High School, 3/2/10, 2-science classes, 40 students attended; and Century High School, 3/2/10, 25 students attended.

- Temple Adat Elohim Environmental Fair, 3/4/10—Stormwater staff displayed a watershed model and discussed water quality impacts from pollutants discharged from residential areas. About 30 students and 10 adults participated at each event..
- Amgen Green bag Lunch Series, 2/10/10—Stormwater outreach Staff presented a powerpoint presentation to an Amgen audience that described residential activities that contaminate runoff and enter into the storm drain system There were 40 people in the audience and 50 viewing on-line.
- Mass Mailing— About 900 residents were directly mailed information about the street-to-storm drain connection and the pollutants that are suspected of causing surface water impacts from residential land use. Steps to eliminate these pollutant contributions were also included.

Ventura

- Citywide volunteer based programs with a mission to preserve Ventura's natural resources include:
- Ventura River Clean Up- over 550 CLU students, 25 faculty, and city personnel, removed over 7.7 tons of trash
- Coastal Cleanup Day- Large beach cleanup; 4 locations reported (Marina Park, Seaward,St. Beach, Ventura Promenade), 777 volunteers
- Earthday; Beach cleanup at Promenade Beach (4/17/10)
- Arroyo Verde Park Cleanup- (5-16-10)

Volunteers at Coastal Cleanup Day

- Marina Park Beach Cleanup- (6/5/10) End of school year beach cleanup project
- Harbor Wetlands Restoration Project- 7 Saturdays 09/09-02/10
- Ventura River Clean Up – Over 550 Cal Lutheran Students (freshmen) and 25 Faculty, as well as City of Ventura staff removed over 7.7 tons of trash from the Ventura River. This project gives all those directly involved, (workers, river bottom dwellers, vendor for debris collected), as well as those who read about the recovery of these materials, an up close picture of how humans impact the watershed.
- Household Hazardous Waste Collection Events – Each vehicle that participates is given a Residential Illicit Discharge brochure (average 150 cars/event; 11 times/year)
- Marina Park Beach Clean Up – End of school year beach clean up using students from high schools to pick up trash and debris.

Little Volunteers

- Earth Day Event – Share brochures and educate the general public regarding stormwater and run-off. Also, a beach clean up at Promenade Beach was conducted
- Home and Garden Show – Stormwater information used to educate public about the best use of pesticides and fertilizers regarding run off issues related to home gardening.
- 4th of July Street Fair – Approximately 30,000 people attend the street fair and a constant crowd stops at the Environmental Services booth for information including the topic of Stormwater.
- Hillside Conservancy Music Festival – Stormwater outreach materials for general public education and run off issues. (approximately 2500 attendees)
- Summerfest – share stormwater brochures; target children with games involving stormwater education (approximately 600 children)
- City of Ventura Environmental Services Website and Facebook page – dedicated to stormwater education and watershed protection
- Don't Dump Drains to Ocean (Ventura County Fair) – Our stormwater outreach campaign included messaging at the Ventura County Fair with attendance of over 300,000 visitors during the 12 day event.
- Business Outreach Program Bumper Stickers – businesses receive a "Don't Dump, Drains To The Ocean" bumpersticker during the onsite stormwater inspection program.
- School Outreach – City staff conduct educational visits to schools in the district to discuss environmental issues including stormwater pollution. Most presentations include utilizing the Enviroscape as a hands on teaching tool.
- The Chamber of Commerce Showcase – Educational presentation on environmental awareness including stormwater education.
- Ventura Community College Eco Fest – brochures and educational materials including stormwater education

Ventura County

- Partnered with Triunfo Sanitation District to distribute 4,500 educational brochures through water service bills.

Simi Valley

- Helped coordinate and facilitate two major arroyo clean up events during the reporting period. Coastal Cleanup Day and a Neighborhood council with more than 330 volunteers removing 10,100 pounds of trash in a two mile section of the arroyo near Tapo Canyon road. Informational brochures were made to all the cleanup volunteers as well as participants at Earth Day and Arbor Day.

3.3.7 Storm Drain Inlet Markers and Signage Discouraging Illegal Dumping

The Permit requires each Permittee to label all storm drain inlets that they own with a legible "no dumping" message and to maintain them. The Permit also requires signs with prohibitive language (i.e., discouraging illegal dumping) to be posted and maintained at designated public access points to creeks, other relevant waterbodies, and channels.

Label Storm Drain Inlets with "No Dumping" Message

As of 2008-2009, the Permittees had completed labeling or marking the curb inlets to their entire storm drain system. Permittees maintain their inlet signs by reapplying stencils/markers as they wear out (see Control Measure PA5) and applying stencils/markers to new inlets as they are installed.

Label storm drain inlets with a "no dumping" or equivalent message			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 3-9

Markers at curb inlets have varying useful lives due to the materials from which they are constructed (e.g., paint, thermoplastic), their position (e.g., on top of curb, on face of curb), and wear factors (e.g., traffic, street sweeping, sunlight). As a result, the Permittees have different programs to maintain curb inlet markers within their respective jurisdictions. Some Permittees replace a portion of their markers each year, whereas others re-mark all inlets every few years. Regardless of the specific inlet marker practice, all Permittees understand the importance of storm drain inlet markers to the education component of their program and are committed to installation and maintenance of the markers.

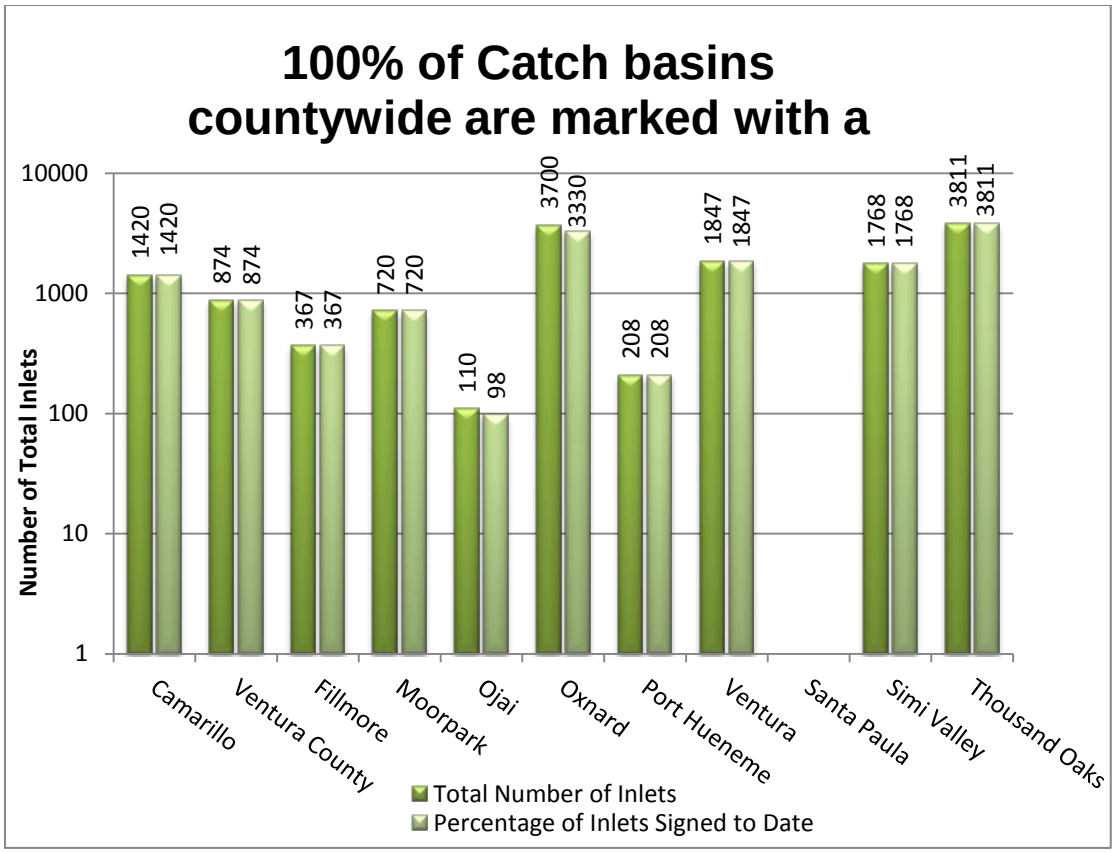


Figure 3-1 Catch Basin Labeling

Post Signs with Language Discouraging Illegal Dumping

The Permittees are required to designate appropriate access points to the creeks and channels within their jurisdiction for the placement of signs with prohibitive language to discourage illegal dumping. Each Permittee is responsible for designating the appropriate access points to creeks and channels within their jurisdiction, which requires field verification and mapping. This performance standard also requires, in some cases, the cooperation between a Permittee and special districts outside a Permittee's jurisdiction.

Public access sign

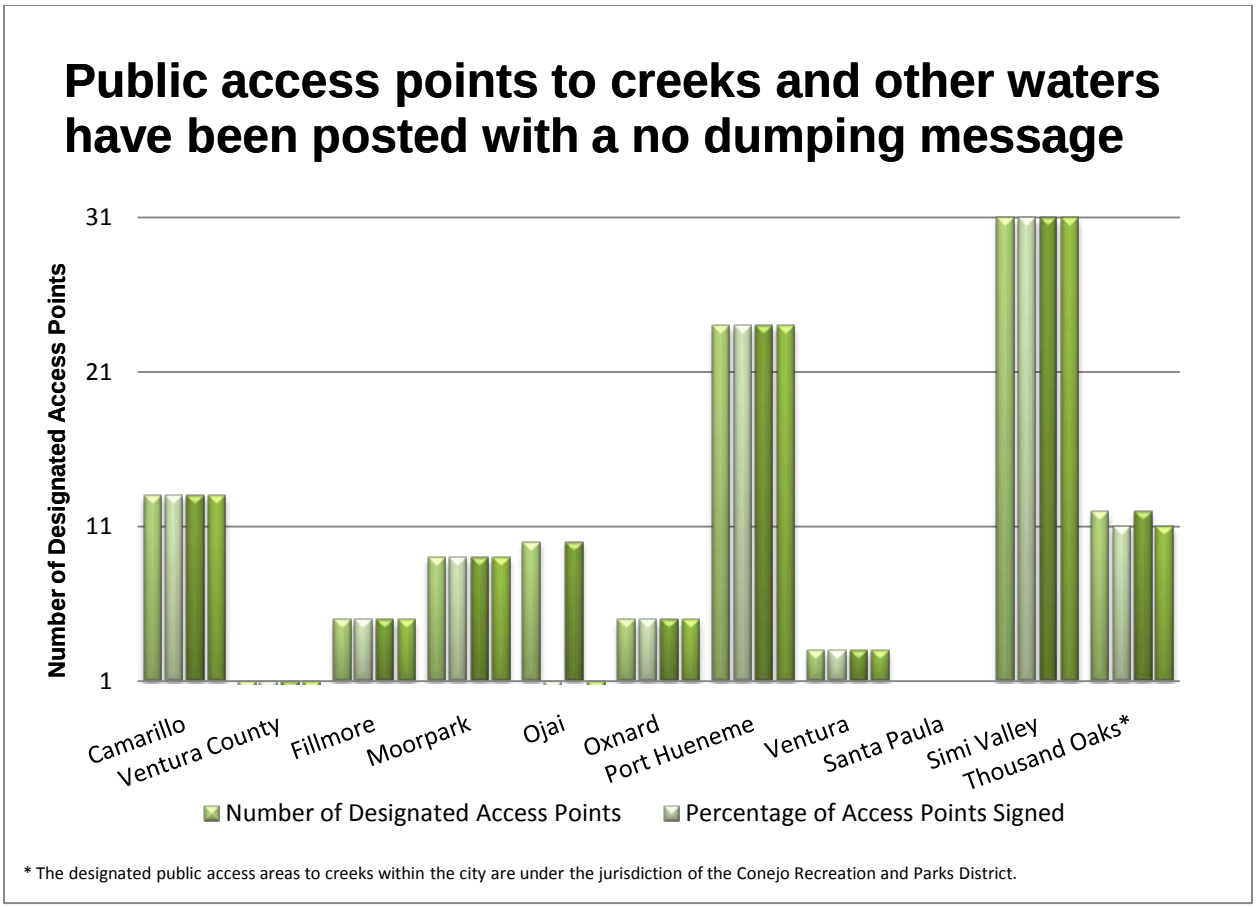


Figure 3-2 Public Access Point Signage

3.3.8 Educational Materials

The Permittees are required to distribute stormwater pollution prevention educational materials covering specific types of pollutants to specific businesses. The businesses to be targeted with these pollutant-specific educational materials include automotive parts stores; home improvement centers, lumber yards, and hardware stores; and pet shops and feed stores. In addition, the Permit requires the Permittees to continue the existing outreach program to residents on the proper disposal of litter, green waste, pet waste, proper vehicle maintenance, lawn care and water conservation practices.

The cleanwatershed.org website continues to reinforce the various public outreach messages as well as make available a network of resources to help the web viewer make informed decisions. The website is updated on a regular basis to add relevant campaign materials as well as educational materials. 2,509 unique visitors made 4,347 visits and read an average of 1.83 pages in fiscal year 2010. The unique visitor count is 19% higher than last fiscal year with number of visits up 16.7%. Web visits peaked in October and November 2009, coinciding with the fall public outreach campaign.

Retail Partnership Brochures: Gardeners, Pet Owners, Car Owners (Due July 8, 2011)

Three Watershed Protection Tip pamphlets aimed at residents were created to encourage best practices in their homes. These brochures were distributed to targeted retailers called out in the permit stores to reach the population that is likely involved in the activities. Each colorful pamphlet defines the Watershed, explains the storm drain system, how polluted water is damaging and gives both overall and topic-specific tips for how to keep the Watershed clean. For example:

- Gardeners: talks about plant selection, irrigation, fertilizer and pesticide practices, integrated pest management and yard maintenance
- Pet Owners: safe methods for handling and disposing pet waste, both for cats and dogs
- Car Owners: do-it-yourself clean vehicle practices for fluids, tires, batteries and car-washing

Retail Partnership Brochures

Nursery BMP Poster (English)

Best Management Practices Poster - Garden

English and Spanish versions of these colorful, informative BMP posters were distributed to 30 commercial nurseries in Ventura County. The decision to use comic illustrations was made due to their ability communicate in a universal language and thus, cross any translation barriers as well as communicate to those who might not take the time to read each best practice. The illustrations demonstrated what not to do while brief descriptions of the proper practices were spelled out.

The practices outlined on the posters reflect some of the key actions within these industries that directly impact storm-water pollution.

BMP distribution through a retail partnership with Home Depot

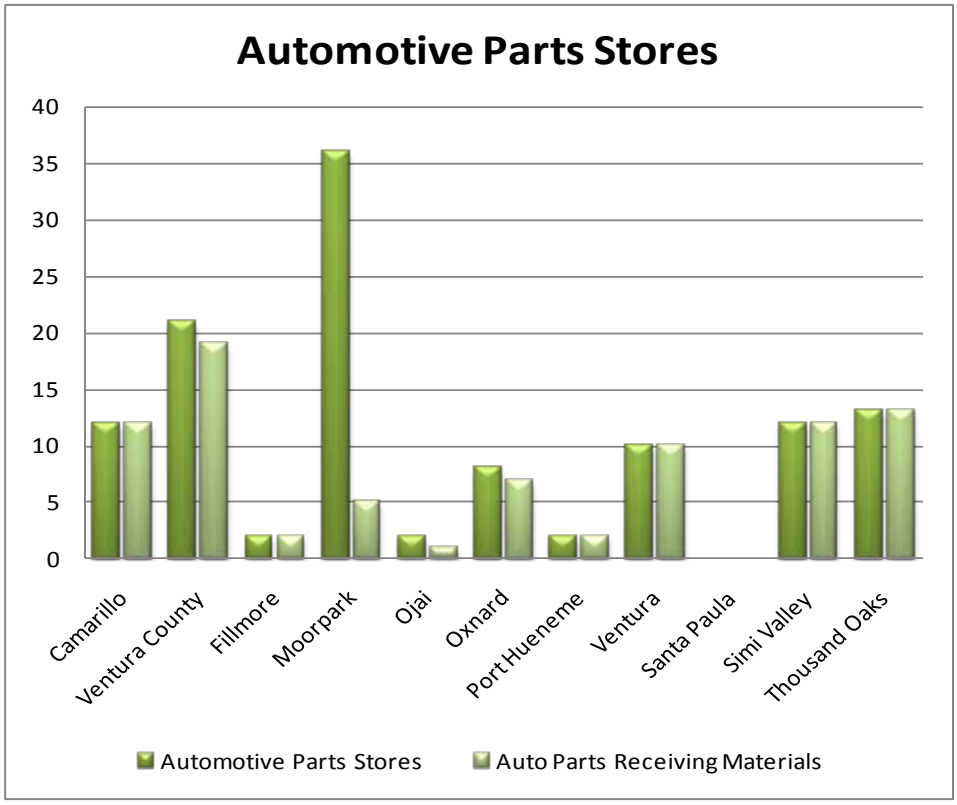


Figure 3-3 Summary of Retail Partnership – Auto Parts Store

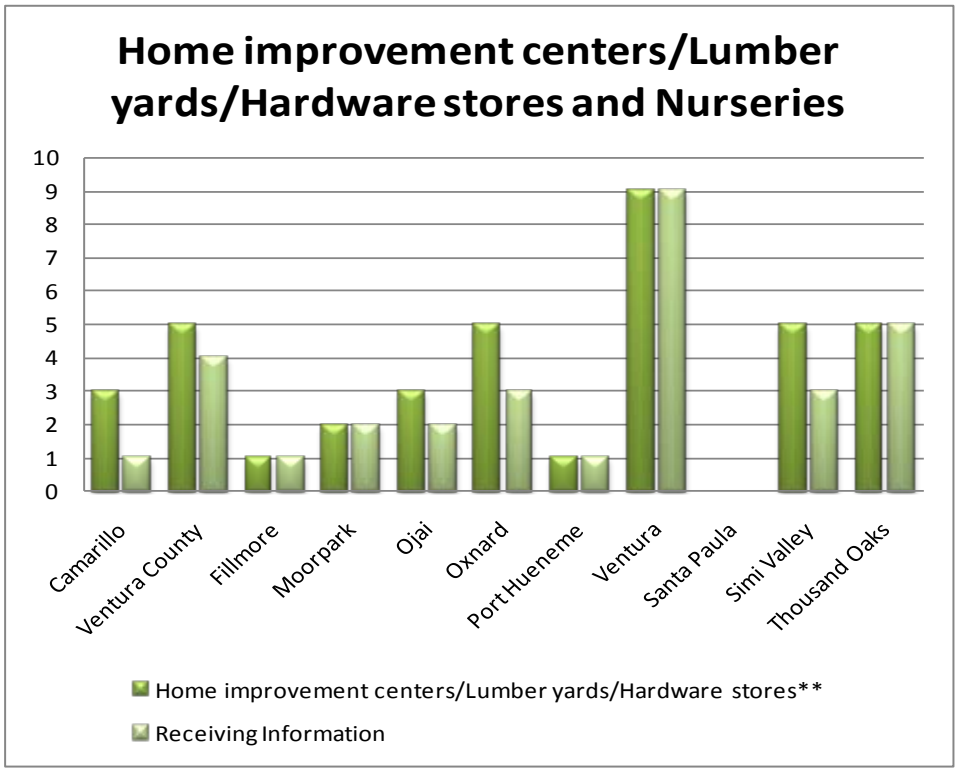


Figure 3-4 Summary of Retail Partnership – Home Improvement and Nurseries

Figure 3-5 Summary of Retail Partnership –Pet Shops

The Community for a Clean Watershed Web site (cleanwatershed.org) is the primary mechanism used by the Permittees to reinforce the various public outreach messages as well as make available a network of resources to help the web viewer make informed decisions. The Web site is updated on a regular basis to add relevant campaign materials as well as educational materials.

3.3.9 Conduct Mixed Media Campaigns

Conduct Stormwater Pollution Prevention Advertising Campaign and Stormwater Pollution Prevention Public Service Announcements

The Permittees work collectively to conduct a mixed media campaign that consists of radio and public access cable channel public service announcements (PSAs), movie theater slides, print ads (including newspaper), signage (including on outdoor bulletins and at transit shelters), and Web site banners. The mixed media campaign is the primary mechanism that is implemented in order to achieve the 2.5 million impressions that are required to be achieved via newspaper, local TV access, local radio and/ or internet access.

Conduct a stormwater pollution prevention advertising campaign			
	Yes	No	In Progress
Ventura Countywide Stormwater Quality Program	☑		

Performance Standard 3-10

Conduct stormwater pollution prevention public service			
	Yes	No	In Progress
Ventura Countywide Stormwater Quality Program	☑		

Performance Standard 3-11

The Community for a Clean Watershed program was established in 2005 by the Ventura Countywide Stormwater Quality Management Program. Through the development of educational public outreach media campaigns, brochures and the Clean Watershed Web site, the Community for a Clean Watershed program has successfully raised awareness among Ventura County residents on the issues impacting the health of Ventura County's watersheds. Designed with the help of focus groups, the name was chosen to instill a sense of community and ownership. Through the development of educational public outreach campaigns, brochures and the Clean Watershed Web site, the Community for a Clean Watershed program has successfully raised awareness among Ventura County residents on the issues impacting the health of Ventura County's watersheds. The objectives of the Community for a Clean Watershed program are:

- Create and build awareness
- Educate residents
- Change negative behavior
- Develop a consistent message throughout all cities and areas in Ventura County
- Attempt a year-round effort to increase top-of-mind awareness of the watershed

Since 2005, the Countywide Program has utilized the marketing services of the Agency. A full-service advertising and public relations agency located in Ventura County, the Agency continues to develop materials and implement Community for a Clean Watershed campaigns and related research.

A summary of the mixed media campaigns that were conducted for the general public is provided in this report under section 3.4.3 (Make Five (5) Million Stormwater Quality Impressions per Year).

3.3.10 Maintain and Update the Countywide Stormwater Web Site

The Permit requires the Permittees to maintain the Countywide stormwater Web site (www.vcstormwater.org) This is the website specified by the Permit, but the Permittees also use cleanwatershed.org primarily for outreach, as described earlier under "activity-specific outreach to residents". In addition, the website is required to include pollutant-specific educational material addressing (at a minimum) information on the proper disposal, storage, and use of the following:

- Vehicle waste fluids
- Household waste materials
- Construction waste materials
- Pesticides and fertilizers (including IPM)
- Green waste (including lawn clippings and leaves)
- Animal wastes

Community for a Clean Watershed website

Community for a Clean Watershed Website

The cleanwatershed.org website continues to reinforce the various public outreach messages as well as make available a network of resources to help the web viewer make informed decisions. The website is updated on a regular basis to add relevant campaign materials as well as educational materials. 2,509 unique visitors made 4,347 visits and read an average of 1.83 pages in fiscal year 2010. The unique visitor count is 19% higher than last fiscal year with number of visits up 16.7%. Web visits peaked in October and November 2009, coinciding with the fall public outreach campaign.

Maintain the stormwater Web site (www.vcstormwater.org)			
	Yes	No	In Progress
Ventura Countywide Stormwater Quality Program	☑		

Performance Standard 3-12

The Countywide Stormwater Web Site (***www.vcstormwater.org***) is periodically updated to include pollutant-specific educational materials for businesses and do-it-yourself homeowners. Facts sheets have been

developed over the life of the program and include educational materials on the proper disposal, storage, and use of the following pollutants:

- Vehicle waste fluids
- Household waste materials
- Construction waste materials
- Pesticides and fertilizers (including IPM)
- Green waste (including lawn clippings and leaves)
- Animal wastes

3.3.11 Community Events

The Permit requires the Permittees to individually and collectively organize community-oriented educational activities and events and to participate in countywide events focusing on stormwater quality. The main countywide event for the stormwater program is Coastal Cleanup Day.

The 26th annual California Coastal Cleanup Day was held this year on September 25th, 2010. More than 80,300 volunteers turned out across California to help pick up trash and prevent it from spreading in our coastal and inland waterways. Statewide, the volunteers picked up more than 1.1 million pounds of trash. Internationally, when combined with The Ocean Conservancy's International Coastal Cleanup Day which is held on the same day, the event becomes one of the largest volunteer events of the year. Families, students, service groups and neighbors all work together to show their support for our shared natural resources while helping reduce and prevent the impacts of marine debris.

The Ventura County Coalition for Coastal and Inland Waterways (VCCIW) coordinates the event in Ventura County. Representatives of the stormwater Permittees serve on the VCCCIW and have been actively involved in organizing Ventura County's Coastal Cleanup Day efforts since 1996. The VCCCIW conducts advertising campaigns, finds sponsors, coordinates materials receipt and pickup, and works with site captains to organize site access permission and trash hauling. The California Coastal Commission oversees the California Coastal Cleanup Day and provides some advertising materials and assistance as needed.

At Ventura County's 2010 Coastal Cleanup Day, 3,129 volunteers at 22 sites countywide collected 11,608 pounds of trash and 2,204 pounds of recyclables, and covered a distance of 60 miles. Not only does the event remove a significant amount of trash, but each item that is picked up is tallied by category, providing a wealth of information about the types of items that are being found. This information is useful for shaping future public outreach campaigns.

This year, the "bring your own bucket, bottle, and gloves (BYOBBG)" pre-campaign began. The BYOBBG campaign aims to make Coastal Cleanup Day a zero waste event by having participants bring their own reusable waste buckets, gloves and water bottles, thereby reducing the volume of trash generated at the event. The main "bring your own" campaign is set for 2011, but the response of participants in 2010 was promising, given the limited amount of promotion the campaign was given. The success of the 2010 campaign should continue in 2011, as volunteers pick up more trash and become more aware of the trash they are generating, its proper disposal, and the effect it has on stormwater quality.

Collectively organize events targeted to residents and population subgroups			
	Yes	No	In Progress
Ventura Countywide Stormwater Quality Program	☑		

Performance Standard 3-13

3.3.12 Pollutant-Specific Outreach

The Permit requires the Permittees to coordinate to develop outreach programs that focus on the following specific pollutants of concern: metals, urban pesticides, bacteria, and nutrients. For effectiveness in delivering these messages they were incorporated into the other outreach programs requirements of a multimedia campaign and retail partnerships with auto shops, pet stores and home improvement stores/nurseries.

To focus on nutrients good gardening techniques were used as a more understandable surrogate for the public as communicating that "nutrients" are a bad thing would create an additional hurdle to the ultimate goal of changing behavior. This information along with pesticide BMPs were distributed at retail nurseries throughout the county. Bacteria from pet waste have been an ongoing target of the program and new material was created during the permit year and given to pet stores to distribute. As stated in the permit the metals pollutant-specific outreach is addressed through the industrial-commercial inspection program.

Pesticide BMP Poster

Develop a strategy to develop outreach programs focusing on pollutants of concern?			
	Yes	No	In Progress
Metals	☑		
Urban Pesticides	☑		
Bacteria	☑		
Nutrients	☑		

Performance Standard 3-14

Implement outreach programs focusing on pollutants of concern			
	Yes	No	In Progress
Metals	☑		
Urban Pesticides	☑		
Bacteria	☑		
Nutrients	☑		

Performance Standard 3-15

Various BMP Brochures

3.5 PO3 – YOUTH OUTREACH AND EDUCATION

This Control Measure ensures that the Permittees either provide school districts within the County with outreach materials (including, but not limited to videos, live presentations, and other information), provide funds to the Environmental Education Account to educate school-page children about stormwater pollution, or submit a Youth Outreach Plan.

Educational outreach to children is an important way to affect a change in behavior. Outreach to children not only changes behavior of the next generation, but children also act as watchdogs over their parent's behavior. Because of this the Program and the individual Permittees have been conducting public outreach with a youth component for many years. Their experience with the local schools in Ventura County and developing programs targeting school-aged children have provided valuable input in the selection of the youth outreach option and the development of a Youth Outreach Plan (Plan) submitted to the Regional Board in July of 2009.

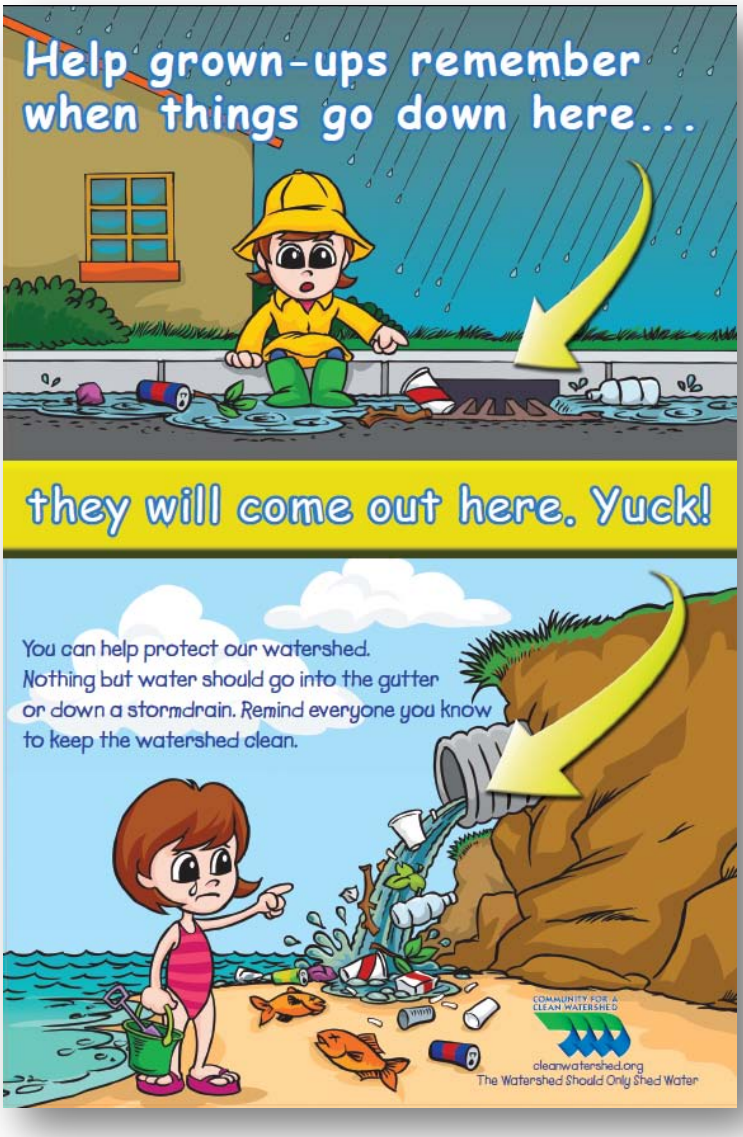
The document summarizes the Program's experience in developing and presenting outreach material to school-aged children, and demonstrates how that experience led to the rationale behind the selection of the Permit required Youth Outreach Plan option. The Plan is described in detail and includes the ground work of identifying what Ventura County youth know about stormwater pollution, where they get their information, and which watershed pollution concepts need additional development. This information was then used to prepare the creative objectives for a media campaign aimed at changing behavior to improve the quality of stormwater runoff. The target audience includes Ventura County youth from kindergarten through high school. The media outlets, broadcast frequency and number of impressions expected are outlined in the media campaign. Finally, the Plan includes methods of measuring program effectiveness and providing feedback for continual improvement of the Youth Outreach Plan to give the next generation the understanding needed to improve the stormwater runoff quality in Ventura County.

Youth – General Watershed Message – "Boat Ride", a new 30-second television spot using an animation style popular with youth called 'anime', allows children to follow a paper boat as it travels from in front of a typical suburban home through a storm drain cluttered with smelly trash and yard waste to a beach filled with litter. This simple, yet powerful, message educates children of all ages – and their parents as well. Complementing the TV spot is a :60 radio commercial that opens with teenagers at various beach recreational areas that are smelly and undesirable because of litter; the voiceover explains the Watershed and the types of pollutants which can ruin the Watershed, killing wildlife.

Frames from "Boat Ride" TV Spot

April 2010: Youth – General Watershed Message

The 30-second "Boat ride" TV and the 60-second radio commercials from the Fall campaign were brought back to reinforce the message during the Spring and coinciding with Earth Day. In addition, a youth anime poster was created for distribution in schools. This poster used the same young girl from the TV commercial to urge students to, "Help grown-ups remember when things go down here (the storm drain)…..they come out here (the beach).



Youth outreach poster

3.4 PO4 – BUSINESS OUTREACH

The Permit requires the Permittees to develop and implement both a corporate outreach and a small business assistance program to educate and inform corporate franchise operators, local facility managers,

and small businesses about stormwater regulations and BMPs to reduce the discharge of pollutants in stormwater.

3.4.1 Corporate Outreach

Develop Corporate Outreach Program (due by July 8, 2012)

The Permittees must work with other regional or statewide agencies and associations such as the California Storm Water Quality Association (CASQA) to develop a Corporate Outreach program to educate and inform the following corporate franchise operators and/or local facility managers (at a minimum) about stormwater regulations and BMPs.

- Four (4) Retail Gasoline Outlet (RGO) Franchisers
- Four (4) Retail Automotive Parts Franchisers
- Two (2) Home Improvement Center Franchisers
- Six (6) Restaurant Franchisers

Educational materials for RGOs, and restaurants have been developed by the Permittees and are distributed to local facility mangers during inspections. Automotive part stores are included in the retail partnership program to help educate the public shopping at their locations; the next step is to educate the corporate franchise operators and/or local facility managers. Under the nursery inspection program some Permittees are including home improvement centers due to the size of their gardening sections. As more is understood about the threats to stormwater from these locations and the need for information new materials will be developed to educate them about stormwater regulations and BMPs.

Work with other regional or statewide agencies and associations such as the California Storm Water Quality Association (CASQA) to develop a Corporate Outreach program to educate and inform the following corporate franchise operators and/or local facility managers (at a minimum) about stormwater regulations and BMPs? (by July 8, 2012)			
	Yes	No	In Progress
Ventura Countywide Stormwater Quality Program			☑

Performance Standard 3-16

3.4.2 Business Assistance Program

Provide Consultation Regarding Business Responsibilities

On-site, telephone or e-mail consultation is required to help business reduce the discharge of pollutants. The Permittees provide on-site consultation regarding the responsibilities of businesses to reduce the discharge of pollutants, during inspections this is covered in Section IV Industrial Commercial Programs. These trained and knowledgeable inspectors are also available to respond to questions via phone or email.

Distribute Educational Materials to Specific Businesses

As mentioned above the Industrial Commercial Program is responsible for the distribution of information to businesses. This occurs mostly at inspections, but may also be done when obvious problems are reported. An opportunity to disseminate this information to new business before they are in operation is through the business license program. All businesses need a business license to operate legally in a jurisdiction. It is as that time that the permittees are able to distribute information regarding stormwater regulations and appropriate BMPs for their operations. The Program has developed many specific fact sheets over the years for this purpose. The fact sheets may be distributed with the business license or the proprietor may be directed to the web site for the information. Some of the Permittees efforts are described below.

- The City of Camarillo educates automotive repair shops while conducting inspections of the facilities. Mobile car detailing and other mobile detailers (such as pet groomers, pressure-washing companies) are educated through business licensing office; when obtaining a business license, each business operator must sign a statement acknowledging they understand and will follow the "stormwater regulations". The City also educates these types of businesses in the field and through articles in our local quarterly newsletter. In addition, a mailout was sent to pet service businesses and pool service companies alerting them to the stormwater regulations**.**
- Ojai's Building Department counter has brochures available and recommends them to those seeking guidance to review and address stormwater quality issues.
- The City of Oxnard has an active Business Assistance Program. Technical Services Program – Source Control (TSP-SC) staff distribute educational materials and BMP guidelines during routine inspections of commercial facilities and restaurants. In addition, staff also provides verbal direction and guidance during these inspections.

  In March of 2009, the City of Oxnard conducted training for mobile detailers permitted to operate within the City limits. A PowerPoint presentation was given as well as BMP guidance literature regarding proper collection and disposal of wastewater generated during vehicle washing activities. TSP-SC staff is also proactive in providing educational materials to mobile detailers and carpet cleaners as they are spotted in the field. Mobile detailers are also provided with educational material/BMP guidance when they obtain their City business license.

- The City of Ventura assigned an Environmental Services staff member to the business outreach program. Most of the attention was focused on developing materials and strategies for the program, to be included in the presentation for waste reduction and recycling was the stormwater element.

  Local businesses were notified of the City's business outreach program through a newsletter insert included in the commercial trash bills, and also on the City website. A request for assistance from a business triggers an initial phone call and appointment, after which, a site visit and waste assessment is conducted. Stormwater compliance is discussed with businesses for the following areas:
  - Trash Enclosures
  - Landscape Management
  - Building Maintenance and Remodeling
  - Outdoor Storage of Materials or Wastes

- Illicit Discharges

The Stormwater Illicit Discharge brochure for Businesses is included in the assistance program packet for discussion. Other handouts and fact sheets are utilized for specific activity awareness.

Business licensing refers new mobile businesses to the Environmental Services contact to answer any questions the new business may have. Some of those businesses include:

- Pool Cleaning
- Mobile Detailers
- Carpet Cleaning
- Surface Washing

The City business inspection program has been improved by updating outreach materials, geared toward the activities performed by that business. Also, the new business inspection checklists that were developed this year, offer Stormwater BMP guidance for pollution prevention.

3.7 PO5 – EFFECTIVENESS ASSESSMENT

3.4.3 Behavioral Change Assessment Strategy

The Permit requires the Permittees to develop and implement a behavioral change assessment strategy based on current sociological data and studies to determine whether the Public Outreach Program is demonstrably effective in changing the behavior of the public.

The Ventura County Watershed Permittees are committed to tracking performance of their outreach efforts. To that end, periodic research surveys are conducted to measure awareness, perceptions and actions taken by Ventura County residents to protect the local Watershed. The research also gives insight about whether outreach messaging is effective along with providing some insight into local media preferences. The following summarizes the 2010 Adult Research Survey, which is the third survey since outreach started five years ago.

Develop and implement a behavioral change assessment strategy based on current sociological data and studies to determine whether the Public Outreach Program is demonstrably effective in changing the behavior of the public			
	Yes	No	In Progress
Ventura Countywide Sotrmwater Quality Program	☑	☐	☐

Performance Standard 3-17

A web survey or 'panel' was used as the method for data collection to measure public outreach effort effectiveness. Study participants, 30 from each city, had to be involved in decision making for their home and were required to live in Ventura County for at least two years. In addition, they were recruited according to specific demographic criterion, which includes a 55-65 age breakout segment not included in the 2006 survey plus higher income categories.

Seriousness of Problems

- Overall, concerns expressed in the current survey are consistent with 2006 levels and down slightly from 2007.

- **Pollution of the ocean** is viewed with the highest rate of seriousness (59%) Perceived seriousness of **pollution of local lakes**, creeks and rivers was next at 47%. Concern over **litter in waterways and on the beach** were rated about the same in terms of seriousness (40%-43%)

- Concern over litter on highways is consistent with previous years and still viewed by the smallest segment of the survey group as a serious problem (28%). Overall there is a **decline in concern over litter issues from 2007**.

Awareness of Watershed Pollution & Protection Practices

- Most agreed (89%) that polluted runoff can enter the storm drain system without rain and this understanding is trending upward (+5% per study).

- Increasing trend (+7%) in understanding "toxic yard runoff prevention" over both 2006 and 2007.

- Respondents claim to have adopted, on average, four watershed protection practices in the past year. Four behaviors most likely to have been adopted include:

- Pick up pet waste

- Take used motor oil to recycling

- Pick up litter in front of one's home or office

- Use a broom instead of a hose to sweep

- Other key watershed protection behaviors noted by a 70% or more of participants:

- Checking for auto leaks

- Reading directions before applying pesticides

- Reduced usage of pesticides

Pollutants of Concern

- Concern over primary pollutants of concern was relatively unchanged with the exception of:

- Perceived seriousness of lawn fertilizers (52%) and garden pesticides (71%), are trending upward.

- Perceived seriousness of pet waste is trending downward. (51%)

- Also noted was that although 74% see litter as having a serious impact, only 28% perceive litter on highways to be a serious problem.

Public Outreach Messaging Recall

- A significantly greater number of respondents were able to recall hearing or seeing something regarding watershed protection in 2010 as compared to 2007 (37% vs. 25%).

- Overall, 28% of the sample was able to recall one or more of the various ads.

In general, our ongoing research occasionally reveals an apparent disconnect between 'concern' over a pollutant and considering it to be a 'serious problem'. Concern is the precursor to considering a pollutant to be an imminent danger to the watershed. Only when that danger is fully understood will individuals 'act'. The Community for a Clean Watershed outreach program strives to continue to build the understanding that will ultimately change behaviors.

The Community for a Clean Watershed logo and catch phrase

3.4.4 Conduct Annual Effectiveness Assessment

Effectiveness assessment is a fundamental component required for the development and implementation of a successful storm water program. In order to determine the effectiveness of the Public Outreach Program Element, a comprehensive assessment of the program data is conducted as part of the Annual Report. The results of this assessment are used to identify modifications that need to be made to the program. Each year the effectiveness assessment is reviewed and revised as necessary.

By conducting these assessments and modifying the Program Element as necessary, the Permittees ensure that the iterative process is used as an effective management tool. Due to the types of data collected for the Public Outreach Program, current and future assessments will primarily focus on Outcome Levels 1, 2, and 3.

- Outcome Level 1 (L1) answers the question: Did the Permittees implement the components of the Permit?

- Outcome Level 2 (L2) answers the question: Can the Permittees demonstrate that the control measure/performance standard significantly increased the awareness of its target audience?

- Outcome Level 3 (L3) answers the question: Can the Permittees demonstrate that the control

measure/performance standard changed a target audience's behavior, resulting in the implementation of recommended BMPs?

The following is an assessment regarding the effectiveness of the Public Outreach Program.

PO1 – Public Reporting

The Permittees have identified staff to serve as contact persons for public reporting. (**L1**)

The Permittees maintain two types of public reporting hotlines, one for general stormwater information and the other for reporting water pollution problems. (**L1**)

The Permittees are promoting and publicizing the public reporting hotlines and contact information. The information is available on Permittee web sites and is published in the government pages of the local phone book and other appropriate locations. **(L1)**

The Permittees are raising awareness about the public reporting hotline numbers. **(L2)**

PO2 – Public Outreach Implementation

The Permittees have developed and are implementing the public outreach program that provides key stormwater messages. **(L1)**

- Education of Ethnic Communities – The Permittees have developed and implemented a strategy to educate ethnic communities through culturally effective methods. The Permittees educated ethnic communities by reaching out to the Hispanic community in Ventura County via Spanish language advertising in the media. In 2009-2010, Spanish language advertising accounted for approximately 1.3 million (21.6%) of the total stormwater quality impressions.
- Storm Drain Inlet Markers and Signage – The Permittees have labeled or marked 100% of the storm drain inlets for the entire storm drain system and maintain the stencils/markers through the Public Agency Activities Program. In addition, 90% of all public access points to creeks and channels have signage with language that discourages illegal dumping, this includes access points that are outside of Permittee jurisdiction.
- Educational Materials – The Permittees have developed and are providing a variety of stormwater pollution prevention outreach materials, including those for specific pollutants and activities. Some materials are also provided in Spanish. The materials include pamphlets, brochures, and BMP posters and are provided via a number of mechanisms, including at community events, at specific businesses, utility billing inserts, and the Countywide stormwater Web site (http://cleanwatershed.org/). In 2009-2010, the Permittees distributed pollutant-specific outreach materials to the following business types: automotive parts stores; home improvement centers, lumber yards, and hardware stores; and pet shops and feed stores. In addition, the Permittees distributed activity-specific stormwater pollution prevention educational materials to residents regarding the following activities: proper disposal of litter, green waste, and pet waste; proper vehicle maintenance; lawn care; and water conservation practices.
- Mixed Media Campaigns – The Countywide program has continued to work with a local public relations agency, theAgency, to develop and implement Community for a Clean Watershed campaigns. The Permittees have provided the public with various stormwater-related articles or messages via radio and public access cable channel PSAs, movie theater slides, print ads (including newspaper), signage on outdoor bulletins and at transit shelters, and Web site banners. During 2009-2010, the Permittees conducted a total of three campaigns (Green Waste and Youth, Transit Shelter Overrun, and Pesticide and Youth) for an estimated 4.73 million total impressions through mixed media campaigns.

- Countywide Stormwater Web Site – The Permittees continue to maintain and utilize both Web sites (http://cleanwatershed.org/ and http://vcstormwater.org/) to provide regularly updated outreach to the public.
    - The Permittees are tracking the number of visits and unique visitors to the Web site (3,724 and 2,101 in 08/09; 4,347 and 2,509 in 09/10, respectively). Both the number of visits (16.7% increase) and number of unique visitors (19% increase) were higher in 2009-2010 than in 2008-2009. **(L2)**
- Community Events – The Permittees outreached to the general public by sponsoring, organizing, and/or exhibiting at multiple community events and providing information to event attendees. These events included Coastal Cleanup Day; a total of 3,129 volunteers collected trash at 22 sites countywide.
- Pollutant-Specific Outreach – The Permittees are implementing a pollutant-specific outreach program regarding metals, urban pesticides, bacteria, and nutrients in coordination with multi-media campaigns and retail partnerships with auto shops, pet stores, and home improvement stores and nurseries. Pollutant-specific outreach materials have been distributed via these retail partnerships.

As a result of the above efforts, in 2009-2010, an estimated total of 10 million impressions were made, well exceeding the goal of five million stormwater quality impressions per year.

PO3 – Youth Outreach and Education

The Permittees developed and submitted a Youth Outreach Plan in July 2009 that outlines how the Permittees will address youth outreach via a media campaign. During 2009-2010, the Permittees began implementing this campaign, making approximately 747,627 impressions to reach youth in Ventura County. The Permittees continued to conduct outreach to youth by distributing outreach materials specifically targeting school-age children, as well as providing information, games, and activities on the Kids' Section of the Countywide Web site. In addition, although not required by the Permit, at least two individual Permittees made presentations to students at schools or Permittee facilities. **(L1)**

PO4 – Business Outreach

The Permittees provided on-site consultation to businesses during inspections regarding their responsibility to reduce discharge of pollutants. Inspectors are also available for consultation via telephone and e-mail. **(L1)**

The Permittees distributed educational materials to specific businesses during inspections, when business licenses are obtained, and when problematic businesses are reported. In addition, information is made available on the Countywide Web site, and businesses are referred to the Web site as appropriate. **(L1)**

PO5 – Effectiveness Assessment

The Permittees conducted the 2010 Adult Research Survey, the third survey of local residents since outreach began in 2005. **(L1)**

- Awareness of Watershed Pollution & Protection Practices – Participants demonstrated an increased understanding of the concept that polluted runoff can enter the storm drain system without rain (89% in 2010; 84% in 2007; 79% in 2006). In addition, participants had an increased understanding of "toxic yard runoff prevention" (7% increase since 2006 and 2007). **(L2)**
- Pollutants of Concern – Participants perceived lawn fertilizers (52%) and garden pesticides (71%) to be serious issues; these results indicate that awareness has increased since the 2006 and 2007 surveys. **(L2)**

- Public Outreach Messaging Recall – More participants (37%) were able to recall hearing or seeing information regarding watershed protection in 2010 than in 2007 (25%). **(L2)**

The results outlined above show that the Public Outreach program efforts have increased awareness among Ventura County residents regarding some key issues impacting the health of Ventura County's watersheds.

3.4.5 Public Outreach Program Element Modifications

On an annual basis, the Permittees plan to evaluate the results of the Annual Report, as well as the experience that staff has had in implementing the program, to determine if any additional program modifications are necessary to comply with the Clean Water Act requirement to reduce the discharge of pollutants to the maximum extent practicable. Any key modifications made to the Public Outreach Program Element during the next fiscal year will be reported in the following Annual Report.

4 Industrial/Commercial Facilities Programs

4.1 OVERVIEW

The purpose of the Industrial/Commercial Facilities Program Element is to effectively prohibit unauthorized non-stormwater discharges and reduce pollutants in stormwater runoff from industrial and commercial facilities to the MEP.

The daily activities of many businesses create a potential for pollutants to enter a storm drain system. The Permittees have developed programs to address this source of pollutants through inspections of targeted businesses providing educational outreach and enforcement if needed. These efforts include providing information on the potential for illicit discharges and illegal connections from businesses, aid in the selection and use of proper BMPs, and formal enforcement action and fines if environmental rules are ignored.

The program for industrial and commercial facilities is accomplished by tracking, inspecting, providing outreach, and ensuring compliance at industrial and commercial facilities identified as critical sources of pollutants in stormwater. Industrial and commercial facilities are managed under a single Program Element due to the similarities among these types of facilities and the effort involved to implement the program. Additionally, industrial and commercial land uses within Permittee jurisdictions are commonly located in close proximity to one another, often in the same watershed or sub-watershed.

The Permittees use the Business and Illicit Discharge/Illegal Connection Subcommittee meeting to coordinate and implement a comprehensive program to control pollutants in stormwater discharges to municipal systems from targeted commercial facilities. The Subcommittee is comprised of representatives of the Permittee cities and other municipal staff from various departments (e.g. Environmental Health, Environmental Services and Wastewater Services). Each Permittee has implemented an Industrial/Commercial Business Program using the control measures identified below.

4.2 CONTROL MEASURES

The Permittees have developed several Control Measures and accompanying performance standards to ensure that the Industrial/Commercial Facilities Program requirements found in the Permit are met and provide information for optimizing the Program.

The Industrial/Commercial Facilities Program Control Measures are organized to be parallel to the organization of the Permit and consist of the following:

IC	Control Measure
IC1	Facility Inventory
IC2	Inspection
IC3	Industrial/Commercial BMP Implementation
IC4	Enforcement
IC5	Training
IC6	Effectiveness Assessment

Table 4-1 Control Measures for the Industrial/Commercial Facilities Program Element

IC1 – Facility Inventory

The Facility Inventory Control Measure addresses the need to develop and maintain a complete and comprehensive database of industrial and commercial facilities that are determined to be critical sources of stormwater pollution. Information for the database is primarily derived from new business licenses and sanitary sewer connection permits, in addition to facility inspections performed by the Permittees. Some permittees perform surveys of the industrial zoned areas in their jurisdiction to help maintain their industrial facility inventory. This survey is usual associated with industrial waste pretreatment inspections required for agencies operating a wastewater collection system. The inventory provides the basis for all Permittee actions under this Program Element and serves as a repository for information related to inspection, outreach, compliance, progressive enforcement and program effectiveness assessment.

4.2.1 Maintain and Annually Update the Industrial and Commercial Facility Inventory

As required by the Permit the Permittees maintain an inventory of industrial and commercial facilities within their jurisdictions, including those covered under the state Industrial General Permit. This inventory identifies the type of business, the watershed it is located in and inspections and enforcement action history.

The Permittees supplement their inventory by utilizing local business licenses, and data from County Environmental Health to obtain current facility numbers prior to planned inspections. The Regional Water Board's website also provides useful information for all Industrial General Permit holders and is used extensively for that program. These data were last compiled during the 2009-2010 reporting period and will be updated on an ongoing basis as the next round of inspections discovers new facilities as well as companies that are no longer in operation. Some businesses, such as restaurants, have a high turnover with new ones opening each year and many also closing their doors permanently. Because of the continued turnover of businesses the Industrial and Commercial inventory can never be assumed to be 100% accurate, it is a snap shot and will be continually improved as information becomes available. The current inventory for 2009-2010 is summarized in the following Tables.

Did the Co-permittees maintain and update the Industrial and Commercial Facility Inventory			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 4-1

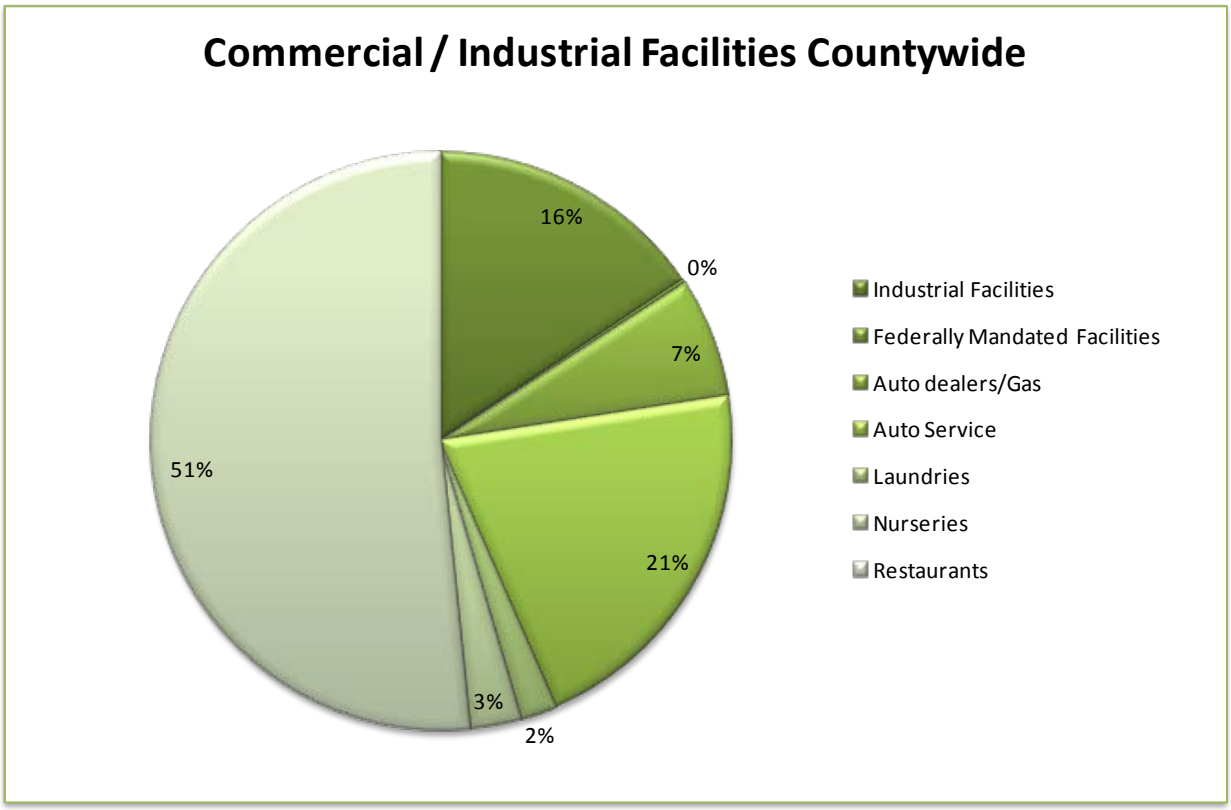


Figure 4-1Commercial/Industrial Facilities Inventory

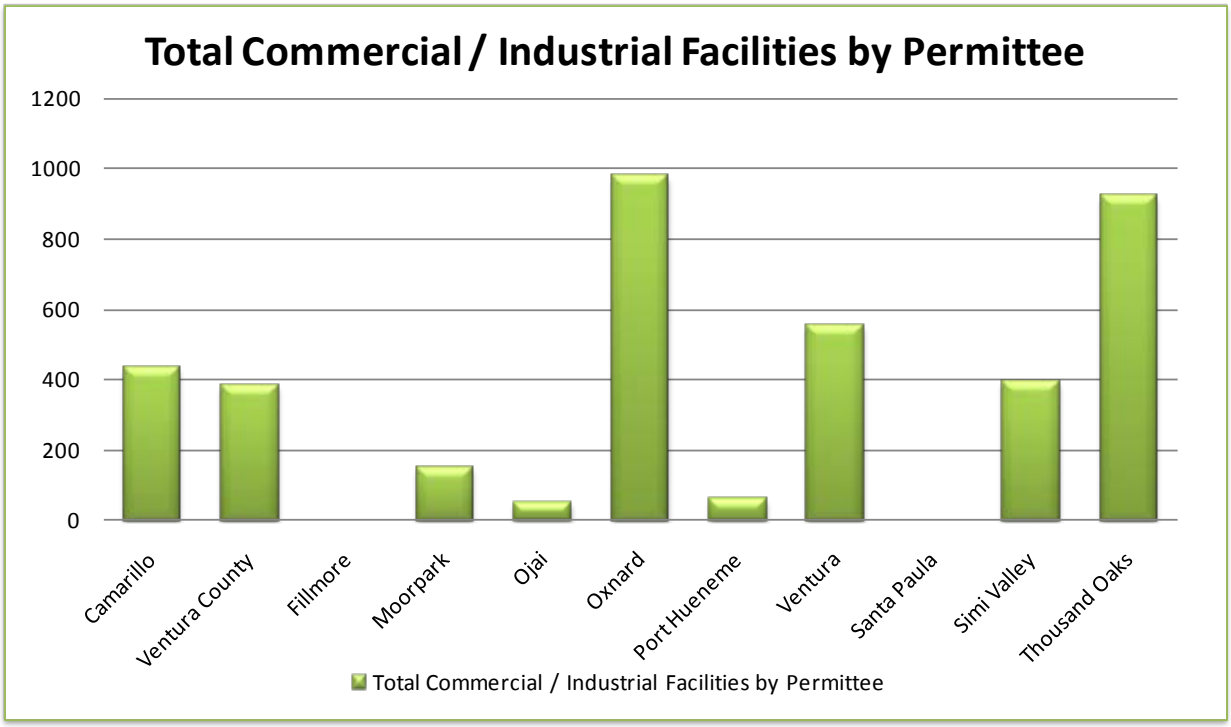


Figure 4-2 Commercial/Industrial Facilities by Permittee

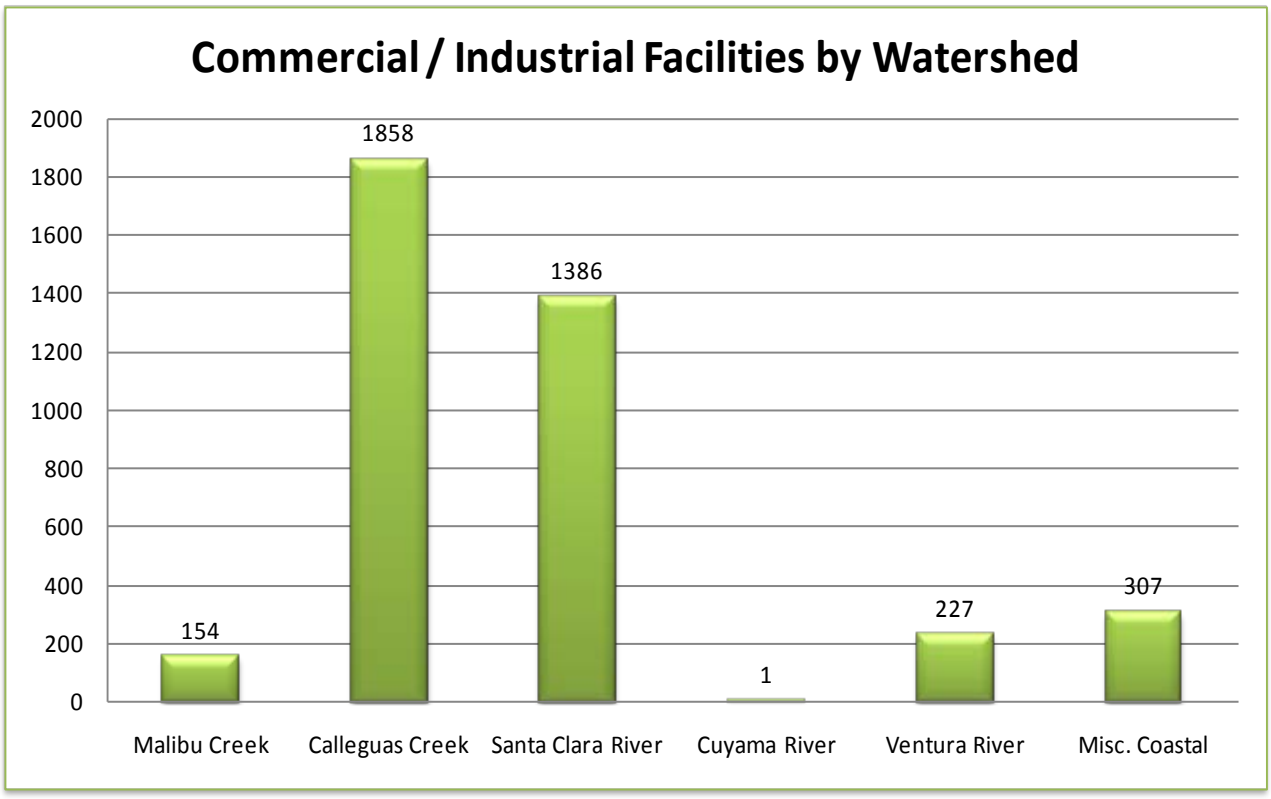


Figure 4-3 Commercial Industrial Facilities by Watershed

Inspect Industrial and Commercial Facilities Twice during Permit Term

To satisfy the requirement of inspecting these facilities twice during the Permit term the Permittees began their inspection of industrial and commercial facilities. With respect to industrial facilities, if the initial inspection reveals that there is no risk of exposure of industrial activities to stormwater at a facility, then the facility may be categorized as *No Exposure Status.*A second inspection at a rate that provides annual re-inspection of a minimum of 20% of all such facilities determined to have non-exposure is then required.

After the 2010-2011 Mandatory Compliance inspection a new table will be added that tracks the number of inspections conducted at facilities determined not to have exposure of industrial activities to stormwater.

All initial industrial and commercial facility inspections must be completed no later than July 8, 2012. A minimum interval of six months between the first and second compliance inspection is required at all industrial and commercial facilities. It is possible for a site to be visited sooner than six months upon request by the Regional Board staff to assist with their investigations.

All Permittees are in compliance with this requirement since the industrial and commercial inspections are not required to be completed during the reporting period of this report. That is not to say that the Permittees have not initiated an inspection program. The inspection program begins with the inventory described above, followed by inspections and any needed enforcement. The program will be ongoing with continual updates to the inventory and facilities being re-inspected at least twice during the permit term.

Industrial inspection

The status of the industrial commercial inspection program through the end of the reporting period is represented in the following tables. When reviewing these tables it is important to keep in mind that they represent a program in progress and that the permit requirement for the first inspection is July 8, 2012. At that time the table will represent a more complete picture of inspection compliance as the Permittees will have had time to perform the required inspections.

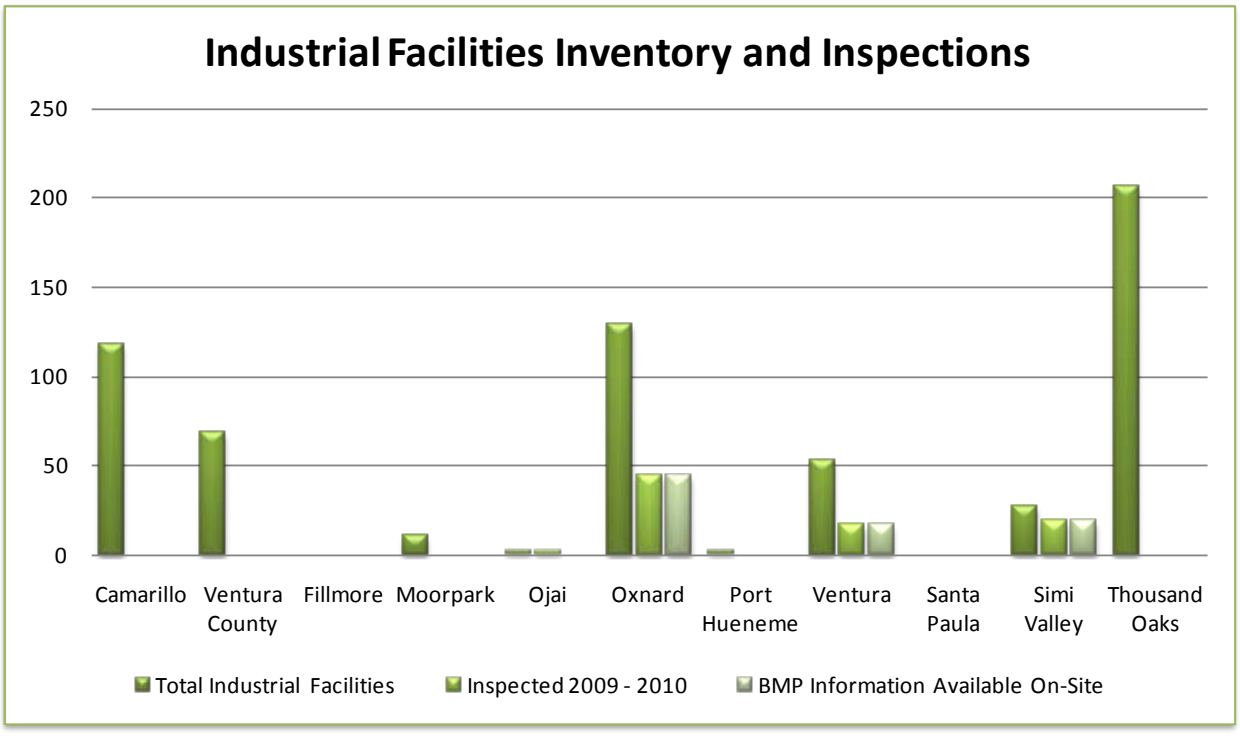


Figure 4-4 Industrial Facilities Inventory and Inspections

Industrial Facilities includes U.S. EPA Phase I, II Facilities required to obtain coverage under the Industrial Activities Stormwater General Permit (IAGSP). These facilities are identified by either the Standard Industrial Classifications (SIC) or the North American Industry Classification System (NAICS). Facility ownership (federal, state, municipal, private) and profit motive of the facility are not factors in this definition.

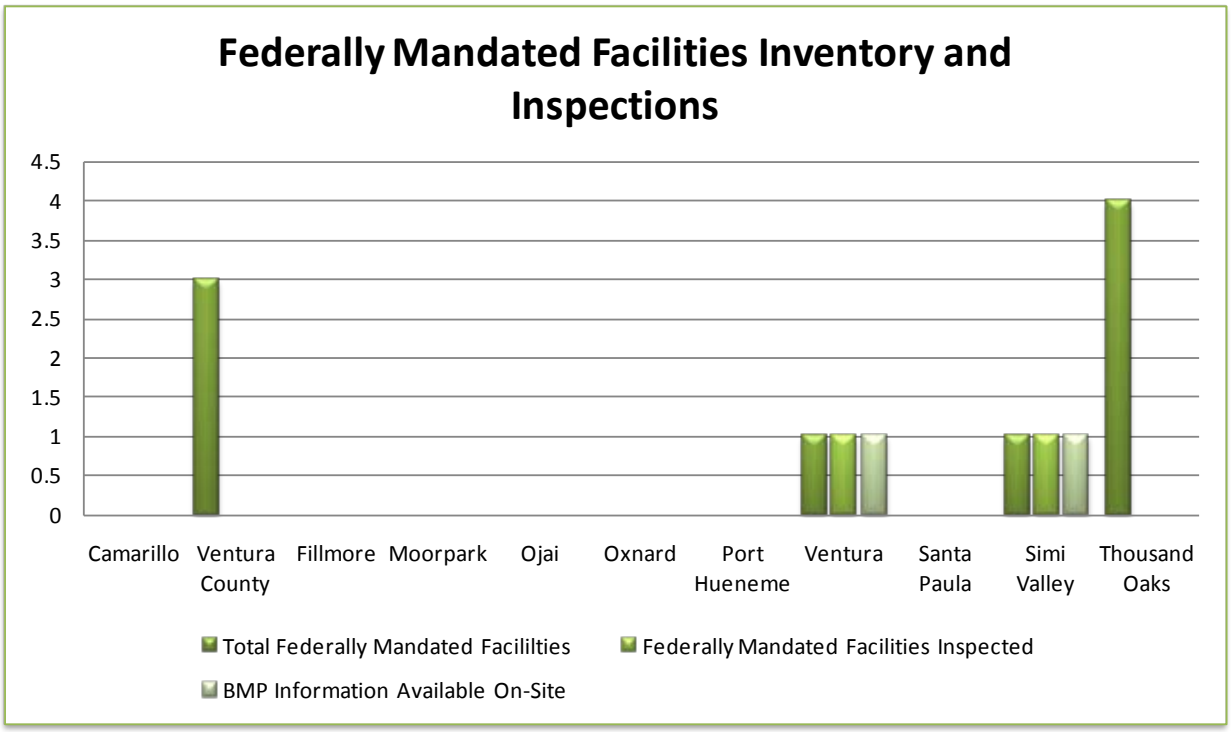
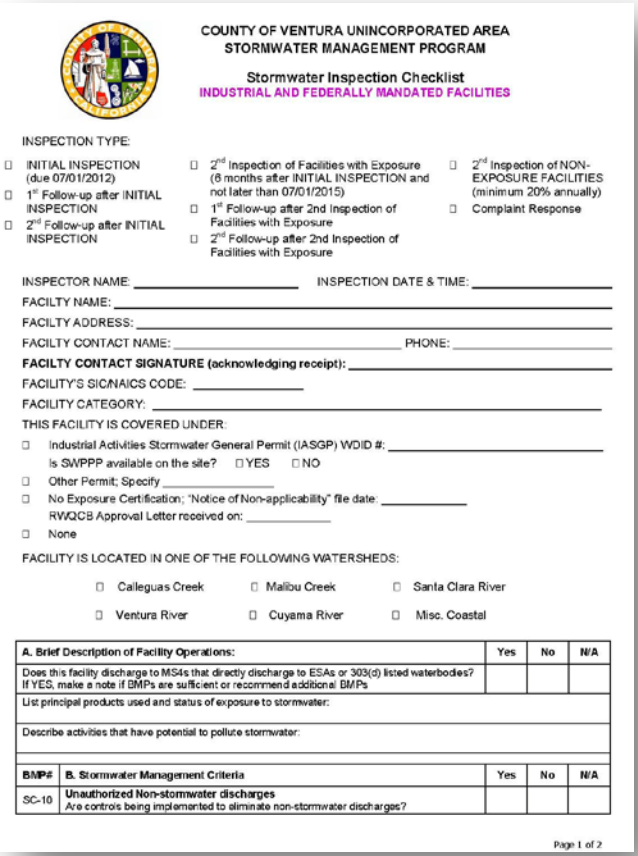


Figure 4-5 Federally Mandated Facilities

Other Federally-mandated Facilities [as specified in 40 CFR 122.26(d)(2)(iv)(C)] are also required to obtain coverage under the IAGSP. Again, facility ownership (federal, state, municipal, private) and profit motive of the facility are not factors in this definition. Included in this category are:

- Municipal landfills
- Hazardous waste treatment, disposal, and recovery facilities
- Facilities subject to SARA Title III (also known as the Emergency Planning and Community Right-to-Know Act (EPCRA))



COUNTY OF VENTURA UNINCORPORATED AREA
STORMWATER MANAGEMENT PROGRAM

Stormwater Inspection Checklist
INDUSTRIAL AND FEDERALLY MANDATED FACILITIES

INSPECTION TYPE:

- ☐ INITIAL INSPECTION (due 07/01/2012)
- ☐ 1st Follow-up after INITIAL INSPECTION
- ☐ 2nd Follow-up after INITIAL INSPECTION
- ☐ 2nd Inspection of Facilities with Exposure (6 months after INITIAL INSPECTION and not later than 07/01/2015)
- ☐ 1st Follow-up after 2nd Inspection of Facilities with Exposure
- ☐ 2nd Follow-up after 2nd Inspection of Facilities with Exposure
- ☐ 2nd Inspection of NON-EXPOSURE FACILITIES (minimum 20% annually)
- ☐ Complaint Response

INSPECTOR NAME: _____ INSPECTION DATE & TIME: _____
FACILTY NAME: _____
FACILTY ADDRESS: _____
FACILTY CONTACT NAME: _____ PHONE: _____
FACILTY CONTACT SIGNATURE (acknowledging receipt): _____
FACILITY'S SIC/NAICS CODE: _____
FACILITY CATEGORY: _____
THIS FACILITY IS COVERED UNDER:

- ☐ Industrial Activities Stormwater General Permit (IASGP) WDID #: _____
  Is SWPPP available on the site? ☐ YES ☐ NO
- ☐ Other Permit; Specify _____
- ☐ No Exposure Certification; "Notice of Non-applicability" file date: _____
  RWQCB Approval Letter received on: _____
- ☐ None

FACILITY IS LOCATED IN ONE OF THE FOLLOWING WATERSHEDS:

☐ Calleguas Creek ☐ Malibu Creek ☐ Santa Clara River
☐ Ventura River ☐ Cuyama River ☐ Misc. Coastal

A. Brief Description of Facility Operations:	Yes	No	N/A
Does this facility discharge to MS4s that directly discharge to ESAs or 303(d) listed waterbodies? If YES, make a note if BMPs are sufficient or recommend additional BMPs			
List principal products used and status of exposure to stormwater:			
Describe activities that have potential to pollute stormwater:			

BMP#	B. Stormwater Management Criteria	Yes	No	N/A
SC-10	Unauthorized Non-stormwater discharges Are controls being implemented to eliminate non-stormwater discharges?			

Page 1 of 2

Industrial facilities inspection form

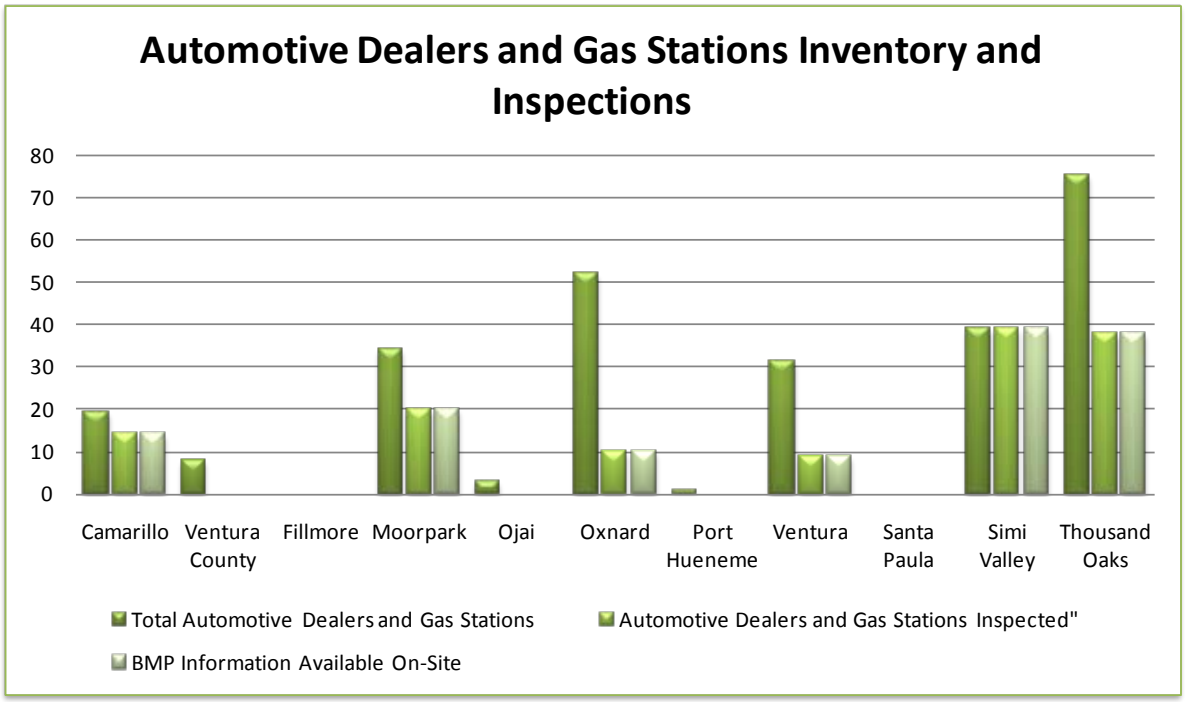


Figure 4-6 Automotive Dealers and Gas Stations

Inspections are conducted at all automotive and gas station facilities even if these facilities do not have outdoor activities or outside storage that are exposed to stormwater. In addition the Permittees have identified other facilities where engine oil is present and potentially threat to stormwater pollution, e.g., boat dealers, RV dealers, motorcycle dealers, etc. Facilities that are only inspected if they have outdoor activities or outside storage that are exposed to stormwater are auto parts stores and tire dealers.

Automotive service facility inspection

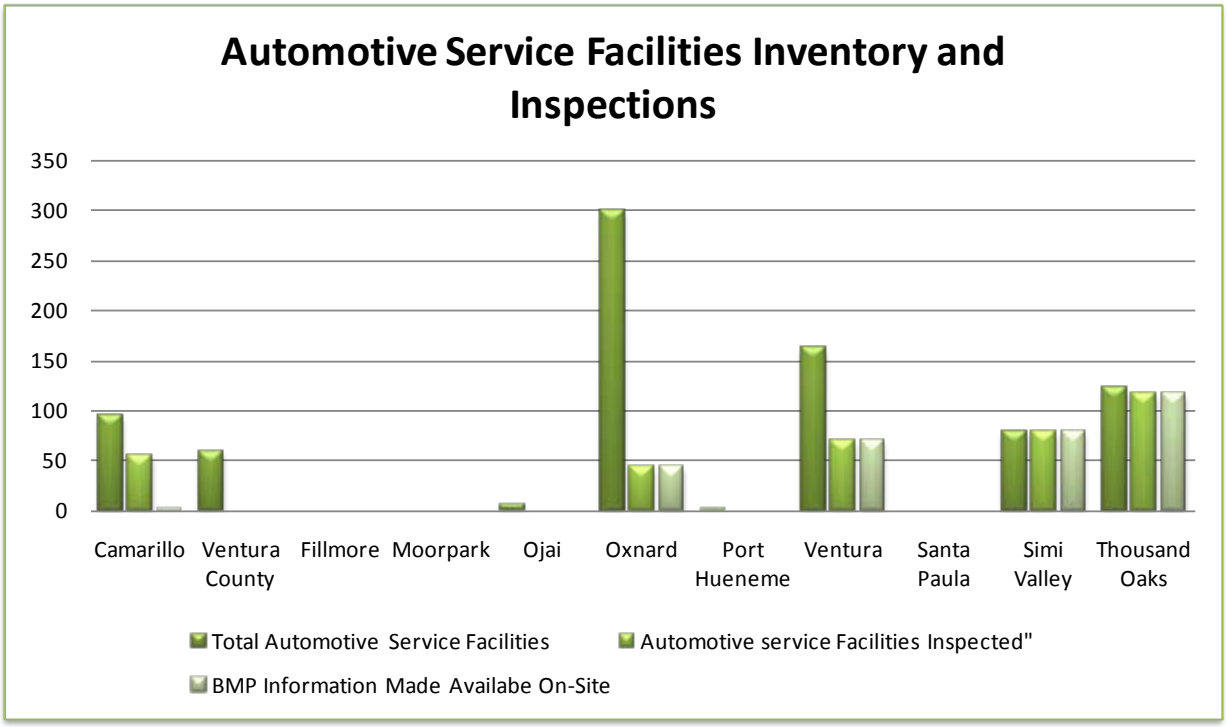


Figure 4-7 Automotive Service Facilities

All automotive service facilities are included in the inventory for inspection, this category also includes motorcycle and boat repair if there is a potential for stormwater pollution.

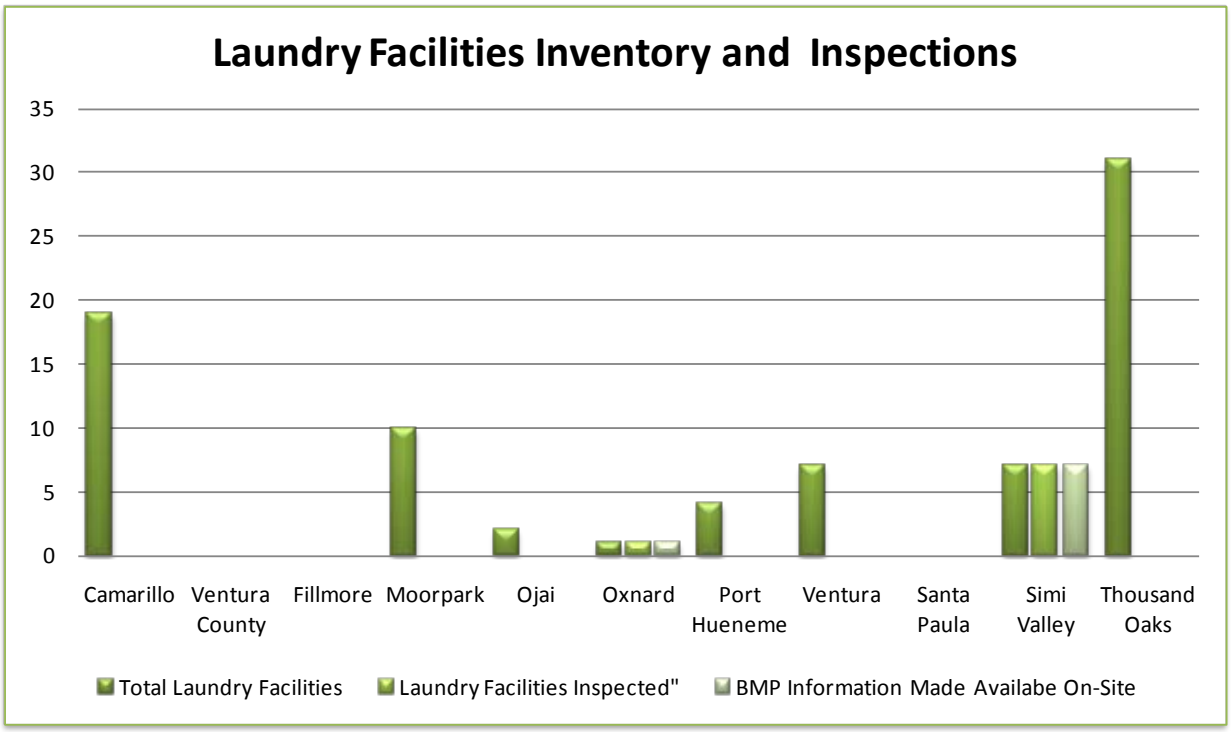


Figure 4-8 Laundry Facilities

Permittees made an effort to identify all laundry facilities in their jurisdiction that may possibly have an exposure to stormwater and therefore may represent a threat to stormwater quality. All commercial laundries in a jurisdiction were identified and screened for potential exposure. If there was no exposure potential then an inspection was deemed unnecessary

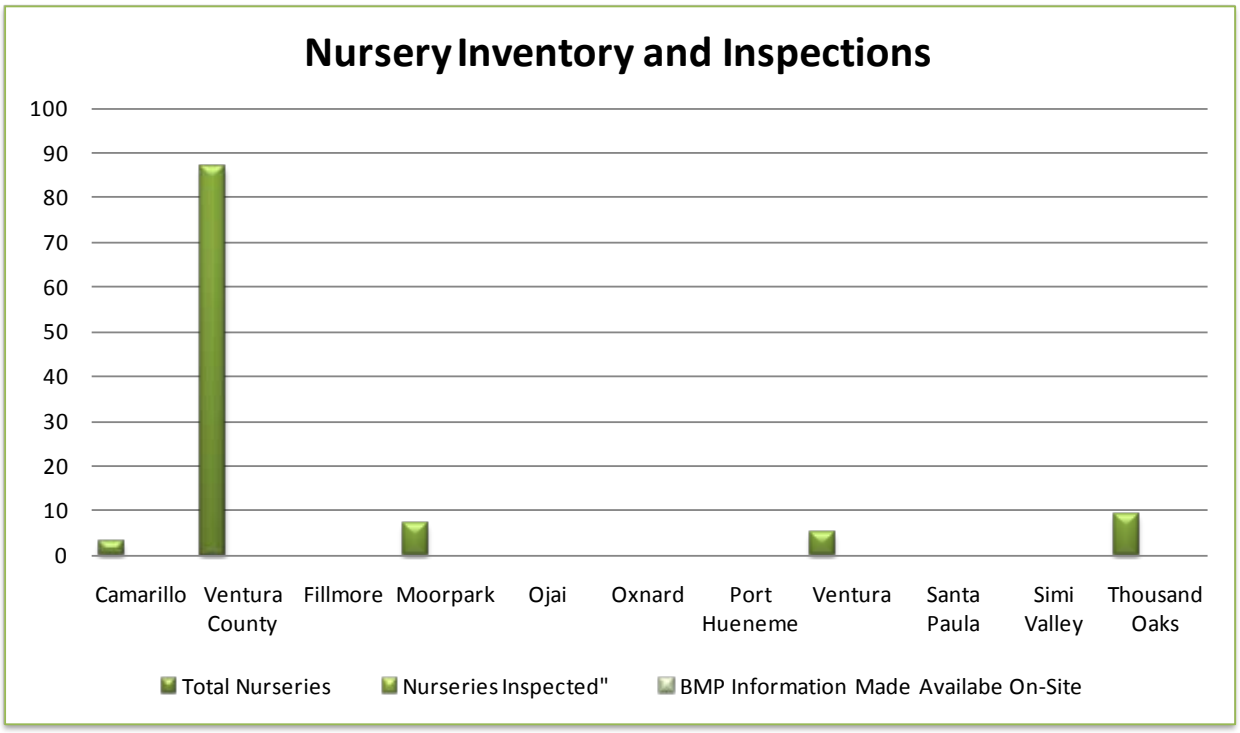


Figure 4-9 Nursery Facilities

The Permit includes requirements for the Permittees to confirm that nursery operators that are exposed to stormwater implement pollutant reduction and control measures with the objective of reducing pollutants in storm water runoff discharges. "Nurseries" comprises establishments primarily engaged in the merchant wholesale distribution of flowers, florists' supplies, and/ or nursery stock (except plant seeds and plant bulbs). The industry in NAICS Code 444220 comprises establishments primarily engaged in retailing nursery and garden products, such as trees, shrubs, plants, seeds, bulbs, floriculture products and sod, which are predominantly grown elsewhere. These establishments may sell a limited amount of a product they grow themselves.

This is interpreted by the Permittees to not include stores that may have some plants or a small nursery section although it is not their primary business. Florist that specialize in cut flowers are also not included because their business and inventory is kept indoors. However, most Permittees have extended this to include the large home improvement centers due to the size of their nursery section.

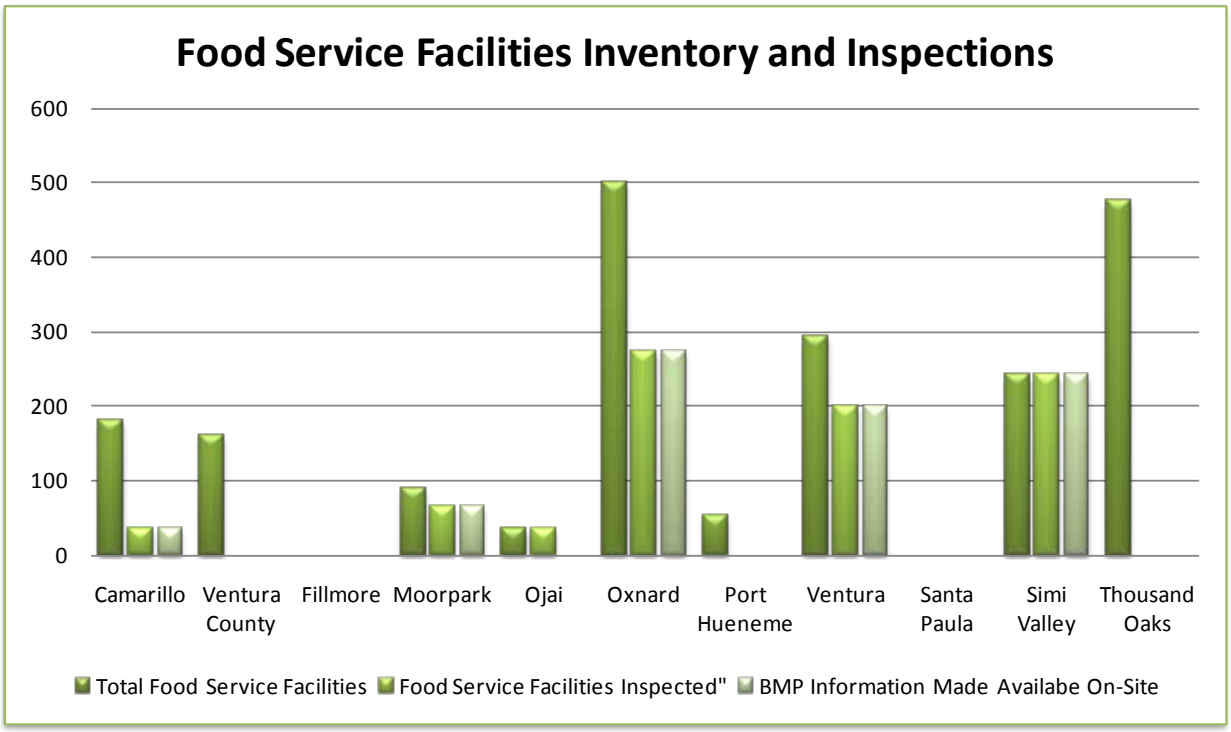
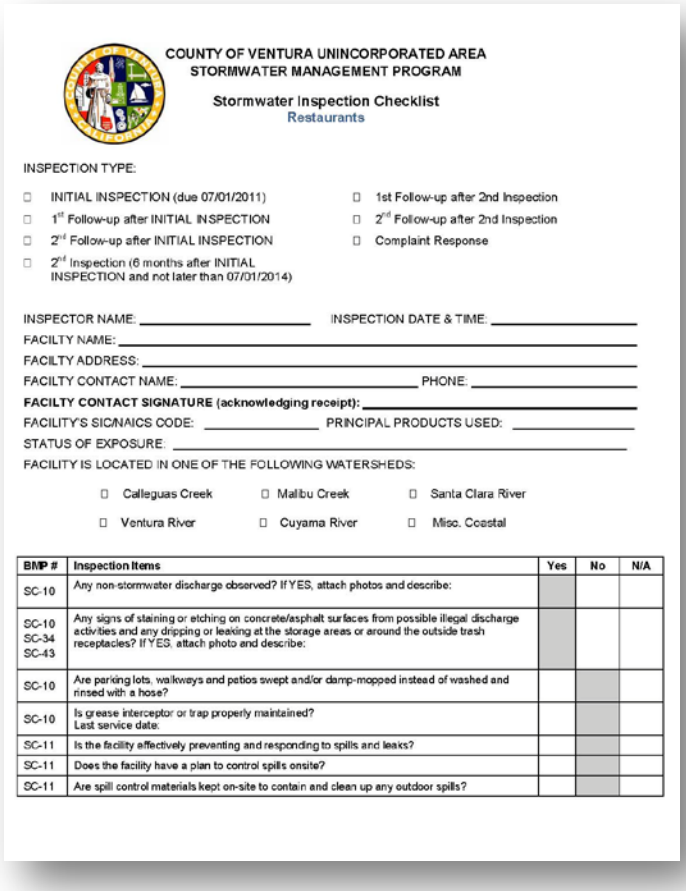


Figure 4-10 Food Service Facilities



COUNTY OF VENTURA UNINCORPORATED AREA
STORMWATER MANAGEMENT PROGRAM

Stormwater Inspection Checklist
Restaurants

INSPECTION TYPE:

- ☐ INITIAL INSPECTION (due 07/01/2011)
- ☐ 1st Follow-up after INITIAL INSPECTION
- ☐ 2nd Follow-up after INITIAL INSPECTION
- ☐ 2nd Inspection (6 months after INITIAL INSPECTION and not later than 07/01/2014)
- ☐ 1st Follow-up after 2nd Inspection
- ☐ 2nd Follow-up after 2nd Inspection
- ☐ Complaint Response

INSPECTOR NAME: _____ INSPECTION DATE & TIME: _____
FACILTY NAME: _____
FACILTY ADDRESS: _____
FACILTY CONTACT NAME: _____ PHONE: _____
FACILTY CONTACT SIGNATURE (acknowledging receipt): _____
FACILITY'S SIC/NAICS CODE: _____ PRINCIPAL PRODUCTS USED: _____
STATUS OF EXPOSURE: _____
FACILITY IS LOCATED IN ONE OF THE FOLLOWING WATERSHEDS:

- ☐ Calleguas Creek
- ☐ Malibu Creek
- ☐ Santa Clara River
- ☐ Ventura River
- ☐ Cuyama River
- ☐ Misc. Coastal

BMP #	Inspection Items	Yes	No	N/A
SC-10	Any non-stormwater discharge observed? If YES, attach photos and describe:			
SC-10 SC-34 SC-43	Any signs of staining or etching on concrete/asphalt surfaces from possible illegal discharge activities and any dripping or leaking at the storage areas or around the outside trash receptacles? If YES, attach photo and describe:			
SC-10	Are parking lots, walkways and patios swept and/or damp-mopped instead of washed and rinsed with a hose?			
SC-10	Is grease interceptor or trap properly maintained? Last service date:			
SC-11	Is the facility effectively preventing and responding to spills and leaks?			
SC-11	Does the facility have a plan to control spills onsite?			
SC-11	Are spill control materials kept on-site to contain and clean up any outdoor spills?			

Restaurant inspection form

For the purposes of inventory and inspection restaurant means a facility that sells prepared foods and drinks for consumption, including stationary lunch counters and refreshment stands selling prepared foods and drinks for immediate consumption (SIC Code 5812). This will include supermarkets if they have a deli selling food which is prepared on site, but will not include grocery stores, bakeries and candy stores not engaged in food preparation.

4.3 IC2 – INSPECTION

The Inspection Control Measure establishes the inspection requirements associated with on-site visits. The inspections ensure that the facility operator is effectively implementing source control BMPs, is in compliance with municipal ordinances, has pertinent educational materials, and is not producing unauthorized non-stormwater discharges. Inspection of facilities covered under the IASGP also ensures that the operator has a current Waste Discharge Identification (WDID) number, a SWPPP is available on site, and the operator is effectively implementing BMPs. Stopping unauthorized discharges is the primary purpose of the inspections, however it also just as important to educate businesses on proper disposal of wastes and other BMPs to prevent future discharges to the storm drain system. Because of this educational information is made available to businesses that do not immediately have it available for their staff.

4.3.1 Inspections

The Permittees' municipal ordinances currently allow authorized officers to enter any property or building to perform inspections. On refusal to allow inspection by the owner, tenant, occupant, agent or other responsible party, the Permittees may seek an Administrative Search Warrant. All the Permittees are reviewing their ordinances and deciding if there is a need to strengthen their ability to perform inspection as well as the enforcement tools at their disposal to bring an uncooperative business into compliance with all applicable stormwater ordinances.

The vast majority of site visits performed were unannounced providing the inspectors with an honest look at daily activities of the facility. During these site visits, Permittee inspection staff would meet with the business owner/manager to review the objectives of the inspection. After performing a walk-through of the facility, inspection results were discussed with the business owner/manager. In the event a Permittee determined a facility's stormwater BMPs were insufficient, the Permittee provided their recommendations to the facility owner/manager. Source control BMPs were recommended as a first step in BMP implementation before requiring the facility to implement costly structural BMPs. In all cases, inspection staff informed facilities' owners/managers that BMP implementation does not guarantee compliance nor relieve them from additional regulations, and that it is their responsibility to ensure that pollutants do not escape the facility.

Begin initial inspections of commercial and industrial facilities? (inspections to be completed by July 8, 2012)			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County		☑	
Fillmore	☑		
Moorpark	☑		
Ojai		☑	
Oxnard	☑		
Port Hueneme		☑	
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 4-2

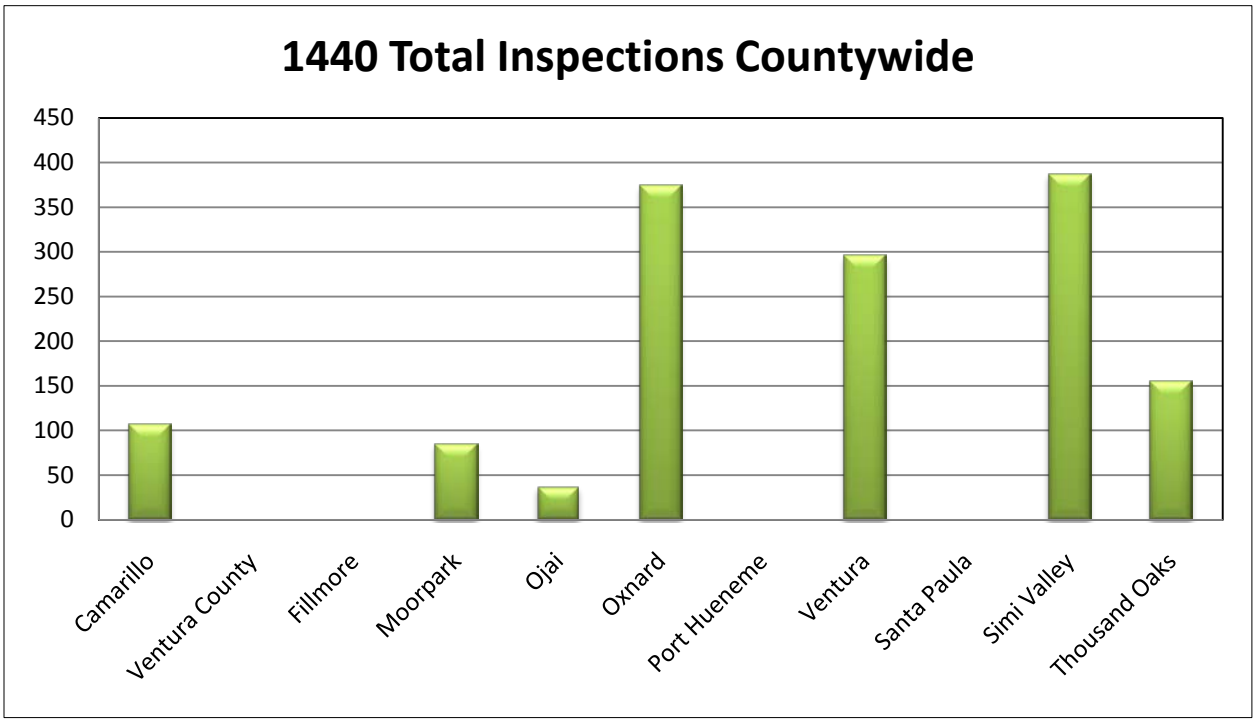


Figure 4-11 Total Inspections Countywide

Review/Revise the Industrial Inspection and Commercial Business-Specific Checklists as Needed

In order to ensure that the inspectors conduct thorough and consistent inspections, industrial and commercial checklists have been developed for different targeted businesses. Permittee industrial inspectors receive proper training to adequately assess facilities and offer assistance in suggesting remedies. County and municipal ordinances and City Attorney's offices also provide the proper legal backing for inspections and any necessary enforcement. Checklists are periodically updated as necessary to ensure that they provide an adequate and sufficiently comprehensive basis upon which to conduct inspections. Currently, the Program has inspection checklists for general industry, restaurants, automobile related businesses, nurseries, and laundries. Examples of the checklists are included as Attachment A

Review/revise the industrial inspection checklist to be consistent with the permit			
	Yes	*No*	*N/A*
	☑		
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark		☑	
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 4-3

Review/revise the commercial business-specific checklist to be consistent with the permit			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 4-4

Conduct Follow-up Inspections as Necessary

Whenever evidence of an illicit discharge was found, the Permittee determined that an operator has failed to adequately implement all necessary BMPs as required by the Permit, or otherwise are deemed out of compliance, the Permittees engage in progressive enforcement action. If the facility can be brought into compliance while the inspector is still on-site a follow-up inspection is not deemed necessary. All other facilities that failed to implement all necessary BMPs were advised there would be follow-up visits. The Permit requires that re-inspection occurs within four weeks of the initial inspection. Follow-up visits may be scheduled, especially if the facility operator is difficult to get a hold of, but for the majority of businesses the follow-up inspections are also unannounced surprise inspections. If continued stormwater violations were found progressive enforcement actions were initiated and another visit was scheduled if necessary. Enforcement actions may include any of the following: Warning Notice, Notice of Violation(s), Administrative Civil Liability actions and monetary fines. These actions are described in detail and reported in Section 8 - Programs for Illicit Discharges.

The number of required Initial Follow-Up Inspections and Secondary Follow-Up Inspections can be seen by Permittee in Figure 4-12 Follow-up and Secondary Inspections.

Conduct follow-up inspections as necessary			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 4-5

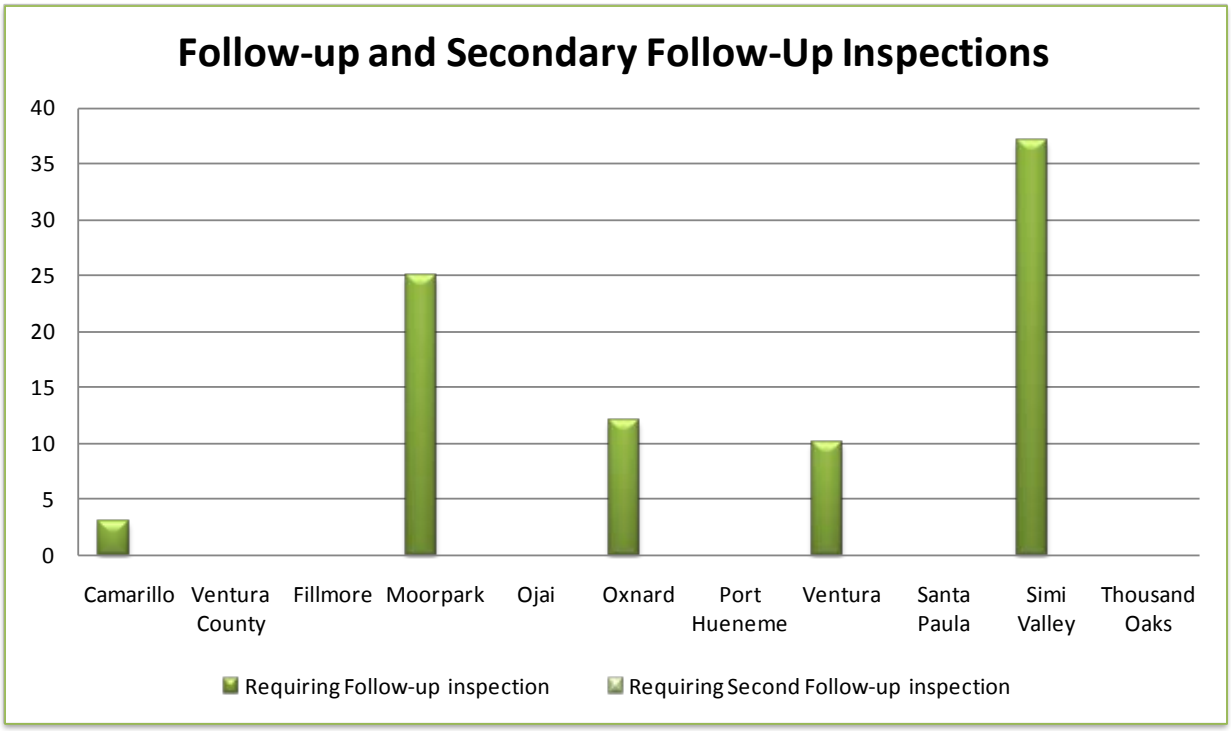


Figure 4-12 Follow-up and Secondary Inspections

4.4 IC3 – INDUSTRIAL/COMMERCIAL BMP IMPLEMENTATION

The Industrial/Commercial BMP Implementation Control Measure requires industrial and commercial businesses to reduce pollutants in stormwater discharges and effectively prohibits unauthorized non-stormwater discharges to the storm drain system. Although the Permittees may provide guidance to facility operators on appropriate Source and Treatment Control BMP selection and application, the selection of specific BMPs to be implemented is the responsibility of the discharger. The Permittees develop business specific guidance (fact sheets) that is updated as necessary to reflect new requirements and/or knowledge.

4.4.1 BMP Fact Sheets and Selection

In order to assist the industrial and commercial facilities in selecting and implementing the appropriate types of BMPs, the Permittees developed BMP Fact Sheets for industrial and commercial businesses. The BMP Fact Sheets are distributed during the inspections and made available on the Ventura Countywide Stormwater Quality Management Program's website at the following address:

http://www.vcstormwater.org/programs_business.html#business_factsheets

BMP fact sheets are periodically reviewed and updated as needed. Fact sheets for restaurants, automotive service facilities, RGOs, and nurseries will be updated to reflect the Permit BMPs requirements and be available prior to inspections scheduled to be conducted during the 2010-2011 reporting period.

4.4.2 Distribute BMP Fact Sheets during Inspections

The Permittees distribute BMP Fact Sheets to facility owners/operators as a part of the inspection process.

Ensure information on BMPs was available on site			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 4-6

4.5 IC4 – ENFORCEMENT

The Enforcement Control Measure outlines the progressive levels of enforcement applied to industrial and commercial facilities that are out of compliance with County and municipal ordinances and establishes the protocol for referring apparent violations of facilities subject to the Industrial Activities Storm Water General Permit to the Regional Water Board. The Enforcement Control Measure has been developed to address specific legal authority issues related to industrial and commercial facility discharges and should be implemented in coordination with the Permittees' efforts to maintain adequate legal authority for the Stormwater Program in general.

4.5.1 Implement the Progressive Enforcement and Referral Policy

The Permittees have a progressive enforcement and referral policy so that the enforcement actions match the severity of a violation and include distinct, progressive steps initiated to bring a facility into compliance. Options are available for progressive corrective actions for repeat offenders. Inspections are

performed to assess compliance with municipal stormwater ordinances. Noncompliance may include failure to implement adequate source control or structural BMPs, or other violations of County and municipal ordinances.

The Permittees' facility inventory contains an "inspection findings" data field for comments pertaining to the inspection of a specific facility. If there is an unsatisfactory inspection, then a comment is made in this data field and the facility is marked for re-inspection within four weeks of the date of initial unsatisfactory inspection. Past experience with facilities has shown that facility operators are cooperative and willing to bring facilities into compliance.

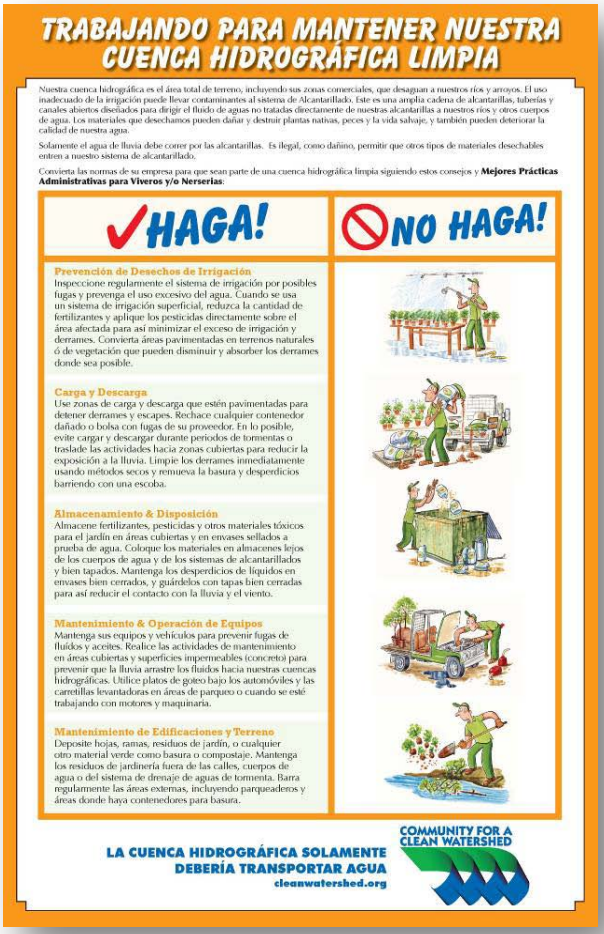
Implement a progressive enforcement policy			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 4-7

4.5.2 Implementation of Industrial Referral Policy

As a means to enhance interagency coordination, the Permittees may refer industrial business violations of County and/or municipal stormwater ordinances and California Water Code §13260 to the Regional Water Board provided that under applicable stormwater ordinances Permittees have made a good faith effort of progressive enforcement. Referral to the Regional Water Board is required so that they can enforce their permit on non-compliant industries. Every effort is taken at the local level to achieve compliance before referring a facility, including using the threat of calling in the Regional Board and their ability to levy hefty fines. At a minimum the permit requires Permittees provide a good faith effort to bring a facility into compliance and that must be documented with:

- Two follow-up inspections
- Two warning letters or notices of violation



For those facilities in violation of municipal ordinances and subject to the IASGP, the Permittees may escalate referral of such violations to the Regional Water Board after one inspection and one written notice (copied to the Regional Water Board) to the operator regarding the violation. This is up to the discretion of the Permittee, and is only likely to be used in cases where there is a severe discharge causing or contributing to a water quality exceedance.

Such referrals are filed electronically with the Regional Water Board once an inspection that led to a notice of violation or the discovery of a non-filer. In making such referrals, Permittees are required to include at a minimum the following information in their referral:

1. Name of facility
2. Operator of facility
3. Owner of facility
4. WDID number (if applicable)
5. Industrial activity being conducted at the facility that is subject to the IASGP
6. Records of communication with the facility operator regarding the violation which shall include at least an inspection report
7. The written notice of the violation copied to the Regional Water Board

Nursery BMPs in Spanish and English

4.5.3 Investigation of Complaints Transmitted by Regional Water Board

On occasion regional Board staff will receive information on an industry within a Permittee's jurisdiction that needs to be investigated in a timely manner. To The Permittees implement procedures for responding to complaints forwarded by the Regional Water Board to ensure initiation[2] of inspections within one business day. Complaint-initiated inspections include, at a minimum, a limited inspection of the facility to confirm the complaint to determine if the facility is effectively complying with municipal stormwater urban runoff ordinances and, if necessary, an initiation of corrective action.

The Permittees have (and will continue to) work closely with the Regional Water Board when a facility is identified as requiring a compliance inspection.

The City of Ventura received one complaint from the Regional Board. After an initial investigation, it was determined the company did not operate within the City of Ventura's jurisdiction. The Regional Board was informed of our findings and told that the company's operations were located in the City of Oxnard. No further actions were taken by the City of Ventura

Facility Category	Nature of Complaint	Confirmation of Complaint	Permittee Assistance and/or Corrective Action
Industrial			
SIC # 1311	Operating w/o indust permit	Not operating within City jurisdiction	Findings reported to Region Board staff
Pacific Rock, Inc WDID 456 S 017071	Request for assistance in inspections during rain events to determine if site runoffs leaves site or drains to artificial lake as desisgned	Not a Complaint	Field inspections on 10/14/2009 and 1/19/2010.
Other Federally-Mandated Facilities			

Table 4-2 Summary of Complaints Transmitted by Regional Water Board for Investigation by Permittees

4.5.4 Task Force Participation

The Permittees will participate in an interagency workgroup, such as the Environmental Task Force or the Storm Water Task Force, as a means to communicate information and concerns regarding stormwater enforcement actions undertaken by the Permittees. Participation in such a workgroup should facilitate communication of special cases of stormwater violations and address a coordinated approach to enforcement action.

[2] Permittees may comply by taking initial steps (such as logging, prioritizing, and tasking) to "initiate" the investigation within one business day. However, the Regional Water Board expects that the initial investigation, including a site visit, would occur within four business days.

The Ventura County Stormwater Program, City of Ventura, City of Oxnard, City of Thousand Oaks and County Environmental Health participate on the **Ventura County Environmental Crimes Task Force.** Going forward, a representative from the Environmental Services work group of the City of Ventura will attend the monthly meetings for sharing information and concerns with regard to environmental issues, including stormwater.

4.6 IC5 – TRAINING

The Training Control Measure is important for the implementation of the Industrial/Commercial Program Element. An effective training program is one of the best pollution prevention BMPs that can be implemented because it provides for consistency in inspections and enforcement, gives the inspector the ability to respond to a variety of situations and questions, and ultimately encourages the inspectors to prompt behavioral changes that are fundamentally necessary to protect water quality.

Each Permittee identified inspection staff and other personnel for training based on the type of stormwater quality management and pollution issues that they might encounter during the performance of their regular inspections or daily activities. Targeted staff may include those who perform inspection activities as part of the HAZMAT, and wastewater pretreatment programs as well as staff who may respond to questions from the public or industrial/commercial businesses, such as those working with business licenses.

Staff was trained in a manner that provided adequate knowledge for effective business inspections, enforcement, and answering questions from the public or industrial/commercial operators. Training included a variety of forums, ranging from informal "tailgate" meetings, to formal classroom training, and self-guided training methods. When appropriate, staff training included information about the prevention, detection and investigation of illicit discharges and illegal connections (ID/IC). See **Section 8** for more information regarding ID/IC training.

Conduct training for key staff involved in the Business Inspection program			
	Yes	*No*	*N/A*
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 4-8

During this reporting period, the Permittees trained 107 inspection staff in stormwater pollution prevention. Figure 4-13 depicts the number of staff trained in the program area for each Permittee. Some agencies contract out their inspections to trained consultant or used the County Environmental Health Department for their inspections and therefore did not target any of their employees.

Target Audience	Format	Subject Material	Comments
• Industrial/Commercial inspectors • County Health restaurant inspectors	• Classroom • Field Demos	• Overview of stormwater management program • Stormwater ordinance and enforcement policy • BMPs for facilities • Facility inventory tracking	• Training seminars or workshops related to the program may be made available by other organizations

Table 4-3 Training Areas of Focus for the Industrial/Commercial Program Element

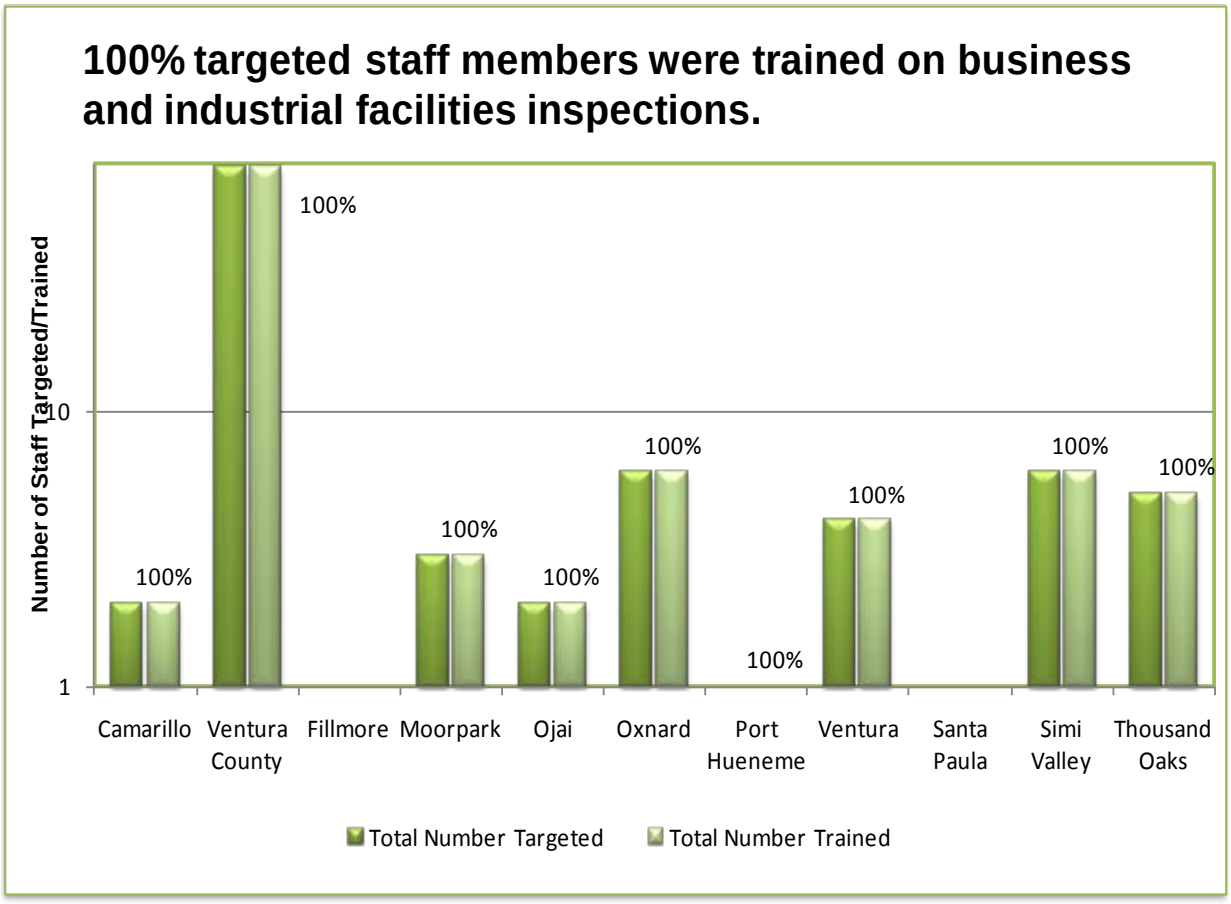


Figure 4-13 IC/ID Training

4.7 IC6 – EFFECTIVENESS ASSESSMENT

Effectiveness assessment is a fundamental component required for the development and implementation of a successful stormwater program. In order to determine the effectiveness of the Industrial/Commercial Facility Program Element, a comprehensive assessment of the program data is conducted as part of the Annual Report. The results of this assessment are used to identify modifications that need to be made to the Program Element. Each year the effectiveness assessment is reviewed and revised as necessary.

By conducting these assessments and modifying the Program Element as necessary, the Permittees ensure that the iterative process is used as an effective management tool. Due to the types of data collected for

the Industrial/Commercial Facility Program, current and future assessments will primarily focus on Outcome Levels 1 and 2.

- Outcome Level 1 (L1) answers the question: Did the Permittees implement the components of the Permit?
- Outcome Level 2 (L2) answers the question: Can the Permittees demonstrate that the control measure/performance standard significantly increased the awareness of its target audience?

The following is an assessment regarding the effectiveness of the Industrial/ Commercial Program.

4.7.1 Facility Inventory Maintain and Annual Update Inventory

All Permittees maintain an inventory of industrial and commercial facilities. Permittees have begun to inspect facilities with the goal of completing all initial inspections by July 8, 2012 and inspecting facilities twice during the permit term. Initially inspections focused on industrial facilities, auto dealers, auto service shops, laundry facilities, nurseries and restaurants. Figure 4-4 through Figure 4-12 summarizes the inspections done to date. (L1)

4.7.2 Inspection

Inspections

As indicated in the previous performance standard, initial inspections are not yet due (July 8, 2012). Some Permittees have initiated progress and over the 2009-10 reporting periods, more than 1400 inspections were conducted Countywide. (L1) Permittees conduct follow-up inspections as needed and as shown in Figure 4-12, 87 follow-up inspections were conducted. (L1)

The majority of Permittees have review and revised their inspection checklists, as necessary to be consistent with the permit. (L1)

4.7.3 Industrial/Commercial BMP Implementation

BMP Fact Sheets and Selection

Industrial and commercial BMP Fact Sheets were developed and are available at the Ventura Countywide Stormwater Quality Management Program website. (L1)

Distribute BMP Fact Sheets

Permittees that have initial an inspections program distribute fact sheets as part of the inspection process. (L1)

4.7.4 Enforcement

Implement Progress Enforcement and Referral Policy

The Permittees have a progressive enforcement and referral policy so that the enforcement actions match the severity of a violation and include distinct, progressive steps initiated to bring a facility into compliance. (L1)

Implementation of Industrial Referral Policy

All Permittees may refer industrial business violations to the Regional Water Board provided that Permittees have made a good faith effort of progressive enforcement. (L1)

Investigation of Complaints Transmitted by Regional Water Board

The Permittees implement procedures for responding to complaints forwarded by the Regional Water Board to ensure initiation of inspections within one business day. (L1)

Task Force Participation

A representative from the Environmental Services work group of the City of Ventura will attend the monthly meetings for sharing information and concerns with regard to environmental issues, including stormwater on the Ventura County Environmental Crimes Task Force. (L1)

4.7.5 Training

Conduct Training

During this reporting period, the Permittees trained over 100 staff in business inspections and enforcement. Permittees effectively trained 100% of targeted staff. (L1)

4.9 INDUSTRIAL/COMMERCIAL PROGRAM ELEMENT MODIFICATIONS

On an annual basis, the Permittees evaluate the results of the Annual Report, as well as the experience that staff has had in implementing the program, to determine if any additional program modifications are necessary to comply with the Clean Water Act requirement to reduce the discharge of pollutants to the maximum extent practicable.

Many key modifications have been made to the Industrial/Commercial Program Element with the adoption of the new permit. Key modifications that have been made are tracking facilities by watershed, the expanded list of businesses and industries that are tracked and clearly defining how to identify those businesses and industries.

5 Planning and Land Development

5.1 OVERVIEW

The addition of impervious areas for homes, industrial and commercial businesses, parking lots, and streets and roads increases the amount of stormwater runoff, as well as the potential for pollution. The Planning and Land Development Program Element ensures that the impacts on stormwater quality from new development and redevelopment are limited through implementation of general site design measures, site-specific source control measures, low impact development strategies and treatment control measures. The general strategy for development is to avoid, minimize, and mitigate (in that order) the potential adverse impacts to stormwater. The potential for long-term stormwater impacts from development is also reduced by requiring ongoing operation and maintenance of post-construction treatment controls.

The Permittees have developed and implemented a Program for Planning and Land Development to address stormwater quality in the planning and design of development and redevelopment projects. The term "development project" as used in this Program encompasses those projects subject to a planning and permitting review/process by a Permittee. A development project includes any construction, rehabilitation, redevelopment or reconstruction of any public and private residential project, industrial, commercial, retail and other non-residential projects, including qualifying public agency projects.

To meet the goals and objectives of the Program, the Permittees attend Planning and Land Development Subcommittee meetings to coordinate and implement a comprehensive and consistent program to mitigate impacts on water quality from development projects to the maximum extent practicable (MEP). However, the Permittees may modify their programs to address particular issues, concerns or constraints unique to a particular watershed such as local geology or known water quality impairments.

5.2 CONTROL MEASURES

The Permittees have developed several Control Measures and accompanying performance standards to ensure that the planning and land development program requirements are effectively developed and implemented. For each Control Measure there are accompanying performance standards which, once accomplished, constitute compliance with the Permit requirements.

The Planning and Land Development Program Control Measures consists of the following:

LD	Control Measure
LD1	State Statute Conformity
LD2	New Development/ Redevelopment Performance Criteria
LD3	Plan Review and Approval Process
LD4	Maintenance Agreement and Transfer
LD5	Tracking, Inspection and Enforcement
LD6	Training
LD7	Effectiveness Assessment

Table 5-1 Control Measures for the Planning and Land Development Program Element

The next section of the annual report provides information on the specific tasks that have been initiated and/or completed during the reporting period pursuant to the Planning and Land Development Program performance standards and implementation schedules.

5.3 LD1 – STATE STATUTE CONFORMITY

Traditional methods of land development can lead to increase stormwater discharge volumes and flow velocities. These alterations to the natural hydrologic regime may increase erosion and flooding and decreased habitat integrity. Water quality and watershed protection principles and policies such as minimization of impervious areas, pollutant source controls, preservation of natural areas, and peak runoff controls can help to minimize the impacts of urban development on the local hydrology and aquatic environment. Integration of stormwater quality and watershed principles into the Permittees' General Plan will serve as the basis for directing future planning and development in order to minimize these adverse effects. In addition, the California Environmental Quality Act (CEQA) process provides for consideration of water quality impacts and appropriate mitigation measures.

5.3.1 Review/Revise CEQA Review Documents

The California Environmental Quality Act (CEQA) sets forth requirements for the processing and environmental review of many projects. The Permittees use the CEQA processing and review as an excellent opportunity to address stormwater quality issues related to proposed projects early in the planning stages. The National Environmental Quality Act (NEPA) comes into play less often than CEQA, but may be included on projects involving Federal funding. Like CEQA, NEPA processing and review provides opportunities to address stormwater quality issues related to proposed projects early in the planning stages.

The CEQA review process is necessary for determining what impacts a proposed development project could have on the environment. The Permittees' current CEQA review process includes procedures for considering potential stormwater quality impacts and providing for appropriate mitigation. Permittees will review and revise the CEQA review documents as needed for consistency with the new Permit.

Each Permittee has reviewed their internal planning procedures for preparing and reviewing CEQA (and NEPA when applicable) documents and has linked stormwater quality mitigation conditions to legal discretionary project approvals. In addition, when appropriate, the Permittees consider stormwater quality issues when processing environmental checklists, initial studies and environmental impact reports. The Permit requires that stormwater controls are incorporated into the Permittees CEQA process by July 8, 2011, progress reported to date gives every indication that the Permittees will be successful in meeting that obligation.

CEQA process include the procedures necessary to consider potential stormwater quality impacts (Due *by July 8, 2011*)			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore			
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme			☑
Ventura			☑
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks		☑	

Performance Standard 5-1

5.3.2 Revise the General Plan

The Permittees' General Plans provide the foundation and the framework for land use planning and development. Therefore, the General Plan is a useful tool to promote the policies for protection of stormwater quality. The Permittees are to include watershed and stormwater management considerations in the appropriate elements of their General Plans whenever these elements are significantly rewritten.

Table 5-2 indicates the scheduled date of a significant rewrite to the Permittees' General Plan elements if known. Note that some Permittees have already modified their General Plan to include stormwater requirements under the previous permit and thus it is stated stormwater incorporated.

Land Use	General Plan includes Stormwater Requirements (Y/N)	Scheduled Date for Significant Rewrite of General Plan	Date Submitted to Regional Board
Camarillo	Stormwater Incorporated	Stormwater Incorporated	Stormwater Incorporated
County of Ventura	Yes	Update in Process	September 10, 2010
Fillmore			
Moorpark	In Progress	To Be Determined	To Be Determined
Ojai	na		
Oxnard	Stormwater Incorporated	Stormwater Incorporated	March 2, 2009
Port Hueneme	In Progress	2015	To Be Determined
Ventura	Yes		
Santa Paula	Yes		
Simi Valley	Stormwater Incorporated	Stormwater Incorporated	Stormwater Incorporated
Thousand Oaks	No	2015	
Housing			
Camarillo	Stormwater Incorporated	2014	
County of Ventura	Yes	Update in Process	September 10, 2010
Fillmore			
Moorpark	In Progress	To Be Determined	To Be Determined
Ojai	na		
Oxnard	Stormwater Incorporated	Stormwater Incorporated	March 2, 2009
Port Hueneme	In Progress	2018	To Be Determined
Ventura	Yes		
Santa Paula	Yes		
Simi Valley	Stormwater Incorporated	Stormwater Incorporated	Stormwater Incorporated
Thousand Oaks	No	2015	
Conservation			
Camarillo	Stormwater Incorporated	To Be Determined	To Be Determined
County of Ventura	Yes	Update in Process	To Be Determined
Fillmore			
Moorpark	In Progress	To Be Determined	To Be Determined
Ojai	na		
Oxnard	Stormwater Incorporated	Stormwater Incorporated	March 2, 2009
Port Hueneme	In Progress	2015	To Be Determined
Ventura	Yes		
Santa Paula	Yes		
Simi Valley	Stormwater Incorporated	Stormwater Incorporated	Stormwater Incorporated
Thousand Oaks	No	2015	
Open space			
Camarillo	Stormwater Incorporated	To Be Determined	To Be Determined
County of Ventura	Yes	Update in Process	To Be Determined
Fillmore			
Moorpark	In Progress	To Be Determined	March 2, 2009
Ojai	na		
Oxnard			
Port Hueneme	In Progress	2015	To Be Determined
Ventura	Yes		
Santa Paula		2012	
Simi Valley	Stormwater Incorporated	Stormwater Incorporated	Stormwater Incorporated
Thousand Oaks	No	2015	

Table 5-2 Scheduled Dates for Permittees' General Plan Rewrite

It is an additional the Permit requires that when General Plan elements are being updated that drafts are provided to the Regional Board for their review. These permit requirements do not have an absolute due date other than as General Plan elements are updated, current progress by permittees Permittees who have draft general plan elements and have made them available can also be seen in Table 5-2.

5.4 LD2 – NEW DEVELOPMENT PERFORMANCE CRITERIA

Post-construction BMPs, including those for site design, source control, low impact development, and treatment, are necessary for development and re-development projects in order to mitigate potential water quality impacts. In addition, priority projects identified within the Permit require specific mitigation measures. In order to assist developers in meeting these requirements, the Permittees developed a Technical Guidance Manual for Stormwater Quality Control Measures for new development and redevelopment (2010 TGM).

5.4.1 Update the 2002 Ventura County Technical Guidance Manual for Stormwater Quality Control Measures (Manual)

In May 2010 the Permittees updated the 2002 Manual for the selection, design, and maintenance of BMPs for new development and redevelopment projects as identified in Order 2009-0057. This Manual was never approved by the Regional Board Executive Officer due to the permit being remanded and subsequently re-heard by the Board. As an outcome of that hearing new language was adopted into the Permit and a new date set for the revisions to Manual. The Manual will address the 5 percent effective impervious area requirement, retention and biotreatment, alternative compliance for technical infeasibility, interim hydromodification requirements for projects disturbing land area less than fifty acres, water quality criteria, and maintenance agreements (also see Control Measure LD4).

Low Impact Development BMP

5.4.2 Require Compliance with Performance Criteria

New development and redevelopment projects, as outlined in Permit Provision 4.E.II., are subject to Permittee conditioning and approval for the design and implementation of post-construction controls to mitigate stormwater pollution. New performance criteria outlined within the Permit include reducing the percentage of effective impervious area to 5 percent or less of the total project area, hydromodification control criteria, and water quality mitigation criteria. These Permit condition will become effective 90 days after

the Manual is approved by the Regional Board Executive Officer. Until these new criteria are effective the Permittees are to comply with the previous performance criteria under the Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) and the 2002 TGM.Project Review and Conditioning

The Permittees approach stormwater concerns early in the project development process when the options for pollution control are greatest and the cost to incorporate these controls into new development and redevelopment projects is least. In planning and reviewing a development project, the Permittees consider three key questions with respect to stormwater quality control: 1. what kind of water quality controls are needed?; 2. where should controls be implemented?; 3. what level of control is appropriate? During the planning and review process, the Permittees identify potential stormwater quality problems, communicate design objectives, and evaluate the plan for the most appropriate alternatives and design.

Stormwater Quality Urban Impact Mitigation Plan (SQUIMP)

Until the Land Development section of the Permit becomes effective the Permitees require the implementation of the Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) for new development projects that fall into one or more of the following categories:

- Single-family hillside residences;
- 100,000 square foot commercial development;
- Automotive repair shops;
- Retail gasoline outlets;
- Restaurants;
- Home subdivisions with 10 or more housing units;
- Locations within, or directly adjacent to or discharging to an identified Environmentally Sensitive Area (ESA); and
- Parking lots of 5,000 square feet or more with 25 or more parking spaces and potentially exposed to stormwater runoff.

In addition, redevelopment projects of one of the SQUIMP categories that result in the creation, addition or replacement of 5,000 square feet or more of impervious surfaces, that is not a part of routine maintenance, are subject to SQUIMP requirements. If a redevelopment project creates or adds 50% or more impervious surface area to the existing impervious surfaces, then stormwater runoff from the entire area (existing and redeveloped) must be conditioned for stormwater quality mitigation. Otherwise, only the affected area of the redevelopment project requires mitigation.

The SQUIMP lists the minimum required BMPs that must be implemented for new development and redevelopment projects subject to the SQUIMP. The minimum requirements include the following BMPs:

- Control peak stormwater runoff discharge rates
- Conserve natural areas
- Minimize stormwater pollutants of concern
- Protect slopes and channels
- Provide storm drain stenciling and signage
- Properly design outdoor material storage areas
- Properly design trash storage areas
- Provide proof of ongoing BMP maintenance

- Meet design standards for structural or treatment control BMPs
- Comply with specific provisions applicable to individual priority project categories, which include the following: 100,000 square foot commercial development; restaurants; retail gasoline outlets; automotive repair shops; and parking lots.

Require compliance with performance criteria under SQUIMP			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore			
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 5-2

5.4.3 BMP Selection and Design Criteria

During the permit year Permittees required project proponents to follow the countywide 2002 Technical Guidance Manual for Stormwater Quality Control Measures. This manual addresses the SQUIMP requirements of the NPDES permit, specifying design storm volumes and flows to be treated. Also, it identifies Pollutants of Concern from certain types of projects and provides various site, source and treatment control BMPs applicable to Ventura County and the SQUIMP project.

The Permittees consider site-specific conditions of development projects when determining which BMPs are most appropriate for a site. Prior to approving BMPs, the staff conditioning the project evaluates post-construction activities and potential sources of stormwater pollutants. The project proponent is required to consider BMPs that would address the potential pollutants reasonably expected to be present at the site once occupied. BMPs to protect stormwater during the construction phase may also be a part of this conditioning process, but are addressed through the grading permit process through the Construction Program.

Low Impact Development BMP

In order to achieve appropriate stormwater quality controls, the Permittees use the following common criteria in screening and selecting, or rejecting BMPs during the planning stage with a priority given to non-proprietary designed BMPs:

- Project characteristics;
- Site factors (e.g., slope, high water table, soils, etc.);
- Pollutant removal capability;
- Short term and long term costs;
- Responsibility for maintenance;
- Contributing watershed area; and
- Environmental impact and enhancement.

The BMP selection criteria listed above is applied by the Permittees in accordance with the overall objective of the Planning and Land Development Program, i.e., to reduce pollutants in discharges to the MEP. Some BMPs will clearly be more appropriate and effective in some site-specific situations than others, and BMP selections reflect this variability.

The number of projects required to comply with the performance criteria during the permit year is outlined in Figure 5-1. This includes projects that were required by the Permit to implement stormwater treatment controls as well as projects that due to their nature or potential to discharge pollutants of concern were required to implement stormwater management controls of either source control or water quality treatment.

Low Impact Development BMP

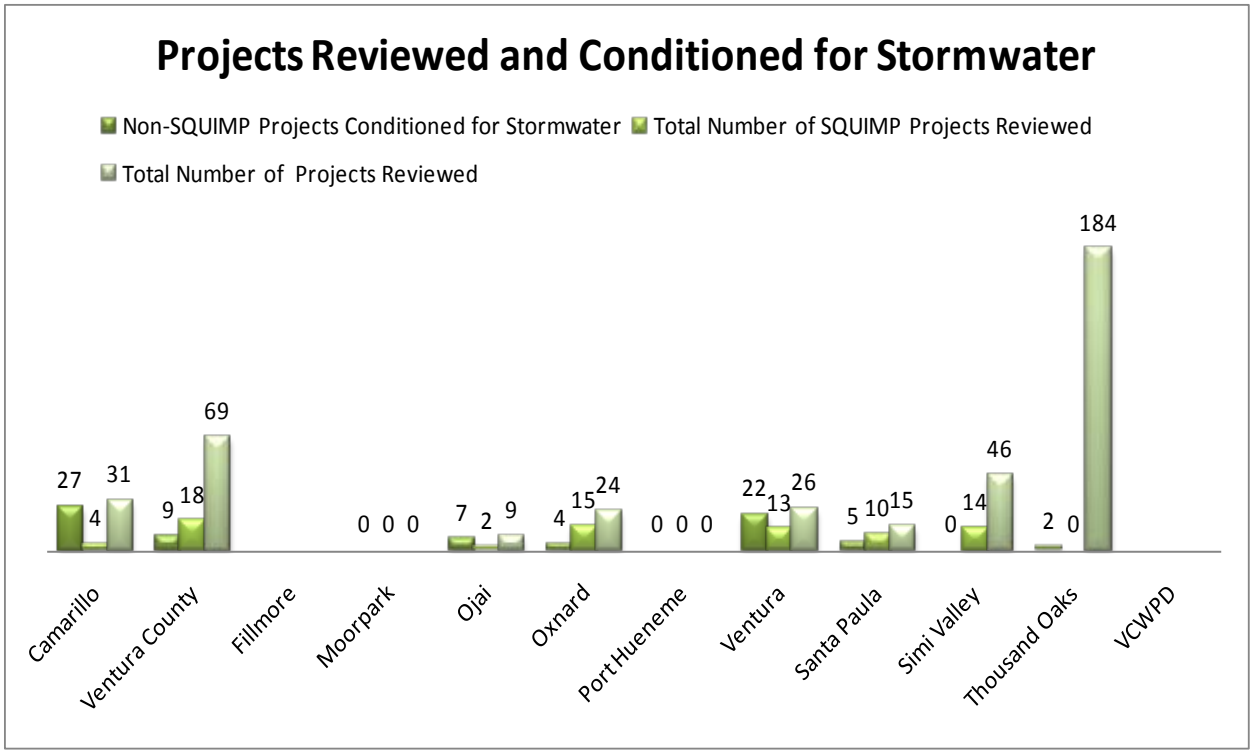


Figure 5-1 Projects Reviewed and Conditioned

5.4.4 Documentation of Offsite Mitigation Projects

The new requirements of the Permit become effective 90 days after the Manual is approved by the Executive Officer provide an alternative to compliance with the land development criteria of onsite retention and biotreatment through the use of offsite mitigation. New developments and significant re-developments that have identified technical infeasibilities and therefore, cannot comply with the retention and biofiltration requirements onsite may have the option of utilizing alternative mitigation offsite.

The identification of potential off-site mitigation projects was not required in 2009-2010. The Permittees are in the process of developing an off-site mitigation framework and identifying potential locations. Infill and redevelopment projects that demonstrate technical infeasibility may be eligible for offsite mitigation. As required by the Permit, Permittees will track and summarize offsite mitigation projects.

The Permittees will embark on a project to research and analyze potential management and funding structures for creating a new offsite stormwater alternative mitigation program as identified in the Permit. The project will focus on general funding mechanisms, accounting, and the program management structure needed to implement and sustain a long term stormwater retention and/or biofiltration program.

An offsite stormwater mitigation program could be cooperative and multi-beneficial if an integrated water resource management approach is taken that also addresses flood protection, surface water impairments, sea water intrusion, groundwater recharge, and potential water reuse through water banking. The potential for integrated water resource management programs with third party partners (e.g. local water agencies) are also to be identified and analyzed for regional benefits, potential initial investments and hurdles to implementation. Integrating this program with other water needs of Ventura County may present opportunities for third party involvement to help fund, manage and develop local water resources.

5.4.5 Require Hydromodification Criteria

Permittees currently require the interim hydromodification criteria as specified in Permit Provision 4.E.III.3(a)(3). Interim criteria will be required until the Southern California Water Monitoring Coalition (SMC) completes the Hydromodification Control Study (HCS).

The purpose of Hydromodification Control Measures is to minimize impacts to natural creeks due to changes in postdevelopment stormwater runoff discharge rates, velocities, and durations by maintaining within a certain tolerance to the project's pre-project stormwater runoff flow rates and durations.

Hydromodification Control Measures may include on-site, subregional, or regional Hydromodification Control Measures; Retention BMPs; or stream restoration measures. Preference will likely be given to onsite Retention BMPs and Hydromodification Control Measures, however in-stream restoration measures may be determined to be the best use of resources and may more quickly address the beneficial uses of natural drainage systems.

The Southern California Storm Water Monitoring Coalition (SMC) is developing a regional methodology to eliminate or mitigate the adverse impacts of hydromodification as a result of urbanization, including hydromodification assessment and management tools. The Program will develop and implement watershed specific Hydromodification Control Plans (HCPs) after the completion of the SMC study (Permit requires HCP is submitted 180 days after the completion of the SMC study). Until the completion of the HCPs, the Interim Hydromodification Control Criteria, described below, apply to applicable, non-exempt new development and redevelopment projects.

Participate in the Stormwater Monitoring Committee's Hydromodification Control Study			
	Yes	No	N/A
Ventura Countywide Stormater Quality Program	☑		

Performance Standard 5-3

Develop and implement watershed specific HCPs? (180 days after the completion of the SMC HCS)			
	Yes	No	In Progress
Ventura Countywide Stormater Quality Program			☑

Performance Standard 5-4

5.4.6 Interim Hydromodification Control Criteria

1) Projects disturbing less than 50 acres shall comply with the stormwater management standards contained in the 2010 TGM.

2) Projects disturbing 50 acres or greater must develop and implement a Hydromodification Analysis Study (HAS) that demonstrates that post development conditions are expected to approximate the pre-project erosive effect of sediment transporting flows in receiving waters. The HAS must lead to the incorporation of project design features intended to approximate, to the extent feasible, an Erosion Potential value of 1, or any alternative value that can be shown to be protective of the natural drainage systems from erosion, incision, and sedimentation that can occur as a result of flow increases from impervious surfaces and damage stream habitat in natural drainage systems.

5.5 PLAN REVIEW AND APPROVAL PROCESS

Stormwater quality controls should be considered throughout the development plan review and approval process. Comprehensive review by the Permittees of development plans must be provided in order to ensure that stormwater controls minimize stormwater quality impacts.

5.5.1 Conduct BMP Review

Permittees conducted a detailed review of proposed BMPs. Review included matching BMPs to the polluntants of concern, sizing calculations, pollutant removal performance and municipal approval.

Conducted a detailed review of proposed BMPs. Review included sizing calculations and pollutant removal performance			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore			
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 5-5

5.5.2 Establish Authority among Municipal Departments with Project Review Jurisdiction

Permittees have an established structure for communication and delineated authority between and among municipal departments that have jurisdiction over project review, plan approval, and project construction. Each Permittee has approached this in the manner that will be most effective within their organization. Interdepartmental communication and coordination does not represent a complicated hurdle for the smaller agencies, however, larger agencies such as the County of Ventura have formally drafted Memorandums of Understanding to establish the structure and define responsibilities.

Establish authority among municipal departments with project review jurisdictioncontrol BMPs? (by July 8, 2011)			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore			
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks			☑

Performance Standard 5-6

5.6 LD4 – TRACKING, INSPECTION AND ENFORCEMENT

Permittees have implemented a tracking systems and an inspection and enforcement program for new development and redevelopment post-construction stormwater BMPs.

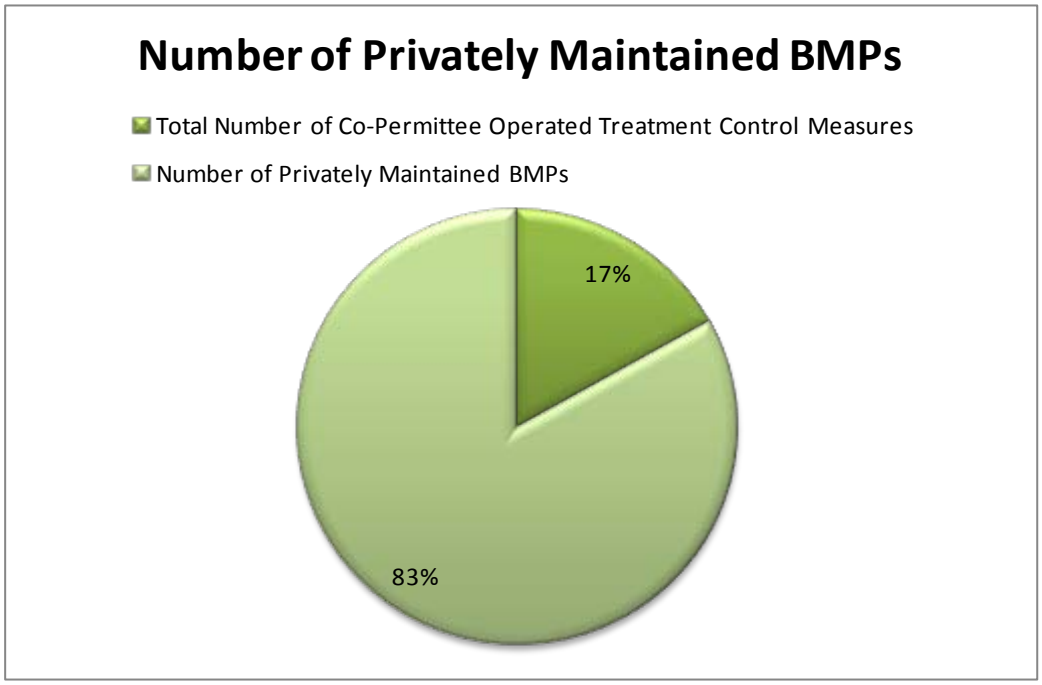


Figure 5-2 Privately Maintained BMPs

5.6.1 Develop/Implement a Tracking System for Post-Construction Treatment Control BMPs

Permittees have been conditioning development projects for stormwater controls for several years and understand that maintenance of these BMPs will be instrumental to their performance of improving water

quality. Developing and implementing a system for tracking projects that have been conditioned for post-construction treatment control BMPs will be necessary to ensure that BMPs are properly maintained and working. This Permit requires this tracking system by July 8, 2011.

Develop and implement a system for tracking projects that have been conditioned for post-construction treatment control BMPs? (by July 8, 2011)			
	Yes	No	In Progress
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark			☑
Ojai	☑		
Oxnard			☑
Port Hueneme			☑
Ventura			☑
Santa Paula			☑
Simi Valley	☑		
Thousand Oaks			☑

Performance Standard 5-7

Each Permittees' electronic system should contain the following information:

1. Municipal Project ID
2. State WDID No.(IAGSP)
3. Project Acreage
4. BMP Type and Description
5. BMP Location (coordinates)
6. Date of Acceptance
7. Date of Maintenance Agreement
8. Maintenance Records
9. Inspection Date and Summary
10. Corrective Action
11. Date Certificate of Occupancy Issued
12. Replacement or Repair Date

5.6.2 Conduct Inspections of Completed Projects

Beginning July 8, 2010 the Permittees are required to conduct inspections of completed projects subject to the Planning and Land Development Program requirements to ensure proper installation of all approved control measures have been implemented and are being maintained. Identifying and tracking these projects will follow the permitting process and the Certificate of Occupancy is withheld until a project can show that BMPs have been installed as designed on approved plans. See Attachment B for an example inspection checklist from the City of Camarillo.

Conduct inspections of completed projects subject to the Planning and Land Development Program requirements to ensure proper installation of BMPs (effective 90 days after aproval of Manual)			
	Yes	No	In Progress
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula	☑		
Simi Valley			☑
Thousand Oaks			☑

Performance Standard 5-8

5.6.3 Conduct Inspections of Permittee Owned BMPs

The Permittees are responsible for the inspection and maintenance of BMPs they own and operate. Sometimes Permittees will accept this responsibility from a development as a way to ensure that proper maintenance is performed; some Permittees have had very few capital projects and have not yet installed or accepted ownership of permanent BMPs. This is required once every two years and not until July 8, 2012.

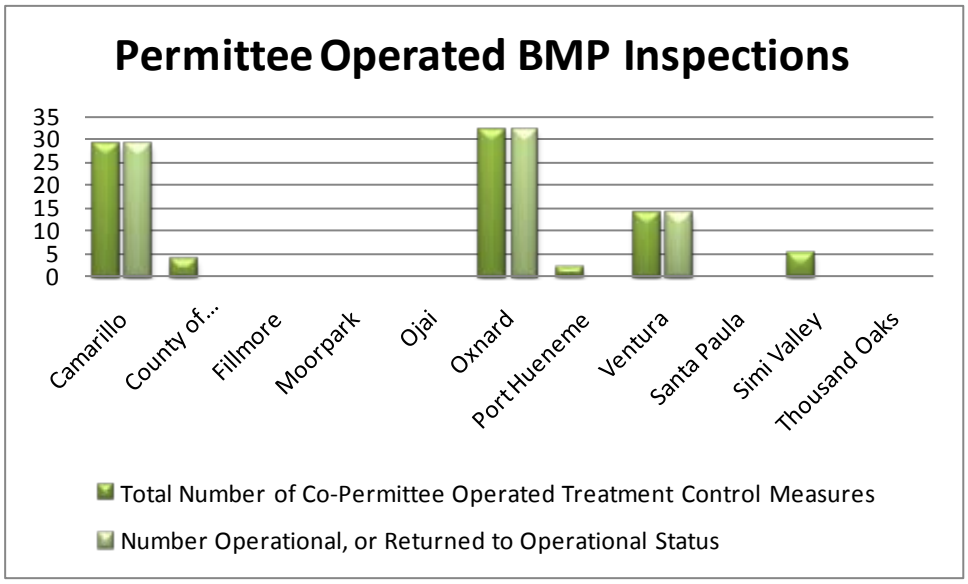


Figure 5-3 Permittee Operated BMPs

Inspect post-construction BMPs operated by the Permittees at least once every 2 years (beginning July 8, 2012)			
	Yes	No	N/A
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark			☑
Ojai	☑		
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula		☑	
Simi Valley			☑
Thousand Oaks			☑

Performance Standard 5-9

5.7 Take Enforcement Action

Inspections and annual reports are only the first step towards ensuring BMPs are operational. Enforcement actions based on the results of the inspection may be needed in order to bring the facility into compliance. The Permit requirement for inspections are for Permittee owned BMPs and enforcement is not necessary in that scenario, and since the permit requirement for annual reports has not yet become effective very little enforcement has been accomplished. To ease future compliance the Permittees are using this time for educational outreach to the owner/operators of BMPs.

A performance standard on enforcement may be developed in future reports, however, enforcement would only be needed when there is a non-compliance. Low enforcement numbers (high level of compliance) may represent an effective program just as well as high enforcement numbers would.

5.8 LD5 – MAINTENANCE AGREEMENT AND TRANSFER

Maintenance agreement and transfers ensure that post-construction BMPs will remain effective upon project completion and continued occupancy. As a condition of approval for all priority development projects, Permittees require the owner/developer/successor-in-interest of stormwater BMPs to provide proof of control measure maintenance in the form of a Stormwater Treatment Device Operation and Maintenance Agreement and a Maintenance Plan.

5.8.1 Require Stormwater Treatment Device Operation and Maintenance Agreement

Permittees integrated the development/submittal of a stormwater maintenance agreement as a condition within the project approval process for projects subject to the Permit's Planning and Land Development Program requirements. To enforce the requirements of post-construction BMPs, a Maintenance Agreement is required to be executed between the Permittee and the owner/developer/successor-in-interest (ODS) for any private facilities who remain the responsible party in operating and maintaining the post-construction Treatment Control Measures.

The 2002 TGM addresses the development and submittal of Maintenance Agreements when a developer is responsible for ongoing maintenance of on-site treatment BMPs.

Require an operation and maintenance plan for applicable stormwater BMPs			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 5-10

5.7.1 Require Annual Reports for Post-Construction BMPs

By July of 2011 the Permittees are required to require the submittal of Annual Reports for BMPs maintained by parties other than the Permittees. The annual reports are to provide information to the Permittees showing that the BMPs have been properly maintained. In many cases a copy of an invoice from a service provider showing the date maintenance performed will suffice for an annual report.

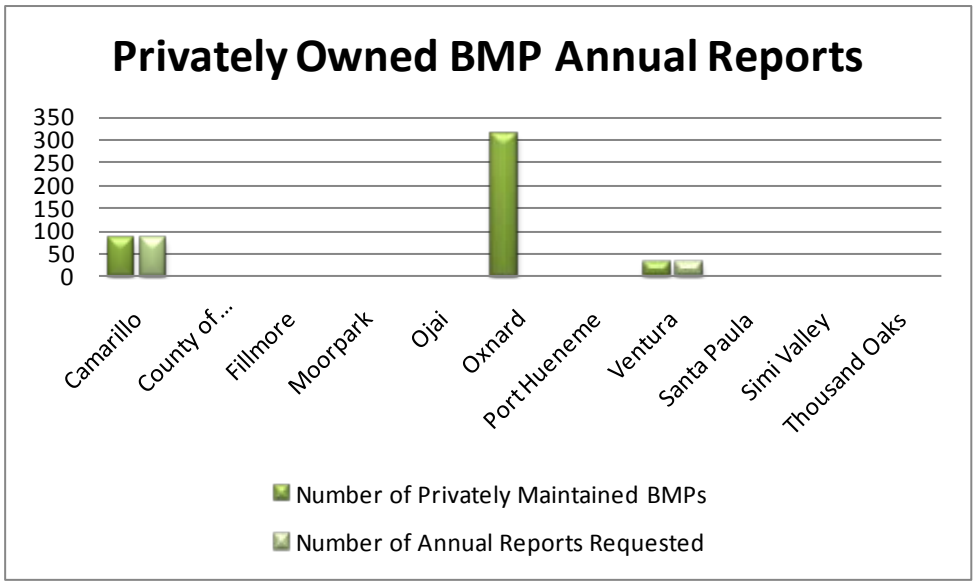


Figure 5-4 BMP Annual Reports

Require annual reports for private post-construction BMPs to demonstrate proper maintenance and operations (by July 8, 2011)			
	Yes	No	In Progress
Camarillo	☑		
Ventura County			☑
Fillmore			
Moorpark			☑
Ojai			☑
Oxnard			☑
Port Hueneme			☑
Ventura	☑		
Santa Paula		☑	
Simi Valley			☑
Thousand Oaks			☑

Performance Standard 5-11

5.9 LD6 – TRAINING

Training is important to the successful implementation of the Planning and Land Development Program Element. An effective training program is one of the best pollution prevention BMPs that can be implemented because it prompts behavioral changes that are fundamentally necessary to protect water quality. The Permittees evaluate the efficacy of the training modules they offer by conducting pre- and post-surveys used to assess a trainee's command of a topic before and after receiving training on the subject.

5.9.1 Conduct Training

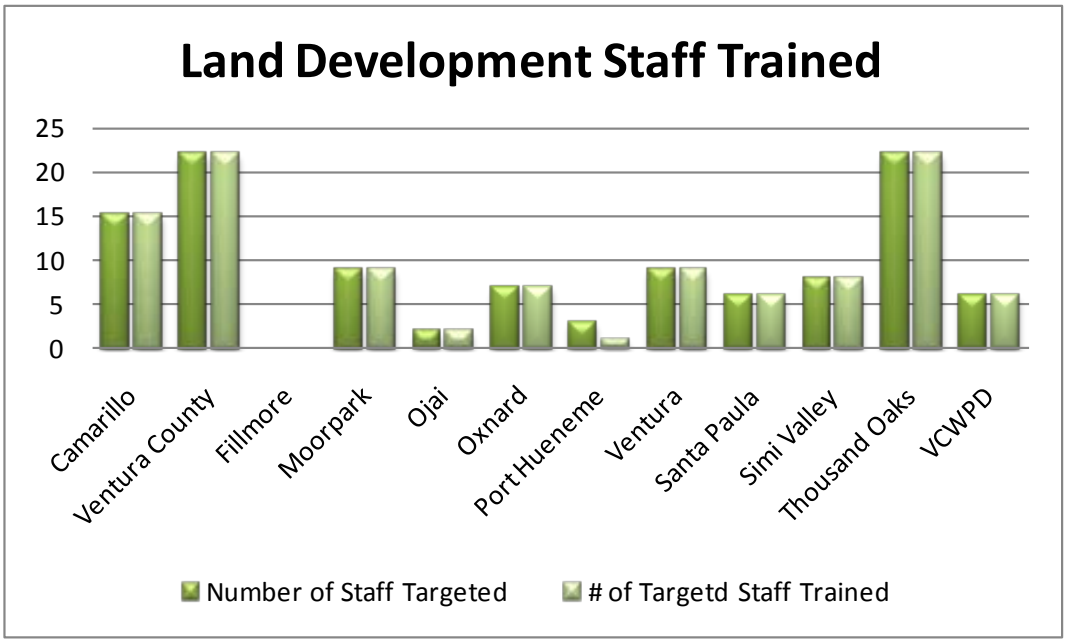


Figure 5-5 Land Development Training

Target Audience	Format	Subject Material
• Plan Checkers • Engineers • Building and Construction Inspectors • Builders • Design Professionals • Regulators • Resource Agencies • Other Stakeholders	• Classroom	• Overview of 2010 TGM • Integration of LID at various project scales • Guidance on relationship between LID strategies, source control BMPs, and hydromodification control requirements • Highlight LID pilot projects and demonstration projects

Table 5-3 Training Areas of Focus for the Planning and Land Development Program Element

5.10 LD7 – EFFECTIVENESS ASSESSMENT

Effectiveness assessment is a fundamental component for developing and implementing successful stormwater programs. In order to determine the effectiveness of the Planning and Land Development Program, a comprehensive assessment of the program data is conducted as a part of the annual report. The results of this assessment are used to identify modifications that need to be made to the program. Each year the effectiveness assessment is reviewed and revised as needed.

By conducting these assessments and modifying the program as needed, the Permittees ensure that the iterative process is used as an effective management tool. Due to the types of data collected for the Planning and Land Development Program, current and future assessments will primarily focus on Outcome Levels 1, 2 & 3.

- Outcome Level 1 (L1) answers the question: Did the Permittees implement the components of the Permit?
- Outcome Level 2 (L2) answers the question: Can the Permittees demonstrate that the control measure/performance standard increased awareness of a target audience?
- Outcome Level 3 (L3) answers the question: Can the Permittees demonstrate that the control measure/performance standard changed a target audience's behavior, resulting in the implementation of recommended BMPs?

The following is an assessment regarding the effectiveness of the Planning and Land Development Program.

5.10.1 State Statute Conformity

Review/Revise CEQA Review Documents

The CEQA process and review process is an effective mechanism for addressing stormwater quality issues early in the planning stages. Where applicable, all Permittees have reviewed their internal planning procedures for preparing and reviewing CEQA documents. Where applicable, all Permittees are committed to formally integrating stormwater quality issues into the CEQA review process by July 8, 2011 **(L1)**.

Revise the General Plan

The majority of Permittees have either already incorporated or are in the process of incorporating stormwater requirements into their General Plans **(L1)**. This control measure is dependant on the

scheduled updates/amendments to General Plans which varies greatly by municipality. Once updated, Permittees will submit draft elements to the Regional Board for review. Effectiveness of this control measure will continue to be evaluated as progress is made.

5.10.2 New Development Performance Criteria

Update the 2002 Ventura County TGM

The 2002 Ventura County TGM was updated and submitted to the Regional Board on November 5, 2010 **(L1)**. The updated TGM (2010 TGM) includes:

- Interim hydromodification criteria (addressed in Section 2);
- Expected BMP pollutant removal performance (addressed in Section 3 and Appendix D);
- Improved correlation of BMPs with stormwater POCs (addressed in Section 3 and Appendix D);
- BMP maintenance and cost considerations (addressed in Section 7, Appendices H &I);
- Integration of integrated water resources planning and management goals (Sections 1 and 4).

Require Compliance with Performance Criteria

Permittees continued to require compliance with 2002 TGM for all SQUIMP new development and redevelopment project categories **(L1)**. As indicated in Figure 5-1, Permittees required 66 projects to implement source control and/or water quality treatment (note these numbers apply to both SQUIMP and non-SQUIMP project categories). The 2010 TGM will become effective 90 days after it is review by the Regional Board Executive Officer. Once the 2010 TGM goes into effect, priority new development and redevelopment project will be required to comply with the 5% EIA Requirement and other new development provisions contained within Order No. R4-2010-0108.

Documentation of Offsite Mitigation Projects

The Permittees are in the process of developing an offsite mitigation framework and creating a list of potential locations. Offsite mitigation is not an option for developers until the 2010 TGM is effective.

Require Hydromodification Criteria

The Permittees currently require SQUIMP project categories to comply with the interim hydromodification criteria **(L1)**. The Ventura Countywide Stormwater Quality Program contines to participate in the SMC's hydromodification control study **(L1)**. Permittees will implement watershed-specific HCP's once the hydromodification control study is complete.

Further assessment of these control measures will be conducted once the 2010 TGM is effective.

5.10.3 Plan Review and Approval Process

Conduct BMP Review

Proposed post-construction BMPs were reviewed by each Permittees. BMP review included calculation sizing and pollutant removal performance. Premitees have effectively conducted BMP review for several years now and current review mechanisms are considered adequate **(L1)**.

Establish Authority among Municipal Departments

Each Permittee has successfully established the authority for review of stormwater quality measures. The mechanism varies by Permittee and for the larger Permittees may consist of a formal MOU **(L1)**.

5.10.4 Tracking, Inspection and Enforcement

Develop/Implement Tracking Mechanism

To be developed – due July 8, 2011

Conduct Inspections of Completed Projects

Although this performance measure was not due until July 8, 2010 (just outside of reporting period) 8 of 11 Permittees had already begun to conduct inspections of completed projects with the remaining Permittees in the process of developing their inspections programs **(L1)**.

Conduct Inspections of Permittee Owned BMPs

To be developed – due July 8, 2012

Take Enforcement Action

This performance measure is reliant on the implementation of an inspection program which was not fully operational during this reporting period (inspection program startup date: July 8, 2010).

5.10.5 Maintenance Agreement and Transfer

Require Stormwater Treatment Device Access and Maintenance Agreement

Permittees have required and will continue to require device access and a maintenance agreement since 2002 **(L1)**.

Require Annual Reports for Post-Construction BMPs

To be developed – due July 2011

5.10.6 Training

Conduct Training

During this reporting period, Permittees trained more than 100 staff (see Figure 5-5). Training primarily focused on updates to the 2010 TGM **(L1)**.

5.11 PLANNING AND LAND DEVELOPMENT PROGRAM MODIFICATIONS

On an annual basis, the Permittees plan to evaluate the results of the Annual Report, as well as the experience that staff has had in implementing the program, to determine if any additional program modifications are necessary to comply with the Clean Water Act requirement to reduce the discharge of pollutants to the maximum extent practicable. Any key modifications made to the Land Development Program Element during the next fiscal year will be reported in the following Annual Report.

6 Development Construction

6.1 OVERVIEW

During construction projects, a number of activities may generate or mobilize pollutants. The purpose of the Development Construction Program Element is to coordinate programs and resources to effectively reduce pollutants in runoff from construction sites during all construction phases.

Reducing pollutants from construction activities has been a focus of the Permittees' compliance program since the stormwater program's inception. The Permittees regulate private construction activities and also have responsibility for the construction and renovation of municipal facilities and infrastructure (these projects are reported in Chapter V Public Agency Activities). Major components of the Permittee's Construction Program include:

- Review of local SWPPPs for compliance with local codes, ordinances, and permits
- Inspect all construction sites for the implementation of stormwater quality controls a minimum of once during the wet season. Follow-up inspections takes place within two weeks for inspected sites that have not adequately implemented their Local SWPPP;
- Require proof of filing a Notice of Intent (NOI) for coverage under the State General Construction Permit prior to issuing a grading permit for all projects requiring coverage.

Additionally, the Construction Program provides construction site owners, developers, contractors and other responsible parties information on the requirements and guidelines for pollution prevention/BMP methods. To ensure construction sites are implementing the SWPPPs properly, each jurisdiction conducts inspections during the rainy season to verify the appropriateness and implementation of BMPs, taking enforcement action as necessary. Inspectors are also visiting the sites in the dry season to reduce the potential for illicit discharges. Furthermore, training and outreach is done regularly to make certain implementation occurs consistently throughout Ventura County.

The Permittees attend Construction Subcommittee meetings to coordinate and implement a comprehensive program to mitigate impacts on water quality from construction sites to the maximum extent practicable (MEP). In order to facilitate effective inspections and to document compliance with this requirement the Construction Subcommittee developed a model Stormwater Quality Checklist for Permittee use and can be found in Attachment C. The checklist and the meetings create countywide consistency in the programs, however, the Permittees usually modify their programs to address particular issues, concerns or constraints that are unique to a particular watershed or to an individual municipality. The Subcommittee is comprised of representatives of the Permittees cities and other municipal staff from various departments including Engineering Services, Planning and Land Development and Inspection Services.

6.2 CONTROL MEASURES

The Permittees have developed several Control Measures and accompanying performance standards to ensure that the construction-related requirements found in the Permit are met and provide information for optimizing the program. For each Control Measure there are accompanying performance standards which, once accomplished, constitute compliance with the Permit.

The Development Construction Program Control Measures consist of the following:

DC	Control Measure
DC1	Plan Review and Approval Process
DC2	Inventory
DC3	Inspections and BMP Implementation
DC4	Enforcement
DC5	Training
DC6	Effectiveness Assessment

Table 6-1 Control Measures for the Development Construction Program Element

6.3 DC1 – PLAN REVIEW AND APPROVAL PROCESS

The Plan Review and Approval Process control measure provides the Permittees with the mechanism to review and approve construction plans that address sediment and erosion controls. Effective planning of construction site activities leads to minimizing erosion and preventing pollutants from entering the storm drain system. The Permittees require all projects that disturb less than one acre of land to address pollutants and activities during the construction phase of the project by implementing the erosion control, sediment control, non-stormwater management and waste management BMPs identified in the NPDES Permit. For larger projects greater than one acre and greater than five acres the list of required BMPs gets progressively larger, more complex and more protective. Prior to issuing a grading permit, the Permittees review construction drawings to ensure that necessary erosion and sediment control BMPs and source and treatment control BMPs are identified and properly designed to control runoff pollution to the maximum extent practicable. In the case of construction that encroaches in the Watershed Protection District's right-of-way, those projects are inspected but are invariably part of larger project and the lead agency for that project will be the jurisdiction permitting the design and building of that larger project.

6.3.1 Review Grading and Construction Permit Applications for SWPPP Requirements

Prior to approving a grading permit, the Permittees require a Storm Water Pollution Prevention Plan (SWPPP) be submitted for projects greater than one acre. Additionally, as is mandatory for all construction related activity disturbing one or more acres, Permittees require proof of filing an NOI for projects subject to the General Construction Permit. The SWPPP remains in effect until the construction site is stabilized and all construction activity is completed. The SWPPP includes identification of potential pollutant sources and the design, placement and maintenance of BMPs to effectively prevent the entry of pollutants from the construction site to the storm drain system. In addition, the Permittees require construction projects to include the following requirements:

- Erosion from slopes and channels will be eliminated by implementing BMPs, including but not limited to, inspecting graded areas during rain events, planting and maintaining vegetation on slopes and covering erosion susceptible slopes.

- Sediments generated on the project site shall be retained using structural drainage controls

- No construction-related materials, wastes, spills or residues shall be discharged from the project site to streets, drainage facilities or adjacent properties by wind or runoff;

- Non-stormwater runoff from equipment and vehicle washing and any other activity shall be contained at the project site;

The Permittees have also incorporated SWPPP provisions in their own construction projects resulting in soil disturbance of one acre or more, located in hillside areas, or directly discharging to an ESA. The Permittees include provisions delineating contractor responsibilities for SWPPP preparation, implementation and for performance of the work and ancillary activities in accordance with the SWPPP approved by the Permittee for the project. In some jurisdictions, Local SWPPPs were required and submitted for nearly all projects including those not exceeding Permit thresholds. This conservative approach underlines the importance the Permittees place on ensuring implementation of stormwater controls at construction sites.

This figure reflects the number of grading permits issued during this reporting period and does not necessarily reflect the number of active construction projects. This is due to the fact that some larger projects may have take longer than a year to complete. Conversely, not all projects that received grading permits granted during the permit year began grading and construction. Because of these facts the number of active projects requiring inspection does not always match the number of grading permits granted.

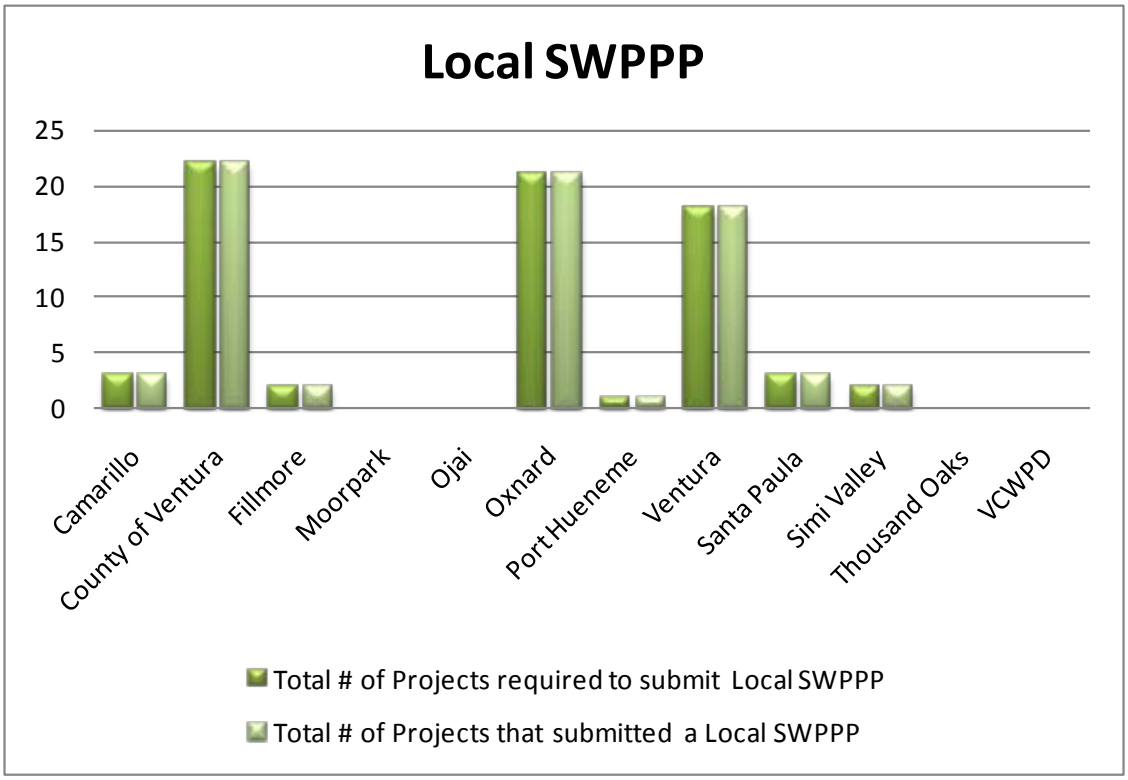


Figure 6-1 Local SWPPPs

The Permittees have consistently required projects to submit SWPPPs. A project may be operating under a grading permit granted the previous year, or the grading permits may have been granted after the wet season so there was no opportunity for a wet season inspection, so the the number of permits and projects inspected rarely match. Generally, Permittees inspect more construction sites than were required to submit a SWPPP, and inspect them more frequently for stormwater compliance than the permit requires.

The Permittees require all construction projects subject to the General Stormwater Permit for Construction Activities to submit proof of filing a Notice of Intent (NOI) prior to issuing a grading

permit. Proof of filing a NOI can include a copy of the completed NOI form and a copy of the check sent to the State Water Resources Control Board (SWRCB), or a copy of the letter from the SWRCB with the Waste Discharge Identification Number (WDID) for the project.

In addition, the Permittees will file NOIs with the SWRCB and pay the appropriate fees whenever Permittee construction projects require coverage under the General Construction Permit. The NOIs and appropriate fees are sent to the State prior to the commencement of any construction activity covered by the General Construction Permit. A copy of the NOI is kept with the project files and in the SWPPP for the project.

Projects subject to the requirements of the General Construction Permit currently include those involving clearing, grading, or excavation resulting in soil disturbances of at least one acre. Permittee emergency work and routine maintenance projects do not require preparation of a SWPPP. That does not imply that stormwater controls are not implemented during these activities; routine maintenance and emergency projects are performed in accordance with the Permit's requirements for Public Agency Activities.

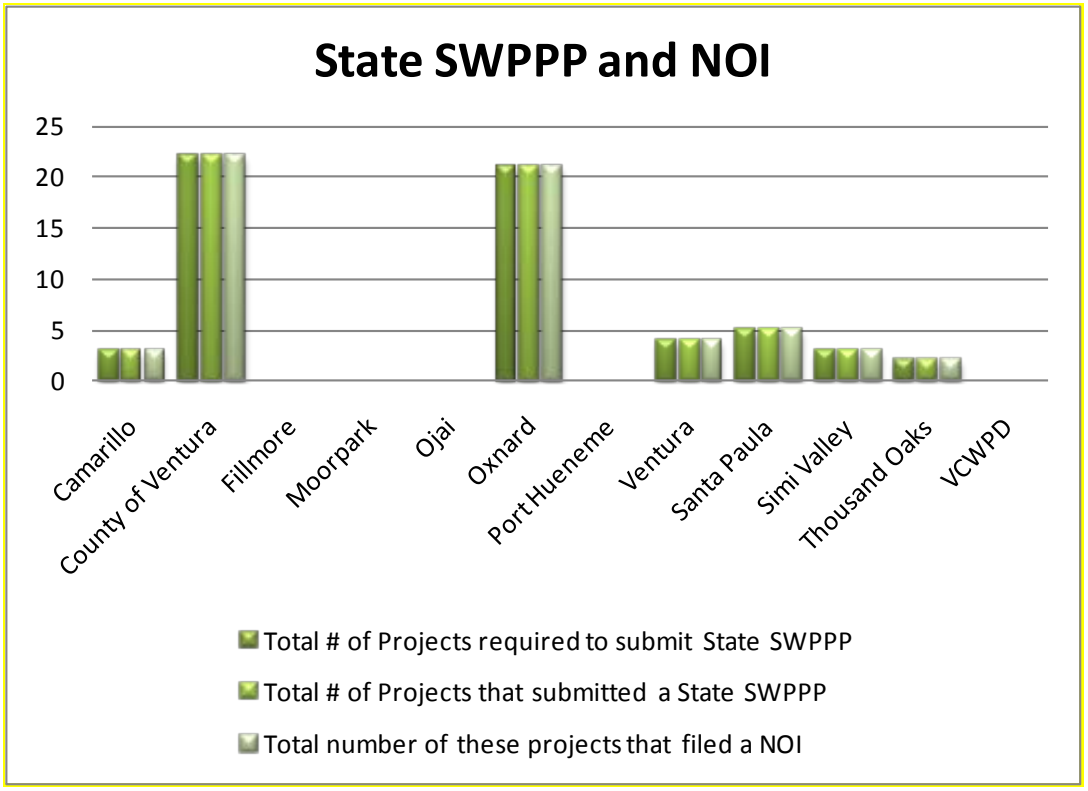


Figure 6-2 State SWPPPS and NOIs

6.4 DC2 –INVENTORY

The Construction Projects Inventory Control Measure involves tracking construction sites from the planning stage to completion. This is essential for ensuring that stormwater pollutants are reduced to the MEP. Maintaining a database to track all stages of the construction process is the foundation of construction-related source identification and helps to ensure that pollution prevention and source control are emphasized during all phases of the construction project. The permitting process is also an

opportunity to provide stormwater education and outreach to the construction community and to emphasize the penalties that can be incurred with non compliance.

The Permittees have programs in place to track all grading, encroachment, demolition, and building permits as required by the NPDES Permit. For the purposes of ensuring the appropriate BMPs are being implemented when soil disturbing activities are taking place the Permittees focus on the grading permit process to identify projects and the level of BMPs required. This has been determined as the most effective way to track projects with a potential to impact water quality as many encroachment, building and other permits that are not associated with grading activities do not present the same level of risk to stormwater quality.

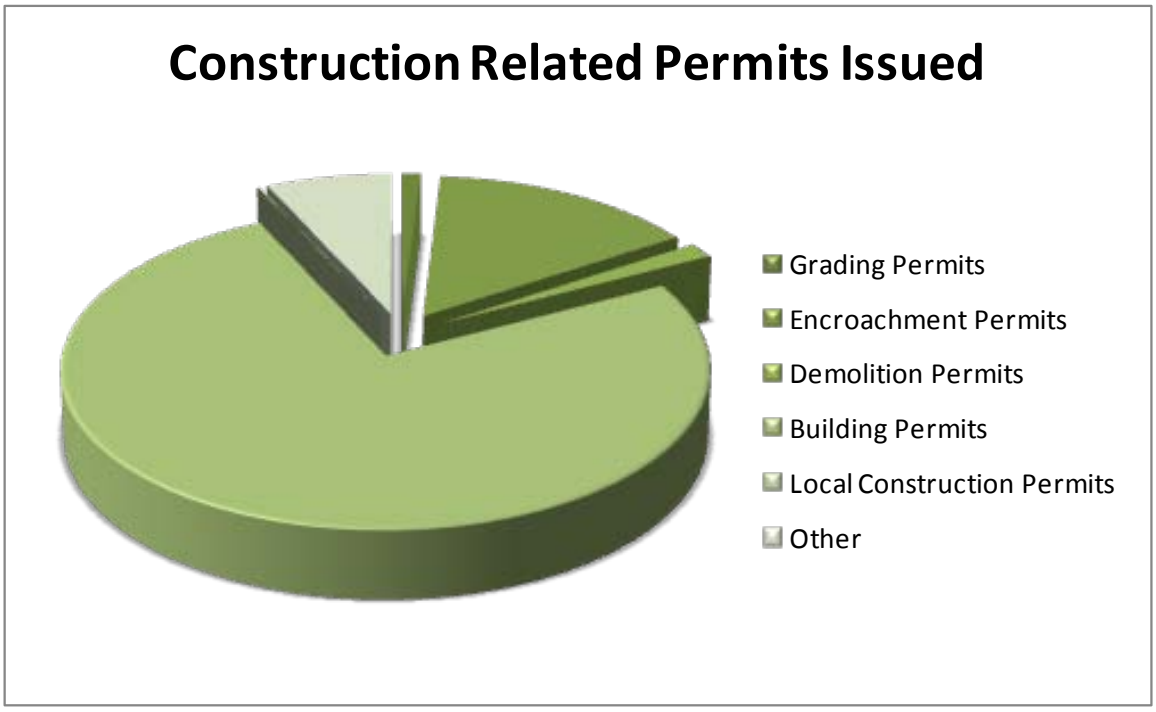


Figure 6-3 Construction Sites Tracked

Maintain an electronic system to track grading permits, encroachment permits, and any other municipal authorization to move soil			
	Yes	In Progress	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme		☑	
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks			

Performance Standard 6-1

Required proof of Change of Information form (COI) and a copy of the modified SWPPP(s) at any time a transfer of ownership takes place			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai		☑	
Oxnard	☑		
Port Hueneme		☑	
Ventura		☑	
Santa Paula			☑
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 6-2

6.5 DC3 – INSPECTIONS AND BMP IMPLEMENTATION

The Inspection and BMP Implementation Control Measure is critical to the ultimate success of the Development Construction Program Element. An effective construction site inspection program requires having adequate legal authority to enforce Permittee requirements, tracking active construction sites to identify repeat violators, and conducting inspections to ensure the sources are identified and that BMPs are being implemented and maintained. The inspection program also provides the basis for notifying the Regional Water Board when inspectors identify non-compliant sites including non-filers or repeat violators.

6.5.1 Inspect Construction Sites

The Permittees inspect all active construction sites for the implementation of stormwater quality controls a minimum of once during the wet season; including all construction sites with SWPPPs a minimum of once during the wet season to determine if the SWPPP is adequately implemented. During these site inspections, a checklist is completed to document inspection results. If it is determined the SWPPP is not adequately implemented, or when there is evidence of a reasonable potential for sediment, construction materials, wastes, or non-stormwater runoff to be discharged from the project site, the Permittees will inform the responsible party of what needs to be corrected and conduct a follow-up inspection within two weeks, but most often it is much sooner. The follow-up inspections are not always scheduled and often the response needed to correct the situation does not require two weeks to implement.

Storm drain protection during construction

Construction sites less than 1 acre inspected to ensure that the minimum set of BMPs was implemented			
	Yes	No	In Progress
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 6-3

Construction sites greater than 1 acre and less than 5 acres inspected to ensure that the minimum set of BMPs was implemented			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 6-4

Construction site greater than 5 acres inspected to ensure that the minimum set of BMPs was implemented			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		☑
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 6-5

The Permittees inspect each project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing roadbed surfaces to ensure that the minimum set of BMPs were implemented. This is routinely done at the same time inspections are performed to ensure all work is being performed according to the design and the standards required of public works projects.

Projects that include roadbed or street paving, repaving, patching, digouts, or resurfacing roadbed surfaces inspected to ensure that the minimum set of BMPs was implemented			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 6-6

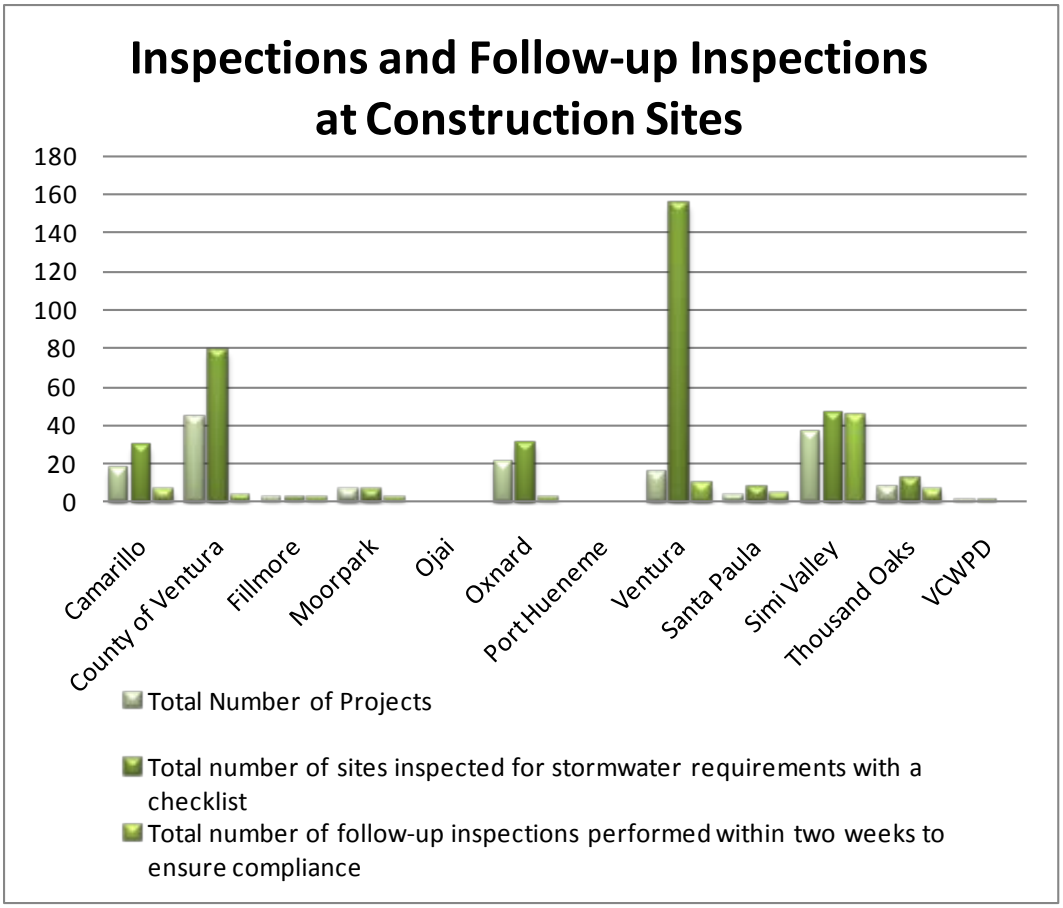


Figure 6-4 Summary of Active Construction Sites and Inspections

6.5.2 Implementation of Enhanced Practices at "High Risk" Sites

Construction sites located on hillsides, adjacent to CWA 303(d) listed waters for siltation or sediment, and directly adjacent to ESAs are termed "High risk" sites. The Permittees ensure implementation of enhanced practices such as increased BMP inspection and maintenance requirements at "high risk" sites to ensure that they do not create a threat to water quality.

The Permit requires that high risk sites be inspected by the project proponent's Qualified SWPPP Developer or Qualified SWPPP Practitioner or personnel or consultants who are Certified Professionals in Erosion and Sediment Control (CPESC) at the time of BMP installation, at least weekly during the wet season, and at least once each 24 hour period during a storm event that generates runoff from the site. This requirement could only be met by CPESC during the reporting period because the tests and certification for Qualified SWPPP Developer or Qualified SWPPP Practitioners had not yet been issued. Many of the permittees did not have any designated high risk construction sites but did have the program in place to identify and implement the added requirements.

Require that high risk sites be inspected by the project proponent's Qualified SWPPP Developer or Qualified SWPPP Practitioner			
	Yes	No	N/A
Camarillo	☑		☑
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula			☑
Simi Valley	☑		
Thousand Oaks			☑

Performance Standard 6-7

Require that high risk sites be inspected by the project proponent's Qualified SWPPP Developer or Qualified SWPPP Practitioner			
	Yes	No	N/A
Camarillo			☑
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks			☑

Performance Standard 6-8

Construction sites are dynamic and changing environments and must be routinely inspected by the project proponent to ensure that the appropriate BMPs are in place and maintained. Permittees require that the project proponent of High Risk sites retain records of the inspection and a determination and rationale of the BMPs selected to control runoff during the wet season.

6.5.3 Inspect for Post-Construction Controls

The Permittees inspected the constructed site design, source control and treatment control BMPs conditioned during the development process to verify that they have been constructed in compliance with all specifications, plans, permits, ordinances, and the MS4 permit prior to approving and/ or signing off for occupancy and issuing the Certificate of Occupancy for all construction projects subject to post-construction controls. Permanent BMPs may be installed at any point during the construction process and therefore may be exposed to runoff conditions much worse than their intended design. The Permit also requires inspections to ensure that the BMPs are in good operating condition and are not in the need of maintenance. These inspections are routinely performed at the same time to be cost efficient and to use the leverage the Certificate of Occupancy provides the Permittee. This requirement is also part of Section V – Planning and Land Development.

As stated previously, the number of projects reaching the final stages of construction and requesting a Certificate of Occupancy will not directly match the number of active construction sites or grading permits issued due to the elapsed time from permitting to project initiation, completion and occupancy.

Inspected constructed site design, source control and treatment control BMPs to verify constructed in compliance with all specifications prior to approving issuing the Certificate of Occupancy			
	Yes	No	In Progress
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark			
Ojai			☑
Oxnard			
Port Hueneme			☑
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks			☑

Performance Standard 6-9

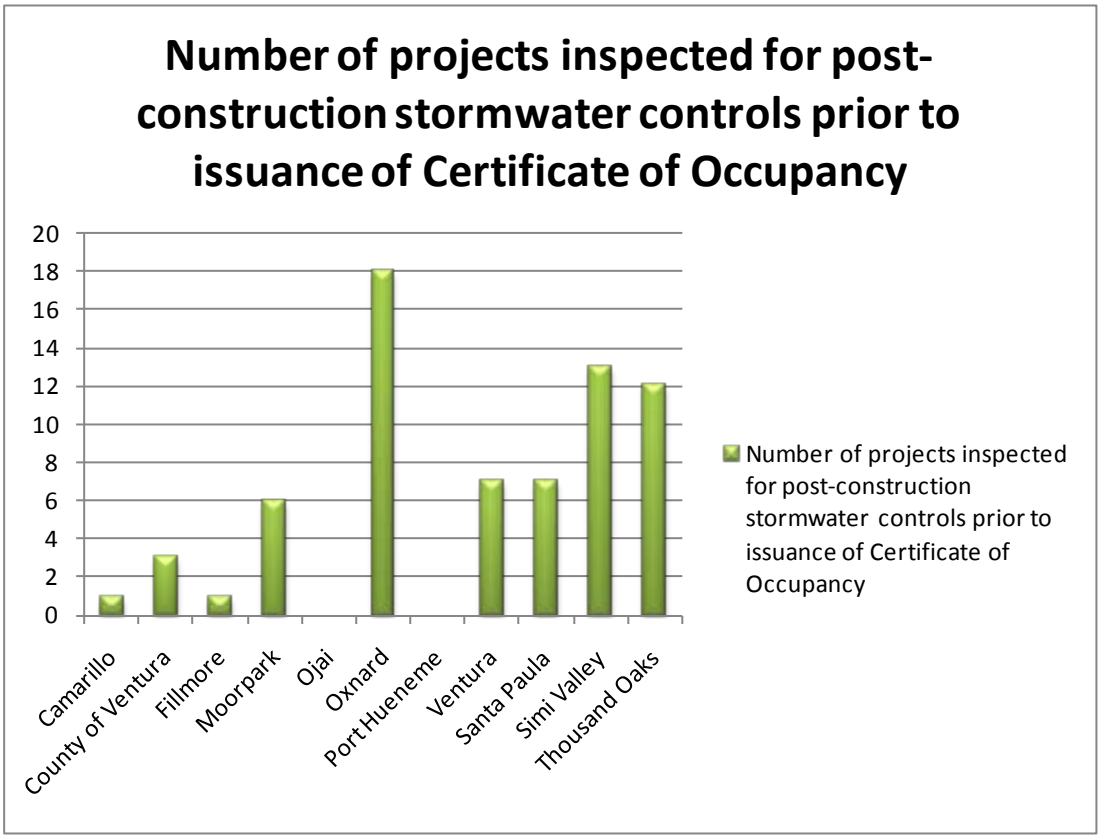


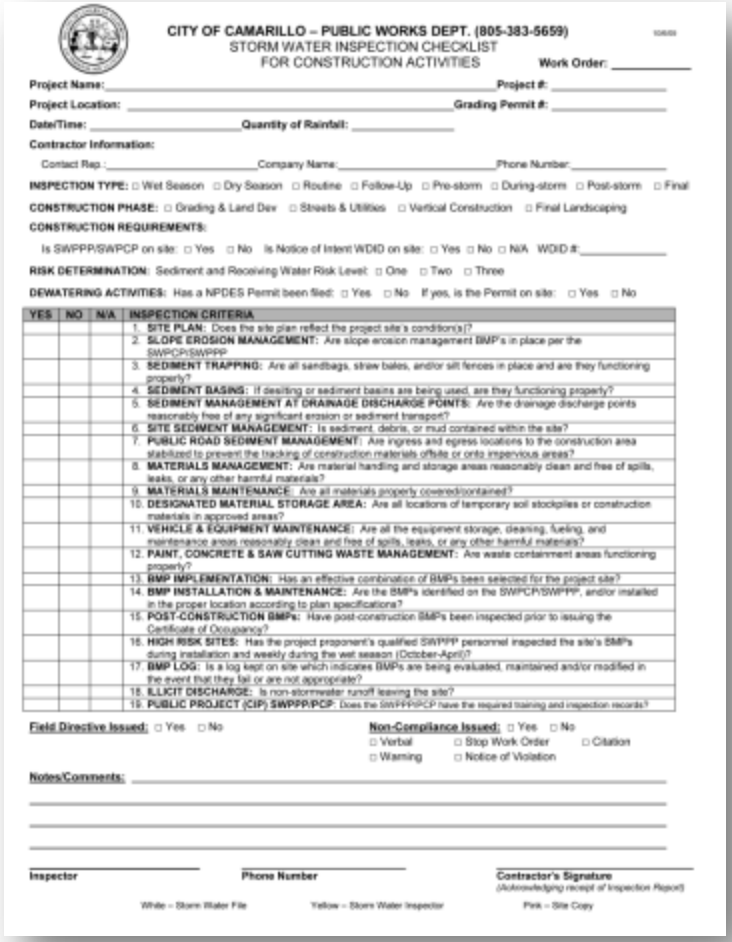
Figure 6-5 Inspections Prior to Certificate of Occupancy

6.6 DC4 – ENFORCEMENT

The Enforcement Control Measure outlines the progressive levels of enforcement applied to construction sites that are out of compliance with local ordinances and establishes the protocol for referring apparent violations of construction sites subject to the General Construction Permit to the Regional Water Board. The progressive enforcement and referral policy, as well as the accompanying legal authority to execute it, is an important tool for providing a fair and equitable approach to bringing contractors and developers into compliance with the Permittees'municipal code requirements. Enforcement actions range from issuance of verbal warnings to stop work orders. Legal action may also be taken, although is rarely necessary as in almost all cases stopping work at a site will focus the developers attention to the BMPs . For repeat offenders or contractors that have not filed appropriate applications, the referral policy includes notification to the Regional Water Board.

6.6.1 Enforcement Action to Achieve Compliance

When a construction site fails to comply with the SWPPP, minimum BMPS or other stormwater requirements, a Permittee implements the appropriate notification and enforcement procedures. There are five general levels of notification and enforcement for most stormwater related problems for construction projects. These are: Verbal Notification, Job Memorandum, Notice of Violation, Administrative Compliance Order, Stop Work Order. Sites that are permitted under the construction activities general permit (CASGP) are also referred to the RWQCB if they fail to achieve compliance and a good faith effort has been made by the Permitee to achieve compliance. At a minimum that is two follow-up inspections within three months, and at least two warning letters or NOVs. The decision to use any level of compliance control is based upon the severity of the violation(s). Severe violation may result in all construction activities being stopped at the job site and not allowed to proceed until compliance is achieved. The Regional Board may be notified of severe violations at sites under the CASGP if the situation warrants immediate attention, if such a case occurs the Permittees will work with Board staff in identification of owners and operators, assist with joint inspections, and other efforts to reduce pollutants from entering an MS4.



CITY OF CAMARILLO – PUBLIC WORKS DEPT. (805-383-5659)
STORM WATER INSPECTION CHECKLIST
FOR CONSTRUCTION ACTIVITIES
Work Order: _____

Project Name: _____ Project #: _____
Project Location: _____ Grading Permit #: _____
Date/Time: _____ Quantity of Rainfall: _____
Contractor Information:
Contact Rep.: _____ Company Name: _____ Phone Number: _____

INSPECTION TYPE: □ Wet Season □ Dry Season □ Routine □ Follow-Up □ Pre-storm □ During-storm □ Post-storm □ Final
CONSTRUCTION PHASE: □ Grading & Land Dev □ Streets & Utilities □ Vertical Construction □ Final Landscaping
CONSTRUCTION REQUIREMENTS:
Is SWPPP/SWPCP on site: □ Yes □ No Is Notice of Intent WDID on site: □ Yes □ No □ N/A WDID #: _____
RISK DETERMINATION: Sediment and Receiving Water Risk Level: □ One □ Two □ Three
DEWATERING ACTIVITIES: Has a NPDES Permit been filed: □ Yes □ No If yes, is the Permit on site: □ Yes □ No

YES	NO	N/A	INSPECTION CRITERIA
			1. **SITE PLAN:** Does the site plan reflect the project site's condition(s)?
			2. **SLOPE EROSION MANAGEMENT:** Are slope erosion management BMP's in place per the SWPCP/SWPPP
			3. **SEDIMENT TRAPPING:** Are all sandbags, straw bales, and/or silt fences in place and are they functioning properly?
			4. **SEDIMENT BASINS:** If desilting or sediment basins are being used, are they functioning properly?
			5. **SEDIMENT MANAGEMENT AT DRAINAGE DISCHARGE POINTS:** Are the drainage discharge points reasonably free of any significant erosion or sediment transport?
			6. **SITE SEDIMENT MANAGEMENT:** Is sediment, debris, or mud contained within the site?
			7. **PUBLIC ROAD SEDIMENT MANAGEMENT:** Are ingress and egress locations to the construction area stabilized to prevent the tracking of construction materials offsite or onto impervious areas?
			8. **MATERIALS MANAGEMENT:** Are material handling and storage areas reasonably clean and free of spills, leaks, or any other harmful materials?
			9. **MATERIALS MAINTENANCE:** Are all materials properly covered/contained?
			10. **DESIGNATED MATERIAL STORAGE AREA:** Are all locations of temporary soil stockpiles or construction materials in approved areas?
			11. **VEHICLE & EQUIPMENT MAINTENANCE:** Are all the equipment storage, cleaning, fueling, and maintenance areas reasonably clean and free of spills, leaks, or any other harmful materials?
			12. **PAINT, CONCRETE & SAW CUTTING WASTE MANAGEMENT:** Are waste containment areas functioning properly?
			13. **BMP IMPLEMENTATION:** Has an effective combination of BMPs been selected for the project site?
			14. **BMP INSTALLATION & MAINTENANCE:** Are the BMPs identified on the SWPCP/SWPPP, and/or installed in the proper location according to plan specifications?
			15. **POST-CONSTRUCTION BMPs:** Have post-construction BMPs been inspected prior to issuing the Certificate of Occupancy?
			16. **HIGH RISK SITES:** Has the project proponent's qualified SWPPP personnel inspected the site's BMP's during installation and weekly during the wet season (October-April)?
			17. **BMP LOG:** Is a log kept on site which indicates BMPs are being evaluated, maintained and/or modified in the event that they fail or are not appropriate?
			18. **ILLICIT DISCHARGE:** Is non-stormwater runoff leaving the site?
			19. **PUBLIC PROJECT (CIP) SWPPP/PCP:** Does the SWPPP/PCP have the required training and inspection records?

Field Directive Issued: □ Yes □ No
Non-Compliance Issued: □ Yes □ No
□ Verbal □ Stop Work Order □ Citation
□ Warning □ Notice of Violation

Notes/Comments: _____

Inspector _____ Phone Number _____ Contractor's Signature _____
(Acknowledging receipt of Inspection Report)

White – Storm Water File Yellow – Storm Water Inspector Pink – Site Copy

Construction Inspection Form

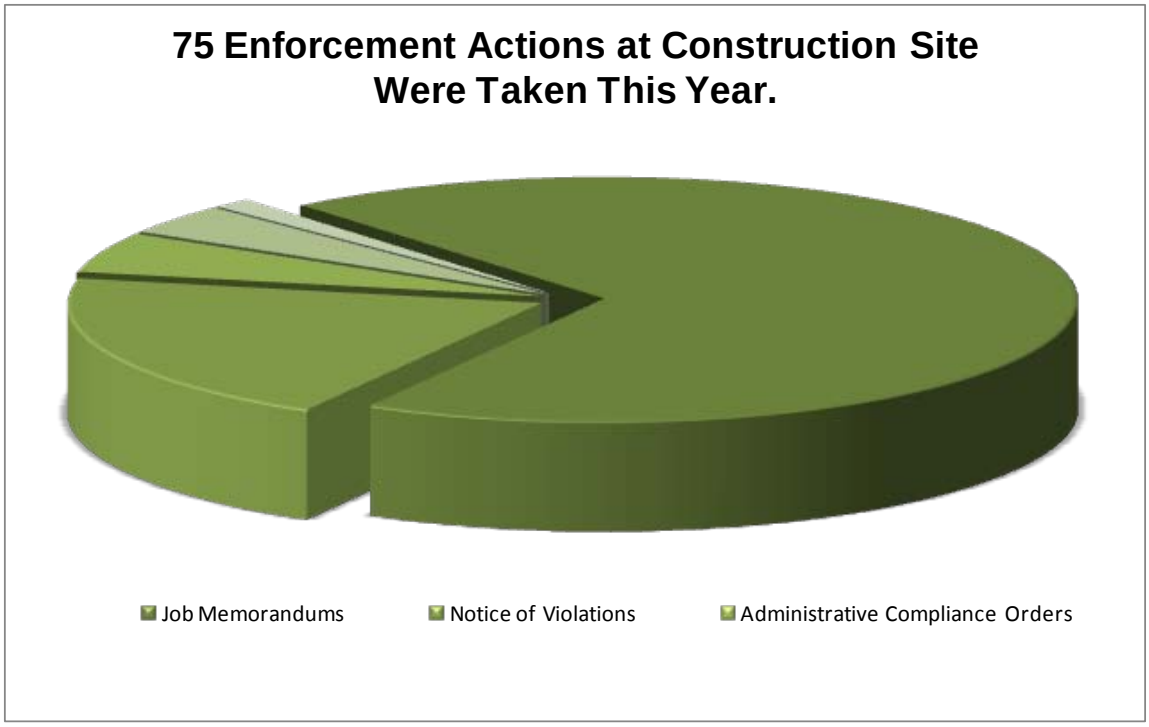


Figure 6-6 Enforcement at Construction Sites

Type of Enforcement Action	Number
Referrals to RWQCB	1
Cease and Desist Orders	3
Administrative Compliance Orders	2
Notice of Violations	15
Job Memorandums	52

Table 6-2 Number and Types of Enforcement Actions

6.6.2 Implement Progressive Enforcement and Referral Policy

During the reporting year no construction sites failed to return to compliance and no sites were referred to the Regional Water Board for enforcement actions under the CAGSP. Referral to the Regional Water Board would be summarized in Table 6-3.

WDID Number	Reason for Referral
None	N/A

Table 6-3 Summary of Referrals

6.6.3 Refer Non-filers Under the CASGP or the Small LUP General Permit

Countywide all construction activities that were required to file for coverage under the CASGP or the Small Linear Underground Project Permit did so. This is because the Permittees have developed the appropriate programs and procedures to ensure that local permits are not granted until the project proponent can provide adequate proof of state permit coverage.

6.6.4 Investigation of Complaints Regarding Facilities - Transmitted by the Regional Water Board Staff

The Permittees are required to initiate an initial investigation of complaints transmitted by the Regional Water Board Staff (other than non-storm water discharges) on the construction site(s) within its jurisdiction. During the reporting period the Regional Board did not transmit any complaints for Permittee investigation; any reports received would be summarized in Table 6-4 below.

Permit #	Initial Investigation conducted within 1 business day? (Y/N)	Inspection of the Facility and its Perimeter? (Y/N)
**	**	**

Table 6-4 Summary of Complaints Transmitted by the Regional Water Board

6.6.5 Support of Regional Water Board Enforcement Actions

If the Regional Water Board is aware of non-compliance at a construction site they may request assistance from the Permittees to support their formal enforcement actions. Fortunately during the reporting period the Permittees were able to use their local authority to keep all construction sites in compliance and assistance to the Regional Water Board enforcement actions was not needed. Table 6-5 describes what kind of assistance the Permittees could provide and will be used in future reports to summarize any enforcement action assistance.

Permit #	Assisted in Identification of Current Owners/ Operators of Properties/Sites? (Y/N)	Provided Staff for Joint Inspections with Regional Water Board Inspectors? (Y/N)	Appeared to Testify as Witnesses in Regional Water Board Enforcement Hearings? (Y/N)	Provided Copies of Inspection Reports and Other Progressive Enforcement Documentation? (Y/N)

Table 6-5 Summary of Complaints Transmitted by the Regional Water Board

6.7 DC5 – TRAINING

Training is important for the implementation of the Development Construction Program Element. An effective training program is one of the best pollution prevention BMPs that can be implemented because it prompts behavioral changes that are fundamentally necessary to protect water quality. The Permittees

targeted employees involved with construction engineering and inspection for training regarding the requirements of the Program for Construction Sites. Training methods varied amongst the Permittees and ranged from informal meetings, formal classroom training, seminars to self-guided training. The Permittees also trained staff on the prevention, detection and investigation of illicit discharges and illegal connections (ID/IC) associated with construction activities. See Chapter 8 for more information regarding ID/IC training.

During this reporting period, the Permittees trained 64 key staff, including contractors whose interactions, jobs, and activities affect development construction in stormwater management, construction inspections, SWPCPs, SWPPPs, illicit discharge response, and non-stormwater discharges. Figure 6-7 depicts the number of staff trained in the program areas for each Permittee.

6.7.1 Conduct Training

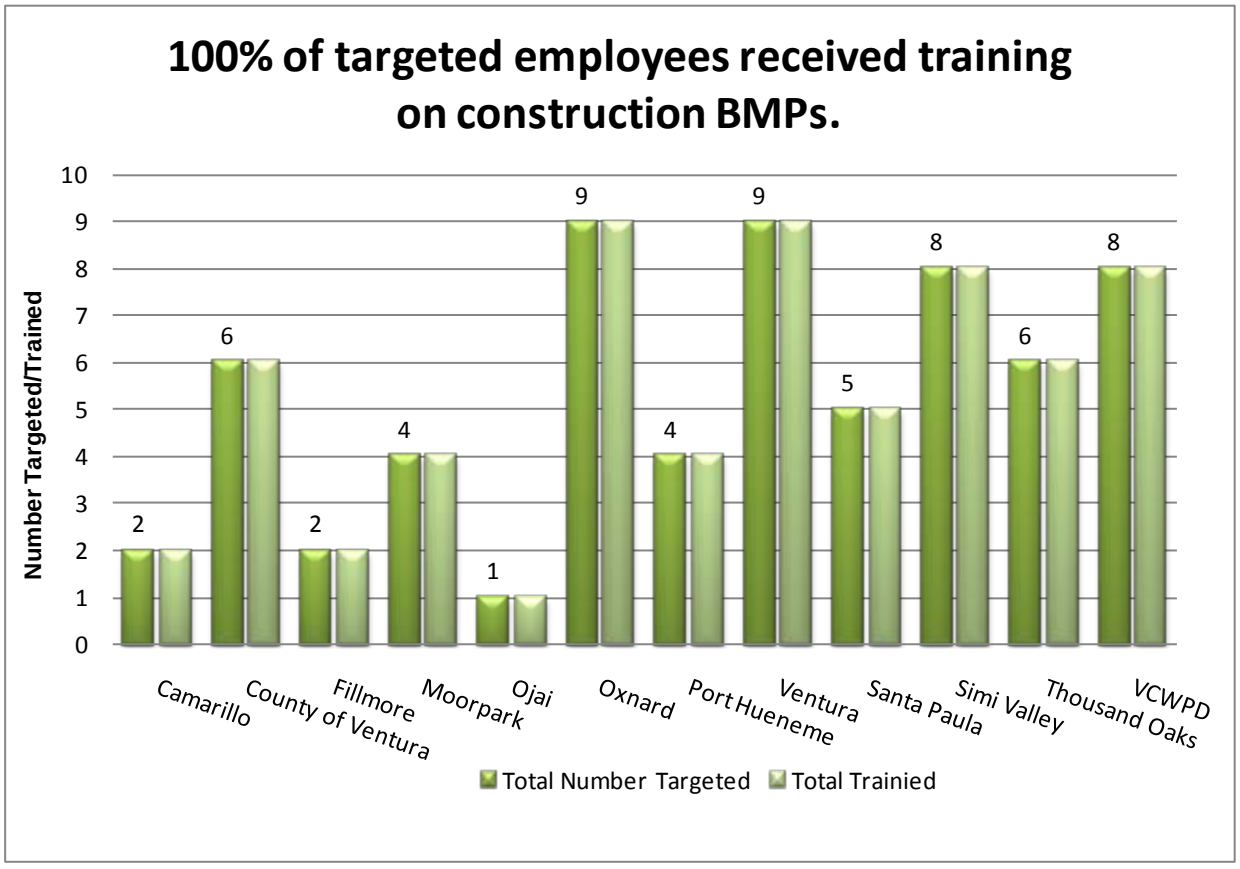


Figure 6-7 Construction Inspection Training

6.8 DC6 – EFFECTIVENESS ASSESSMENT

Effectiveness assessment is a fundamental component for developing and implementing successful stormwater programs. In order to determine the effectiveness of the Development Construction Program, a comprehensive assessment of the program data is conducted as a part of the annual report. The results of this assessment are used to identify modifications that need to be made to the program. Each year the effectiveness assessment is reviewed and revised as needed.

By conducting these assessments and modifying the program as needed, the Permittees ensure that the iterative process is used as an effective management tool. Due to the types of data collected for the Development Construction Program, current and assessments will primarily focus on Outcome Levels 1, 2 & 3.

- Outcome Level 1 (L1) answers the question: Did the Permittees implement the components of the Permit?
- Outcome Level 2 (L2) answers the question: Can the Permittees demonstrate that the control measure/performance standard significantly increased the awareness of its target audience?
- Outcome Level 3 (L3) answers the question: Can the Permittees demonstrate that the control measure/performance standard significantly modified the behavior of a target audience?

The following is an assessment regarding the effectiveness of the Development Construction Program.

6.8.1 Plan Review and Approval Process

Review Grading and Construction Permit Applications for SWPPP Requirements

Prior to approving a grading permit, the Permittees require a SWPPP be submitted for projects greater than one acre. (L1) All projects required to submit a State SWPPP, submitted a State SWPPP and filed a NOI as shown in Figure 6-2. (L1) Proof of filing a NOI included a copy of the completed NOI form and a copy of the check sent to the SWRCB, or a copy of the letter the SWRCB with the WDID for the project. (L1)

In some jurisdictions, Local SWPPPs were required and submitted for nearly all projects including those not exceeding Permit thresholds as shown in Figure 6-1. (L1)

The Permittees required proof of state permit coverage so that all construction activities that were required to file for coverage under the CASGP or Small Linear Underground Project Permit did so.

6.8.2 Inventory

The majority of the Permittees maintained an electronic system to track grading permits, encroachment permits, and any other municipal authorization to move soil. (L1) The majority required a copy of the SWPPP at any time a transfer of ownership took place. (L1)

Inspection and BMP Implementation

As shown in Figure 6-4, the majority of Permittees inspected all active construction sites for stormwater quality requirements during routine inspections a minimum of once during the wet season,. (L1) For inspected sites that had not adequately implemented their SWPPPs, the Permittees conducted a follow-up inspection within two weeks. Most often, the follow-up inspection occurred much sooner. (L1) In addition, the majority of Permittees inspected each project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing roadbed surfaces to ensure that the minimum set of BMPs were implemented. This was routinely done at the same time inspections are performed to ensure all work is being performed according to the design and standards required of public works projects. (L1)

The Permittees required a CPESC to inspect the construction sites at the time of BMP installation, at least weekly during the wet season, and at least once each 24 hour period during a storm event that generates runoff from the site if the site was:

- Within or adjacent to an ESA

- On a hillside
- Discharging into a sedimentation/siltation impaired water body listed on the CWA 303(d) list

Many of the permittees did not have any of these types of high risk construction sites but did have the program in place to implement the added requirements.

Prior to approving and/ or signing off for occupancy and issuing the Certificate of Occupancy for all construction projects subject to post-construction controls, the majority of Permittees inspected the constructed site design, source control and treatment control BMPs conditioned during the development process to verify that they have been constructed in compliance with all specifications, plans, permits, ordinances, and the MS4 permit, as shown in Figure 6-5. (L1)

6.9 ENFORCEMENT

Enforcement Action to Achieve Compliance

When a construction site fails to comply with the SWPPP, minimum BMPS or other stormwater requirements, a Permittee implements the appropriate notification and enforcement procedures. (L1) Sites that are permitted under the construction activities general permit (CASGP) are also referred to the RWQCB if they fail to achieve compliance in two weeks and a good faith effort has been made by the Permittee to achieve compliance. (L1) Figure 6-6 shows each enforcement level and the relative number of enforcement actions taken. The Permittees did not make any referral of violation of the new development and redevelopment post construction requirements and municipal stormwater ordinances to the Regional Water Board because there were no violations. (L1) One site was referred to the Regional Water Board so they could take appropriate enforcement actions under the CAGSP.

Training

During this reporting period, the Permittees trained 64 key staff, including contractors whose interactions, jobs, and activities affect development construction in stormwater management, construction inspections, SWPCPs, SWPPPs, illicit discharge response, and non-stormwater discharges. (L1) 100% of targeted staff members received training on construction BMPs, as shown in Figure 6-7.

6.9 DEVELOPMENT CONSTRUCTION PROGRAM MODIFICATIONS

On an annual basis, the Permittees plan to evaluate the results of the Annual Report, as well as the experience that staff has had in implementing the program, to determine if any additional program modifications are necessary to comply with the Clean Water Act requirement to reduce the discharge of pollutants to the maximum extent practicable. Any key modifications made to the Development Construction Program Element during the next fiscal year will be reported in the following Annual Report.

7 Public Agency Activities

7.1 OVERVIEW

The Permittees own and operate public facilities, and build and maintain much of the infrastructure of the urban and suburban environment throughout their jurisdictions. Some programs help remove pollutants before they reach receiving waters and others focus on source control ensuring all the activities performed do not contribute to stormwater pollution to the maximum extent practicable. Therefore public agencies have a dual role in removing pollutants before they are transported by the storm drain system and preventing pollution from being generated in the operation and maintenance of these facilities.

Permit requirements include both maintenance of infrastructure to remove pollutants and implementing control measures to prevent the generation or transport of pollutants. Maintenance activities include street sweeping and drainage facility inspection and cleaning. The Permittees, as part of their normal operations conduct a number of activities (e.g., catch basin cleaning, street repairs, street sweeping via a contract) that have the potential to generate or mobilize pollutants. Control Measures in the Public Agency Activities Program Element are designed to ensure that these operations and maintenance activities are performed using processes and procedures to minimize the pollutants generated and the potential for pollutants to enter the storm drain system.

7.2 CONROL MEASURES

The Permittees have developed several Control Measures and accompanying performance standards to ensure that the public agency activities related permit requirements are effectively developed and implemented. For each Control Measure there are accompanying performance standards which, once accomplished, constitute compliance.

The Public Agency Activities Control Measures are organized to be parallel to the organization of the Permit and consist of the following:

PA	Control Measure
PA1	Public Construction Activities Management
PA2	Vehicle Maintenance/Material Storage Facilities/Corporation Yards Management/Municipal Operations
PA3	Vehicle and Equipment Wash Areas
PA4	Landscape, Park, and Recreational Facilities Management
PA5	Storm Drain Operation and Management
PA6	Street And Roads Maintenance
PA7	Emergency Procedures
PA8	Training
PA9	Effectiveness Assessment

Table 7-1 Control Measures for the Public Agency Activities Program Element

7.3 PA1 – PUBLIC CONSTRUCTION ACTIVITIES MANAGEMENT

The Public Construction Activities Control Measure provides protocols to be followed in the design and construction phases of capital projects undertaken by the Permittees. In essence, the Permittees will follow the Planning and Land Development and Construction Programs requirements for all Permittee-owned or operated public construction projects. Those requirements include complying with the Development Planning Program requirements in at public construction projects and all the Development Construction Program requirements at Permittee owned or operated construction sites including requiring the development of SWPCP for projects that disturb less than 1 Acre.

Comply with all the Development Planning Program requirements at public construction projects			
	Yes	No	N/A
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks		☑	
Watershed Protection	☑		

Performance Standard 7-1

Comply with all the Development Construction Program requirements at Permittee owned construction sites			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 7-2

Since grading or building permits are not granted for public construction projects within an agency's jurisdiction identifying and defining small construction projects is less straight forward. To ensure that extremely small projects such as installing a stop sign or providing wheelchair access to a sidewalk meet permit requirements permittees have adopted standard practices to serve as the SWPCP. The practices include the BMPs identified in the permit for construction projects under one acre.

Require the development of a Storm Water Pollution Control Plan for public projects			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 7-3

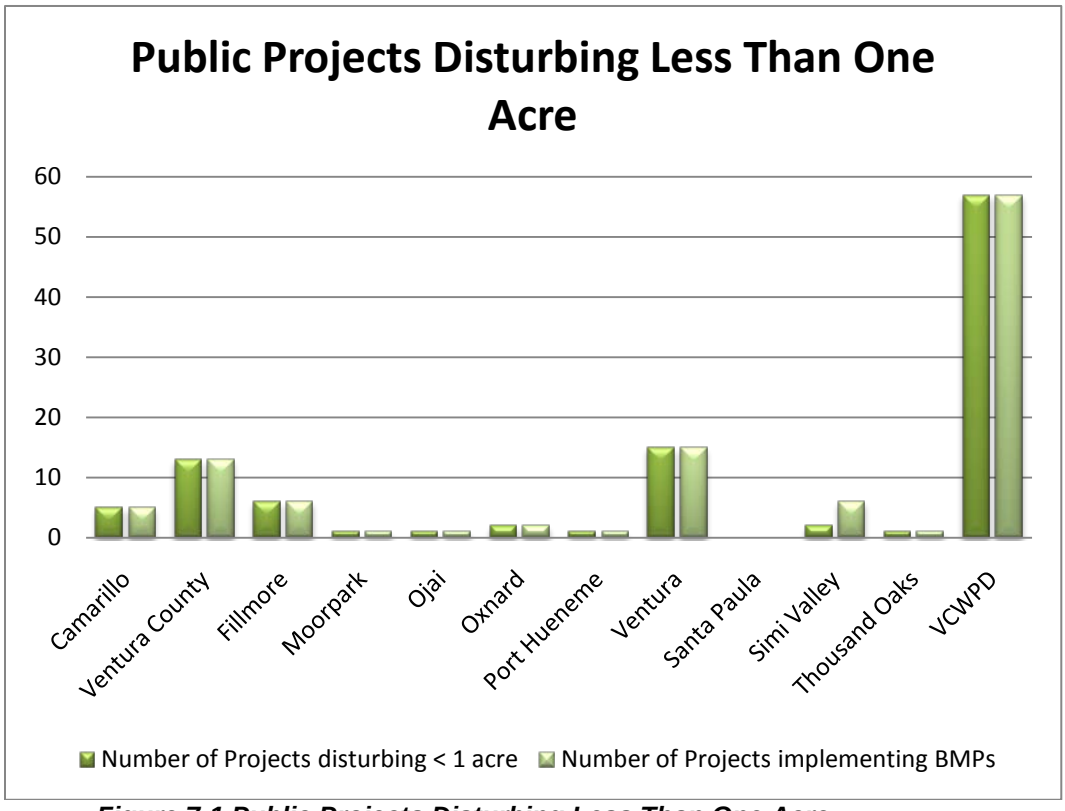


Figure 7-1 Public Projects Disturbing Less Than One Acre

Larger projects have requirements in the construction bid documents to require the contractor to draft and implement an approved SWPCP with the size appropriate BMPs. All public constructions projects are required to be in compliance the the State's requirements under the Construction Activities General Stormwater Permit (CAGSP). Figure 7-2 indentifies how many projects the Permittees had that fell under those requirements.

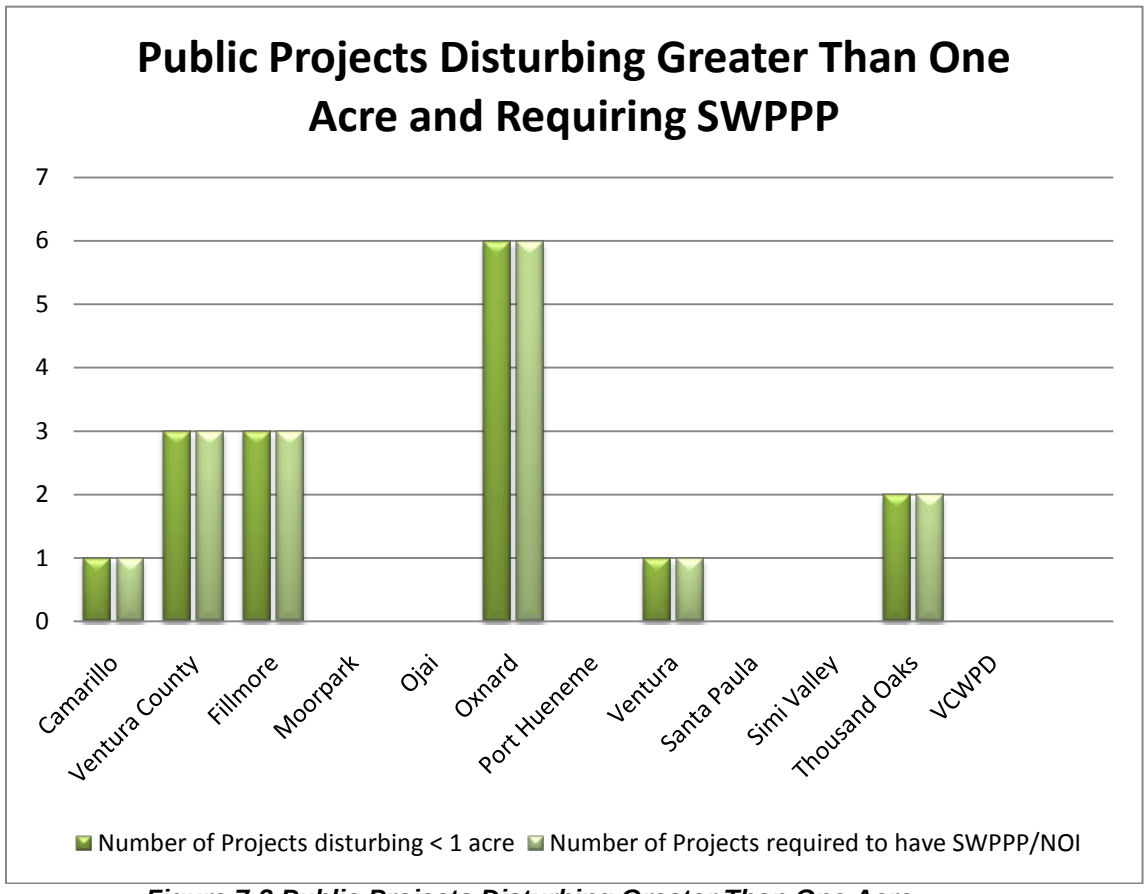


Figure 7-2 Public Projects Disturbing Greater Than One Acre

7.4 PA2 – VEHICLE MAINTENANCE/MATERIAL STORAGE FACILITIES/CORPORATION YARDS MANAGEMENT/MUNICIPAL OPERATIONS

The Vehicle Maintenance/Material Storage Facilities/Corporation Yards Management/Municipal Operations Control Measure addresses pollutants entering the storm drain system from Permittee-owned/leased facilities (e.g., vehicle equipment maintenance facilities, material storage facilities, collectively referred to as corporation yards). There are other non-operation oriented facilities that are owned or leased by the permittees where these permit conditions are not relevant, such as libraries, parks and office buildings. However, these facilities are required to comply with any other applicable permit requirements such as pesticide use.

The Permittees require corporation yards to support operation and maintenance activities within their jurisdiction. Corporation yards are operated and maintained by the Permittees for the following activities or facilities:

- Vehicle and equipment
- Storage and parking
- Maintenance
- Fueling
- Washing and cleaning
- Sign painting activities
- Bulk material storage areas

Permittee Corporate Yards	Name	Address	SWPCP Developed & Implemented	SWPCP available on site	All vehicle wash areas self-contained	Prohibit untreated SW runoff from toxic/ hazardous mtrl storage areas	Prohibit untreated SW runoff from fueling areas & vehicle maintenance areas
Camarillo	Camarillo Corporation Yard	283 South Glenn Drive	Yes	Yes	Yes	Yes	Yes
County of Ventura	El Rio Corporate Yard	682 El Rio Drive	Yes	Yes	Yes	Yes	Yes
	Moorpark Yard	7150 Walnut Cyn Rd.	Yes	Yes	Yes	Yes	Yes
Fillmore	Fillmore Public Works Yard	711 Sespe Avenue	Yes	Yes	Yes	Yes	Yes
Moorpark	Moorpark Public Services Facility	627 Fitch Avenue, Moorpark CA 930	Yes	Yes	N/A	N/A	N/A
Ojai	City of Ojai Corporate Yard	485 Signal Street	Yes	Yes	N/A*	N/A	Yes
Oxnard	Oxnard Corporation Yard	1060 Pacific Avenue	Yes	Yes	Yes	Yes	Yes
	Regional Recycling Center	111 S. Del Norte Blvd	Yes	Yes	Yes	Yes	Yes
	Oxnard POTW	6001 S. Perkins Rd., Oxnard, CA					
	Oxnard Water Treatment Yard	251 S. Hayes Avenue	Yes	Yes	Yes	Yes	Yes
Port Hueneme	Municipal Service Center	700B E. Port Hueneme Rd.	Yes	Yes	Yes	Yes	Yes
	Service Yard Annex	746 Industrial Avenue	Yes	Yes	Yes	Yes	Yes
Ventura	SanJon Corporate Yard	336 SanJon Road	Yes	Yes	Yes	Yes	Yes
Santa Paula	Corporation Street Yard	903 Coporation Street	Yes	Yes	Yes	Yes	Yes
	Palm Avenue Yard	180 South Palm Avenue	Yes	Yes	Yes	Yes	Yes
Simi Valley	Simi Valley Police Department	490 West Los Angeles Ave					
	Simi Public Service Center	500 West Los Angeles Avenue	Yes	Yes	Yes	Yes	Yes
Thousand Oaks	Municipal Service Center	1993 Rancho Conejo Blvd.	Yes	Yes	Yes	Yes	Yes
VCWPD	El Rio Corporate Yard	630 El Rio Drive	Yes	Yes	N/A	Yes	N/A
	Moorpark Yard	7150 Walnut Cyn Rd.	Yes	Yes	N/A	Yes	N/A

Table 7-2 Summary of Permittee-Owned and Leased Facilities

7.4.1 Implement Required BMPs for each Facility

The Permittees have written SWPCPs for corporation yards to ensure implementation of appropriate BMPs, including those identified in Table 10 of the Permit. The SWPCPs wre required under the previous permit and serve to help implement the current permit requirements. The SWPCPs call for annual inspections to be performed and documented by trained staff. Any insufficiencies identified during inspections are quickly corrected by facility staff.

Require Permittee facilities and corporation yards to ensure implementation of appropriate BMPs (by October 6, 2010)			
	Yes	No	In Progress
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark	☑		
Ojai		☑	
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 7-4

7.5 PA3 – VEHICLE AND EQUIPMENT WASH AREAS

The Vehicle and Equipment Wash Areas Control Measure addresses pollutants entering the storm drain system from Permittee-owned/leased vehicle and equipment wash areas. The Permit provides several options to eliminate wash water discharges from vehicles and equipment washing facilities by implementing one of the following:

- Self-contain, and haul-off for disposal;
- Equip with a clarifier;
- Equip with an alternative pre-treatment device; or

- Plumb to the sanitary sewer

Thousand Oaks' car wash facility that drains to wastewater treatment plant

The Permittees have been successful in implementing applicable BMPs to eliminate wash water discharges from vehicles and equipment washing. As municipal facilities are constructed, redeveloped, or replaced all vehicle wash areas will be plumbed to the sanitary sewer or be self contained and all wastewater disposed of legally.

Address discharges of wash waters from vehicles and equipment washing facilities by implementing one of the following (by July 8, 2011)			
	Yes	No	In Progress
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark	☑		
Ojai		☑	
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 7-5

7.6 PA4 – LANDSCAPE, PARK, AND RECREATIONAL FACILITIES MANAGEMENT

The Landscape, Park, and Recreational Facilities Management Control Measure ensures that the discharges of pollutants from the Permittees' use and storage of fertilizers and pesticides are reduced. Among other things, the control measures use BMPs that promote the use of integrated pest management (IPM) and retention and planting of native plant species requiring less water and chemical augmentation to remain healthy.

7.6.1 Implement IPM Program

A model integrated pest management (IPM) program was drafted through the Public Agencies Activities Subcommittee and used as a template by the Permittees to develop their own plans. This standardized protocol was posted on Program's website November 2009 and is included as Attachment D. The due date in the Permit for implementation of IPM plans is October 8, 2010, which is outside the reporting period of this annual report.

The purpose of this standardized protocol is to define an application protocol for the routine and non-routine application of pesticides, fertilizers, and herbicides (including pre-emergents). This protocol provides a comprehensive policy to comply with the Ventura County Permit.

The intent is to focus on preventing pesticides, fertilizers, and herbicides from entering the storm drain system and discharging to receiving waters. This protocol is applicable to 1) the outdoor use of pesticides, herbicides, and fertilizers; 2) the use of pesticides and fertilizers where the materials may come into contact with precipitation; 3) the use of pesticides, herbicides, and fertilizers where these materials may come into contact with runoff (natural or induces); and 4) the use of pesticides, herbicides, or fertilizers anywhere where they may be directly or indirectly discharged to a storm drainage system.

The protocol is applicable to any Permittee staff and contracted services that apply pesticides, fertilizers, or herbicides. Such staff commonly include, park, public works, purchasing, building/grounds maintenance, hazardous materials, and pesticide application staff. It is not applicable to the indoor use of pesticides, herbicides or fertilizers, but is applicable to the consequential outdoor handling, mixing,

transport, or disposal of materials related to indoor use. This protocol also does not apply when another NPDES permit and/or abatement orders are in effect at the selected site. Furthermore, this protocol is not intended to replace federal or state requirements or provide complete directions for applying, handling, transporting, mixing, or storing pesticides, fertilizers, or herbicides.

An effective IPM program should include the following elements:

- Pesticides are used only if monitoring indicates they are needed according to established guidelines.
- Treatment is made with the goal of removing only the target organism.
- Pest controls are selected and applied in a manner that minimizes risks to human health, beneficial, nontarget organisms, and the environment.
- Its use of pesticides, including Organophosphates and Pyrethroids do not threaten water quality.
- Partner with other agencies and organizations to encourage the use of IPM.
- Adopt and verifiably implement policies, procedures, and/or ordinances requiring the minimization of pesticide use and encouraging the use of IPM techniques (including beneficial insects) in the Permittees' overall operations and on municipal property.
- Policies, procedures, and ordinances shall include commitments and timelines to reduce the use of pesticides that cause impairment of surface waters by implementing the following procedures:
    - Quantify pesticide use by its staff and hired contractors.
    - Prepare and annually update an inventory of pesticides used by all internal departments, divisions, and other operational units.
    - Demonstrate reductions in pesticide use.

The prevention of pesticides from harming non-target organisms is the primary goal of the Permittees IPM program. The Permit also asks for the demonstration of a reduction in pesticide use, however that is not as simple as comparing one year's use to another. Many factors go into the decision to use pesticides and year to year variables can have a significant impact on that decision. For example, an above average wet year will require more weed abatement than a dry year, or the need to address an insect infestation before it spreads across a city will require an intensified use of pesticides in that area. Since year to year reductions cannot be accurately measured due to variable needs the reduction in use of pesticides by the Permittees will be compared to the pesticides that would have been used under a non-IPM program.

Implement an integrated pest management (IPM) program consistent with Permit (July 8, 2011)			
	Yes	No	Draft
Camarillo			☑
Ventura County			☑
Fillmore			
Moorpark			☑
Ojai		☑	
Oxnard			☑
Port Hueneme			☑
Ventura	☑		
Santa Paula			
Simi Valley			☑
Thousand Oaks	☑		
Watershed Protection			☑

Performance Standard 7-6

7.6.2 Maintain and Expand Internal Inventory on Pesticide Use

Permittees require all staff applying pesticides to be either certified by the California Department of Food and Agriculture, or under the direct on-site supervision of a certified pesticide applicator, as defined in the standardized protocol. Permittees have also restricted the purchase and use of pesticides and herbicides to certified staff.

Prepare and annual update an inventory of pesticides used by all internal departments and hired contractors (by July 8, 2011)			
	Yes	No	N/A
Camarillo			☑
Ventura County	☑		
Fillmore			☑
Moorpark		☑	
Ojai		☑	
Oxnard			☑
Port Hueneme	☑		
Ventura			☑
Santa Paula			
Simi Valley			☑
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 7-7

Permittees that contract out for pesticide applications have included contract provisions requiring the contract applicator meet all requirements of this program, including compliance with the standardized protocol, the prohibitions and requirements for certification and supervision of pesticide applicators

Establish standard protocols for routine and non-routine application of pesticide consistent with the permit requirements (by January 8, 2011)			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 7-8

7.7 PA5 – STORM DRAIN OPERATION AND MANAGEMENT

The Storm Drain Operation and Management Control Measure provides for the long-term performance and integrity of the Permittees' storm drain system. The Permittees must prioritize catch basins for cleaning based on the required level of maintenance, and all catch basins are marked with a storm drain message, whether stenciled or permanently imprinted. This Control Measure also includes a requirement for special event to prevent debris accumulation in catch basins and storm drains.

7.7.1 Implement Storm Drain System Mapping

The Permit requires that the Permittees map at a scale and in a format specified by the Principal Permittee showing the location and length of underground pipes 18 inches and greater in diameter, and channels within their permitted area. A schedule is provided to allow time to develop the needed information. The first due date is October 6, 2010, outside the reporting period of this report. However, work has begun in identifying the mapping capabilities of the Permittees and the ability of the Principal Permittee to integrate them. Since Ventura Counties cities are all separated by open space and an MS4 from one city does not discharge to another, the need to integrate the maps into a countywide storm drain map is not as imperative as the need for a Permittee to be able to know what is upstream from any point in their MS4, and where that water will discharge. Giving that the priority for the mapping is internal to the agency operating the system, the Permittees were given the autonomy to decide what form of mapping will work best for their needs. All maps will be incorporated into the Watershed Protection District's, as Principal Permittee, GIS system as best as possible. This incorporation will allow for other formats to be available and viewed when needed.

Prepare a map or list of catch basins, with GPS coordinates, designations, and rationale for designations (by July 8, 2011)			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection			☑

Performance Standard 7-9

7.7.2 Implement Catch Basin Maintenance Program

Each Permittee developed the criteria and method of a catch basin mapping and prioritization system for their agency. This is due to the different types of databases, mapping systems, infrastructure, and methods used by the Permittees for inspection and cleaning. The Permit does not specify the criteria for designating catch basin priorities nor require a uniform system of mapping catch basins. The Permittees have begun to implement catch basin cleaning schedules based upon the prioritization designations as required by the Permit, however, the requirement of a list or map of catch basins with their GPS coordinates and their prioritization designation is due July 8 2011, outside the reporting period of this report. Figure 7-3 through Figure 7-6 shows the Permittees' efforts to date on prioritization, inspection and maintenance.

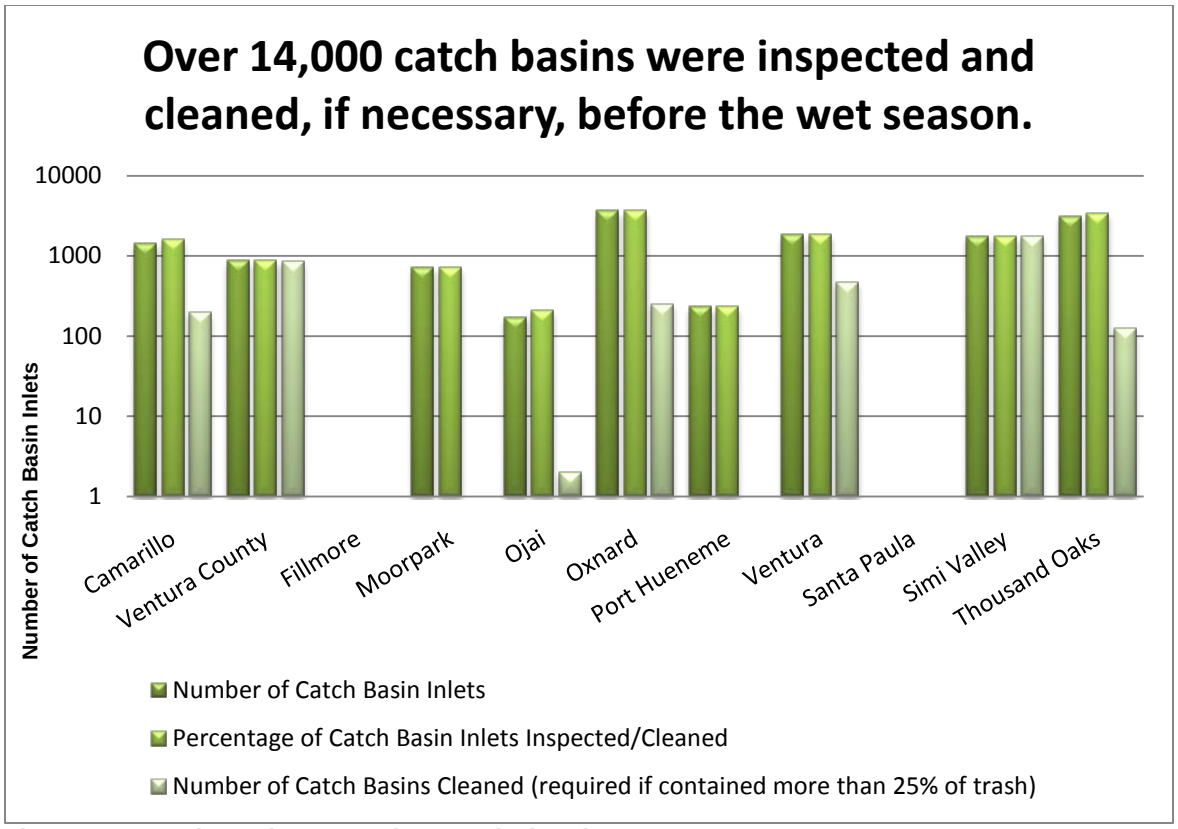


Figure 7-3 Catch Basin Inspections and Cleaning

Permittees routinely inspect catch basins and other drainage facilities that are a part of their system. These inspections are scheduled and completed in accordance with the requirements of the catch basin prioritization (due July 2011). The prioritization requires:

- Priority A inspected 3 times a wet season and once during the dry season;
- Priority B inspected once during the wet season and once during the dry season;
- Priority C inspected a minimum of once per year.

Inspections include the visual observation of each catch basin, and open channels to determine if the facility has accumulated trash, sediment or debris requiring removal. All debris removed from the system is disposed of properly and therefore represents pollutants that would have likely been washed downstream to a receiving water. For catch basins, "as-needed cleaning" occurs whenever trash, sediment or debris accumulation is found to be at least 25% of capacity. Watershed Protection District cleans and maintains their flood control facilities, but does not operate any catch basins that receive runoff directly from streets or roads.

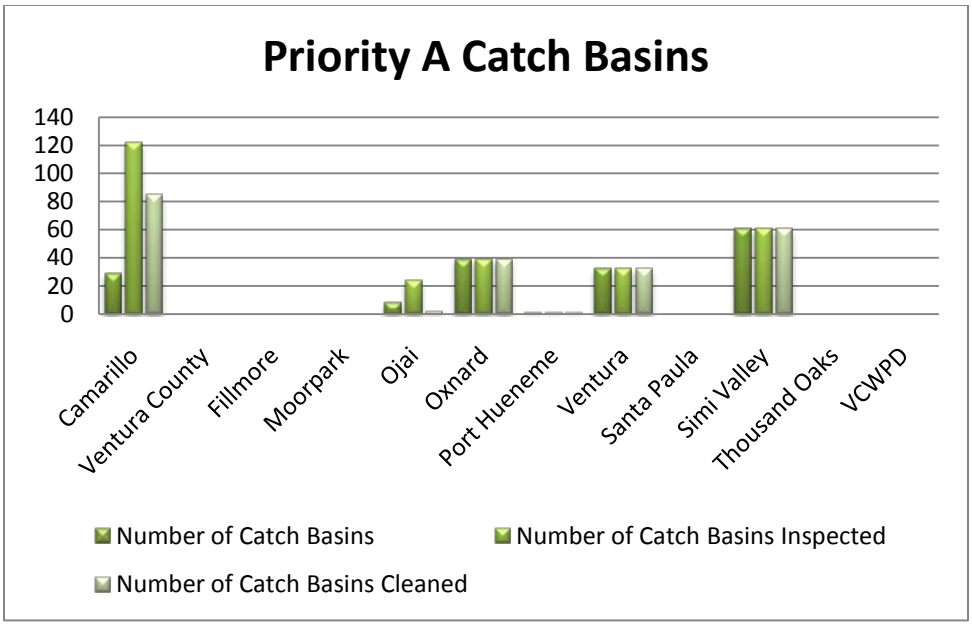


Figure 7-4 Priority A Catch Basins

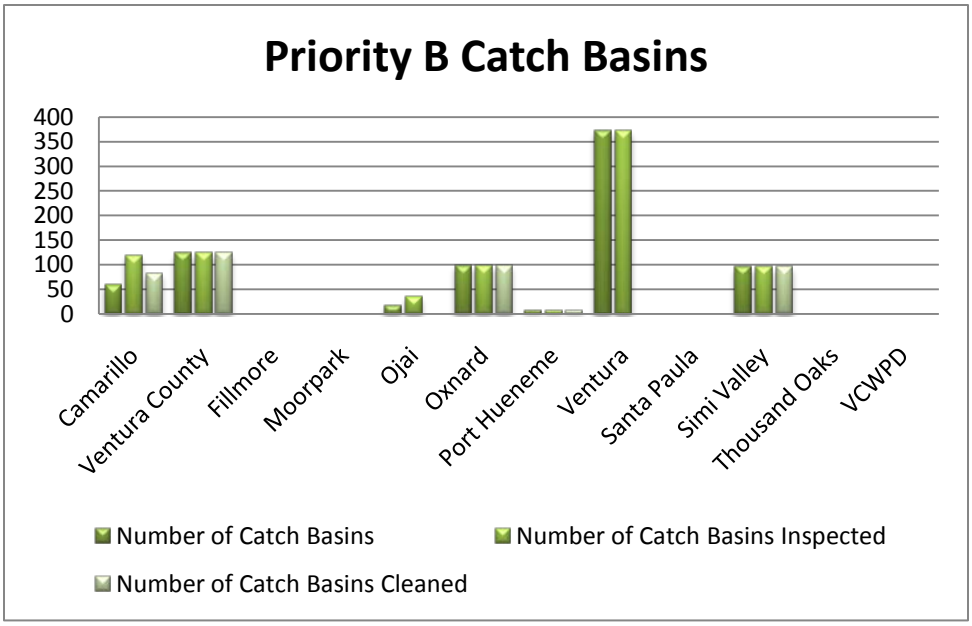


Figure 7-5 Priority B Catch Basins

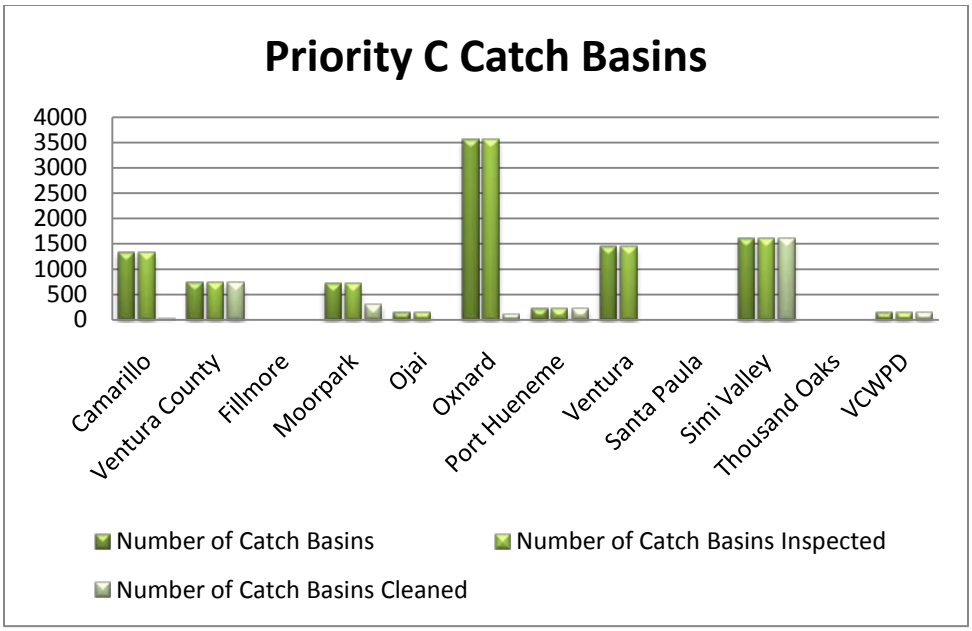


Figure 7-6 Priority C Catch Basins

Inspect, and clean if necessary, all publically owned and maintained catch basins according to the schedule based on prioritization (by July 8, 2012)			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura		☑	
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection			☑

Performance Standard 7-10

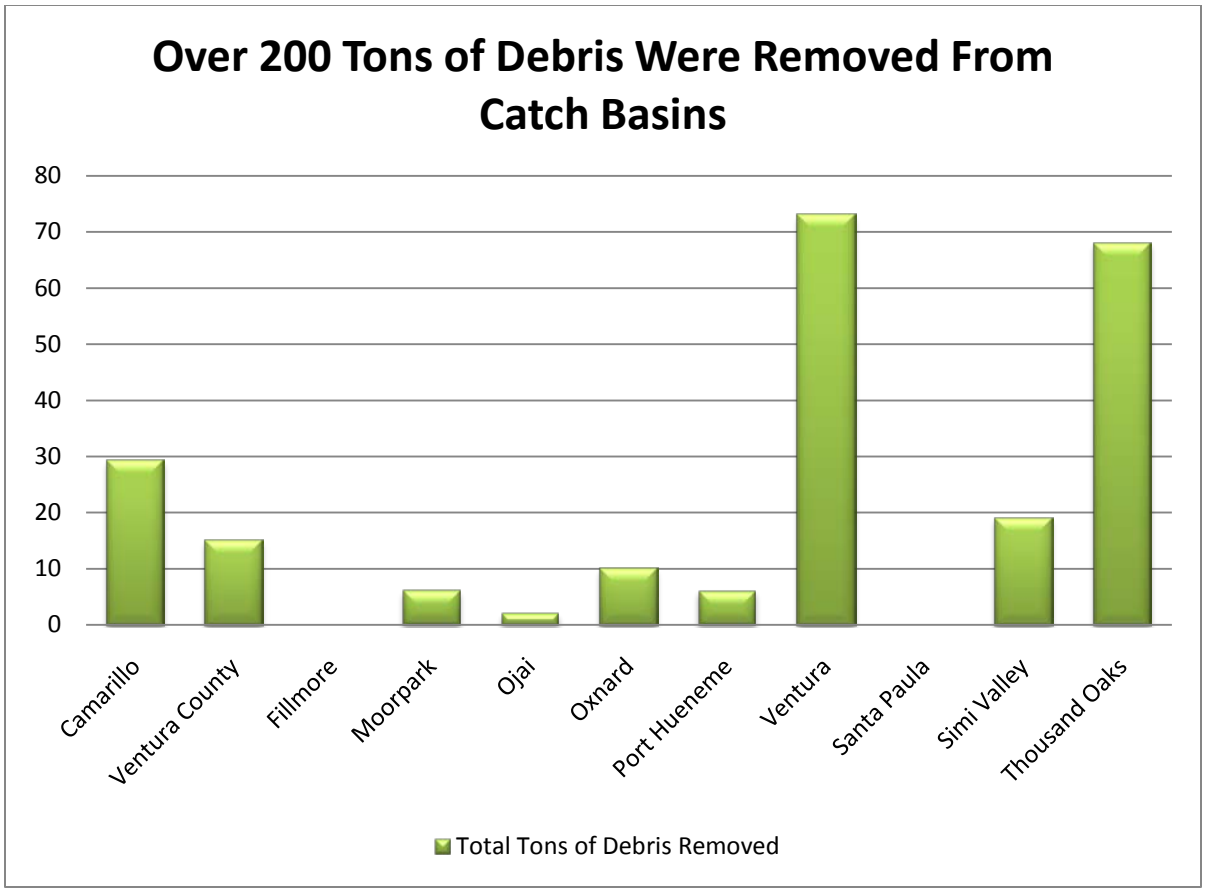


Figure 7-7 Total Tons Removed from Catch Basins

7.7.3 Install Trash Receptacles

Permittees have begun identifying the city bus stop areas which are typically located in commercial areas and near schools as areas to install trash receptacles. Some have completed this task, but it is not required until July 8, 2011. Other areas identified for trash receptacles include Permittee-maintained trail entrances and parks. Additionally, commercial areas are typically required to install trash receptacles at store fronts to aid in proper disposal. Trash programs usually involve solid waste divisions and brings their expertise in performing trash auditsto determine the need for additional trash receptacles.

Have trash receptacles, or equivalent trash capturing devices in areas subject to high trash generation within its jurisdiction? (by July 8, 2011)			
	Yes	No	N/A
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard		☑	
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley		☑	
Thousand Oaks	☑		
Watershed Protection			☑

Performance Standard 7-11

Trash receptacles cleaned out and maintained as necessary to prevent trash overflow			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard		☑	
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley		☑	
Thousand Oaks	☑		
Watershed Protection			☑

Performance Standard 7-12

7.7.4 Install Additional Trash Management Devices and Programs

Permittees have begun the implementation of this performance standard which is due July 8, 2012. Some agencies already had trash capturing devices installed in known problem areas before the permit was adopted. The City of Ventura has installed 64 trash excluding devices covering many "Priority A" drains throughout the City and the downtown area where large public events occur. To continue this effort they have budgeted $50,000 per year for the next 5 years on trash excluding devices. The City of Simi Valley has a pilot study in progress on different areas and types of excluders. The beach city of Port Hueneme has screened inlets to prevent trash from entering and also has full trash removal devices constructed at priority storm drain outfalls.

Other increased trash management programs initiated by Permittees include increased inspection and maintenance frequency to four times annually in high trash generation areas, with attention given to solid waste collection receptacles that have been placed in priority areas. The City of Oxnard Environmental Resources Division has installed additional trash receptacles at all locations identified as Priority A. In

addition, the City of Oxnard owns and maintains two Fresh Creek trash removal devices located downstream of the high priority areas in the Wooley Road and Oxnard West Drains.

To address the Revolon Slough trash TMDL, the City of Camarillo has implemented a Trash Reporting & Monitoring Program at three locations along the Camarillo Hills Drain in which trash was collected monthly from September 2009 through August 2010. The County of Ventura also is studying trash generation rates and volumes to better plan to effectively address this issue.

Provide additional trash management practices in areas defined as Priority A? (by July 8, 2012)			
	Yes	No	In Progress
Camarillo			☑
Ventura County			☑
Fillmore	☑		
Moorpark		☑	
Ojai		☑	
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley		☑	
Thousand Oaks	☑		

Performance Standard 7-13

7.7.5 Trash Management at Public Events

Events in the public right of way, or wherever it is foreseeable that substantial quantities of trash and litter may be generated, require the following measures:

- Proper management of trash and litter generated
- Arrangement for temporary screens to be placed on catch basins
- Arrangement that trash is removed after the event

The Permittees appreciate having the ability to select the option that will work best in their jurisdiction and have employed several methods to ensure trash does not get into a storm drain after a public event. Most cities use the power of the Special Use Permit or Temporary Use Permit. With this they can and do require a trash and recycling management plan and/or a substantial deposit before receiving an event permit. Funds can be withheld if trash has not been properly managed and costs recovered and even fines levied if is staff needed to clean up afterwards. A few agencies take on this responsibility and have sweepers employed to clean streets of any trash immediately after a large event, or cleans the affected drains with a vacuum truck after the event has concluded.

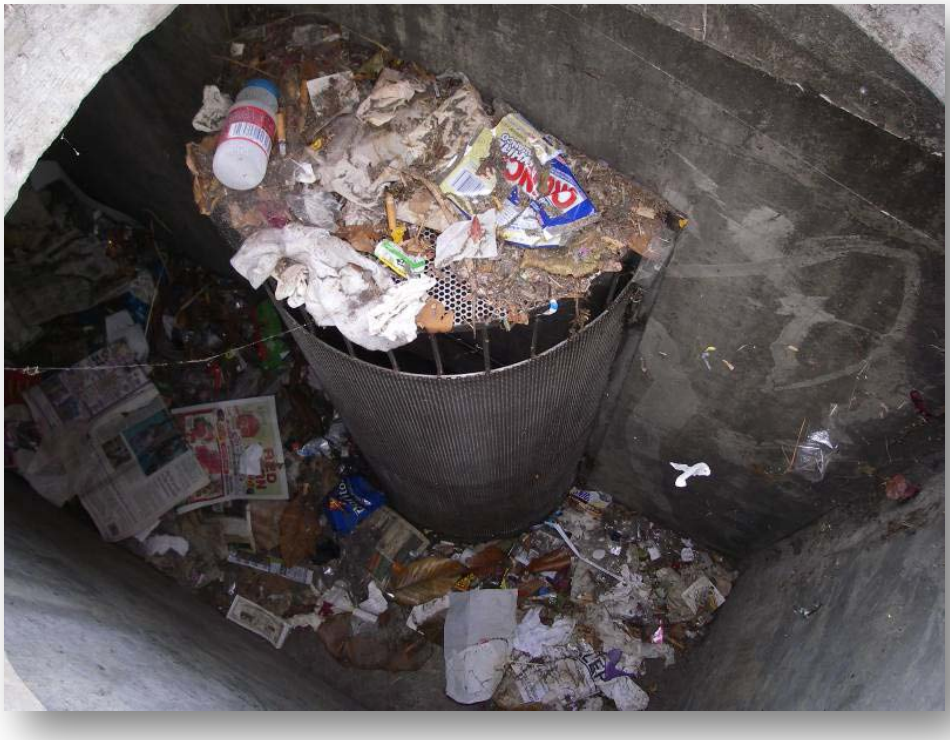
Require appropriate litter control measures for public events			
	Yes	No	In Progress
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard			☑
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 7-14

7.7.6 Implement Storm Drain Maintenance Program

Permittees also routinely inspect and clean their drainage facilities during the year on an as-needed basis. "Routine cleaning" for these facilities, means the removal of accumulations of trash, sediment and debris likely be washed downstream with the next runoff event or cause a loss of hydraulic capacity and result in potential flooding.

Permittees have completed labeling or marking the curb inlets to their entire storm drain system. This requirement is part of the Public Participation and Public Information section, but the inspection and relabeling is required under Public Agencies. During the reporting period, some Permittees maintained their inlet signs by reapplying stencils/markers as they wore out and applying stencils/markers to new inlets as they were installed.



Hard working trash excluder

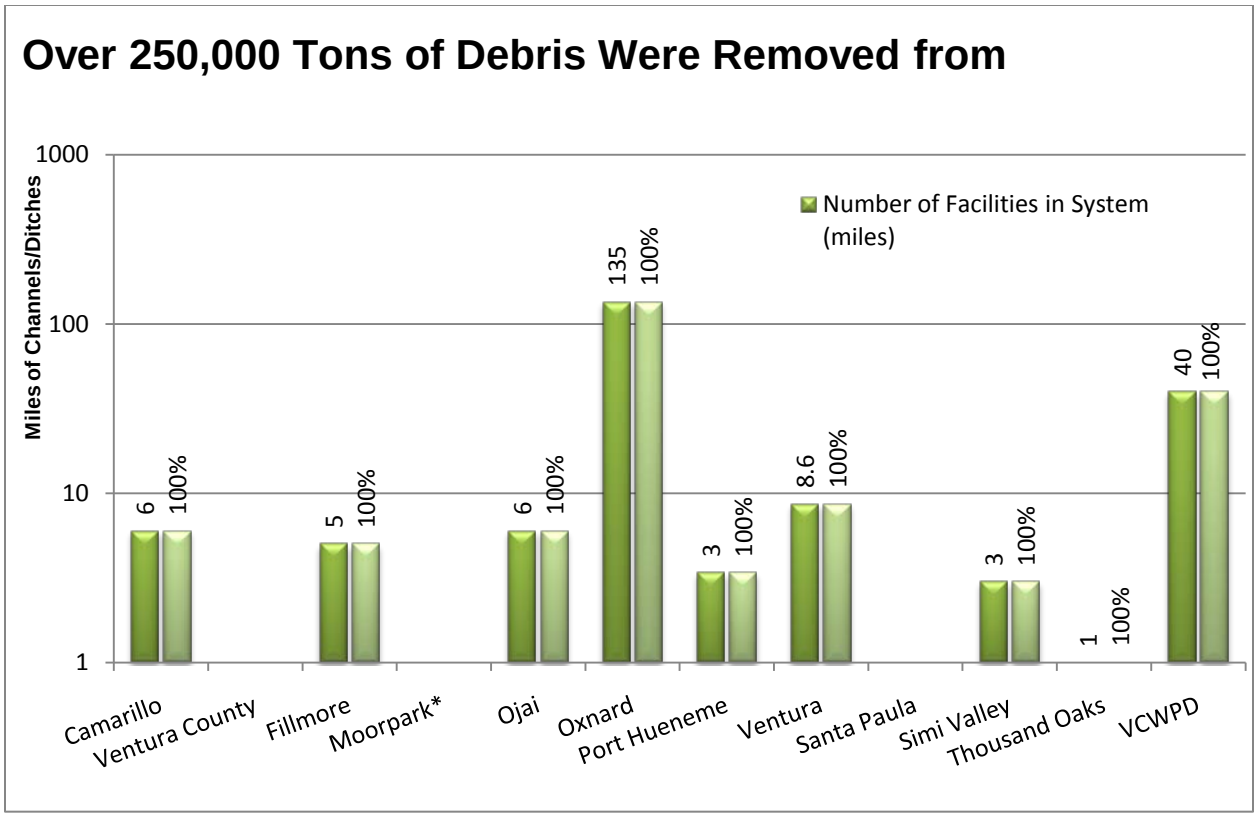


Figure 7-8 Tons Removed from Channels and Ditches

Signs at curb inlets have varying useful lives due to the materials from which they are constructed (e.g., paint, thermoplastic), their position (e.g., on top of curb, on face of curb), and wear factors (e.g., traffic, street sweeping, sunlight). As a result, the Permittees have different programs to maintain curb inlet signage within their respective jurisdictions. Some Permittees replace a portion of their signs each year whereas others re-sign all inlets every few years. In the cases where a Permittee has a separate program for catch basin label maintenance from their catch basin debris maintenance program the catch basin debris maintenance inspection does not inspect for the label. Catch basin label data reported in public outreach program.

When performing cleaning activities, Permittees implement appropriate BMPs to prevent sediments and debris from being washed downstream. By removing this amount of material from the catch basin inlets, open channels and detention basins the Permittees make a significant contribution in preventing the passage of these materials in downstream receiving waters. During the reporting period, the Permittees tallied the collection of over 13,700 tons of solid debris from drainage facility maintenance activities.

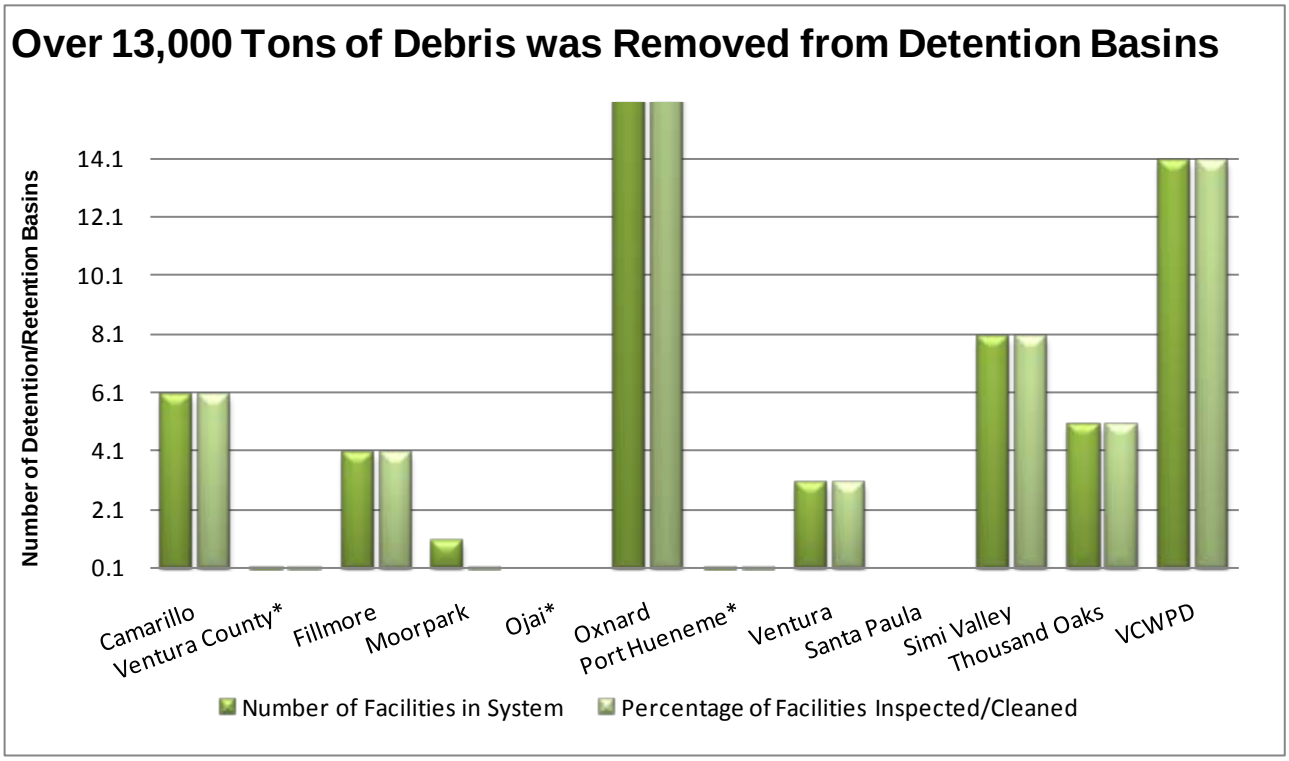


Figure 7-9 Tons Removed from Detention basins

7.7.7 Implement Spill Response Plan

The Permittees implement, within their respective jurisdiction, a response plan for spills generated from their operations that have the potential to enter the MS4 system. Response plans include:

- Investigation of all complaints received within 24 hours of the incident report;
- Response within 2 hours to spills for containment upon notification, except where such overflows occur on private property, in which case the response should be within 2 hours of gaining legal access to the property; and
- Notification to appropriate public health agencies and the Office of Emergency Services (OES)

Unfortunately, even with good training and well maintained equipment there are occasions where a spill or release will happen and need to be cleaned up. Cleanup can be as simple as dispatching a crew to pick up fallen debris, or a street sweeper or vacuum truck to clean an area or catch basin and storm drain after a known spill. It could also become a major multi-agency operation if hazardous materials are involved.

Implement a response plan for spills to the MS4 from Permittee facilities			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection			☑

Performance Standard 7-15

7.7.8 Inspect and Maintain Permittee-Owned Treatment Control BMPs

Permittees that own or are authorized to maintain treatment control BMPs have programs to implement an inspection and maintenance program for all Permittee-owned treatment control BMPs, including post-construction treatment control BMPs. BMPs required for new development are managed in different ways. Some Permittees do not want to be responsible for the cleaning and maintenance of these BMPs and limit their role to inspection and enforcement to ensure effectiveness. Others will take on that responsibility on a case by case basis, and there are occasions where a Permittee have installed their own treatment BMPs to improve water quality.

When Permittees are performing maintenance of BMPs they implement their own BMPs to ensure that residual water produced by a treatment control BMP (not internal to the BMP performance) is:

- Hauled away and legally disposed of; or
- Applied to the land without runoff; or
- Discharged to the sanitary sewer system (with permits or authorization); or
- Treated or filtered to remove bacteria, sediments, nutrients, and meet all limitations

Implement an inspection and maintenance program for all Permittee-owned treatment control BMPs			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore			
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks			☑
Watershed Protection			☑

Performance Standard 7-16

Ensure that residual water produced by a treatment control BMP was properly disposed			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection			☑

Performance Standard 7-17

7.8 PA6 – STREET AND ROADS MAINTENANCE

The Street and Roads Maintenance Control Measure ensures that the streets and roads are maintained and cleaned to reduce pollutants.

7.8.1 Implement Street Sweeping Program

Permittees have identified curbed streets within their jurisdiction and have implemented a sweeping program for these streets. In Many cases the frequency of street sweeping is beyond the permit requirement of commercial areas and areas subject to high trash generation twice a month.

Perform street sweeping of curbed streets in commercial areas and areas subject to high trash generation at least two times a month			
	Yes	No	N/A
Camarillo	☑		
Ventura County			☑
Fillmore			
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection			☑

Performance Standard 7-18

To increase the efficiency of the street sweeping, Permittees have made an effort to encourage voluntary relocation of street-parked vehicles on scheduled sweeping days. This has been achieved by placing temporary "no stopping" and "no parking" signs, posting permanent street sweeping signs and/or distributing street sweeping schedules to residents and businesses. Many of the Permittees have coordinated street sweeping to follow the routine trash collection days in order to remove any litter left in the streets by the trash removal service.

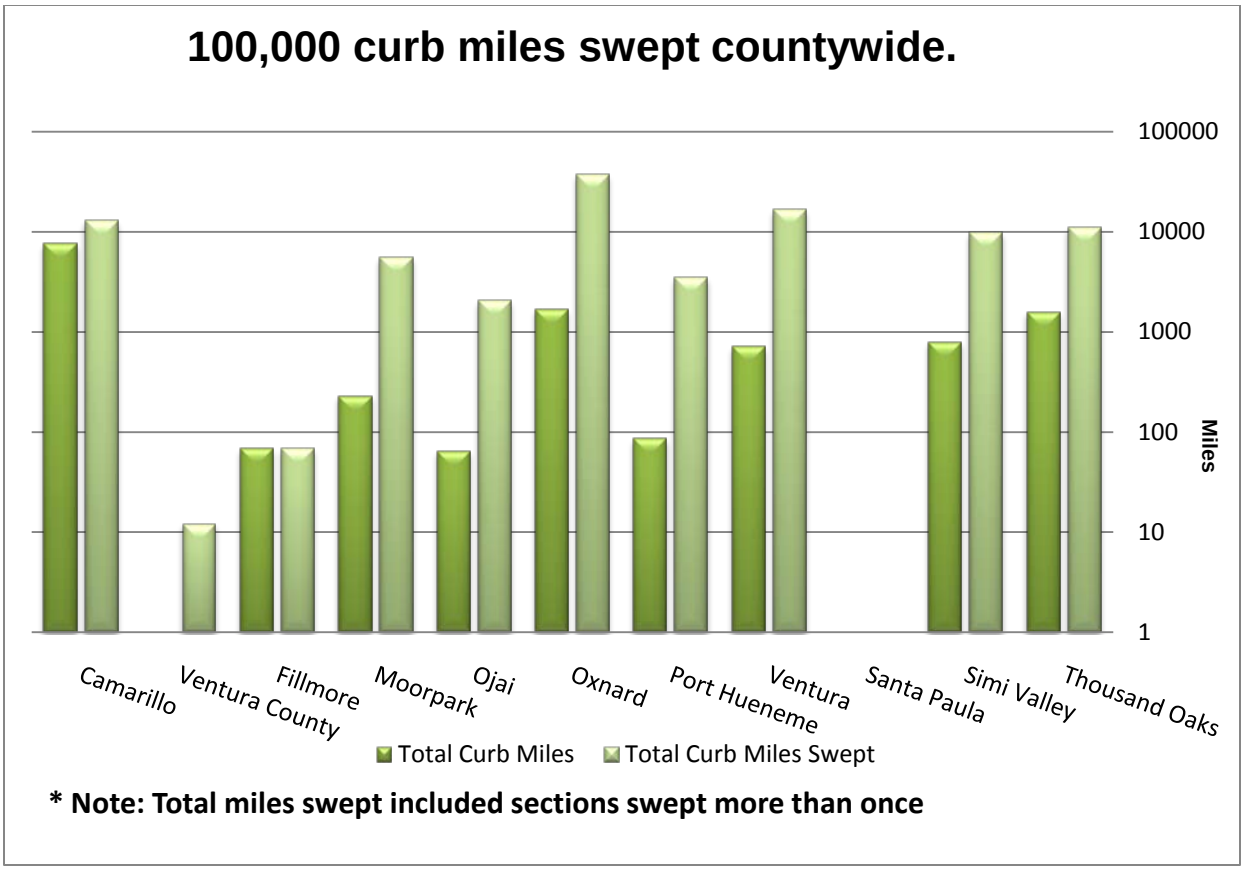


Figure 7-10 Curb Miles Swept

7.8.2 BMP Implementation for Road Reconstruction Projects

For any road reconstruction project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing road surfaces the Permittees require that appropriate BMPs are implemented. The vast majority of this work falls under the definition of routine maintenance as the road will maintain the line and grade and original purpose of the facility. The implementation of these BMPs ensures the project will not impact stormwater without the need for a formal SWPPP or other documentation.

Require that appropriate BMPs be implemented for any project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing road surfaces			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		
Watershed Protection	☑		

Performance Standard 7-19

7.9 PA7 – EMERGENCY PROCEDURES

The Emergency Procedures Control Measures ensures that each Permittee can conduct repairs of essential public service systems and infrastructure in emergency situations with a self-waiver. A self-waiver is required when there is a discharge to the storm drain system and the repairs needed to halt that discharge cannot be made within one day.

7.9.1 Invoke Emergency Procedures Self-Waiver

Fortunately during the Permit term there were not any emergencies that caused a Permittee to invoke Emergency Procedures Self-Waiver. Any Self-Waivers invoked would be reported here.

7.10 PA8 – TRAINING

Training is important for the implementation of the Public Agency Activities Program Element. An effective training program is one of the best pollution prevention BMPs that can be implemented because it prompts behavioral changes that are fundamentally necessary to protect water quality.

Each Permittee targets staff based on the type of stormwater quality and pollution issues they typically encounter during the performance of their regular maintenance activities. Targeted staff included those who perform activities in the following areas: stormwater maintenance, drainage and flood control systems, streets and roads, parks and public landscaping and corporation yards.

Training methods vary amongst Permittees and range from informal meetings, to formal classroom training or self-guided training. The Permittees also train staff on the prevention, detection and investigation of illicit discharges and illegal connections (ID/IC). (See Section 8 for more information regarding ID/IC training).

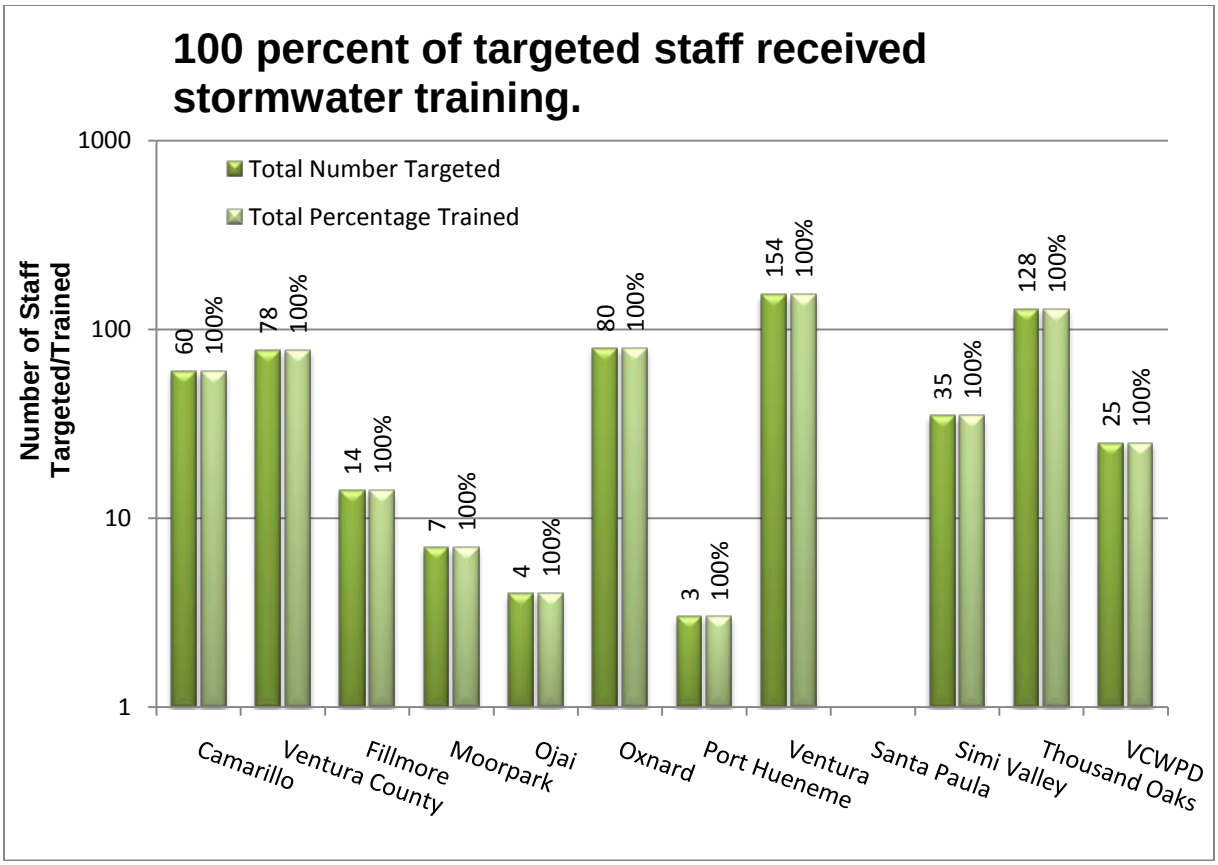


Figure 7-11 Public Agency Training

The Permittees provide training for contractors, or ensure that contractors hired had the required training, whose interactions, jobs, and activities affect stormwater quality. Not all employees receive the same training as certain positions require special focus, such as key staff that use or have the potential to use pesticides or fertilizers.

Target Audience	Subject Material
• Employees whose interaction, jobs and activities affect stormwater quality.	• Understanding of the potential for activities to pollute stormwater. • Implementation of BMPs.
• Employees and contractors who use or have the potential to use pesticides and/or fertilizers	• Potential for pesticide-related surface water toxicity • Proper use, handling, and disposal of pesticides • Least toxic methods of pest prevention and control, including IPM • Reduction of pesticide use
• Employees and contractors responsible for the ID/IC program	• Cover the full ID/IC program from identification to enforcement.

Table 7-3 Areas of Focus for the Public Agency Activities Program Element Training

7.11 PA9 – EFFECTIVENESS ASSESSMENT

Effectiveness assessment is a fundamental component for developing and implementing successful stormwater programs. In order to determine the effectiveness of the Public Agency Activities Program, a comprehensive assessment of the program data is conducted as a part of the annual report. The results of

this assessment are used to identify modifications that need to be made to the program. Each year the effectiveness assessment is reviewed and revised as needed.

By conducting these assessments and modifying the program as needed, the Permittees ensures that the iterative process is used as an effective management tool. Due to the types of data collected for the Public Agency Activities Program, current and future assessments will primarily focus on Outcome Levels 1-3.

- Outcome Level 1 (L1) answers the question: Did the Permittees implement the components of the Permit?

- Outcome Level 2 (L2) answers the question: Can the Permittees demonstrate that the control measure/performance standard significantly increased the awareness of a target audience?

- Outcome Level 4 (L3) answers the question: Can the Permittees demonstrate that the control measure/performance standard reduce the pollutant load?

The following is an assessment regarding the effectiveness of the Public Agency Program.

7.11.1 Public Construction Activities Management

Require Public Projects to Comply with Planning and Land Development and Construction Program Requirements

Where applicable, all Permittees require publically-owned or operated construction projects to comply with the Planning and Land Development and Construction Program requirements. (L1)

Require Development of SWPCP for Projects that Disturb less than 1 Acre

Grading or building permits are not an effective mechanism for identifying or defining small construction projects since they are not granted for public construction projects. Instead, all Permittees have effectively required small public projects to submit a SWPCP that identifies BMPs. (L1)

7.11.2 Vehicle Maintenance/ Material Storage Facilities/ Corporation Yard Management/ Municipal Operations

Implement Required BMPs for Each Facility

As indicated in figure 7-3 Permittees have developed and implemented SWPCPs at all corporate yards. Inspections are performed annually and deficiencies and quickly corrected by Facility staff. (L1)

7.11.3 Vehicle and Equipment Wash Areas

Eliminate Wash Water Discharges

The majority of Permittees have successfully eliminated wash water discharges through a variety of options including offsite disposal, disposal to sanitary sewer and treatment through clarifer. (L1) Discharges will continue to be eliminated as facilities are constructed, redeveloped or replaced.

7.11.4 Landscape, Park and Recreational Facilities Management

Implement IPM Program

The majority of Permittees have a draft IPM program that is consistent with the Permit. Further assessment will be conducted once the Permit deadline has passed (October 8, 2010).

Maintain and Expand Internal Inventory on Pesticide Use

Permittees have effectively restricted the purchase and use of pesticides and herbicides to staff certified by the California Department of Food and Agriculture. Permittees that contact out for pesticide applications include standard protocols and requirements as a condition of the contract. (L1)

7.11.5 Storm Drain Operation and Management

Implement Storm Drain System Mapping

Although this performance standard is not due until October 6, 2010, work has already begun to identify mapping mechanisms and the process for incorporating individual Permittees maps into a Countywide map. An assessment will be developed once the deadline has passed (October 6, 2010).

Implement Catch Basin Maintenance Program

Each Permittee has identified criteria and a methodology for catch basin mapping and prioritization. More than 14,000 catch basins were cleaner during the Annual Reporting period. (L1) Although prioritization is due by July 8, 2011, Permittees have already begun the process of designating and reporting debris removal by prioritization. During 2009-10, Permittees collectively removed more than 228 tons of debris from catch basins. (L2)

As mentioned, prioritization designations are due by July 8, 2011. A more detailed assessment will be conducted at that time.

Install Trash Receptacles

The majority of Permittees have installed trash receptacles in high trash generation areas. Trash receptacles are cleaned out as necessary. (L1)

Install Additional Trash Management Devices

Permittees have begun the implementation of this performance standard. A more detailed assessment will be conducted once the deadline has passed (July 8, 2012).

Trash Management at Public Events

The majority of Permittees required trash management for any event in the public right-of-way. (L1)

Implement Storm Drain Maintenance Program

Each Permittee has a program to maintain curb inlet labeling. (L1) Additionally, all Permittees regularly maintain channels, ditches and detention basins. (L1) Implementation of this performance standard

removed more than 28650 tons of debris from channels and ditches and 13,761 tons of debris from detention basins countywide. (L2)

Implement Spill Response Plan

All Permittees maintain a spill response plan. (L1)

Inspect and Maintain Permittee-Owned Treatment Control BMPs

Permittees that own or are authorized to maintain treatment control BMPs have programs to implement an inspection and maintenance program for all Permittee-owned treatment control BMPs, including post-construction treatment control BMPs. (L1)

7.11.6 Street and Roads Maintenance

Implement Street Sweeping Program

Permittees have implemented a street sweeping program that at a minimum, targets commercial areas and high trash generation areas twice a month. More than 100,000 curb miles were swept countywide. (L1)

BMP Implementation Road Reconstruction Projects

All Permittees required BMPs for any road reconstruction project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing. (L1)

7.11.7 Emergency Procedures

Invoke Emergency Procedures

No emergencies occurred that required Permittees to invoke Emergency Procedures. (L1)

7.11.8 Training

Conduct Training

Permittees provided training for 100% of targeted staff. Close to 600 staff were trained on the implementation of BMPs, reduction of pesticide use and reduction of illicit connections/illicit discharges. (L1)

7.12 PUBLIC AGENCY ACTIVITES PROGRAM MODIFICATIONS

On an annual basis, the Permittees plan to evaluate the results of the Annual Report, as well as the experience that staff has had in implementing the program, to determine if any additional program modifications are necessary to comply with the Clean Water Act requirement to reduce the discharge of pollutants to the maximum extent practicable. Any key modifications made to the Public Agency Program Element during the next fiscal year will be reported in the following Annual Report.

8 Illicit Connections and Illicit Discharges Elimination

8.1 OVERVIEW

Illicit connections and illicit discharges (IC/ID) can be concentrated sources of pollutants to municipal storm drain systems. To reduce this source of pollutants the Permittees have developed and implemented programs for the identification and elimination of ID/IC to the MS4. Key components of these programs are public reporting, field screening, incidence response and enforcement actions.

To reduce this source of pollution the Permittees have developed and implemented programs for the identification and elimination of illicit discharges and illegal connections to the municipal separate stormwater sewer system (MS4). Key components of these programs are public reporting, incidence response and enforcement actions. Some areas even have a cooperative effort with Police and Sheriffs to catch perpetrators by installing hidden security cameras in areas of frequent illegal dumping.

The term "illicit discharges" used in this program is any discharge to the storm drain system that is prohibited under local, state or federal ordinances. The term includes all discharges not composed entirely of stormwater except discharges allowed under an NPDES permit. Examples of illicit discharges include:

- Incidental spills or disposal of wastes or non-stormwater. These may be intentional, unintentional or accidental and would typically enter the storm drain system directly through drain inlets, and catch basins
- Discharges of sanitary sewage due to overflows or leaks; usually incidental but may be continuous
- Discharges of prohibited non-stormwater other than through an illicit connection. These typically occur as surface runoff from outside the public right-of-way (e.g., area washdown from an industrial site).

Categories of non-stormwater discharges not prohibited (exempted or conditionally exempted) under the Permit (and detailed in the SMP) are listed below.

- Stream diversions permitted by the State Board
- Natural springs and rising groundwater
- Uncontaminated groundwater infiltration [as defined by 40 CFR 35.2005(20)]
- Flows from riparian habitats of wetlands
- Discharges from potable water sources
- Drains for foundation, footing and crawl drains
- Air conditioning condensate
- Water from crawl space pumps
- Reclaimed and potable landscape irrigation runoff
- Dechlorinated/debrominated swimming pool discharges
- Non-commercial car washing by residents or non-profit organizations
- Sidewalk rinsing
- Pooled stormwater from treatment BMPs

Accidents are inevitable, so it will be impossible to eliminate all illicit discharges. However, through the combined efforts of the public education, business inspection, construction inspection and illicit discharge

programs the preventable acts of willfully using the storm drain system to dispose of waste will be kept to a minimum.

Illicit connections, while sometimes done in error, cannot be considered accidents. An illicit connection to the storm drain system is an undocumented and/or un-permitted physical connection from a facility or fixture to the storm drain system. Finding and eliminating illicit connections requires ongoing investigation and screening efforts.

8.2 CONTROL MEASURES

The Permittees have developed several Control Measures and accompanying performance standards to ensure that the Illicit Discharges/Connections Program requirements found in the Permit are met and information provided for optimizing the Program.

The Illicit Discharges/Connections Program Control Measures are organized to be parallel to the organization of the Permit and consist of the following:

ID	Control Measure
ID1	Detection of Illicit Discharges and Illicit Connections
ID2	Illicit Discharge and Illicit Connection Response and Elimination
ID3	Training
ID4	Effectiveness Assessment

Table 8-1 Control Measures for the Illicit Discharges/Connections Program Element

8.3 ID1 – DETECTION OF ILLICIT DISCHARGES AND ILLICIT CONNECTIONS

Detection of ID/IC through public awareness, the availability of a public hotline, and conducting illicit connection screening ensures that the ID/IC Program is proactive in identifying and eliminating problematic discharges. This control measure reflects the Permittee's efforts to detect and eliminate ID/IC and provides several mechanisms for collecting information.

The Permittees have a number of programs supporting the detection of ID/IC. These programs include:

- Industrial and commercial facility site visits (outlined in Section 2: Industrial/Commercial Facilities Program)
- Public education materials (outlined in Section 3: Public Outreach)
- Drainage facility inspection (see Section 5: Public Agency Activities)
- Construction inspections and BMP implementation (outlined in Section 6: Development Construction)
- Water quality monitoring (outlined in Section 9: Monitoring and Reporting Program)

The performance standards for this ID/IC control measure and the activities that have been initiated and/or completed during this reporting period are summarized below.

8.3.1 Public Reporting

The Public Outreach Program control measures (See Section 3) details the methods by which the Permittees educate the community about stormwater pollution. Part of this outreach is information about the ID/IC Program and reporting of ID/IC when observed. For the first few years, as the Stormwater Program evolved and the public became aware of what was not allowed down storm drains, reports of ID/IC increased; however, for the last six years reports of ID/IC have demonstrated a decreasing trend. Since the public is more aware of ID/IC this decrease likely represents a change in behavior and fewer pollutants reaching the storm drains.

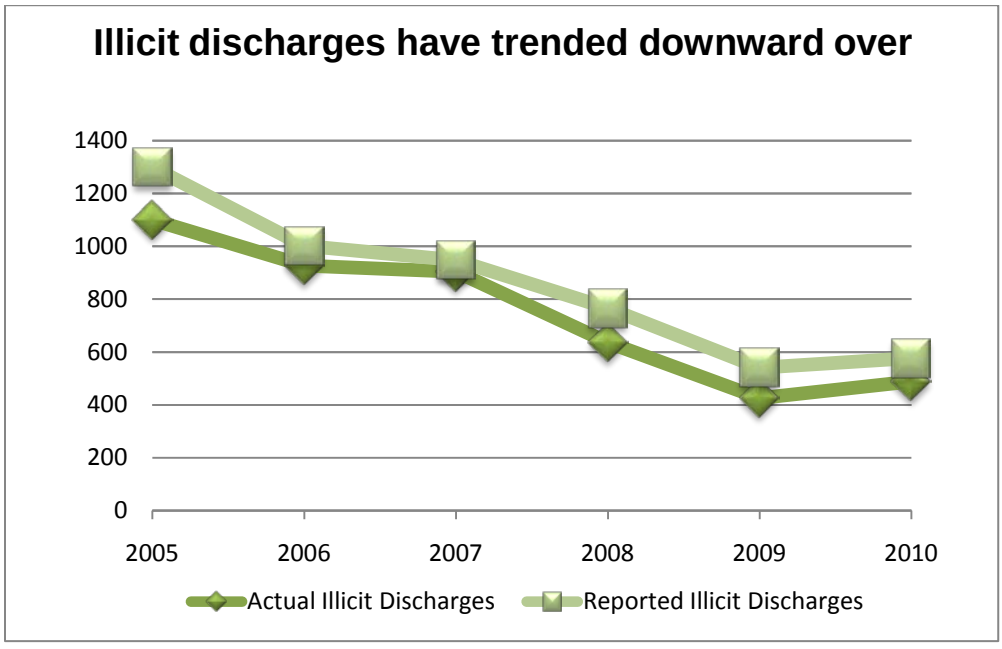
Since the public are the eyes of the illicit discharge program many illicit discharges are identified through public reporting of the situation. The goal of this component, in tandem with the Public Outreach component, is to educate the public and facilitate public reporting of illicit discharges and illegal connections. The baseline objectives are:

- Implement a program to receive calls from the public regarding potential illicit discharges and illegal connections, communicate and coordinate a timely response, perform all necessary follow up to the complaint, and maintain documentation.

- Provide educational material on non-stormwater discharges and why they are harmful to streams, and oceans and how to report them;

- Target the land development/construction community with educational material and provide workshops on stormwater quality regulations and illicit discharge prevention response; and

- Target the industrial/commercial community with educational material and provide workshops on stormwater quality regulations and illicit discharge prevention and response.



- Figure 8-1 Illicit Discharge Trends

8.3.2 Publication of ID/IC Program Procedures

As part of the ID/IC outreach effort, the Permittees have documented their ID/IC Program through past Annual Reports which are available for public review at the Program's web site.[3] This is one means by which interested individuals can educate themselves of what constitutes ID/IC and how to report it. More directly, however, the program promotes the reporting of illicit discharges through the public information and public participation program.

Document the procedures of the ID/IC Program and make them available for public review			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme			☑
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-1

8.3.3 Public Reporting

Public reporting is one of the most important ways that the public can help prevent the discharge of pollutants from ID/IC. Each Permittee has identified staff serving as the contact person(s) for public reporting of ID/IC, as discussed further in Public Outreach Control Measures (See Section 3). As required by the Permit Permittees maintain a phone hotline to receive reports of ID/IC. Due to the need for timely response to illicit discharges by inspectors the web sites direct people to report by telephone to a "live person" instead of through email which, while quickly delivered, may not be read within the short time frame that a discharge is occurring. The Program maintains a website that contains the phone numbers for all the Permittees. This information is updated as necessary and, as required in the Permit, published in the government pages of the local phone book and other appropriate locations. A list of hotlines are presented in Table 8-2 Permittee Hotlinesbelow.

[3] http://www.vcstormwater.org

Maintain a phone hotline to receive reports of ID/IC			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai		☑	
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-2

Maintain a web site to receive/direct reports of ID/IC			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-3

Permittee	Hotline
Camarillo	(805) 388-5338
County of Ventura Unincorporated Area	(805) 650-4064
Fillmore	(805) 524-3701
Moorpark	(805) 517-6257
Ojai	(805) 640-2560
Oxnard	(805) 271-2220
Port Hueneme	(805) 986-6507
Santa Paula	(805) 933-4212
Simi Valley	(805) 583-6400
Thousand Oaks	(805) 449-2400
Ventura	(805) 667-6510
VC EHD Sewage/wastewater discharges	(805) 654-2813
VC EHD Hazardous waste and material discharges	(805) 654-2813
VC PWA Transportation	(805) 672-2131
VC WPD O&M	(805) 650-4064
VC WPD Permit Section	(805) 650-4064

Table 8-2 Permittee Hotlines

Timely responses to reports of illicit discharges are necessary to have the opportunity to determine the source, identify the responsible party and initiate any cleanup to reduce pollutants from such discharge to the MEP. The baseline objectives include:

- Initiate response within 24 hours of receiving a report of discharge from the public, other agencies or observed by a Permittee field staff during the course of their normal daily activities;
- Investigate to determine the nature and source of discharge and eliminate through voluntary termination or enforcement action (when possible); and
- Educate identified responsible parties and initiate enforcement actions as necessary.

While the goal is to respond within 24 hours, most reports of illicit discharge are responded to within a few hours. Some Permittees have prioritized problem areas (where geographical and/or activity-related) for inspection, cleanup and enforcement using the methods defined in the program. All illicit discharges reported and the results of the inspections is presented in Figure 8-2.

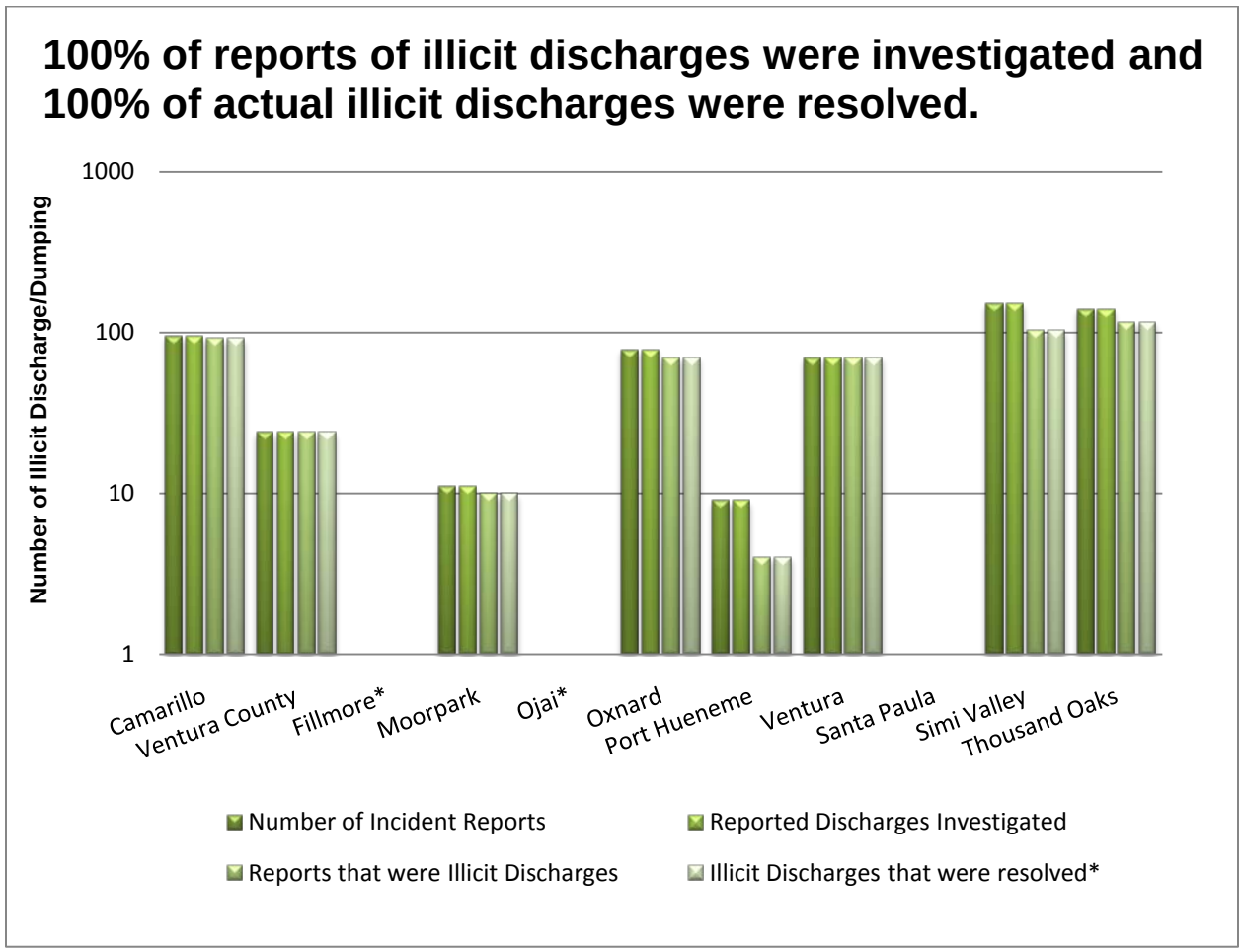


Figure 8-2 Illicit Discharge Investigations

8.3.4 IC/ID Tracking

Tracking the location of illicit connections and illicit discharges, aside from being a Permit requirement will assist the Program's efforts understanding which land uses, age of neighborhood or other potential identifier is common to the problem of illicit discharges and connections. That knowledge will be used in the future as the Public Outreach and Business Inspections programs continue to evolve.

In order to identify priority areas for further investigation and elimination of ID/IC, the Permittees will map all known connections to their storm drain system and all ID/IC incidents by May 7, 2012. The maps are to be developed in a uniform scale and format specified by the Principal Permittee.

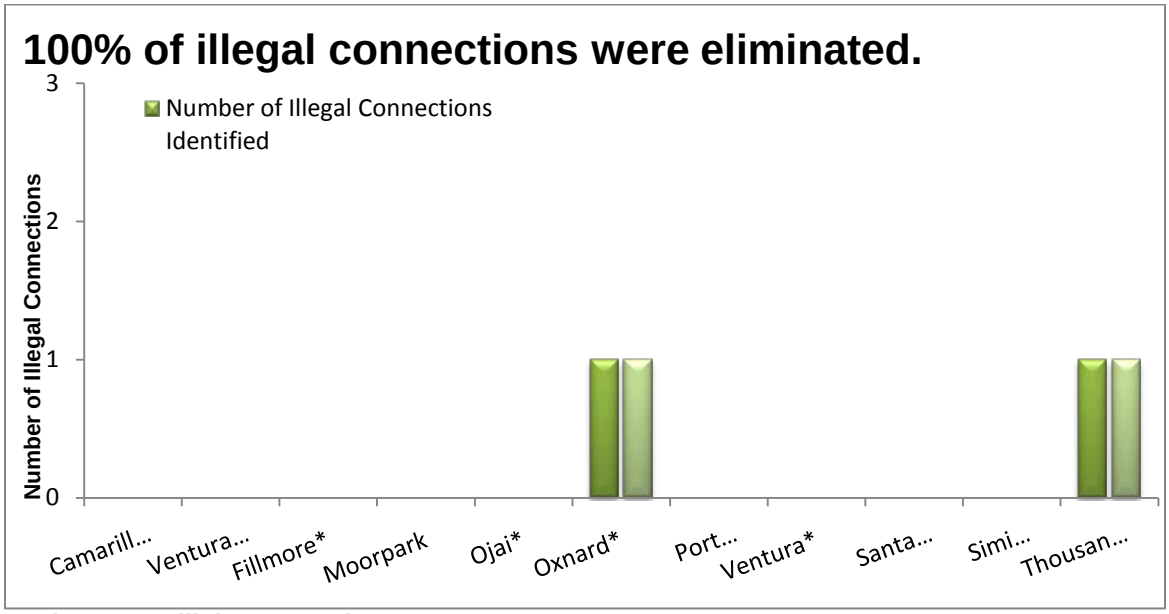


Figure 8-3 Illicit Connections

Document the location of the reported IC/ID and the actions undertaken in response to all IC/ID complaints			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai	☑		
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-4

Mapping of Known Connections to Storm Drain System

The benefit of mapping all storm drain connections is to allow the Permittees the ability to know the upstream location of an unknown, and conversely what might be possibly affected downstream. This is required in the Permit by May 7, 2012. Since the storm drain system includes all streets and gutters, literally mapping all known connections would include every driveway and property that drains to a street. Since an endeavor of that scale would be resource intensive and with an end product that will lack practical usability, the Perimttees have looked to the Regional Board for clarification of the requirement. In the response to comments on this topic the Regional Board provided the following statement: *"Known connections in the Order refer to permitted below grade connections whose locations are likely already known to Permittees. Staff agrees that mapping may reveal additional connections, but those are likely to be un-permitted."* This guidance creates a manageable effort and ultimately a useful product that will increase the Permittees ability to respond to IC/IDs.

Mapping Illicit Connection Incidents

The Permit requires the mapping of all incidents of illicit connections to their storm drain system since January 2009 by May 7, 2012 at a scale and in a format specified by the Principal Permittee. ***Performance Standard:***

Map all known connections to their storm drain system and all ID/IC incidents? (By May 7, 2012)			
	Yes	No	In Progress
Camarillo	☑		
Ventura County			☑
Fillmore	☑		
Moorpark		☑	
Ojai		☑	
Oxnard	☑		
Port Hueneme	☑		
Ventura			☑
Santa Paula			
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-5

8.3.5 Screening for Illicit Connections

Inspections of infrastructure can detect and eliminate illicit connections to the MS4 and reduce pollutants discharged through such connections to the MEP. The objectives of illicit connections screening are to:

- Inspect the storm drain system to identify illicit connections during scheduled infrastructure maintenance by personnel
- Investigate and determine the origin and nature of the discharge when connections to the storm drain system are suspected or observed to be a source of an illicit discharge

Mapping of Storm Drain System

Similar to mapping requirements of known connections to the storm drain system the Permit requires mapping of the entire system in a phased approach outlined below.

- Map all channeled portions of the storm drain system by October 6, 2010 (outside of reporting period)
- Map all portions of the storm drain system consisting of pipes 36 inches in diameter or greater by May 7, 2012
- Map of all portions of the storm drain system consisting of pipes 18 inches in diameter or greater by May 7, 2014

To assist in screening for illicit connections, the Permittees have mapped channels within their permitted area and the storm drain system. These maps were transmitted to the Principal Permittee and are in the

process of being incorporated into the Watershed Protection District's GIS system. This incorporation may be as simple as having scanned drawings available through the GIS system when no true GIS data exists. Maps depicting the storm drain system consisting of 36 and 18 inches or greater will be completed by May 7, 2012 and May 7, 2014, respectively.

Field Screening

The Permittees have developed an IC/ID Field Screening Protocol using the guidance from the "Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments"[4]. This document is included as Attachment E and suggests that field screening consist of:

- Progressive sampling of manholes to isolate ID/IC to specific sections of the storm drain system (e.g., sampling progressively up the storm drain trunk from an outfall)

- Based on a specific indicator in ID/IC and land use of drainage area, survey of suspected generating sites within the drainage area and on-site testing (e.g., based on sudsy discharge and commercial drainage area, drive through drainage area to identify laundromats and conduct on-site testing)

- Tracking ID/IC to a pipe section of the storm drain system through video or smoke testing.

- Septic system inspections through homeowner surveys, surface inspections, or infrared photography (e.g., Inspect area above septic system for foul odors, wet ground)

As discussed previously in this section, the Permittees have begun to map the storm drain system in order to identify high priority areas for inspection. The Permittees will inspect the storm drain system based on these maps, and report illicit connections to the Regional Water Board. The requirements for screening were not effective during the reporting period and are outlined below.

- Screen all portions of the storm drain system consisting of pipes 36 inches in diameter of greater by May 7, 2012

- Screen all high priority areas identified during the mapping of illicit connections and discharges by May 7, 2012

- Screen all portions of the storm drain system 50 years of age or older by May 7, 2012

[4] *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments*. The Center for Watershed Protection, Pitt R., October 2004. Chapter 13, 13.1,13.2, 13.3, 13.4

8.3.6 ID2 – Illicit Discharge/Connection Investigation and Elimination

Timely investigations of reports of ID/IC are necessary to have the opportunity to determine the source, identify the responsible party and initiate any cleanup to reduce pollutants from such discharge to the MEP. This reporting year, the Permittees continued to:

- Investigate the cause, determine the nature and estimate the amount of discharge for each reported illicit discharge/dumping incidents
- Determine when possible the type of materials and source type for each reported illicit discharge/dumping incidents
- Determine when possible the probable cause for the illicit discharge/dumping
- Conduct enforcement or educational activities to prevent similar discharges from reoccurring
- Verify that reported illicit discharge/dumping incidents were terminated and/or cleaned
- Refer illicit discharge/dumping or illegal connections to other agencies when appropriate
- Identify and eliminate illegal connections
- Provide educational materials and contact numbers for reporting illicit discharge/dumping when conducting stormwater inspections.

8.3.7 Legal authority

Although adequate legal authority existed for most potential pollutant discharges at the inception of the stormwater program in 1994, the Permittees determined for the first stormwater ordinance a Model Stormwater Quality Ordinance should be developed to provide a more uniform countywide approach and to provide a legal underpinning to the entire Ventura Countywide NPDES Stormwater Program.

Subsequently, all of the Permittees adopted largely similar versions of the model Stormwater Quality Ordinance. In addition, each Permittee has designated Authorized Inspector(s) responsible for enforcing the Ordinance. The Authorized Inspector(s) is the person designated to investigate compliance with, detect violations of and/or take actions pursuant to the Ordinance. These ordinances prohibit un-permitted discharges, and provide the Permittees with legal standing to legal authority to prevent and remove illicit connections and illicit discharges. A Stormwater Quality Ordinance has been adopted in each Permittees' jurisdictions as indicated in Table 8-3.

Ordinance Adoption Dates		
Co-permittee	**Adopted Date**	**Amendment Date**
Camarillo	3/25/1998	
County of Ventura	7/22/1997	
Fillmore	12/8/1998	
Moorpark	12/3/1997	
Ojai	2/9/1999	
Oxnard	3/24/1998	
Port Hueneme	2/1/2001	
San Buenaventura	1/11/1999	
Santa Paula	11/16/1998	
Simi Valley	4/22/2002	
Thousand Oaks	9/14/1999	

Table 8-3 Ordinance Adoption Dates

Legal authority to prevent and remove illicit connections and illicit discharges	
	Adopted Date
Camarillo	3/25/1998
Ventura County	7/22/1997
Fillmore	12/8/1998
Moorpark	12/3/1997
Ojai	2/9/1999
Oxnard	3/24/1998
Port Hueneme	2/1/2001
Ventura	1/11/1999
Santa Paula	11/16/1998
Simi Valley	4/22/2002
Thousand Oaks	9/14/1999

Performance Standard 8-6

The Permittees are aware that further ordinance revisions will be needed are are working together to indentify the needed amendments and draft an adoptable ordinance by the July 8, 2012 due date.

8.3.8 Response to Illicit Connections

Investigation

Figure 8-3 indicates the number of illegal connections identified and eliminated. Each Permittee detects and eliminates illegal connections within its municipal storm drain system. Any illegal connection identified by the Permittees during routine inspections or reported by a third party is investigated. Appropriate actions are then taken to approve undocumented connections by permit procedure and/or pursue removal of those connections determined to be illicit connections and therefore not permissible.

If the discharge from an identified connection is determined to consist only of stormwater or exempted non-stormwater, the connection will be allowed to remain and will no longer be considered an illegal connection. Permittees may elect to issue a permit for the connection or allow the connection to remain if

information on the connection is documented; or the discharge will be permitted through a separate NPDES permit; or the connection will be terminated through voluntary action or enforcement proceedings.

Maintain a list of all connections under investigation for possible illicit connection and their status			
	Yes	No	N/A
Camarillo			☑
Ventura County			☑
Fillmore	☑		☑
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme			☑
Ventura			☑
Santa Paula			☑
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-7

Each of the Permittee also maintains a record of all connections currently under investigation for possible illicit discharge and tracks their status.

Complete investigation of reports of illicit connections to determine the source, nature, and volume of the discharge as well as the responsible party within 21 days			
	Yes	No	N/A
Camarillo			☑
Ventura County			☑
Fillmore	☑		☑
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme			☑
Ventura			☑
Santa Paula			☑
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-8

The response time to an illicit connection is included in the Permittees' ID/IC database and does not exceed 21 days. The source, nature, and type of discharges from these connections as well as the responsible party are also documented in the Permittees' ID/IC database. Summary statistics of the source of the illicit discharge from these connections is grouped with all other illicit discharges.

Termination

Permit requires the connection terminated within 180 days of completion of the investigation. Upon confirmation of an illicit connection, the Permittees terminate the connection using formal enforcement within 180 days of completion of the investigation.

Terminate the connection using formal enforcement within 180 days of completion of the investigation			
	Yes	No	N/A
Camarillo			☑
Ventura County			☑
Fillmore			☑
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme			☑
Ventura			☑
Santa Paula			☑
Simi Valley			☑
Thousand Oaks	☑		

Performance Standard 8-9

Documentation

The Permittees' ID/IC database documents the time by which the illicit connection is terminated. Owners of existing drains without appropriate permits (including encroachment permits) are notified to comply. For those drains where the owner is unresponsive or cannot be identified, each Permittee is responsible for deciding whether to formally accept the connection as part of their public drainage system or cap it off.

Keep records of all illicit connection investigations and formal actions taken to eliminate all illicit connections			
	Yes	No	N/A
Camarillo			☑
Ventura County			☑
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme			☑
Ventura			☑
Santa Paula			☑
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-10

Investigations and responses are tracked in the Permittees' ID/IC database and summarized in Figure 8-2 through Figure 8-6 below.

8.3.9 Response to Illicit Discharges

Upon receipt of a complaint, the Co-investigate the source and nature of the ID/IC with the goals of:

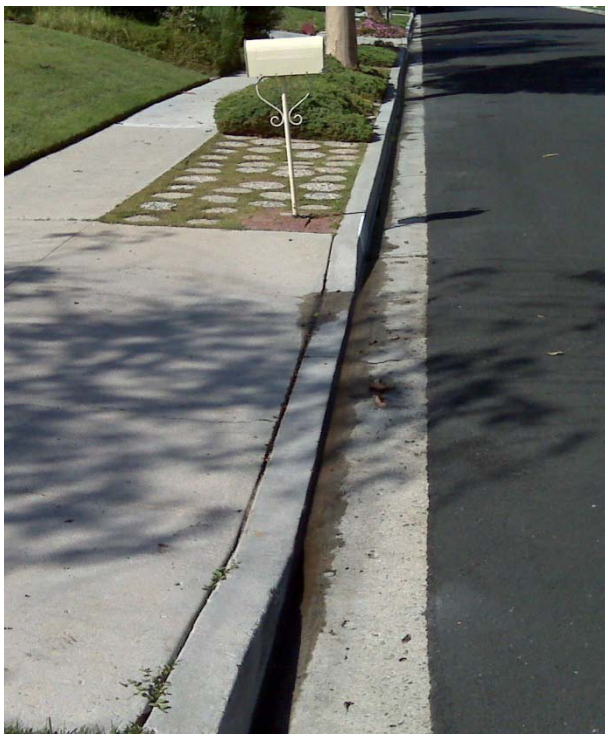
- Eliminating the ID/IC through voluntary termination or enforcement action (when possible)
- Educating identified responsible parties and initiating enforcement actions as necessary

Investigation and Cleanup

Timely responses to reports of illicit discharges are necessary to have the opportunity to determine the source, identify the responsible party and initiate any cleanup to reduce pollutants from such discharge to the MEP. The baseline objectives include:

- Initiate response within 24 hours of receiving a report of discharge from the public, other agencies or observed by a Permittee field staff during the course of their normal daily activities;
- Investigate to determine the nature and source of discharge and eliminate through voluntary termination or enforcement action (when possible); and
- Educate identified responsible parties and initiate enforcement actions as necessary.

Evidence of an illicit discharge



Pollutants removed after cleanup

While the goal is to respond within 24 hours, most reports of illicit discharge are responded to within a few hours. Some Permittees have prioritized problem areas (where geographical and/or activity-related) for inspection, cleanup and enforcement using the methods defined in the program. In the normal course of an investigation the responsible party will be directed to perform any possible clean-up.100% of illicit discharges were investigated and 100% of confirmed illicit discharges were resolved.

Respond within 1 business day or discovery or report of a suspected illicit discharge and abate, contain, and/or cleanup the discharge			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-11

The discovery of potential or likely illicit discharges through business inspections has worked to reduce the number of overall illicit discharges. Inspections of infrastructure can also detect and eliminate illegal connections to the MS4 and reduce pollutants discharged through such connections to the MEP. The baseline objectives include:

- Inspect the storm drain system to identify illegal connections during scheduled infrastructure maintenance by personnel;
- Connections to the storm drain system that are suspected or observed to be a source of an illicit discharge will be investigated to determine the origin and nature of the discharge;
- Use business inspections to identify and resolve potential illicit discharges and illegal connections; and
- Educate the business community on the environmental and legal consequences of illicit discharges.

Investigate illicit discharges during or immediately following containment and cleanup activities			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-12

While the goal is to respond to illicit discharges reports within 24 hours, most reports are responded to within a few hours.

Enforcement

Permittees continue to implement enforcement procedures to eliminate illicit discharges and illegal connections available through their legal authority of their respective ordinances. Most enforcement processes follow a common sequence. These typically include:

- Verbal or written warnings for minor violation
- Formal notice of violation or non-compliance with compliance actions and time frames
- Cease and desist or similar order to comply
- Specific remedies such as civil penalties (e.g., infraction), non-voluntary termination with cost recovery, or referral for criminal penalties or further legal action
- Authority to issue civil citations of $100 on site

Every time a responsible party is identified for an illicit discharge there is an opportunity for education and enforcement. Enforcement activity begins at the appropriate level as determined by the Permittees' authorized representative. For incidents more severe or threatening at the outset, enforcement starts at an increased level. Often times a verbal warning and requiring cleanup of the discharge is effective, if necessary the Permittee will charge the responsible party for cleanup services provided. Enforcement steps are accelerated if there is evidence of a clear failure to act or an increase in the severity of the discharge. Enforcement actions for violating any of the provisions of the Permittees' ordinances may include any of the following or a combination thereof:

- Criminal Penalties
- Monetary punishment

- Imprisonment
- Civil Penalties

Education of targeted audiences occurs through inspections of illicit discharges, businesses and construction activities. The importance of eliminating or mitigating non-stormwater discharges to local streams and channels is emphasized.

The capacity to issue civil citations has been added to the City of Oxnard's enforcement plan to ensure that repeat violators of local, state, and federal stormwater quality regulations are assessed a fine for their illicit (illegal) activities. The integration of this enforcement action allows the municipality to assess a $100.00 fee for those individuals or entities that receive a notice of violation (NOV) and thereafter again engage in the same illicit discharge activity. An additional $100.00 fine is assessed, per day and per violation, if a repeat violation is committed within a thirty (30) day period. If, after thirty (30) days, the same party is once again engaging in similar illicit activities then a $200.00 citation is given. A $500.00 fine is issued to third time participants of an illicit discharge committed sixty (60) days after the initial citation. Since current City policy allows the Mayor to delegate the authority to issue civil citations to designated employees, no changes to the City's stormwater ordinance were necessary. The only prerequisite imposed on these employees was that they receive training on civil citation writing from the City of Oxnard Code Enforcement Unit. Simply having the ability, and threat, to issue a civil citation has proven to be enough of a deterrent to discourage/eliminate future occurrences of the same type of illicit activities from the local residents and the construction/building communities.

Take appropriate enforcement action to eliminate the illicit discharge			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-13

Documentation

Permittees keep records of all illicit discharge discoveries, reports, responses, and enforcement and track the efforts during the permit term in the Permittees' ID/IC database summarized in the figures below.

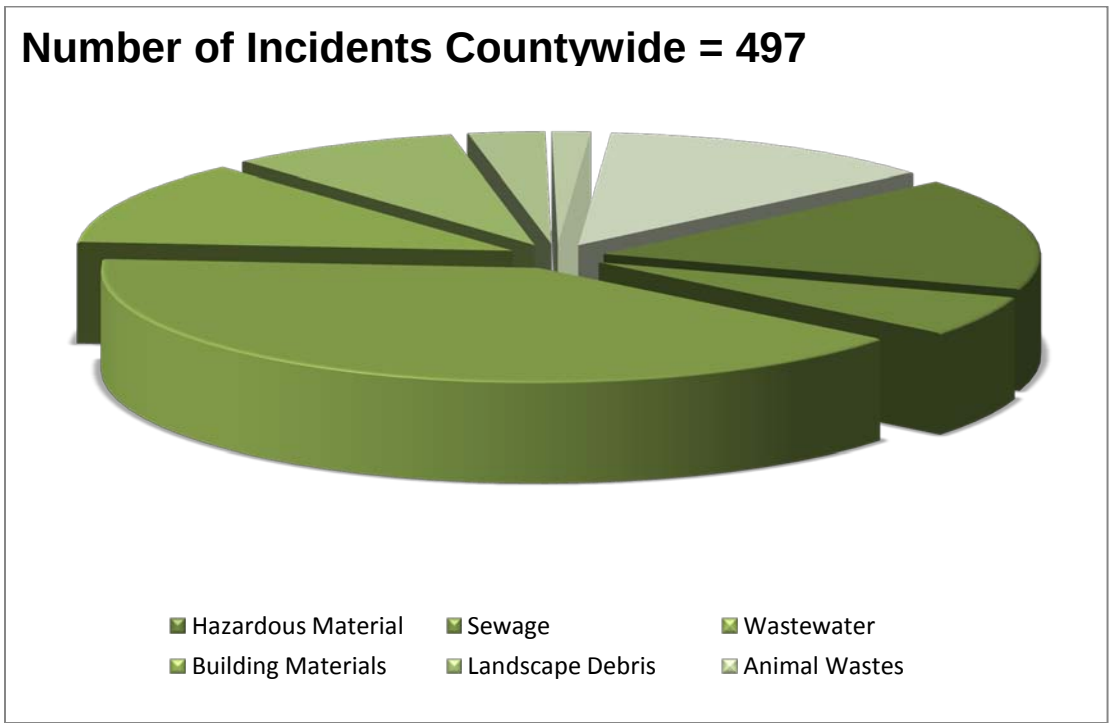


Figure 8-4 Illicit Discharge Incidents

As part of their field investigation of reported illicit discharges/dumping incidents, the Permittees attempt to determine the material's source. This investigation begins at the surface drainage system in the vicinity of suspected illicit discharges. This may include accessible areas in the public right-of-way adjacent to residences and businesses, catch basins, open channels near known points of discharge, and upstream manholes. If the source and responsible party can be determined, Permittees take one or all of the following actions when appropriate:

- Voluntary cleanup/termination;
- Initiate enforcement procedures;
- Take steps to prevent similar discharges from reoccurring.

When the source cannot be determined, the appropriate department or contractor will be notified to contain and clean up the material. Because these situations and materials can vary, procedures vary as well. In general, the following are steps that are taken by Permittees to determine sources:

- Verify location of the spill/discharge;
- Containment and cleanup;
- Investigate the cause (look for origin);
- Determine the nature and estimate the amount of illicit discharge/dumped material;

- When appropriate, refer documented non-stormwater discharges/dumping or illegal connections to the proper agency for investigation; and
- If appropriate, notify the RWQCB and/other proper agencies.
-

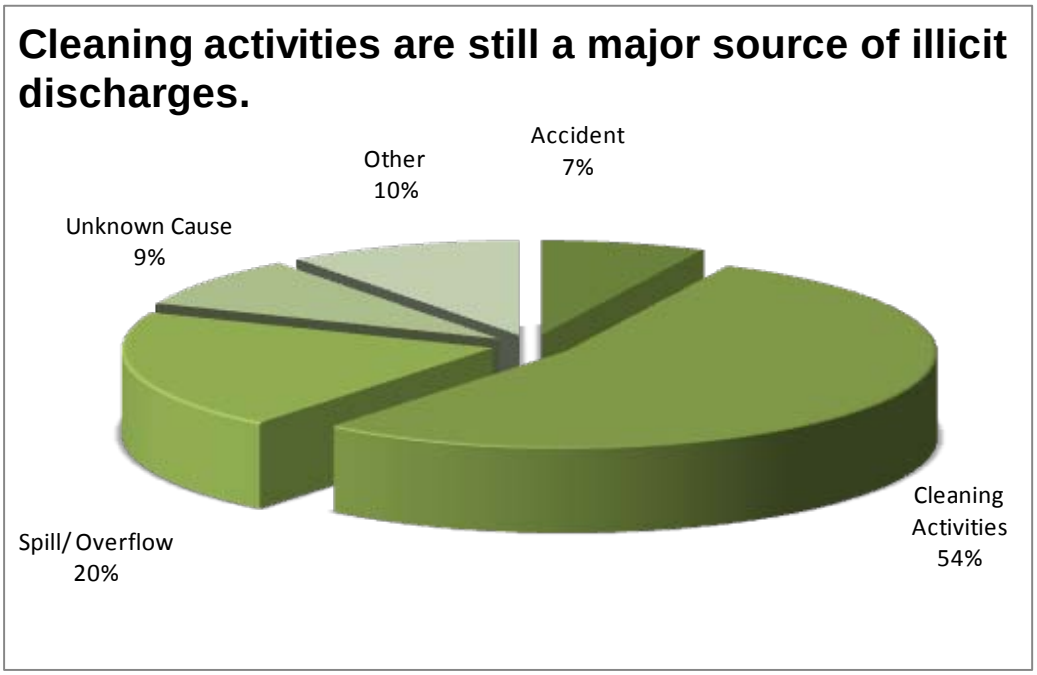


Figure 8-5 Cause of Illicit Discharges

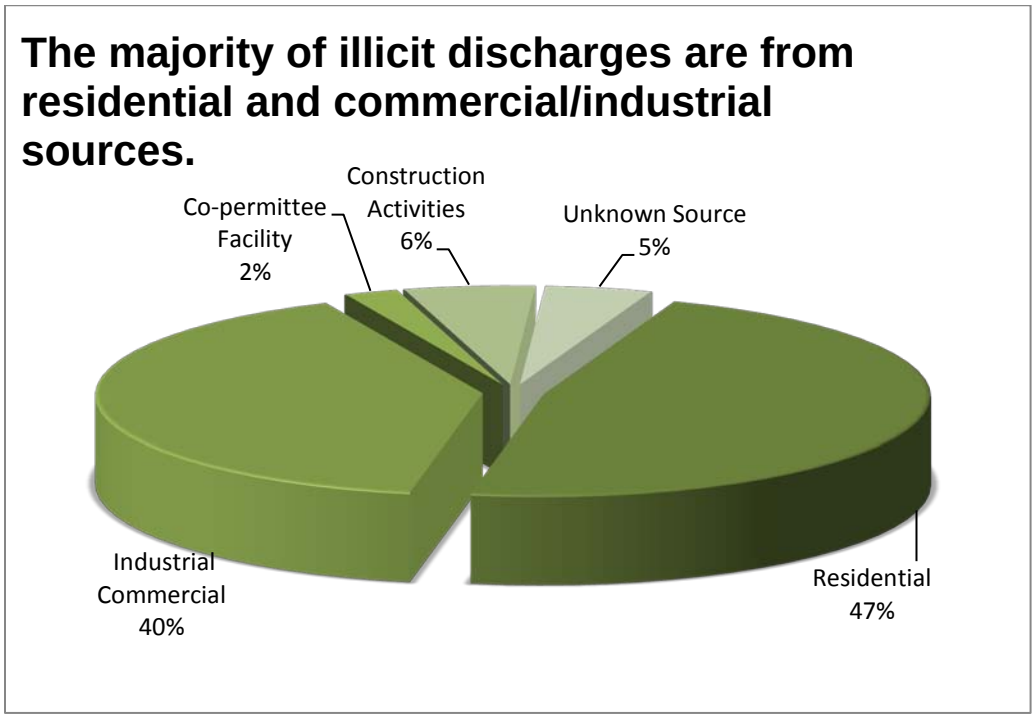


Figure 8-6 Sources of Illicit Discharges

Keep records of all illicit discharge discoveries, reports, responses, and formal enforcement			
	Yes	No	N/A
Camarillo	☑		
Ventura County	☑		
Fillmore	☑		
Moorpark	☑		
Ojai			☑
Oxnard	☑		
Port Hueneme	☑		
Ventura	☑		
Santa Paula	☑		
Simi Valley	☑		
Thousand Oaks	☑		

Performance Standard 8-14

8.4 ID3 – TRAINING

The Training Control Measure is important for the implementation of the ID/IC Program Element. An effective training program is one of the best pollution prevention BMPs that can be implemented because it prompts behavioral changes that are fundamentally necessary to protect water quality. The Co-evaluate the efficacy of the training modules they offer by conducting pre- and post-training surveys used to assess a trainee's command of a topic before and after receiving training on the subject.

8.4.1 Conduct Training

Each Permittee targets staff based on the type of stormwater quality and pollution issues they may encounter. Targeted staff included illicit discharge inspectors, drainage, roadway, landscape and facilities staff, industrial pretreatment inspectors and code enforcement officers. Training is incorporated with existing business inspection, construction site, and public agency activity programs.

Staff is trained in a manner that provides adequate knowledge for effective illicit discharge identification, investigation, reporting and/or clean up. Training was achieved in a variety of ways, including informal "tailgate" meetings, formal classroom training and/or self-guided training methods. During this reporting period, Permittees trained 371 municipal staff on illicit discharge response and non-stormwater discharges.

The staff trained by the Permittees is presented in Figure 8-7 and training program is outlined in Table 8-4**.**

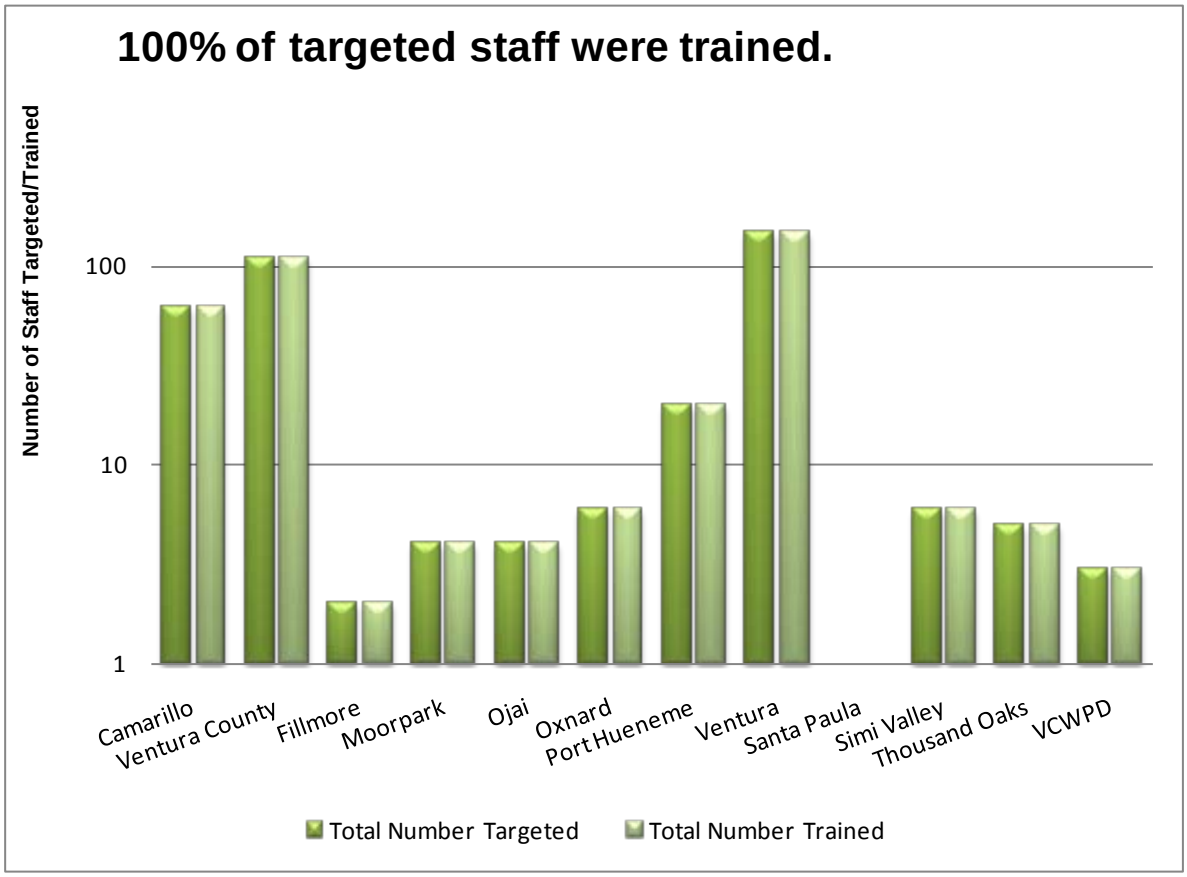


Figure 8-7 Illicit Discharge and Illicit Connection Training

Target Audience	Format	Subject Material	Comments
• Illicit discharge inspectors • Drainage, roadway, landscape, and facilities staff • Industrial pretreatment inspectors • Code enforcement officers	• Classroom • On-site	• Identification • Investigation • Termination • Cleanup • Reporting of incidents • Documentation of incidents	• Training seminars or workshops related to the program may be made available by other organizations

Table 8-4 Training Areas of Focus for the ID/IC Program Element

8.5 ID4 – EFFECTIVENESS ASSESSMENT

Effectiveness assessment is a fundamental component required for the development and implementation of a successful stormwater program. In order to determine the effectiveness of the ID/IC Program Element, a comprehensive assessment of the program data is conducted as part of the Annual Report. The results of this assessment are used to identify modifications that need to be made to the Program Element. Each year the effectiveness assessment is reviewed and revised as necessary.

By conducting these assessments and modifying the Program Element as necessary, the Permittees ensure that the iterative process is used as an effective management tool. Due to the types of data collected for the ID/IC Facility Program, current and future assessments will primarily focus on Outcome Levels 1 and 2.

- Outcome Level 1 (L1) answers the question: Did the Co-implement the components of the Permit?

- Outcome Level 2 (L2) answers the question: Can the Co-demonstrate that the control measure/performance standard significantly increased the awareness of its target audience?

The Permittees have effectively implemented an ID/IC program as described in the following sections. Past Annual Reports have documented the program and are available for public review at the Program's website. [5] (L1)

8.5.1 Detection of Illicit Discharges and Illicit Connections Public Outreach Implementation

Public Reporting

Each Permittee has identified staff serving as the contact person(s) for public reporting of ID/IC. The majority of the Permittees maintain a phone hotline to receive ID/IC complaints. (L1) Due to the need for timely response to illicit discharges Permittee web sites direct people to report by telephone to a "live person" instead of through email which, while quickly delivered, may not be read within the short time frame that a discharge is occurring. The Program maintains a website that contains the phone numbers for all the Permittees. (L1)

For the first few years, as the Stormwater Program evolved and the public became aware of what was not allowed down storm drains, reports of ID/IC increased; however, for the last five years reports of ID/IC have demonstrated a decreasing trend as shown in Figure 8-1. Since the public is more aware of ID/IC this decrease likely represents a change in behavior and fewer pollutants reaching the storm drains. (L3)

IC/ID Tracking

To be developed – due May 7, 2012

Screening for Illicit Connections

To be developed – deadlines range from October 6, 2010 to May 7, 2014

[5] http://www.vcstormwater.org

8.5.2 Illicit Discharge and Illicit Connection Response and Elimination

Legal Authority

Legal authority for most potential pollutant discharges has existed since 1994. More recently Permittees recently adopted a stormwater quality ordinance which more effectively and consistently ensured adequate legal authority across permittees. **(L1)**

Response to Illicit Connections

Each ID/IC complaint was documented with the actions undertaken in response. (1) The Permittees responded to all reports of illicit discharge within 24 hours and often within a few hours. (L1) Where possible, the Permittees identified the source, nature, and volume of the discharge. Figure 8-2, Figure 8-3, and Figure 8-4 show the source, type, and cause of discharges, respectively. Figure 8-2 shows that the source was identified 95% of the time. As shown in Figure 8-5, the Permittees eliminated all known illicit discharges during this fiscal year. (L1) The Permittees took enforcement action as shown in

Figure 8-6. (L1)

The Permittees have developed an IC/ID Field Screening Protocol using the guidance from the "Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments"[6] In order to identify high priority areas for inspection, the Permittees have begun to map the storm drain system. (L1) The Permittees investigated all illegal connection identified during inspections or reported by a third party within 21 days. (L1) Where possible, the Permittees determined the source, nature, and volume of the discharge.

8.5.3 Enforcement

Appropriate actions were then taken to approve undocumented connections and/or pursue removal of illicit connections. Upon confirmation of an illicit connection, the Permittees terminated the connection using formal enforcement within 180 days. (L1) Some of the Permittees maintained a list containing all connections under investigation for possible illicit connection and their status. (L1) The Permittees eliminated all known illicit connections during this reporting year, as shown in Figure 8-7. (L1)

8.5.4 Training

Conduct Training

During this reporting year, the Permittees trained a total of 371 municipal staff members. Each Permittees permittee targets staff based on the type of stormwater quality and pollution issues they may encounter. Targeted staff included illicit discharge inspectors, drainage, roadway, landscape and facilities staff,

[6] *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments*. The Center for Watershed Protection, Pitt R., October 2004. Chapter 13, 13.1,13.2, 13.3, 13.4

industrial pretreatment inspectors and code enforcement officers. This permitting year 100% of targeted staff members were trained. (L1)

8.5.5 Public Outreach Program Element Modifications

On an annual basis, the Co-evaluate the results of the Annual Report, as well as the experience that staff has had in implementing the program, to determine if any additional program modifications are necessary to comply with the Clean Water Act requirement to reduce the discharge of pollutants to the maximum extent practicable.

9 Water Quality Monitoring

9.1 WATER QUALITY MONITORING

As required by Order R410-0108 (issued July 8, 2010), the Ventura Countywide Stormwater Quality Management Program successfully monitored water chemistry, toxicity and biologic function of creeks, rivers and channels within Ventura County during the 2009/10 monitoring season. The complete Monitoring Report with supporting data can be found in Attachment F. Attachment F is included as a separate document due to its large size

The NDPES permit requires the Stormwater Monitoring Program to report the results of stormwater monitoring to the Regional Board in two ways. First, within 90 days of a monitoring event, analytical results must be submitted electronically and must highlight elevated constituent levels relative to Basin Plan and CTR acute criteria. The Stormwater Monitoring Program met this requirement for all four monitoring events during the 2009/10 season. Second, an Annual Storm Water Report must be submitted by December 15th, and must highlight those same elevated levels relative to applicable water quality objectives. The contents of this report fulfill that requirement.

For the analysis of wet-weather data (Events 1-3), the Basin Plan objectives and the acute, freshwater objectives in the CTR were used. For some constituents, the California Toxics Rule does not contain acute objectives. In these cases, the California Toxics Rule Human Health (Organisms Only) objectives were used in the wet-weather comparison. The CTR Human Health (Organisms Only) objectives were used here because these constituents have no other objectives for comparison. These objectives were used even though they are based on long-term risks to human health that cannot be directly correlated to stormwater discharges. CTR chronic criteria were not used for wet-weather analyses because acute criteria better reflect the short-term storm event exposure experienced by organisms, as compared to the long-term exposure considered by chronic criteria.

For the analysis of dry-weather data (Event 4), the Basin Plan objectives and the chronic, freshwater objectives in the CTR were used. For some constituents, the CTR does not contain chronic objectives. In these cases, the CTR Human Health (Organisms Only) objectives were used in the dry-weather comparisons. The CTR Human Health (Organisms Only) objectives were used here because these constituents have no other objectives for comparison.

For all events, objectives in the CTR for metals were calculated based on the hardness of the water. This analysis used the hardness value measured at a particular site during a particular monitoring event for calculating a certain metals objective, except when the measured hardness was greater than 400 mg/L. The CTR sets a hardness cap of 400 mg/L for calculating the objectives, so any measured hardness value above 400 mg/L was set equal to 400 mg/L for the purposes of the calculation.

9.1.1 Stormwater Monitoring Stations

Monitoring locations for water chemistry and toxicity included Mass Emission stations and Major Outfall stations. Mass Emission stations are located in the lower reaches of the three major watersheds in Ventura County (Ventura River, Santa Clara River, and Calleguas Creek). Major Outfall stations, a new component of the Stormwater Monitoring Program, are located in watersheds representative of a particular Permittee's contribution to downstream waters. Eleven Major Outfalls will be required to be monitored, only four were required during the reporting period. The first four of these were constructed in

Ojai, Meiners Oaks, Ventura and Camarillo. (Additional sites in each of the remaining Permittees' jurisdiction throughout Ventura County will be brought online during the 2010/11 monitoring season.)

The underpinning of the increased monitoring effort required in the new Permit was the upgrading of all monitoring stations and the data collection platform. New and existing monitoring stations were upgraded to allow remote communication by Stormwater Monitoring Program staff. This allowed sampling program initiation and sampler pacing to be modified as rainfall predictions changed before and throughout the storm. As an added benefit, data handling was significantly reduced, thereby decreasing both staff time and the likelihood of errors.

9.1.2 Methods

Water chemistry samples were collected at Mass Emission and Major Outfall stations during three rainfall events (October 13, 2009, December 7, 2009, and February 5, 2010), and also at Mass Emission and Major Outfall stations during one dry event during the wet season (March 17, 2010). Toxicity samples were collected during the first two events of the season. A smaller subset of water chemistry samples was collected at each of the Major Outfall stations (or similar replacement location) on June 28, 2010, and August 24, 2010, as part of the dry -season, dry-weather monitoring prescribed in the NPDES permit.

Through rigorous adherence to the Stormwater Monitoring Program's sampling protocols and through selection of a high-quality analytical laboratory, the Stormwater Monitoring Program was able to achieve a 96.1% success rate in meeting program data quality objectives.

9.1.3 Regional Bioassessment Program

The Program worked collaboratively with the Stormwater Monitoring Coalition of Southern California on the Regional Biassessment Program led by SCCWRP. Bioassessment sampling was performed at 15 sites throughout Ventura County, divided among each of the three major watersheds (six in the Ventura River Watershed, six in the Calleguas Creek Watershed, and three in the Santa Clara River Watershed). Sampling was conducted May 14, 2009, through June 17, 2009, and the following year from June 9, 2010, through July 12, 2010. Results of this effort will be presented by SCCWRP in context with the data from throughout Southern California.

9.2 URBAN RUNOFF IMPACTS ON RECEIVING WATERS

Pursuant to Part 2 (Receiving Water Limitations) of the Countywide NPDES Permit (Order R410-0108, Permit No. CAS004002), the Permittees are required to determine whether discharges from their municipal separate storm sewer systems are causing or contributing to a violation or water quality standards (WQS). Additionally, Permittees are responsible for preventing discharges from the MS4 of stormwater or non-stormwater from causing or contributing to a condition of nuisance. Specifically, the Order contains the two following Receiving Water Limitations:

1. Discharges from the MS4 that cause or contribute to a violation of water quality standards are prohibited.

2. Discharges from the MS4 of stormwater, or non-stormwater, for which a Permittee is responsible, shall not cause or contribute to a condition of nuisance.

Compliance with the above Receiving Water Limitations is achieved by the Permittees through implementation of control measures and other actions to reduce pollutants in stormwater and non-stormwater discharges in accordance with the requirements of Countywide NPDES Permit. The following section presents a discussion of WQS exceedances and elevated levels[7] that occurred during the three wet-weather and one dry-weather monitoring events during the 2009/10 season.

9.2.1 'Cause or Contribute' Evaluation Methodology

The evaluation used to determine if a pollutant is persistently causing or contributing to the exceedance of a WQS in receiving waters consists of three steps:

1. The water quality data collected at a downstream receiving water site were compared to relevant WQS contained in the CTR and Basin Plan.

2. When a receiving water concentration exceeded a WQS for a particular constituent, the upstream urban runoff concentration of said constituent measured at a Major Outfall (i.e. outfall $\geq$ 36 inches) was compared to the WQS. If an elevated level relative to the associated WQS for said constituent was observed in both urban runoff and the receiving water, then the WQS exceedance in the receiving water was determined "likely caused or contributed to by urban runoff." However, this comparison does not consider the frequency or persistence of WQS exceedances for a given constituent.

3. The persistence of a WQS exceedance was determined by evaluating the number of times (frequency) that a constituent was observed at an elevated level in urban runoff and in excess of the WQS for the receiving water for a particular type of monitoring event (wet or dry) over the course of the monitoring season. If two or more elevated levels in urban runoff and WQS exceedances in the receiving water were observed for a particular constituent over the course of the monitoring season, then the WQS exceedances of said constituent were determined to be persistent. Ideally, an assessment of persistency would be based on a larger data set (e.g., 10 events or more) and an assumed percentage of exceedances (e.g., 50%), but given the need for an annual assessment two or more exceedances from the existing, limited data set were used as the criterion to determine persistence.

9.2.2 Ventura River Watershed

Urban stormwater runoff and urban non-stormwater flows were evaluated at two Major Outfall locations in the Ventura River Watershed during the 2009/10 season: Meiners Oaks-1 (MO-MEI) and Ojai-1 (MO-OJA). Both of these Major Outfalls are located upstream of the ME-VR2 Mass Emission station (Table 9-1), and therefore water quality data collected at ME-VR2 were used to represent receiving water quality in the 'cause or contribute' evaluation conducted for both Major Outfalls. Constituents exceeding WQS in both urban runoff and the downstream receiving water are shown for Major Outfalls MO-MEI and MO-OJA in Table 9-1 and Table 9-2 respectively.

[7] "Elevated levels" is used to describe those concentrations that are above a particular water quality standard. These amounts are not referred to as "exceedances," as has been done for the Mass Emission stations, since, technically, those standards are only applicable to receiving waters, not to the outfalls that were monitored.

Table 9-1 Comparison of MO-MEI and ME-VR2 Relative to Water Quality Standards

Constituent (Unit)	Meiners Oaks-1 Major Outfall (MO-MEI)	Receiving Water (ME-VR2)	Water Quality Standard	
Event 1 (Wet) – Oct. 13, 2009				
E. coli (MPN/100 mL)	8,230	15,531	235	BP
Fecal Coliform (MPN/100 mL)	30,000	16,000	400	BP
Event 2 (Wet) – Dec. 7, 2009				
E. coli (MPN/100 mL)	14,136	4,611	235	BP
Fecal Coliform (MPN/100 mL)	160,000	3,500	400	BP
Event 3 (Wet) – Feb. 5, 2010				
E. coli (MPN/100 mL)	4,884	857	235	BP
Fecal Coliform (MPN/100 mL)	5,000	500	400	BP
Aluminum, Total (µg/L)	4,400	4,500	1,000	BP

Table 9-2 Comparison of MO-OJA and ME-VR2 Relative to Water Quality Standards.

Constituent (Unit)	Ojai-1 Major Outfall (MO-OJA)	Receiving Water (ME-VR2)	Water Quality Standard	
Event 1 (Wet) – Oct. 13, 2009				
E. coli (MPN/100 mL)	241,920	15,531	235	BP
Fecal Coliform (MPN/100 mL)	160,000	16,000	400	BP
Event 2 (Wet) – Dec. 7, 2009				
E. coli (MPN/100 mL)	8,164	4,611	235	BP
Fecal Coliform (MPN/100 mL)	30,000	3,500	400	BP
Event 3 (Wet) – Feb. 5, 2010				
E. coli (MPN/100 mL)	1,576	857	235	BP
Fecal Coliform (MPN/100 mL)	3,000	500	400	BP
Aluminum, Total (µg/L)	2,100	4,500	1,000	BP

9.2.3 Santa Clara River Watershed

Urban stormwater runoff and urban non-stormwater flows were evaluated at one Major Outfall in the Santa Clara River Watershed during the 2009/10 season: Ventura-1 (MO-VEN). MO-VEN is located downstream of the ME-SCR Mass Emission station (see Figure 1). Because the ME-SCR station is located upstream of the MO-VEN station, an assumption was required so that water quality data collected at ME-SCR could be considered to adequately represent Santa Clara River water quality downstream of

the confluence of MO-VEN and the river. It was assumed that pollutant concentrations in the Santa Clara River downstream of ME-SCR remain the same as those measured at ME-SCR to a hypothetical compliance point below the confluence of MO-VEN and the Santa Clara River. With this assumption in effect, water quality data collected at ME-SCR were used to represent receiving water quality in the "cause or contribute" evaluation conducted for the MO-VEN station. Elevated levels of constituents in urban runoff and those exceeding WQS in the "downstream" receiving water are shown in Table 9-3for the MO-VEN station

Table 9-3 Water Comparison of MO-VEN and ME-SCR Relative to Water Quality Standards

Constituent (Unit)	Receiving Water (ME-SCR)[1]	Ventura-1 Major Outfall (MO-VEN)	Water Quality Standard	
Event 1 (Wet) – Oct. 13, 2009				
E. coli (MPN/100 mL)	3,873	14,140	235	BP
Fecal Coliform (MPN/100 mL)	9,000	24,000	400	BP
Aluminum, Total (µg/L)	10,000	1,200	1,000	BP
Event 2 (Wet) – Dec. 7, 2009				
E. coli (MPN/100 mL)	1,553	8,664	235	BP
Fecal Coliform (MPN/100 mL)	2,200	16,000	400	BP
Aluminum, Total (µg/L)	6,400	1,600	1,000	BP
Event 3 (Wet) – Feb. 5, 2010				
E. coli (MPN/100 mL)	857	2,851	235	BP
Fecal Coliform (MPN/100 mL)	2,400	3,000	400	BP

1. Water quality monitoring data collected at ME-SCR were used in the receiving water 'cause or contribute' evaluation as downstream surrogate data to represent the water quality in the Santa Clara River at a compliance point below the confluence of Ventura-1 and the Santa Clara River. The Ventura-1 Major Outfall site is tributary to the Santa Clara River.

9.2.4 Calleguas Creek Watershed

Urban stormwater runoff and urban non-stormwater flows were evaluated at one Major Outfall in the Calleguas Creek Watershed during the 2009/10 season: Camarillo-1 (MO-CAM). As stated earlier, MO-CAM is located in a different subwatershed than the closest receiving water location, the ME-CC station, monitored by the Program (see Figure 1). MO-CAM is tributary to Revolon Slough, which is tributary to Calleguas Creek several miles downstream of ME-CC. Similar to the ME-SCR station in the Santa Clara River watershed, an assumption was made so that water quality data collected at ME-CC could be considered to adequately represent Calleguas Creek water quality downstream of the confluence of Revolon Slough and the creek. It was assumed that pollutant concentrations in Calleguas Creek downstream of ME-CC remain the same as those measured at ME-CC to a hypothetical compliance point below the confluence of Revolon Slough and Calleguas Creek. With this assumption in effect, water quality data collected at ME-CC were used to represent receiving water quality in the "cause or contribute" evaluation conducted for the MO-CAM Major Outfall. Elevated levels of constituents in urban runoff and those exceeding WQS in the "downstream" receiving water are shown in Table 9-4for the MO-CAM station.

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Table 9-4: Comparison of MO-CAM and ME-CC Relative to Water Quality Standards.

Constituent (Unit)	Receiving Water (ME-CC)[1]	Camarillo-1 Major Outfall (MO-CAM)	Water Quality Standard	
Event 1 (Wet) – Oct. 13, 2009				
E. coli (MPN/100 mL)	388	34,480	235	BP
Fecal Coliform (MPN/100 mL)	500	22,000	400	BP
Aluminum, Total (µg/L)	4,100	4,100	1,000	BP
Event 2 (Wet) – Dec. 7, 2009				
E. coli (MPN/100 mL)	3,873	9,804	235	BP
Fecal Coliform (MPN/100 mL)	9,000	16,000	400	BP
Aluminum, Total (µg/L)	6,500	4,800	1,000	BP
Event 3 (Wet) – Feb. 5, 2010				
E. coli (MPN/100 mL)	1,046	3,873	235	BP
Fecal Coliform (MPN/100 mL)	3,000	3,000	400	BP
Aluminum, Total (µg/L)	9,000	1,600	1,000	BP
Mercury, Total (µg/L)	0.086	0.055	0.051	CTR
Event 4 (Dry) – Mar. 17, 2010				
Chloride (mg/L)	220	340	150[(2)]/250[(3)]	BP
Total Dissolved Solids (mg/L)	1,100	1,500	850[(2)]/500[(3)]	BP

1. Water quality monitoring data collected at ME-CC were used in the receiving water 'cause or contribute' evaluation as downstream surrogate data to represent the water quality in Calleguas Creek at a compliance point below the confluence of Revolon Slough and Calleguas Creek. The Camarillo-1 Major Outfall site is tributary to Revolon Slough.

2. Site-specific Basin Plan objective for reach of Calleguas Creek where ME-CC is located.

3. Site-specific Basin Plan objective for Revolon Slough.

9.3 DISCUSSION OF WQS EXCEEDANCES

9.3.1 Aluminum and Mercury

Urban runoff and receiving water concentrations of aluminum were above the 1,000 µg/L Basin Plan objective at all Major Outfall/receiving water combinations for one or more events monitoring during the 2009/10 season. These elevated levels were limited to wet weather Event 3 in the Ventura River Watershed at the MO-MEI and MO-OJA stations, and in the receiving water measured at the ME-VR2 station. Concentrations above the aluminum objective occurred during wet weather Events 1 and 2 in the Santa Clara River Watershed at the MO-VEN station and in the receiving water as measured at the ME-SCR station. All three wet weather events showed elevated levels of the aluminum objective at the MO-CAM and ME-CC stations. Additionally, a concentration above the 0.051 µg/L CTR criterion for mercury was observed during wet weather Event 3 in both the urban runoff (MO-CAM) and receiving water (ME-

CC) stations. Based on this one pair of mercury elevated concentrations observed during the 2009/10 monitoring season, the Program does not consider mercury at this time to constitute a persistent pollutant in urban runoff that is causing or contributing to the exceedance of a WQS.

Since the Program began monitoring for aluminum in 2004, it has frequently observed exceedances of the Basin Plan objective for the metal at all Program monitoring sites. Aluminum is found as a ubiquitous natural element in sediments throughout Ventura County geology. These sediments are mobilized during stormwater runoff events and concentrations of aluminum in excess of the Basin Plan objective are commonly measured during wet weather monitoring events. This is clearly shown by the upstream site in the Calleguas Creek watershed (ME-CC) which recorded aluminum concentration of 9,000 mg/L. During the past six years that the Program has monitored aluminum, dry weather exceedances were rarely observed. Total mercury concentrations in excess of the 0.051 µg/L CTR criterion are regularly detected at the ME-CC station during wet weather monitoring events, but have yet to be observed during a dry weather monitoring event. Similar to aluminum, mercury concentrations above the CTR criterion are observed almost exclusively during stormwater runoff events.This natural source is also demonstrated in the Ventura River Watershed which has less than 5% of the watershed is developed.

Because metals are associated with sediment the stormwater program has a number of control measures and BMPs that address metals in general, and sediment specifically. These control measures include street sweeping, catch basin cleaning, industrial and commercial inspections, illicit discharge elimination, household hazardous waste collection, and public education. In addition, the construction program element is structured to address sediment from construction sites and includes review of grading plans, requirements for sediment and erosion control BMPs, and field inspections to confirm BMP implementation. More recently the State Water Resources Control Board adopted WDR Order 2009-0009 DWQ, the Construction General Permit, which covers all construction sites with greater than 1 acre of active land disturbance. This new Order incorporates a risk-based approach to address pollutants from construction sites including sediments and associated metals. The General Permit includes rigorous site planning, numeric effluent and action limits, and minimum BMPs as a function of the site risk for discharging sediment. It is expected that this new Order will provide further control of sediment from construction sites.

In addition to the efforts conducted under the municipal stormwater programs, certain metals (copper, nickel, selenium, and mercury) are being addressed under the TMDL program. These constituents have been identified as causing impairment in Calleguas Creek, its tributaries, and Mugu Lagoon. As a result a metals work plan has been developed and is currently being implemented[8]. This multiple year plan provides the framework to (1) determine whether or not metals impairments still exist in the watershed (2) develop site-specific objectives for copper and nickel, and (3) if necessary, identify the control measures needed to meet the TMDLs. It is expected that the control measures identified under this effort will complement and guide the efforts to address aluminum and mercury in the Callegaus Creek and Santa Clara River watersheds.

9.3.2 Pathogen Indicators

Urban runoff and receiving water concentrations of *E. coli* and fecal coliform bacteria were detected above their respective Basin Plan objectives during all three wet weather events at all Major Outfall and

[8] http://www.calleguascreek.org/ccwmp/4d.asp December 3, 2010.

Mass Emission stations monitored during the 2009/10 season. These indicator bacteria are frequently measured at concentrations in excess of WQS during wet weather events in Ventura County. Dry weather events monitored at the ME-CC Mass Emission station also have historically shown some exceedances for these indicator bacteria.

The stormwater program has in place control strategies that directly address indicator bacteria concentrations in urban runoff. The existing Program include a comprehensive residential public outreach program that utilizes radio, newspaper, online banners, outdoor bulletins, and transit shelters to educate the public about preventing animal waste from entering storm drains. The Program estimates that bacteria outreach efforts achieved more than 2.7 million gross impressions (over three times the population of Ventura County). The bacteria outreach campaign was expanded to include the mailing of a brochure to horse owners, equestrians and horse property owners. The brochure identified BMPs that horse owners can take to reduce bacteria in stormwater runoff. Finally, the Program also conducts outreach to reduce pet waste. The Program installs dispensers for pet waste pickup bags at beaches, parks and trail heads. An estimated over 2 million pet waste bags are given out each year and there are now close to 400 pet waste bag dispensers throughout the County encouraging pet owners to pick up after their pets. The efforts of the Illicit Discharges/Connections Program also help to reduce bacteria in stormwater runoff by identifying and stopping illicit wastewater discharges. Illicit wastewater discharges accounted for the single largest category of illicit discharges (34%) on a Countywide basis during the 2008/09 reporting year.

In addition to the municipal stormwater program, bacteria are being addressed through the TMDL program. Various reaches of Calleguas Creek are listed on the Section 303(d) list due to fecal coliform bacteria. A Bacteria Work Plan has been developed to addresses this problematic pollutant. Addressing bacteriological impairments in the watershed is a challenging task. Bacteriological contamination is a common occurrence throughout California and the United States. However, only a few TMDLs have been developed to control this pollutant, partially due to the many complexities associated with this task. Bacteria TMDLs are complicated by the fact that the standards are based on indicator organisms, not the actual pathogenic bacteria. As a result, it is difficult to ascertain whether a particular water concentration of non-pathogenic indicator bacteria will cause human illness. Adding to the complexity is the fact that wildlife and other naturally occurring sources contribute to bacterial pollution in the Calleguas Creek watershed. Naturally occurring sources of bacteria have the potential to impact human health, but are extremely difficult to control. Additionally, the warm waters of southern California provide ideal conditions for supporting bacteria populations naturally present in creek bed sediments. Finally, bacteria are ubiquitous throughout the watershed at levels that significantly exceed water quality standards. Developing control measures to reduce observed bacteria concentrations to meet water quality standards will be challenging. Treatment measures to address bacteria are likely to be costly and difficult to implement (especially with respect to contaminated stormwater runoff). As a result, implementing measures that will result in compliance with the existing water quality objectives at all times will be extremely difficult. Consequently, the tasks in this work plan are designed to address these complexities to the extent possible and provide mechanisms for protecting the identified beneficial uses in the watershed as is feasible. The strategy outlined in this work plan will assess the beneficial uses and risks to human health from bacteria and use that information to develop a TMDL to address bacteriological impairments. In the near-term an educational program focusing on the requirements of local domestic animal waste ordinances and the effects of domestic animal waste on the watershed is being considered[9].

[9] http://www.calleguascreek.org/ccwmp/4f.asp December 2, 2010.

Like the metals TMDL it is expected that the results from the bacteria TMDL will assist the municipal stormwater program in addressing this problematic pollutant.

As a means to better refine the implementation of BMPs that might result in additional reductions of indicator bacteria, the Permittees are evaluating source identification monitoring at one of the Program's Major Outfalls using Bacteroidales genetic markers to identify the source(s) of fecal bacteria. Such an approach was used in the Calleguas Creek watershed as part of the TMDL monitoring effort. Knowing what bacteria sources – agriculture (horse and/or cow), humans, dogs, and birds – are responsible for the high levels of indicator bacteria measured during storm events will assist in the selection of BMPs better suited to control a particular bacteria source.

9.3.3 Other Constituents

Concentrations of chloride and total dissolved solids were detected above their site-specific Basin Plan objectives in Revolon Slough (MO-CAM) and Calleguas Creek (ME-CC), respectively, during dry weather Event 4. Based on these two pairs of elevated levels observed during the 2009/10 monitoring season, the Program does not consider chloride and total dissolved solids at this time to constitute a persistent pollutant in urban runoff that is causing or contributing to the exceedance of a WQS.

10 Attachments

Attachment A Commercial and Industrial Inspection Checklists

Attachment B Post Construction BMP Inspection Checklist

Attachment C Construction Inspection Checklist

Attachment D Model Integrated Pest Management (IPM) Program

Attachment E Illicit discharge Field Screening Protocol

Attachment F Water Quality Monitoring Report

Attachment A - Industrial/Commercial Inspection Checklist

Attachment A – Commercial Inspection Checklist

CITY OF VENTURA
ENVIRONMENTAL SERVICES OFFICE
www.venturasenvironment.com

SID #: _____

City of Ventura Environmental and Water Resources Division – Environmental Services
STORMWATER INSPECTION CHECKLIST FOR COMMERCIAL BUSINESSES
☐ FOOD SERVICE ☐ AUTO- RELATED ☐ LAUNDRY ☐ NURSERY FACILITIES

INSPECTION TYPE: ☐ 1st Routine* ☐ 2nd Routine** ☐ Complaint Response ☐ Follow-up Visit
INSPECTION DATE: _____ TIME: _____
INSPECTOR NAME: _____ PHONE #: _____
FACILTY NAME: _____
FACILTY ADDRESS: _____
FACILTY CONTACT NAME: _____ PHONE #: _____
FACILITY CONTACT SIGNATURE (acknowledging receipt of insp.): _____
FACILITY SIC/NAICS # _____ CATEGORY: _____
FACILITY IS LOCATED In: Ventura River, Misc. Coastal, Lower Santa Clara River, Watershed **(Circle one Water body)**
Does Facility discharge to MS4 that directly discharges to an ESA? ☐ Yes ☐ No If yes, is there an approved TMDL Implementation Plan? ☐ Yes ☐ No

	BMP #	Inspection Criteria	Yes	No ***	N/A
1	SC-10	**Unauthorized Non-stormwater discharges.** Are controls being implemented to eliminate non-stormwater discharges?			
2	SC-11	**Accidental Spills/Leaks.** Is the facility effectively preventing and responding to spills and leaks?			
3	SC-20	**Vehicle/Equipment Fueling**. Are effective fueling source control devices and practices being implemented?			
4	SC-21	**Vehicle/Equipment Cleaning.** Are effective equipment/vehicle cleaning practices and appropriate wash water management practices being implemented?			
5	SC-22	**Vehicle/Equipment Repair.** Are effective vehicle/equipment repair practices and source control devices being implemented?			
6	SC-30	**Outdoor Loading/Unloading.** Are effective outdoor loading/unloading practices being implemented?			
7	SC-31	**Outdoor Liquid Storage.** Are effective outdoor liquid storage source controls and practices being implemented?			
8	SC-32	**Outdoor Equipment Operations.** Are effective outdoor equipment source control devices and practices being implemented?			
9	SC-33	**Outdoor Storage of Raw Materials.** Are effective source control practices being implemented and appropriate structural devices being used and maintained?			
10	SC-34	**Storage and Handling of Solid Waste.** Are effective solid waste storage/handling practices and control measures being implemented?			
11		**Grease Trap Info.** Is Grease Trap being properly maintained? Size of Trap _____ Last Svc. Date: _____			
12	By Municipality	**Waste/Hazardous Materials Storage, Handling & Disposal.** Are effective storage, handling and disposal procedures for hazardous materials being implemented?			
13	SC-41	**Building and Grounds Maintenance.** Are effective facility maintenance practices being implemented?			
14	SC-43	**Parking/Storage Area Maintenance.** Are effective parking/storage area designs and housekeeping/maintenance practices being implemented?			
15	SC-44	**Storm Water Conveyance System Maintenance Practices.** Are proper conveyance system operation and maintenance protocols being implemented?			
16		**Post Construction Treatment Device**. If facility has treatment device, is it being properly maintained? Device Type: _____			

*1st Routine inspection is due by 5/7/2012; **2nd Routine inspection is due not earlier than 6 months after the 1st insp. and not later than 5/7/2015
*** Note Violation/Correction Needed in Comments Section

ENFORCEMENT ACTION TAKEN

	Verbal Warning / Written Notice of Correction (1st written notice via City SW Insp)		Cease & Desist Order Issued
	Notice of Violation (2nd written notice via City SW Insp.)		Referred to LA Regional Water Board
	Administrative Compliance Order Issued (3rd written notice via City PW Dir. ltr.)		Legal Action Initiated

FOLLOW-UP INSPECTION NECESSARY? YES _____ NO _____

OUTREACH MATERIAL GIVEN TO FACILITY: _____
(List type of material (Business brochure, BMP fact sheet #)

COMMENTS: (Identify # violated above, type of violation and suggested corrective action needed.)

_____

_____

_____

_____

Stormwater Quality Program (805) 207-6371

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Attachment A - Industrial Inspection Checklist

CITY OF VENTURA
ENVIRONMENTAL SERVICES OFFICE
www.venturasenvironment.com

SID #: _____

City of Ventura Environmental and Water Resources Division – Environmental Services
STORMWATER INSPECTION CHECKLIST FOR INDUSTRIAL FACILITIES

INSPECTION TYPE: ☐ 1st Routine[1] ☐ 2nd Routine[2] ☐ 2nd Routine-No Exp. Fac.[3] ☐ Complaint Response ☐ Follow-up Visit

INSPECTION DATE: _____ TIME: _____

INSPECTOR NAME: _____ PHONE #: _____

FACILTY NAME: _____

FACILTY ADDRESS: _____

FACILTY CONTACT NAME: _____ PHONE #: _____

FACILITY CONTACT SIGNATURE (acknowledging receipt of insp.): _____

FACILITY SIC/NAICS # _____ CATEGORY: _____

FACILITY IS LOCATED In: Ventura River, Misc. Coastal, Lower Santa Clara River, Watershed **(Circle one Water Body)**
Does Facility discharge to MS4 that directly discharges to an ESA? ☐ Yes ☐ No If yes, is there an approved TMDL Implementation Plan? ☐ Yes ☐ No

State Industrial NPDES Permit Information	Yes	No[4]	N/A
Does facility have coverage/WDID # under State Industrial Permit? WDID #_____			
If facility has coverage/WDID # under State Industrial Permit, does facility have SWPPP on site?			
If facility's SIC code is identified in Category 10 of Attachment 1 to the Industrial Permit, does facility have any industrial materials, equipment or activities that are exposed to stormwater? (Category 10 includes: SICs 20,21,22,23,2434,25,265,267,27,283,285,30,31 (except 311),323,34 (except 3441),35,36,37(except 373),38,39 or 4221-4225),			
If a Category 10 SIC facility and **no exposure**, did facility file a Notice of Non-Applicability with the LARWQCB? Date filed: _____ LARWQCB Approval Letter Received: (if yes, attach copy to inspection form)			

	BMP #	BMP Inspection Criteria	Yes	No[4]	N/A
1	SC-10	**Unauthorized Non-stormwater discharges.** Are controls being implemented to eliminate non-stormwater discharges?			
2	SC-11	**Accidental Spills/Leaks.** Is the facility effectively preventing and responding to spills and leaks?			
3	SC-20	**Vehicle/Equipment Fueling**. Are effective fueling source control devices and practices being implemented?			
4	SC-21	**Vehicle/Equipment Cleaning.** Are effective equipment/vehicle cleaning practices and appropriate wash water management practices being implemented?			
5	SC-22	**Vehicle/Equipment Repair.** Are effective vehicle/equipment repair practices and source control devices being implemented?			
6	SC-30	**Outdoor Loading/Unloading.** Are effective outdoor loading/unloading practices being implemented?			
7	SC-31	**Outdoor Liquid Storage.** Are effective outdoor liquid storage source controls and practices being implemented?			
8	SC-32	**Outdoor Equipment Operations.** Are effective outdoor equipment source control devices and practices being implemented?			
9	SC-33	**Outdoor Storage of Raw Materials.** Are effective source control practices being implemented and appropriate structural devices being used and maintained?			
10	SC-34	**Storage and Handling of Solid Waste.** Are effective solid waste storage/handling practices and control measures being implemented?			
11		**Grease Trap Info.** Is Grease Trap being properly maintained? Size of Trap _____ Last Svc. Date: _____			
12	By Municipality	**Waste/Hazardous Materials Storage, Handling & Disposal.** Are effective storage, handling and disposal procedures for hazardous materials being implemented?			
13	SC-41	**Building and Grounds Maintenance.** Are effective facility maintenance practices being implemented?			
14	SC-43	**Parking/Storage Area Maintenance.** Are effective parking/storage area designs and housekeeping/maintenance practices being implemented?			
15	SC-44	**Storm Water Conveyance System Maintenance Practices.** Are proper conveyance system operation and maintenance protocols being implemented?			
16		**Appendix D Fact Sheets.** If applicable, is facility applying requirements on these fact sheets?			
17		**Post Construction Treatment Device**. If facility has treatment device, is it being properly maintained? Device Type: _____			

[1]1st Routine insp. due 5/7/2012; [2]2nd Routine insp. for facilities with exposure due not earlier than 6 months after the 1st insp. & not later than 5/7/2015 [3]2nd routine insp. yearly at min. of 20% of facilities determined not to have exposure (Non Applicability Letter on File)
[4]Note violation/correction needed in comments section

ENFORCEMENT ACTION TAKEN

	Verbal Warning/Written Notice of Correction (1st written notice via City SW Insp.)		Cease & Desist Order Issued
	Notice of Violation (2nd written notice via City Storm Water Insp.)		Referred to LA Regional Water Board
	Administrative Compliance Order Issued (3rd written notice via City PW Dir. ltr.)		Legal Action Initiated

FOLLOW-UP INSPECTION NECESSARY? YES _____ NO _____
OUTREACH MATERIAL GIVEN TO FACILITY: _____
(List type of material (Business brochure, BMP fact sheet #)

COMMENTS: (Identify # violated above, type of violation and suggested corrective action needed.)

(Use addition sheet for comments)_____

Stormwater Quality Program (805) 207-6371

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Attachment B - Post Construction BMP Inspection Checklist

Attachment B - Post Construction BMP Checklist

CITY OF CAMARILLO – PUBLIC WORKS DEPT. (805-383-5659) 3/12/2010
STORM WATER POST-CONSTRUCTION TREATMENT DEVICE
INSPECTION CHECKLIST

Type of Device: _____ **Location of Device:** _____

Date of Inspection: _____ **Inspector:** _____

Photos Taken: □ Yes □ No Quantity: _____

Property Manager/Designee: _____ **Company:** _____

Mailing Address: _____

Phone Number: _____

Service Information:

Grassy swale/biofilter/grass strip, catch basin filter, clarifiers, pervious concrete, etc.

- □ Needs removal of litter and debris _____
- □ Needs to be swept _____
- □ Removal of accumulated sediment _____
- □ Reseed and/or apply mulch to damaged grass areas _____

Other repairs/maintenance necessary: _____

_____

- □ No Maintenance is needed at this time

Detention Basins

- □ Needs removal of litter and debris from banks and basin _____
- □ Repair erosion to banks and bottom _____
- □ Clean/repair inlet riprap and pilot channels _____
- □ Clean/repair outlet to prevent clogging _____
- □ Sediment accumulation of 25% or more of original depth (should be cleaned) _____
- □ Perimeter fencing needs repair _____
- □ Apply Mosquito abatement procedure _____

Other repairs/maintenance necessary: _____

_____

- □ No Maintenance is needed at this time

Additional Notes: _____

_____

_____

_____

Outreach Material Given to Facility: _____

Is follow-up inspection needed?

□ Yes □ No

_____ _____

Inspector Signature *Date*

Attachment C - Construction Inspection Checklist

Attachment C - Construction Inspection Checklist

CITY OF CAMARILLO – PUBLIC WORKS DEPT. (805-383-5659) 10/6/09

STORM WATER INSPECTION CHECKLIST
FOR CONSTRUCTION ACTIVITIES **Work Order:** _____

Project Name:_____ **Project #:** _____

Project Location: _____ **Grading Permit #:** _____

Date/Time: _____ **Quantity of Rainfall:** _____

Contractor Information:

Contact Rep.:_____ Company Name:_____ Phone Number:_____

INSPECTION TYPE: □ Wet Season □ Dry Season □ Routine □ Follow-Up □ Pre-storm □ During-storm □ Post-storm □ Final

CONSTRUCTION PHASE: □ Grading & Land Dev □ Streets & Utilities □ Vertical Construction □ Final Landscaping

CONSTRUCTION REQUIREMENTS:

Is SWPPP/SWPCP on site: □ Yes □ No Is Notice of Intent WDID on site: □ Yes □ No □ N/A WDID #:_____

RISK DETERMINATION: Sediment and Receiving Water Risk Level: □ One □ Two □ Three

DEWATERING ACTIVITIES: Has a NPDES Permit been filed: □ Yes □ No If yes, is the Permit on site: □ Yes □ No

YES	NO	N/A	INSPECTION CRITERIA
			1. **SITE PLAN:** Does the site plan reflect the project site's condition(s)?
			2. **SLOPE EROSION MANAGEMENT:** Are slope erosion management BMP's in place per the SWPCP/SWPPP
			3. **SEDIMENT TRAPPING:** Are all sandbags, straw bales, and/or silt fences in place and are they functioning properly?
			4. **SEDIMENT BASINS:** If desilting or sediment basins are being used, are they functioning properly?
			5. **SEDIMENT MANAGEMENT AT DRAINAGE DISCHARGE POINTS:** Are the drainage discharge points reasonably free of any significant erosion or sediment transport?
			6. **SITE SEDIMENT MANAGEMENT:** Is sediment, debris, or mud contained within the site?
			7. **PUBLIC ROAD SEDIMENT MANAGEMENT:** Are ingress and egress locations to the construction area stabilized to prevent the tracking of construction materials offsite or onto impervious areas?
			8. **MATERIALS MANAGEMENT:** Are material handling and storage areas reasonably clean and free of spills, leaks, or any other harmful materials?
			9. **MATERIALS MAINTENANCE:** Are all materials properly covered/contained?
			10. **DESIGNATED MATERIAL STORAGE AREA:** Are all locations of temporary soil stockpiles or construction materials in approved areas?
			11. **VEHICLE & EQUIPMENT MAINTENANCE:** Are all the equipment storage, cleaning, fueling, and maintenance areas reasonably clean and free of spills, leaks, or any other harmful materials?
			12. **PAINT, CONCRETE & SAW CUTTING WASTE MANAGEMENT:** Are waste containment areas functioning properly?
			13. **BMP IMPLEMENTATION:** Has an effective combination of BMPs been selected for the project site?
			14. **BMP INSTALLATION & MAINTENANCE:** Are the BMPs identified on the SWPCP/SWPPP, and/or installed in the proper location according to plan specifications?
			15. **POST-CONSTRUCTION BMPs:** Have post-construction BMPs been inspected prior to issuing the Certificate of Occupancy?
			16. **HIGH RISK SITES:** Has the project proponent's qualified SWPPP personnel inspected the site's BMPs during installation and weekly during the wet season (October-April)?
			17. **BMP LOG:** Is a log kept on site which indicates BMPs are being evaluated, maintained and/or modified in the event that they fail or are not appropriate?
			18. **ILLICIT DISCHARGE:** Is non-stormwater runoff leaving the site?
			19. **PUBLIC PROJECT (CIP) SWPPP/PCP**: Does the SWPPP/PCP have the required training and inspection records?

Field Directive Issued: □ Yes □ No

Non-Compliance Issued: □ Yes □ No
□ Verbal □ Stop Work Order □ Citation
□ Warning □ Notice of Violation

Notes/Comments: _____

_____

_____

_____

Inspector **Phone Number** **Contractor's Signature**
(Acknowledging receipt of Inspection Report)

White – Storm Water File Yellow – Storm Water Inspector Pink – Site Copy

Attachment D- Model Integrated Pest Management (IPM) Program

Ventura County Application Protocol
Adopted July 2001
Amended October 15, 2009

Application Protocol
Pesticides, Fertilizers, and Herbicides

1.0 Ventura County Watershed Protection District NPDES Stormwater Permit

The purpose of this standard operating procedure (SOP) is to define an application protocol for the routine and non-routine application of pesticides, fertilizers, and herbicides (including pre-emergents). This SOP provides a comprehensive policy to comply with the Ventura County Permit (CAS004002), a guidance to provide for consistent implementation countywide for Ventura County Watershed Protection District (VCWPD), the County of Ventura, the Cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura, Santa Paula, Simi Valley, and Thousand Oaks (referred to separately as Co-permittees), and a method for reducing runoff of pesticides, fertilizers, and herbicides to the storm drain system. This protocol was amended to reflect new requirements in the May 7, 2009 Ventura County Municipal Stormwater Permit, Order No. 09-0057.

2.0 Scope

The scope of this application protocol is to focus on preventing pesticides, fertilizers, and herbicides from entering the storm drain system and discharging to receiving waters. This protocol is applicable to 1) the outdoor use of pesticides, herbicides, and fertilizers; 2) the use of pesticides and fertilizers where the materials may come into contact with precipitation; 3) the use of pesticides, herbicides, and fertilizers where these materials may come into contact with runoff (natural or induces); and 4) the use of pesticides, herbicides, or fertilizers anywhere where they ay be directly or indirectly discharged to a storm drainage system.

This protocol is applicable to any Co-permittee staff and contracted services that apply pesticides, fertilizers, or herbicides. Such staff commonly include, park, public works, purchasing, building/grounds maintenance, hazardous materials, and pesticide application staff.

This protocol is not applicable to the indoor use of pesticides, herbicides or fertilizers, but is applicable to the consequential outdoor handling, mixing, transport, or disposal of materials related to indoor use. This protocol does not apply when another NPDES permit and/or abatement orders are in effect at the selected site.

Furthermore, this protocol is not intended to replace federal or state requirements or provide complete directions for applying, handling, transporting, mixing, or storing pesticides, fertilizers, or herbicides. Consult federal and state requirements for this additional information. Use information for each pesticide, fertilizer, or herbicide can be found on the manufacturer's label. Additional safety information can be found in chemical-specific material safety data sheets (MSDSs).

3.0 Definitions

Application – means the use of the product as a fumigant, direct surface spray, treatment, drench, injection, incorporation, side-dressing, pre-emergent, furrowed spread, or broadcast agent.

California Department of Pesticide Regulation (CDPR) – The state agency responsible for regulating the use of pesticides in California.

Attachment D Model Integrated Pest Management (IPM) Program

Direct On-site Supervision – A QAC (or QAL, if services contracted) is physically present and available, on-site (within the location as specified in the Monthly Summary Pesticide Use Report Form located on the Colorado Department of Pesticide Regulation website: http://www.cdpr.ca.gov/docs/pur/forms/enf060.pdf) to directly manage and control the application (of any pesticide, herbicide, or fertilizer) by supervising others. The QAC or QAL manages and controls the application of pesticides, herbicides, and fertilizers through available verbal communication to include direct interaction, telephones, cellular phones, 800mhz phones, and radios.

Feasible – means capable of being accomplished in a successful manner, within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

Forecasted Storm Event – A weather event predicted to commence within the next 24-hour time window, where at least 0.25 inches of rain or more is forecasted to fall.

Herbicide – A common pesticide focused on killing weeds and other plants that grow where they are not wanted.

Integrated Pest Management (IPM) – means a sustainable approach to managing pests by combining biological, cultural, physical and chemical tools in a way that minimizes economic, health, and environmental risks.

Manufacturer's Label – The main source of information on how to use the product correctly, safely, and legally. The main sections of a label are: common name and brand name, active ingredient, EPA registration number, signal words, first aid, directions for use, and storage/disposal.

Material Safety Data Sheets (MSDSs) – An information sheet provided by a chemical manufacturer describing chemical qualities, hazards, safety precautions, and emergency procedures to be followed incase of a spill, fire, or other emergency.

Non-Routine Application – A non-scheduled application to include a "one-time" or an "emergency" use of pesticides, herbicides, and fertilizers.

Notice of Intent (NOI) for Pesticide Usage– An oral or written notification submitted prior to the use of a restricted use pesticide, pursuant to a permit.

Pesticide – Defined by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) as "…any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any insects, rodents, nematodes, fungi, weeds, or any other forms of life declared to be pests, and any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.

Qualified Applicator Certificate Holder (QAC) – Any person who has successfully passed the California State Pesticide Laws and Regulations exam, and qualified in one or more pest control categories and may therefore apply restricted materials, supervise pesticide application, but who is not entitled to supervise the operations of a pest control business.

Qualified Applicator License Holder (QAL) – Any person who has successfully passed the California State Pesticide Laws and Regulations exam, and qualified in one or more pest control categories and may therefore apply restricted materials and supervise the pesticide application/operations made by a licensed pest control business.

Routine Application – A scheduled (weekly, quarterly, annually, etc.) use of a pesticide, herbicide, or fertilizer to attain a specific goal.

Signal Word – Defines approximately how hazardous a pesticide could be to people by using descriptors such as DANGER, WARNING, CAUTION, or DANGER-POISON.

Storm Event – A weather event that produces more than .25 inch of precipitation.

Use - means any pesticide related activity including:

Pre-application to include arranging for application, mixing, loading, and making necessary preparations for application;

Application of the pesticide; and

Post-application activities – control of the treated area, management of the treated area, transportation, storage, disposal of excess pesticides, equipment wash, containers, and cleaning of equipment.

Use does not include emergency responders, commercial transportation, manufacturing, formulating, or packaging.

4.0 Responsibilities

Co-permittees shall:

a. Designate a QAC or QAL holder, to provide advice and assistance in all matters related to pesticide usage, disposal of products, and safety.

b. Provide pesticide applicators (including contracted businesses) with appropriate record keeping forms to document pesticide use http://www.cdpr.ca.gov/docs/pur/forms/enf060.pdf) (Attachment A).

c. Annually verify that the purchasing, storing, mixing, loading, and safety tasks for pesticide, fertilizer, and herbicide use are in accordance with this protocol, applicable laws, and regulations including the current and valid QAC/QAL certifications.

d. Verify that no banned or unregistered pesticide is stored or applied.

e. Request landscapers to implement procedures to encourage the retention and planting of native vegetation to reduce water, pesticide and fertilizer needs.

f. Coordinate annual refresher training courses for all pesticide handlers to meet the continuing education requirements.

Pesticide applicators shall:

a. Be certified as or under the direct on-site supervision of, a QAC or QAL holder and be properly trained to start work with pesticides, fertilizers, and/or herbicides.

b. Follow manufacturer's label instructions and this SOP. When such instruction is in conflict with this SOP, the label instructions will be followed.

c. Ensure that no banned or unregistered pesticide is stored or applied.

d. Follow the policies and procedures established in this application protocol.

e. Report any unsafe work practices to their respective supervisors.

Ventura County Application Protocol
Adopted July 2001
Amended October 15, 2009

4.1 Integrated Pest Management Program (IPM)

Co-Permittees and Pesticide applicators shall implement an IPM program by May 7, 2010 that includes the following:

a. Pesticides are used only if monitoring indicates they are needed according to established guidelines.
b. Treatment is made with the goal of removing only the target organism.
c. Pest controls are selected and applied in a manner that minimizes risks to human health, beneficial, non-target organisms, and the environment.
d. Its use of pesticides, including Organophosphates and Pyrethroids do not threaten water quality.
e. Partner with other agencies and organizations to encourage the use of IPM.
f. Adopt and verifiably implement policies, procedures, and/or ordinances requiring the minimization of pesticide use and encouraging the use of IPM techniques (including beneficial insects) in the Permittees' overall operations and on municipal property.
g. Policies, procedures, and ordinances shall include commitments and timelines to reduce the use of pesticides that cause impairment of surface waters by implementing the following procedures:
    1. Quantify pesticide use by its staff and hired contractors.
    2. Prepare and annually update an inventory of pesticides used by all internal departments, divisions, and other operational units.
    3. Demonstrate reductions in pesticide use.

5.0 Environmental Conditions

Environmental conditions (weather and site conditions) required for application of pesticides, fertilizers, and herbicides is dependent upon label and Ventura County Stormwater Permit requirements . Site conditions are determined by visually (V) observing the area for situations or by collecting information from recognized weather forecasting (F) organizations. For example, storm events can be tracked by using any Internet web link that forecasts rainfall (e.g. www.weather.com).

The following table is provided as a guide to applicators where weather or site conditions may impact the application of the pesticide, fertilizer, or herbicide. Weather/Site conditions must be verified for all listed conditions. Forecasting may be used for other weather/site conditions, but is necessary to establish a 24-hour timeframe prior to actual rainfall. A "Yes" indicates the weather/site conditions where application of pesticides, fertilizers, and herbicides may occur. A "No" indicates weather/site conditions where application of pesticides, fertilizers, and herbicides may not occur.

Weather/Site Conditions	Form of Determining Weather/Site Conditions	Routine Application	Non-routine Application
Wind-free (sufficient to avoid spray drift from point of application)	V	Yes	Yes
Storm events (see definition)	V	No	No
Within one day of a forecasted storm event (see definition) > 0.25 inches	V, F	No (except for application of pre-emergents)	No
After a storm event where water is leaching or running	V	No	No
Water is running off-site	V	No	No
Rising groundwater	V	No	No
Ground is saturated	V	No	No

6.0 Pollution Prevention and Spill Control

Irrigation canals, open trenches, surface waters, wetlands, designated 303(d) waterbodies, and groundwater sources should be noted and application shall be made to prevent contamination of these areas.

In the event that pesticides, fertilizers, and/or herbicides not intended for water application are inadvertently sprayed or spilled into the water sources listed above, the following steps are to be taken:

a. Stop all pesticide applications and assess the situation.

b. Prevent further contamination of water sources by using control measures such as storm drain inlet protection, absorbent materials, sandbags, or trenching.

c. Mark the area where the spill or overspray occurred.

d. Contact the environmental coordinator in your jurisdiction.

e. Report the spill to the appropriate department for clean up.

f. Contact governmental agency of reportable quantities.

7.0 Aquatic Pesticide Application

For control of pests and weeds in open water, storm drainage system, and flood control channel areas, only those materials specifically designed and registered for direct water application may be used. Directions on the labels must be followed as well as evaluating the application for the potential to harm the environment. Currently, the following is required prior to applying an aquatic pesticide.

a. Coverage is obtained and compliance is achieved under Water Quality Order No. 2004-009-DWQ – Aquatic Pesticide NPDES Permit. For copy of the permit visit the State Water Resources Control Board web site at: http://www.waterboards.ca.gov/water_issues/programs/npdes/aquatic.shtml.

b. Directions on the label are followed.

c. The application site is evaluated prior to application for the potential of the pesticide to harm the environment.

8.0 Training and Documentation

8.1 QAC and QAL Requirements

Each Co-permittee will only use staff (including contracted businesses) that are under the direct on-site supervision of a QAC/QAL holder. The QAC/QAL must possess a valid and current certification. The applicator is responsible for following any federal and state requirements as well as all label requirements and reviewing the MSDS prior to use.

8.2 Training

Each person who applies pesticides, fertilizers, or herbicides must be trained for the following:

a. Appropriate application of the pesticide, fertilizer, or herbicide.
b. Application laws and regulations
c. Affects application may have on stormwater quality management
d. The type of chemical and the immediate and long term hazards resulting from exposure
e. The MSDS information
f. Safety procedures
g. Emergency spill information
h. Use of protective equipment
i. Cleanup procedures
j. Disposal procedures

9.0 Storage Facilities

Co-permittees will adopt a purchase, storage, and disposal policy such that all pesticides, fertilizers, and herbicides are under the control of a QAC/QAL holder. Pesticide storage facilities shall meet regulatory requirements to prevent releases into the surrounding environment, waterbodies, or be exposed to stormwater and protect the safety of personnel working within such facilities. These pesticides storage facilities shall be locked/secured when not in use. All doors/entrances to the facilities shall be posted with appropriate warning signs (as specified in the California Department of Pesticide Regulations, see references). All signs shall be legible at a minimum distance of 25 feet from any direction.

Pesticide containers should not be stored on the floor or bare ground. No floor drains, which empty into storm drains, are permitted within the storage facility. All pesticides in a storage facility shall either be in the original container, or the service container. Secondary containment is recommended, but not mandatory. All containers will have a copy of the product label attached.

Open bags of pesticides must be enclosed in a secondary container (a closed heavy plastic bag, or can with a tight lid), to prevent exposure or spillage. If the original pesticide containers are metal and are in a state of rust or deterioration, properly labeled plastic or metal secondary containers shall be provided to prevent accidental leakage.

10.0 Decontamination/Disposal

Each Co-permittee will adopt a decontamination and disposal procedure that is managed by a QAC/QAL and meets the following minimum requirements. Liquids produced during the decontamination process shall be handled according to federal and state requirements and managed to reduce exposure to stormwater and from entering the storm drain system or surface waters.

10.1 Cleanup

Containers used to apply pesticides, fertilizers, or herbicides of 28 gallons or less must be triple rinsed after each use. Containers sent back to the manufacturer will follow manufacturer's recommendations or State and Federal guidelines for transporting. The triple-rinse procedures will consist of the following:

a. Use ¼ the container volume for containers less than 5 gallons and 1/5 the container volume for containers greater than 5 gallons.

b. Place rinse medium in the container, securely close, agitate.

c. Drain rinse solution into tank mix. Allow draining 30 seconds.

d. Repeat steps b. and c. a minimum of two times; or

e. Invert emptied container over a nozzle located in the opening of the mix tank that is capable of rinsing all inner surfaces of the container.

For further information, please visit the web site for the California Department of Pesticide Regulations listed in Section 10 of this SOP.

10.2 Disposal

Pesticide, fertilizer, and herbicide waste includes leftover chemicals and chemical container rinsates. All pesticide waste shall be treated as hazardous waste. Minimization of pesticide waste is a high priority for the pesticide user. If waste is stored before removal, it should be stored in an area that is not exposed to stormwater, stormwater runoff, or surface water.

10.3 Storage

Storage of pesticides, fertilizers, and herbicides should be in accordance with requirements as specified in the manufacturer's instructions or California Department of Pesticide Regulations (see References) if the instructions from the manufacturer are not provided.

11.0 References

11.1 Regulations

a. Ventura County NPDES Permit CAS004002 (Order No. 09-0057)

b. Title 3 CCR, Pesticide and Control Operations Section 6674, 6700-6900 (CalEPA)

c. Uniform Fire Code, Pesticide Storage and Display

d. 40 CFR Regulations of Pesticides sections 165.1-180 (www.usepa.gov)

e. State Water Resources Control Board General NPDES Permit for the Discharge of Aquatic Pesticides for Aquatic Weed Control in Waters of the US; General Permit No. CAG990005 – Water Quality Order No. 2004-0009-DWQ

f. State Water Resources Control Board General NPDES Permit for Discharges of Aquatic Pesticides to Surface Waters of the United States for Vector Control; General Permit No. CAG990004 – Water Quality Order No. 2004-0008-DWQ.

11.2 Web Sites

a. California Department of Pesticide Regulation - www.cdpr.ca.gov

b. Weather tracking – www.weather.com

c. California Environmental Protection Agency (CalEPA) – www.calepa.ca.gov

d. State Water Resources Control Board – Aquatic Pesticide Permits - http://www.waterboards.ca.gov/water_issues/programs/npdes/aquatic.shtml

Attachment E - Illicit discharge Field Screening Protocol

Attachment E Illicit discharge Field Screening Protocol

Draft 10-Mar-2010

ILLICIT CONNECTIONS AND ILLICIT DISCHARGES (IC/IDS) ELIMINATION PROGRAM

FIELD SCREENING PROTOCOL

PERMITTEE'S NAME

1.0 PURPOSE AND OBJECTIVES

This Field Screening Protocol was prepared by the *Permittee's Name*. The purpose of this Field Screening Protocol is to present *Permittee's Name's* approach and procedures to complete illicit connections and illicit discharges (IC/IDs) field screening requirements under the Los Angeles Regional Water Quality Control Board Order No. 09-0057, National Pollutant Discharge Elimination System (NPDES) Permit No. CAS004002, Waste Discharge Requirements for the Stormwater (Wet Weather) and Non-Stormwater (Dry Weather) Discharges from the Municipal Separate Storm Sewer Systems (MS4) NPDES Permit (Permit) within the Ventura County Watershed Protection District, County of Ventura, and the Incorporated Cities therein. Implementation of the Ventura County MS4 Permit is directed by the Ventura Countywide Storm Water Quality Management Program formed by the Ventura County Watershed Protection District, County of Ventura, cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura (Ventura), Santa Paula, Simi Valley, and Thousand Oaks.

2.0 IC/ID ELIMINATION PROGRAM REQUIREMENTS

The following is taken verbatim from the Subpart 4.H. of the Ventura County MS4 Permit. Each Permittee shall implement an IC/IDs program to eliminate, document, track, and report IC/IDs to the storm drain system, as follows:

1. General

a) Implementation - Each Permittee shall implement an IC/ID Program. The IC/ID procedures shall be documented and made available for public review.

b) Tracking - All Permittees shall, no later than May 7, 2012, map at a scale and in a format specified by the Principal Permittee all known connections to their storm drain system. **All Permittees shall map at a scale and in a format specified by the Principal Permittee incidents of illicit connections and discharges since January 2009 on their baseline maps, and shall transmit this information to the Principal Permittee no later than May 7, 2012.** Permittees shall use this information to identify priority areas for further investigation and elimination of IC/IDs.

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2. Public Reporting

a) Permittees shall establish and maintain a phone hotline and internet site to receive all reports of IC/ID complaints.

b) Permittees shall document the location of the reported IC/ID and the actions undertaken in response to all IC/ID complaints.

3. Illicit Connections

a) Screening for Illicit Connections

(1) Each Permittee shall submit to the Principal Permittee:

(A) A map at a scale and in a format specified by the Principal Permittee showing the location and length of underground pipes 18 inches and greater in diameter, and channels within their permitted area and operated by the Permittee in accordance with the following schedule:

(i) All channeled portions of the storm drain system no later than May 7, 2010.

(ii) All portions of the storm drain system consisting of storm drain pipes 36 inches in diameter or greater, no later than May 7, 2012. This provision is not meant to exclude Permittees from using equally effective alternative methods not listed in the manual.

(iii) All portions of the storm drain system consisting of storm drain pipes 18 inches in diameter or greater, no later than May 7, 2014.

(B) The status of suspected, confirmed, and terminated illicit connections.

(2) Permittees shall conduct field screening of their storm drain systems in accordance with screening procedures described in the ***Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments*** (2004)[1]. Permittees shall conduct field screening of their storm drain system that has not been previously screened and reported to the Regional Board, for illicit connections in accordance with the following schedule:

(A) All portions of the storm drain system consisting of storm drain pipes 36 inches in diameter or greater, no later than May 7, 2012.

(B) High priority areas identified during the mapping of illicit connections and discharges, no later than May 7, 2012.

(C) All portions of storm drain systems 50 years or older in age, no later than May 7, 2012.

(3) Each Permittee shall maintain a list containing all connections under investigation for possible illicit connection and their status.

[1] *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments.* The Center for Watershed Protection, Pitt R., October 2004. Chapter 13, 13.1,13.2, 13.3, 13.4

Draft 10-Mar-2010

b) Response to Illicit Connections

(1) Investigation -

Each Permittee, upon discovery or upon receiving a report of a suspected illicit connection, shall complete an investigation within 21 days, to determine the following:

(A) Source of the connection.

(B) Nature and volume of discharge through the connection.

(C) Responsible party for the connection.

(2) Termination –

Each Permittee, upon confirmation of an illicit storm drain connection, shall ensure the following:

(A) Termination of the connection within 180 days of completion of the investigation, using formal enforcement authority to eliminate the illicit connection.

(3) Documentation -

Each Permittee shall keep records of all illicit connection investigations and the formal enforcement taken to eliminate all illicit connections.

4. Illicit Discharges

(a) Investigation -

Each Permittee shall investigate an illicit/ illegal discharge during or immediately following containment and cleanup activities, and shall take appropriate enforcement action to eliminate the illegal discharge.

(b) Abatement and Cleanup -

Each Permittee shall respond, within 1 business day of discovery or a report of a suspected illicit/ illegal discharge, with actions to abate, contain, and/or clean up all illegal discharges, including hazardous waste.

DEFINITIONS

Channel - means an open conduit either naturally or artificially created which periodically or continuously contains moving water, or which forms a connecting link between two waterbodies.

Illegal Discharge - means any discharge to the municipal separate storm sewer (storm drain system) that is prohibited under local, state, or federal statutes, ordinances, codes, or regulations. The term illegal discharge includes all non-storm water discharges not composed entirely of storm water except discharges pursuant to an NPDES permit, discharges that are identified in part 1, "Discharge Prohibitions" of this order, or discharges authorized by the Regional Water Board Executive Officer.

Illicit Connection - means any engineered conveyance that is connected to the storm drain system without a permit or municipal authorization. It also means any engineered conveyance through which

discharges of pollutants to the separate storm drainage systems, which are not composed entirely of storm water or are not authorized by an NPDES permit, may occur.

Illicit Discharge - means any discharge to a municipal separate storm sewer (storm drain system) that is prohibited under local, state, or federal statutes, ordinances, codes, or regulations. The term illicit discharge includes all non-storm water discharges not composed entirely of storm water except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges that are identified in part 1, "Discharge Prohibitions" of this order, or authorized by the Regional Water Board Executive Officer.

Illicit Disposal - means any disposal, either intentionally or unintentionally, of material(s) or waste(s) that can pollute storm water.

Open Channel - means a storm drainage channel that is not a natural water course.

Screening - means using proactive methods to identify illicit connections through a continuously narrowing process. The methods may include: performing baseline monitoring of open channels, conducting special investigations using a prioritization approach, analyzing maintenance records for catch basin and storm drain cleaning and operation, and verifying all permitted connections into the storm drains. Special investigation techniques may include: dye testing, visual inspection, smoke testing, flow monitoring, infrared, aerial and thermal photography, and remote control camera operation.

3.0 INFRASTRUCTURE PROFILE

- *Briefly characterize storm drain system and sewers within the MS4 system (size, age, condition)*
- *Useful statistics to consider (number of storm drain outfalls, miles of storm drain pipe, total stream and channel miles, total areas serviced by storm drain, sewer, and septic tanks)*
- *Reference or include maps as appropriate*

4.0 LEGAL AUTHORITY

In accordance with Subpart 3.B of the Ventura County MS4 Permit, each Permittee shall possess the necessary legal authority to prohibit illicit connections and illicit discharges, and to remove illicit connections. To ensure uniform and consistent countywide approach and to provide a legal underpinning to the entire Ventura Countywide NPDES Stormwater Program, a Model Stormwater Quality Ordinance was developed, which was adopted subsequently by all Permittees with some minor jurisdiction-specific changes. The current Stormwater Quality Ordinance was adopted by *Permittee's Name* on *date*.

In addition, each Permittee has designated Authorized Inspector(s) responsible for enforcing the Ordinance. The Authorized Inspector(s) is the person designated to investigate compliance with, detect violations of and/or take actions pursuant to the Ordinance.

- *Provide reference to specific sections of the Permittee's Ordinances for IC/ID prohibition, elimination and enforcement actions,*
- *Determine if any permits are required to implement IC/ID Plan,*
- *Determine if effective inter-departmental coordination and cooperation currently occur*
- *Summarize enforcement capability or include enforcement plan if available*

5.0 MAPPING

As listed in the Section 2 of this Protocol, item a).(1).(A) in paragraph 3 "Illicit Connections", the Ventura County MS4 Permit contains specific mapping requirements including due dates for submittal of the required maps to the Principal Permittee. *Permittee's Name* is in the process of mapping all known connections within its jurisdiction.

- *Summarize current status of your mapping efforts*
- *Are maps of the storm drain system readily available?*
- *Determine system gaps that require mapping; describe how maps will be updated*
- *Determine if storm drain maps include coverage of sanitary and storm sewer networks*

6.0 STAFF ASSIGNED FOR FIELD SCREENING

The *Permittee's Name* selected the following staff to complete field and office assignments as a part of the IC/IDs field screening requirements presented in Section 2 of this Protocol:

Name	Position	Organization	Phone Number	Responsibility

The staff selected for field and office assignments will have adequate training to follow this Field Screening Protocol and ensure compliance with the Ventura County MS4 Permit. The training will include basic field training, inspection, data collection, health and safety, and operation and calibration of field instruments.

- *Determine staff needs to complete field work*
- *Determine staff needs to complete data analysis and reporting*

7.0 IC/ID TRACKING AND ELIMINATION CAPABILITY

In order to meet Ventura County MS4 Permit requirements presented in Section 2 of this Protocol, the *Permittee's Name* selected the following individuals to support implementation of the IC/IDs Elimination Program:

Name	Position	Affiliation	Phone Number	Responsibility

The proposed staff and contractors are appropriately trained to respond to IC/IDs, spills, overflows, hazardous material emergencies that occur within *Permittee's Name's* jurisdiction. In the event that IC/IDs investigation and elimination involves more than one Permittee, the contact information presented in Table 1 should be used for notification. Each involved Permittee will be notified as responsible parties are identified.

- *Define responsibilities of Agency(ies), assigned personnel, pre-approved contractors to respond to spills, overflows, hazardous material emergencies,*
- *Determine if personnel is properly equipped and trained to respond to illicit connection*
- *Define strategy for keeping information up-to-date*
- *Define strategy for sharing tracking information among Agencies involved*

8.0 FIELD INSTRUMENTS AND ANALYTICAL LABORATORY

The following field instruments are identified as required and available to complete IC/IDs requirements of the Ventura County MS4 Permit presented in Section 2 of this Protocol:

Field Instrument	Parameters to be Measured	Technical Specifications	Calibration Information
		Exhibit A	Exhibit A

In the event that water sample is required for off-site laboratory analysis, *Permittee's Name* has an on-going contract with *Laboratory Name*. The laboratory contact name is _____ and he/she can be reached at _____. Sample collection details are provided in Exhibit B. Results of lab analysis will be provided to _____ for data analysis and implementation as described in Section 10.

- *Determine requirements for field instruments*
- *Provide calibration procedures and forms*
- *Provide contact and contract information for the analytical laboratory*
- *Provide a sample collection checklist and chain-of-custody forms*

9.0 EDUCATION AND OUTREACH

Public Education is an essential part of a municipal stormwater program because changing public behavior can create a real reduction in environmental pollution. When a community has a clear understanding of where the pollution comes from, how it can affect them and what they can do to stop

Attachment E Illicit discharge Field Screening Protocol

Table 1
Ventura County Illicit Discharge Response Contact List

Prepared on 15-Jan-10

Permittee	Dispatch	Primary Contact Name	Primary Contact Office Phone Number	Primary Contact Cell Phone Number	Alternate Contact Name	Alternate Contact Office Phone Number	Alternate Contact Cell Phone Number
Camarillo	(805) 388-5338	n/a	n/a	n/a	n/a	n/a	n/a
Fillmore	(805) 524-3701						
Moorpark	(805) 517-6257	Shaun Kroes	805-517-6257	n/a	Yugal K. Lall	805-517-6255	805-218-5861
Ojai	(805) 640-2560	Brian Meadows	805-646-5561 ext 114	805-797-1594	n/a	n/a	n/a
Oxnard	(805) 271-2220	Dispatch	(805) 271-2220	n/a	Mark Pumford	(805) 271-2220	n/a
Port Hueneme	(805) 986-6507	Wastewater Div.	805 986-6561	n/a	n/a	n/a	n/a
Santa Paula	(805) 933-4212	Jon Turner	(805) 933-4212 ext 303	(805) 850-8562	Richard Jones	(805) 933-4212 ext 310	(805) 320-0497
Simi Valley	(805) 583-6400	Dispatch	805-583-6400	n/a	Ron Linton	805-583-6429	805-297-6110
Thousand Oaks	(805) 449-2400	PW Counter	805/449-2400	n/a	Bob Carson	805/449-2499	n/a
Ventura	(805) 667-6510	ID Hotline	805-667-6510	n/a	Karen Sedlacek	805-667-6517	805-207-6371
Ventura County	(805) 650-4064	Paul Tantet	(805) 662-6737	(805) 901-4763	Ewelina Mutkowska	(805) 645-1382	(805) 765-5068
Ventura County EHD - for sewage/wastwater discharges	(805) 654-2813	Dispatch	(805) 654-2813 After Hours On-call Emergency Response #: (805) 320-6244		n/a	n/a	n/a
Ventura County EHD - for hazardous waste and materials	(805) 654-2813	Dispatch	(805) 654-2813	n/a	n/a	n/a	n/a
VC PWA Transportation Dispatch: www.pwa_road@ventura.org	(805) 672-2131	Road Maintenance Dispatch	(805) 672-2131	n/a	n/a	n/a	n/a
Ventura County WPD	(805) 650-4064	Greg Martinez	805-672-2102	805-340-1175	Karl Novak	805-672-2106	805-804-7792

it, they will be more likely to support the program, change their own practices, and help educate others.

The on-going countywide outreach campaign includes the following key elements:

- Watershed Awareness
- Public Awareness Surveys
- Identification of general and specific goals of the program
- Identification of target audiences and key messages for those audiences
- Development of program strategies and plan overview
- Pollution prevention program using a unified "brand name"
- Development of a watershed based outreach program
- Identification of opportunities to reach out to regulatory agencies
- Development of a model public education/public participation strategy for localization at the Permittee level
- Development and implementation of a school-aged children education outreach program
- Development and implementation of food facilities outreach program materials
- Development and implementation of automotive facilities outreach program materials
- Development and implementation of industrial facilities outreach program materials

The public outreach materials are available at http://www.vcstormwater.org/programs_residental.html

Permittee's Name have established a hotline at (805) *XX-XXXX* for illicit discharge reporting that has enabled easy reporting and improved response hotline.

- *Determine availability of*
  - *Hotline*
  - *Website to post outreach materials*
  - *Any community events to spread the message*
  - *Outreach materials*

Attachment E Illicit discharge Field Screening Protocol

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10.0 IMPLEMENTATION PLAN

10.1 General

Permittee's Name will complete field screening of its storm drain system **no later than May 7, 2012**. Based on Ventura County MS4 Permit requirements, the screening will include the following system portions that have not been previously screened for illicit connections:

a) All portions of the storm drain system consisting of storm drain pipes 36 inches in diameter or greater;

b) High priority areas identified during the mapping of illicit connections and discharges; and

c) All portions of storm drain systems 50 years or older in age.

In addition, *Permittee's Name* continues responding to IC/IDs discovered during the industrial/commercial business inspections, its routine operation and maintenance activities, or as reported by the public.

10.2 Desktop Assessment to Support Field Screening (Optional)

Desktop Assessment provides a prioritization approach for completing screening requirements within the *Permittee's Name's* jurisdiction. The EPA Guidance recommends Desktop Assessment for municipalities with 20 or more stream miles of the storm drain system required for ID/IC screening.

Desktop Assessment was used by *Permittee's Name* to define where to begin searching for IC/ID problems in *Permittee's Name's* community. It involved processing and analysis of available mapping data to quickly characterize and screen for IC/ID problems at the community and subwatershed scale. Key factors considered in the analysis included *water quality, land use, development age, sewer infrastructure, and outfall density*.

In accordance with *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments* (2004) the following 5 steps were applied:

Step 1: Delineate subwatersheds

Permittee's Name delineated the following subwatersheds *or other drainage units* within the community, refer to Map X:

1)

- *List defined subwatersheds or drainage units*

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Step 2: Compile mapping layers and subwatershed data

Permittee's Name compiled available maps (Section 5) and data for each drainage unit (e.g., land use, age, outfalls, infrastructure history).

- *Summarize results of the map analysis; include layered maps if available.*

Step 3: Compute discharge screening factors (SF)

Out of 10 screening factors discussed in the EPA's Guidance Manual, *Permittee's Name* selected the following factors for the IC/ID problem analysis:

- ☐ Past Discharge Complaints and Reports
- ☐ Poor Dry Weather Water Quality
- ☐ Density of Generating Sites or Industrial NPDES Storm Water Permits
- ☐ Storm Water Outfall Density
- ☐ Age of Subwatershed Development
- ☐ Sewer Conversion
- ☐ Historic Combined Sewer Systems
- ☐ Presence of Older Industrial Operations
- ☐ Aging or Failing Sewer Infrastructure
- ☐ Density of Aging Septic Systems

The following are results of the SF analysis for *Permittee's Name's* community:

	SF 1	SF2	SF3	Raw IC/ID Problem Score	Normalized IC/ID Problem Score
Subwatershed A					
Subwatershed B					

Example

Basis for assigning scores (based on benchmarks) to assess IDP is as follows:
Past discharge complaints/reports: <5 = 1; 5-10 = 2; >10 = 3
Dry weather water quality: <25% = 1; 25-50% = 2; >50% = 3
Storm water outfall density: <10 = 1; 10-20 = 2; >20 = 3
Average age of development: <25 = 1; 25- 50 = 2; >50 = 3

- *Checked selected factors*
- *Complete table;*

Step 4: Screening at the subwatershed and community level

Screen and rank illicit discharge potential at the subwatershed and community level

The raw score values of the IC/ID potential problems were re-evaluated using SF data at the subwatershed and community level resulting in normalized scores listed above. Based on *Permittee's Name's* analysis, the following prioritization of the risk was determined:

- Highest risk at *Subwatershed X*
- Medium risk at *Subwatershed Y*
- Low risk at *Subwatershed Z*

Step 5: Generate maps to support field investigations

Incorporating all the Desktop Assessment results, *Permittee's Name* determined that communities A and B have minimal IC/ID problems, C and D exhibit clustered IC/ID problems, and E and F are of severe IC/ID problems, refer to Map(s).

The desktop assessment completed by *Permittee's Name* is used to guide field screening by generating the following outcomes:

1) Screening problem catchments or subwatersheds,
2) Creation of GIS or other database system to track outfalls,
3) Gaining an overall assessment as to the severity of illicit discharge problems in the community, and
4) Generation of basic mapping for subsequent field work

10.3 Field Screening Methodology

The primary field screening tool recommended by the EPA IDDE Guidelines is the Outfall Reconnaissance Inventory (ORI), which is used to find IC/ID problems, develop a systematic outfall inventory, and map or verify existing maps of the MS4. The ORI is a stream walk designed to inventory and measure storm drain outfalls, and find and correct continuous and intermittent discharges and illicit connections.

During ORI walk, *Permittee's Name's* trained staff will use EPA's "Outfall Reconnaissance Inventory Field Sheets" provided in Exhibit C to record field information. These sheets will facilitate recording outfall locations and characteristics. Field crew will describe the following indicators for flowing and non-flowing outfalls as listed in the "Outfall Reconnaissance Inventory Field Sheets":

1. Odor (flowing outfalls only);
2. Color (flowing outfalls only);
3. Turbidity (flowing outfalls only);
4. Floatables (flowing outfalls only);
5. Outfall damage (both flowing and non-flowing outfalls);

6. Deposits/stains (both flowing and non-flowing outfalls);
7. Abnormal vegetation (both flowing and non-flowing outfalls);
8. Poor pool quality (both flowing and non-flowing outfalls), and
9. Pipe benthic/algal growth (both flowing and non-flowing outfalls).

Permittee's Name will compile ORI data including field information, GPS data, and photographs of outfall locations.

The ORI can discover obvious discharges that are indicated by flowing outfalls with very high turbidity, strong odors and colors, or an "off the chart" value on a simple field test strip. When obvious discharges are found and physical indicators are present, refer to Figure 1 "Illicit Discharge Source Investigation Flow Chart", field crews will initiate response within 1 business day. ORI crews may also encounter a discharge of hazardous materials or wastewater that should be immediately referred to the appropriate agency for cleanup, refer Table 1 "Ventura County Illicit Discharge Response Contact List".

In order to complete investigation of the IC/ID source, *Permittee's Name* will select appropriate investigative method from the following methods recommended in the US EPA Guidance Manual:

- Storm Drain Network Investigation (refer to subsection 10.3.1);
- Drainage Area Investigation (refer to subsection 10.3.2);
- On-site investigations (refer to subsection 10.3.3); and
- Septic system investigations (refer to subsection 10.3.4).

Detailed descriptions of the methods are provided in Chapter 13 of the *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments* (2004).

IC/ID discovery, investigation, and response will be documented using forms provided in Exhibit C. Appropriate information will be provided to Regional Water Quality Control Board in the Annual Report. In addition, per Permit requirements, *Permittee's Name* will map incidents of illicit connections and discharges since January 2009 on its baseline maps and transmit this information to the Principal Permittee no later than May 7, 2012.

10.3.1 Storm Drain Network Investigation

Field crews will strategically inspect manholes within the storm drain network system to measure chemical or physical indicators that can isolate discharges to a specific segment of the network. Once the pipe segment is identified, on-site investigations will be used to find the specific discharge or improper connection.

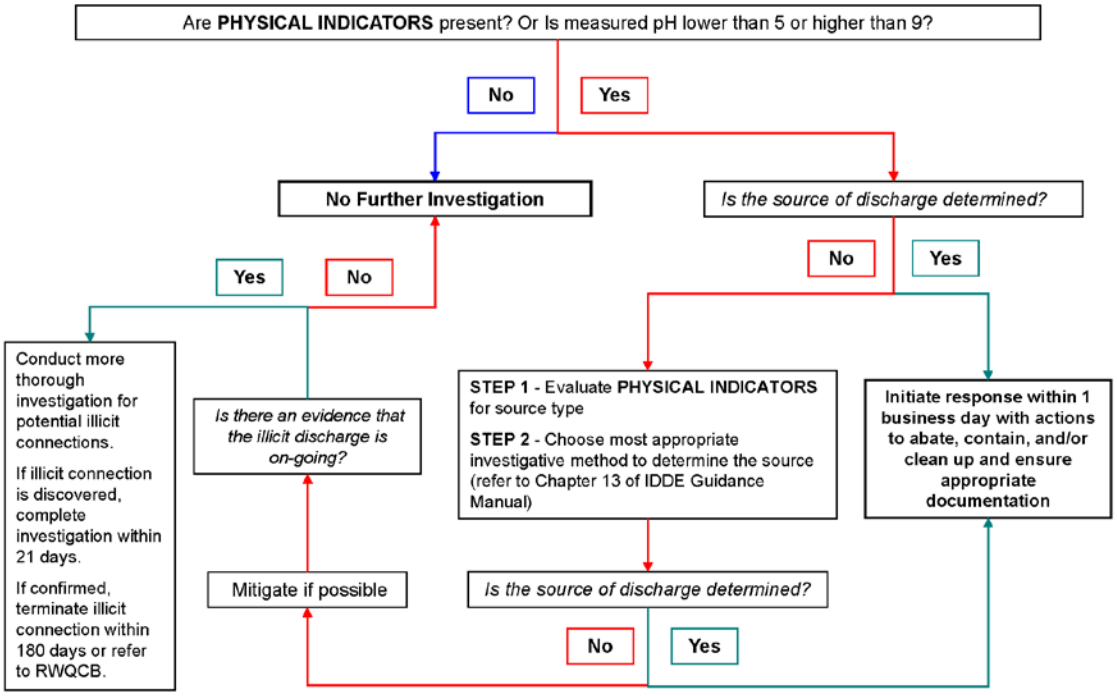
This method involves progressive visual inspections and/or sampling at manholes in the storm drain network to narrow the discharge to an isolated pipe segment between two manholes. When conducting a storm drain network investigation, field crews need to decide where and how to proceed with visual inspections and/or sampling in the network.

Attachment E Illicit discharge Field Screening Protocol

Figure 1 Illicit Discharge Source Investigation Flow Chart

STEP 1 – Complete Outfall Reconnaissance Inventory Field Sheet

STEP 2 – Notify other Permittees if observed discharge is present in their facilities



The field crew should decide how to attack the pipe network that contributes to a problem outfall. Three options can be used:

1) Crews can work progressively up the trunk from the outfall and test manholes along the way.
2) Crews can split the trunk into equal segments and test manholes at strategic junctions in the storm drain system.
3) Crews can work progressively down from the upper parts of the storm drain network toward the problem outfall.

10.3.2 Drainage Area Investigation

This method relies on an analysis of land use or other characteristics of the drainage area that is producing the illicit discharge. The investigation can be as simple as a "windshield" survey of the drainage area or a more complex mapping analysis of the storm drain network and potential generating sites. Drainage area investigations work best when prior indicator monitoring reveals strong clues as to the likely generating site producing the discharge.

10.3.3 On-site Investigation (Optional)

On-site methods are used to trace the source of an illicit discharge in a pipe segment, and may involve dye, video or smoke testing within isolated segments of the storm drain network. While each approach can determine the actual source of a discharge, each needs to be applied under the right conditions and test limitations discussed in details in Chapter 13 of the *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments* (2004). It should be noted that on-site investigations are not particularly effective in finding *indirect* discharges to the storm drain network.

10.3.4 Septic System Investigation (Optional)

Low-density residential watersheds may require special investigation methods if they are not served by sanitary sewers and/ or storm water is conveyed in ditches or swales. The major illicit discharges found in low-density development are failing septic systems and illegal dumping. Homeowner surveys, surface inspections and infrared photography have all been effectively used to find failing septic systems in low-density watersheds.

10.4 Health and Safety Considerations

The field crew (2 staff at minimum) will be trained to raise awareness of many hazardous circumstances that they may confront when conducting field screening of the storm drain system. These health and safety guidelines can only be effective, however, if they are considered, discussed, and applied with a large dose of prudent judgment.

Communication is also a major component. When doubts and concerns arise, field crew will discuss the matter with a supervisor. Furthermore, always err on the side of safety when assessing risk. If there is any doubt whether task can be safely performed, ask the crew leader/supervisor for further instructions and help. Protecting personal safety is more important than completing a risky task – **SAFETY FIRST!**

Attachment E Illicit discharge Field Screening Protocol

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The following list establishes a policy to use for personal protection and environmental sensitivity when performing field screening activities:

- If moving any heavy item, lift with legs while keeping the back straight.
- Do not lift heavy items without adequate help. If a waste object is beyond the means of the onsite crew, note its location and report to program manager.
- Avoid wading in water.
- Avoid walking near steep grades. Soil next to edge may be unstable and give way.
- Carefully avoid hazardous plant life such as poison oak (leaves-of-three beware of me).
- Be aware that some plants have leaves and stalks with sharp edges or thorns.
- Avoid prolonged sun exposure without a hat. Apply plenty of sunscreen prior to field work.
- Hydrate adequately by drinking at least one cup of water each hour on warm days.
- If you suspect a potentially dangerous material, avoid any contact. Note all necessary descriptive details including the precise location. Report the circumstances to the program manager for further instructions. Call 911 if there is an imminent threat.
- Call for support immediately if any suspected hazardous material container is found leaking.
- Be respectful of inhabited areas by moderating noise levels when working there.
- Use care to avoid damaging sensitive riparian (ecologically rich areas bordering natural water environments) vegetation or delicate aquatic ecosystems.
- Discuss your observations and ideas about safety with your associates and crew leader.
- Minimize accelerating erosion by not walking on steep banks.
- Avoid contact with animals wild or domestic. This includes watching where you are walking. Snakes will bite to deal with a perceived threat. Be cognizant of your surroundings.
- Report all injuries that occur. Immediate medical attention can sometimes prevent severe complications arising from small injuries as with infection caused by cuts and bites.
- If human encampments are found, do not disturb the inhabitants or their belongings. Take notes including the precise location. Report this information to the crew leader and/or program manager.
- Ensure appropriate traffic control measures are applied if needed.
- Field activities should be conducted in a safe manner following *Permittee's Name* Health and Safety Protocol.

Attachment F - Water Quality Monitoring Report

The 2009-2010 Water Quality Monitoring Report is provided in a separate document.