2008-09 Annual Report



Ventura Countywide Stormwater Quality Management Program



A cooperative project of the County of Ventura, the cities of Ventura County and the Ventura County Watershed Protection District

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EXECUTIVE SUMMARY

The purpose of this document is to comply with NPDES Permit No. CAS004002/Order No. 00-108, which requires submittal by October 1 of each year of an Annual Storm Water Report (Report). This Report discusses the Co-permittees' Second Term Permit compliance activities for the period of July 1, 2008 to June 30, 2009, includes a description of all activities conducted during the reporting period, and an assessment of the Ventura Countywide Stormwater Program's effectiveness. This Annual Report was prepared with the cooperation and assistance of the Ventura Countywide Co-permittees who contributed the detailed permit compliance information and data regarding their various stormwater programs. The Co-permittees through implementation of various comprehensive program elements, have achieved compliance with all requirements of the Permit.

Although the Regional Board adopted a new permit, (Order No. 09-0057), on May 7, 2009, the new Order did not become effective until August 5, 2009, after the reporting period ended on June 30, 2009. The new permit was not in effect for any part of the reporting year covered by this Report, and this Report only addresses compliance with Order No. 00-108.

The organization of the Report reflects the organization of the 2001 Stormwater Management Plan (SMP). The implementation portion of the SMP consists of the following elements, with this Report containing a section on each element: 2. Management, 3. Program for Residents, 4. Programs for Industrial and Commercial Businesses, 5. Programs for Planning and Land Development, 6. Programs for Construction Sites, 7. Programs for Public Agency Activities, 8. Programs for Illicit Discharges/Illegal Connections, 9. Stormwater Quality Monitoring.

For this year's annual Program Effectiveness Assessment (PEA), the Co-permittees utilized a series of measures (both *direct* and *indirect*) to verify program implementation and ultimately validate achievement of Program goals. The identified measures are designed to assess the effectiveness of the Program to improve stormwater water quality.

This year's PEA shows strong evidence of increasing program effectiveness:

- A. For the past five years illicit discharges have decreased signaling a change in the public's behavior for the better;
- B. Increased enforcement of stormwater requirements at construction sites even though there was a reduction in grading permits granted;
- C. Increased program activities removing trash and debris from catch basins, channels, ditches and detentions basins resulting in more debris removed;
- D. Land development projects are increasingly identified and conditioned for stormwater BMPs based on site activity and pollutants of concern, and not solely on permit requirements.

In addition, key baseline data has been compiled on a watershed and countywide basis for future comparative assessment and trends analysis in the areas of municipal activities, new and existing development, and construction.

Notable accomplishments that occurred during this reporting period include:

- A. The achievement of over 4.6 million impressions in the countywide public outreach effort. 20% of media placed was in Spanish.
- B. Over 1 million pet waste pickup bags were given out at local parks, beaches and trail heads countywide at a cost of over \$100,000.
- C. A cooperative effort with Police and Sheriffs to catch illicit discharges by installing hidden security cameras in areas of frequent illegal dumping.
- D. 1197 food service facilities were inspected for stormwater compliance.

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- E. 644 automotive service facilities inspected for stormwater compliance.
- F. 412 industrial facilities were visited for stormwater quality education.
- G. 82 development projects identified within one or more of the SQUIMP categories were conditioned for stormwater quality controls.
- H. 51 development projects that <u>were not</u> one of the SQUIMP categories were also conditioned for stormwater quality controls.
- 268 stormwater quality inspections were made at active construction sites but only 159 grading permits issued.
- J. Over 43,000 tons of debris was removed by public works crews by cleaning 15,453 catch basins, 220 miles of channels and ditches, and sweeping over 115,000 miles of curbs and gutters.
- K. Inspectors responded to 541 reports of illicit discharges resulting in 357 enforcement actions taken, a decrease for the fifth consecutive year.
- L. Permittees decided to voluntarily implement progressive stormwater programs in advance of permit renewal, even though these programs are not required by the current permit such as storm drain mapping, catch basin prioritization and a Youth Awareness Survey.

With respect to water quality monitoring, the Co-permittees continued to implement a very comprehensive monitoring program. Key points are highlighted below:

- A. The Ventura Countywide Stormwater Monitoring Program met all the monitoring requirements of its Permit.
- B. Water quality monitoring data were collected by the Stormwater Monitoring Program during four wet weather and two dry weather events.
- C. All environmental and QA/AC water chemistry data thoroughly evaluated and accepted by VCWPD staff using *Data Quality Evaluation Plan* and *Data Quality Evaluation Standard Operating Procedures* guidance documents.
- D. Acute toxicity of *Ceriodaphnia dubia* was observed at the agriculture dominated Receiving Water sites W-3 (La Vista) and W-4 (Revolon Slough) for the samples collected during Event 1.
- E. No Chronic toxicity of *Strongylocentrotus purpuratus* (purple sea urchin) was observed at the Mass Emission station.
- F. Toxaphene concentrations exceeded applicable water quality objectives at multiple locations during one or more wet weather monitoring events.
- G. Elevated pollutant concentrations were observed at all monitoring sites during one or more monitored wet weather storm events, as well as ME-CC and ME-SCR during one or more dry weather events. See Section 9 for details and an explanation of monitoring results.

Future Program Activities

The Permittees are aggressively moving forward with implementation of the new permit. Subcommittees are working on developing new forms, protocols and procedures to ensure compliance with each program. Already a Youth Outreach Plan has been submitted to the Regional Board and a new Pesticide Application Protocol has been drafted. Monitoring stations have been installed at the four new monitoring sites and are standing by for the first rain of the season. There are many challenges for the Program this next year including revising the Technical Guidance Manual for Land Development, writing and adopting new ordinances, implementing the Youth Outreach Plan and developing a new annual report format.

The Watershed Protection District (Principal Co-permittee), the County of Ventura and the incorporated cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, Thousand Oaks, (each a Co-permittee and collectively known as Co-permittees) operate municipal storm drain systems and discharge stormwater and urban runoff pursuant to the countywide NPDES permit (Board Order No. 00-108). 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 October 1 of each year.

The first permit was adopted in 1994, and on July 27, 2000 a second permit was adopted. That permit was on administrative extension until October 7, 2009 when the current permit (Board Order 09-0057, adopted May 7, 2009) became effective. This new permit was not in effect for any part of the permit year covered by this report, and this report only address compliance with Board Order 00-108.

1.1 Purpose and Organization of Report

In accordance with the requirements of the permit, the primary purpose of the report is to document:

- The status of the general program and individual tasks contained in the Stormwater Management Plan (SMP);
- Results of the monitoring and reporting program CI 7388; and
- Compliance status and effectiveness of the implementation of permit requirements.

The organization of the report reflects the organization of the Program's 2001 SMP. Each section contains a review of co-permittee program activities and detailed descriptions of the 2007-2008 permit year:

- Program management framework (committee and subcommittee structure) and a fiscal analysis report (**Section 2.0**)
- Status and effectiveness of the public information dissemination and pollution prevention outreach program (Section 3.0)
- Inspection 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. (Section 4.0)
- Efforts to minimize the impact of new development and significant redevelopment on stormwater quality.(Section 5.0)
- Construction site practices to ensure the protection of stormwater quality to the maximum extent practicable (Section 6.0)
- Efforts to reduce the adverse effects that municipal activities may have on water quality (Section 7.0)
- Status of the control measures established under the Illicit Discharge/Illegal Connections elimination program (Section 8.0)
- A summary and analysis of the monitoring results from the water quality monitoring program (Section 9.0) and (Appendix 3)

1.2 Major Program Accomplishments

Notable accomplishments that occurred during the reporting period include:

- Regional Board adoption of new NPDES MS4 Permit (Order No. 08-0057);
- Development and distribution of new BMPS posters for restaurants and auto shops;
- Implementation of a new public education campaign on horse manure management;
- Initiated development of new Youth Outreach Campaign by performing an awareness survey:
- Stormwater Quality Monitoring (6 events, 4 wet and 2 dry);
- 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.

The Co-permittees have been working with Regional Board staff on the adoption of the new NPDES permit since 2005. Because it was reasonable to expect the new permit would substantially change program elements and strategies the Permittees have been conservative in starting and amending programs over the past years. This does not mean Co-permittees forestalled programs improvements or new programs, in fact the permittees have been proactively implementing some program elements found in the new permit.

1.3 Effectiveness Assessment Strategy

The SMP recognizes a number of separate, but nonetheless related, water quality planning processes. These processes are countywide, jurisdictional and watershed based water quality management tools. Each process is iterative and incorporates phases of assessment to determine whether programmatic goals are being achieved.

1.3.1 Measurable Goals

Measurable goals are a primary implementation tool of the SMP. They are described by USEPA as BMP design objectives or goals that quantify the progress of program implementation and the performance of BMPs. They are objective markers or milestones that track the progress of the copermittees in implementing the provisions of the permit and the SMP to the Maximum Extent Practicable (MEP).

Measurable goals may be categorized in a variety of ways. In this report, two categories are acknowledged: (1) the shorter-term confirmation of BMP implementation (Implementation or Process Measures, also termed Programmatic Indicators) and (2) the longer-term verification of environmental improvement (Validation or Results Measures, typically actual indicators of environmental change). These two categories of measurable goals reflect two basic assessment questions:

- Are program elements being implemented correctly?
- Are desired outcomes (i.e. environmental improvements) being achieved?

Programmatic and environmental indicators may be constructed into a hierarchical relationship (See **Table 1.1 Hierarchy of Indicators**). This relationship helps to illustrate the fact that environmental outcomes rest on, or follow from, jurisdictional program implementation. Moreover, it points to the reality that scientific evidence of changing ecosystem quality will follow program implementation over time, and should not be expected to be evident concurrently.

Table 1.1 Hierarchy of Indicators (USEPA, 1998)						
Environmental Indicators (Direct Measures)		Ultimate Impacts: Ecological Health Welfare				
	5	Body Burden/Uptake				
	4	Ambient Conditions				
	3	Discharge/Emission				
Programmatic Indicators	2	Actions by Regulated Community				
(Indirect Measures)	1	Actions by Regulators				

In the context of evaluating stormwater management program implementation, the distinction is also often made between *direct* and *indirect* measures. Direct measures are typically environmental indicators such as determinations of water quality. Indirect measures are essentially non-water quality indicators, such as reductions in pesticide use, from which improvements in water quality can be inferred.

A number of Performance Measures have been identified based upon the following selection criteria:

- Relevance: It has demonstrable relation to the strategy and objectives;
- Reliability: The measure will help identify the strengths and weakness of the program area/process;
- Clarity of Naming System: It is readily understandable by its name; and
- Availability of Data: The data are available at reasonable cost.

These Performance Measures comprise process and result (direct and indirect) measures that are used to highlight the progress of the Co-permittees in implementing water quality management, protection and enhancement requirements of the Permit. The Performance Measures are defined in the SMP and presented in **Table 1.2**

Table 1.2 Pe	erformance Measures		
Program Element	Performance Measure	Type of Perform Measure	
		Process Measure	Result Measure
_			
Program Management	Participation in Management Committee	X	
	Participation in subcommittee meetings	Χ	
	Submittal of Co-permittee Self-Audit	Χ	
	Submittal of the Annual Report	Χ	
	Annually submittal of Co-permittee program evaluation results	X	
	Stormwater program budget updates	Χ	
	Review and adopt or amend legal authority to implement stormwater management plan	X	
Public Outreach	Identify program contact person(s)	Χ	
	Catch basin stenciling	Χ	
	Signs prohibiting illegal dumping at designated public access points to creeks and channels		X
	Educational activities and participation in countywide events		X
	Household Hazardous Waste Collected		Χ
	Used Oil Collected		Χ
	Educational material distribution		
	No. of outreach contacts	Χ	
Industrial/ Commercial Businesses	No. of site education/inspections to automotive, food service and other targeted businesses	X	

Table 1.2 Pe	erformance Measures		
Program Element	Performance Measure	Type of Mea	Performance asure
		Process Measure	Result Measure
	No. of follow up inspections	X	
	No. of additional businesses targeted based on Pollutants	X	
	of Concern (POCs) as appropriate	^	
	No. of facilities identified as potentially subject to the General Industrial Permit given educational materials	X	
	No. of targeted employees trained	X	
Planning & Land Development	No. of Projects reviewed and conditioned for stormwater	X	
	Area to which BMPs have been applied		Χ
	No. of BMPs implemented		Χ
	Stormwater quality conditions included in environmental checklists, initial studies or EIRs required by CEQA and/or NEPA	X	
	Watershed and stormwater management considerations in Co-permittees' General Plan	X	
	Technical Guidance Manual	X	
	Environmentally Sensitive Areas	Χ	
	Development Community Outreach		Χ
	No. of targeted employees trained	Χ	
Construction Sites	No. of SWPCPs/SWPPPs developed and implemented		X
	No. of NOIs filed with the State		X
	No. of sites inspected	X	
	No. of follow up inspections	Χ	
	No. of enforcement actions	Χ	
	Construction Community Outreach		X
	No. of targeted employees trained	Χ	
Municipal Activities	Co-permittee corporate yard SWPCP		Х
	Drainage System Operation and Maintenance		Χ
	Roadway Operation and Maintenance		Χ
	No. of Facilities Inspected Solid Waste Collected	Χ	X
	Pesticide, Herbicide and Fertilizer Protocols		Χ
	Reduction in Total Pesticide Application		Χ
	Reduction in Total Fertilizer (Nitrogen) Application		Χ
	Reduction in Total Fertilizer (Phosphorus) Application		X
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Table 1.2 Pe	rformance Measures		
Program Element	Performance Measure	Type of Meas	Performance sure
		Process Measure	Result Measure
	No. of targeted employees trained	X	
Illicit Discharge/Illegal Connections	No. of complaints		X
	No. of enforcement actions	X	
	Educational material distribution		X
	No. of targeted employees trained	Χ	

1.3.2 Effectiveness Assessment

Effectiveness assessment requires the establishment of a set of baseline conditions. Thereafter, effectiveness can be evaluated by comparisons of indicator information against the baseline data over the years. Where the period of evaluation is characterized by the implementation of new program requirements, determinations of program effectiveness will initially be limited to confirmation of program implementation. Indeed, it must be recognized that direct measures of program effectiveness may not be available within the history of the Stormwater Quality Program. This challenge arises because:

- Baseline water quality conditions are not readily established;
- Water quality changes in response to program implementation are likely to be slow and may be marked by changes due to extreme weather events;
- Establishing a link between receiving water condition and program activities is difficult at the
 watershed scale when program elements are being implemented incrementally with the
 development/redevelopment cycle;
- The watersheds of Ventura County are not predominantly urbanized, so in-stream measurements cannot isolate changes due to urban or other sources.

The evaluation of stormwater program effectiveness assessment is also conducted at two levels. At the jurisdictional or Co-permittee level, the assessment is conducted annually and focuses on program implementation. Inferences about the connection of management program elements to water quality improvements made in these assessments will be drawn from the assessment of programmatic indicators and indirect measures of progress. The Co-permittees' program assessments are presented in **Sections 3.0 – 8.0**.

At the countywide program level, the major assessment is done principally on a permit cycle basis with an emphasis on using indirect measures of progress. The Annual Progress Report strategy is illustrated in **Figure 1-1**.

Figure 1-1 Annual Progress Report

Annual Progress Report

Implementation Monitoring (Process Measures)

- Provide inventories/map
- Complete inspections

Effectiveness Assessment

Validation Monitoring (Indirect Measures)

- · Reduction in violations
- Increased BMPs on sites

Assessments (Direct Measures)

Is the SMP achieving its goals?

- Compile assessments
- Watershed analyses
- Countywide analyses
- Identify problem areas
- Compare programs



Overall Goal

Improvements of the receiving waters

- Water quality analysis
- Bioassessment analyses



Implementation Monitoring (Process Measures)

- Provide inventories/map
- Complete inspections

Implementation Monitoring (Process Measures)

- Provide inventories/map
- · Complete inspections

2.1 Responsibilities

The responsibilities of the Principal Co-permittee and Co-permittees are defined within the Permit and the Implementation Agreement. These roles and responsibilities are outlined below.

2.1.1 Principal Co-permittee

The role of the Principal Co-permittee is similar to the other Co-permittees with the addition of certain overall programmatic and facilitation responsibilities. These responsibilities are not to ensure the compliance of the Co-permittees as the Principal Co-permittee has no regulatory authority over the Co-permittees. These responsibilities include the following:

- Coordinate Permit activities;
- Establish uniform data submittal format;
- Set time schedules;
- Prepare regulatory reports;
- Forward information to the Co-permittees;
- Arrange for public review;
- Secure services of consultants as necessary;
- Implement activities of common interest;
- Develop/prepare/generate all materials and data common to all Co-permittees;
- Update Co-permittees on RWQCB and US Environmental Protection Agency (USEPA) regulations;
- Convene all Management Committee and Subcommittee meetings;
- Manage the countywide educational outreach program; and
- Manage the countywide stormwater quality monitoring program.

2.1.2 Co-permittees

Each Co-permittee is responsible for implementing the NPDES Stormwater Program within their jurisdiction. The main responsibility of each Co-permittee includes:

- Review, approve and comment on budgets, plans, strategies, management programs and monitoring programs developed by the Principal Co-permittee or any subcommittee;
- Implement the various stormwater management programs outlined in the Permit and the Stormwater Management Plan (SMP) within its jurisdiction;
- Establish and maintain adequate legal authority;
- Take appropriate enforcement actions as necessary within its jurisdictions to ensure compliance with applicable ordinances;
- Coordinate among internal departments and agencies, as appropriate, to facilitate the implementation of the Permit and the SMP;
- 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;
- Participate in the Management Committee meetings and subcommittee meetings as outlined in the SMP; and
- Prepare and submit all reports or requests of information to the Principal Co-permittee in a timely fashion.

2.2 Management Activities

2.2.1 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 Co-permittee agencies and meets monthly to assure Program continuity. In addition, this committee periodically evaluates the need to create ad hoc committees or workgroups as required in order to accomplish the objectives of the NPDES Stormwater Program. Participation in the NPDES Management Committee is a specific requirement of the Permit. Co-permittee participation in the NPDES Management Committee is noted in **Figure 2-1**.

12 Regular and 7 Special Management meetings were held.

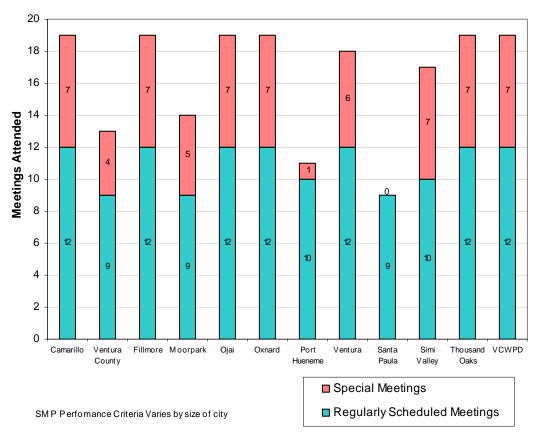


Figure 2-1 Co-Permittee Management Committee Meeting Attendance

2.2.2 Subcommittees

The Subcommittees provide a forum for discussion of particular program elements and are attended by the staff with the appropriate expertise from each Co-permittee. These meetings create a more uniform approach to program management countywide and allow the Co-permittees to learn from each other. The subcommittees are tasked principally with the following program material responsibilities

Residential/Public Outreach Subcommittee

To help provide regional consistency and oversight for the stormwater public education program efforts. Select specific Pollutants of Concern in which public education can potentially make a difference.

SECTION 2.0 PROGRAM MANAGEMENT

• Business and Illicit Discharge Control Subcommittee

Oversee the development of the model industrial/commercial and illicit discharge/illegal connections programs. Create regional consistency to business inspections and reporting of discharges.

Planning and Land Development Subcommittee

To help provide regional tools for design, review and conditioning of new development and redevelopment projects, and promote regional consistency in their application.

Construction Subcommittee

To provide regional consistency to inspections, share solutions to common problems and the development of model new development and construction programs.

Public Infrastructure

The development of the model municipal activities program, corporate yard inspections, and integrated pesticide management, pesticide and fertilizer programs.

Co-permittee participation in Subcommittees is noted in Figure 2-2.

2.2.3 Other Regional Committees/Work Groups

Many of the Co-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 Enhancement and Management 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, Steelhead Restoration and Recovery Plan, Beach Erosion Authority for Clean Oceans and Nourishment (BEACON), Southern California Coastal Water Research Project (SCCWRP) 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.

25 Subcommittee meetings were convened.

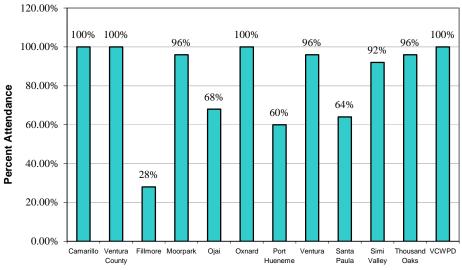


Figure 2-2 Co-Permittee Subcommittee Meeting Attendance

SMP Perfomance Criteria Varies by size of city

2.2.4 Management Framework – Program Implementation

In addition to the countywide and watershed management frameworks for program development, the Co-permittees at a jurisdiction level have formally identified which departments and staff have responsibility for implementation of each program elements within their jurisdictions.

2.3 Legal Authority

Although adequate legal authority existed for most potential pollutant discharges at the inception of the stormwater program in 1994, the Co-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.

Subsequently, all of the Co-permittees adopted largely similar versions of the model Stormwater Quality Ordinance. In addition, each Co-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.

The detection, elimination and enforcement activities undertaken by the Co-permittees during 2008/09 are described further in **Section 8**. In addition to prohibiting un-permitted discharges, the Stormwater Quality Ordinance in conjunction with the SQUIMP also provides for requiring BMPs in new development and significant redevelopment. A Stormwater Quality Ordinance has been adopted in each Co-permittees' jurisdictions as indicated in **Table 2.1**

Table 2-1				
Ordi	nance Adoption Da	ates		
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	4/22/2002		
Thousand Oaks	9/14/1999			

2.4 Watershed Protection Stormwater Program Representation

The Principal Co-permittee represents the Co-permittees participating in the following organizations and associations:

2.4.1 California Association for Stormwater Agencies (CASQA)

The California Association of Stormwater Quality Agencies (previously California Storm Water Quality Task Force) serves as advisory body to the State Water Resources Control Board (SWRCB) on stormwater quality program issues. CASQA is primarily comprised of agencies, organizations, businesses and individuals responsible for and/or interested in the implementation of municipal stormwater management programs in California. Since its inception in 1989, CASQA has evolved into the leading organization in California dealing with stormwater quality issues.

SECTION 2.0 PROGRAM MANAGEMENT

2.4.2 Southern California Coastal Water Research Project (SCCWRP)

The Southern California Coastal Water Research Project (SCCWRP) is a joint powers agency focusing on marine environmental research. SCCWRP's mission is to gather the necessary scientific information so that member agencies can effectively and cost-efficiently protect the Southern California 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.

2.4.3 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.

2.4.4 National and Global Organizations

As Principal co-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.

2.4.5 Southern California Agencies

Beginning in 2003, and continuing through 2008 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 are held to discussions various issues such as TMDL development and progress permit negotiations, and regional monitoring opportunities.

2.4.6 Local Involvement

Watershed Protection District staff participates in various watershed-specific local subcommittees and groups that are focused on water quality and TMDLs. For example, staff regularly attends Calleguas Creek water quality subcommittee meetings and is involved in developing appropriate methods for monitoring water quality. Similarly, in the Malibu Creek watershed, staff provides technical expertise for the water quality monitoring technical advisory committee, reference water quality study workgroup, and bacteria compliance monitoring workgroup.

2.5 Fiscal Analysis

This Section presents a summary of the costs incurred by the Co-permittees in developing, implementing and maintaining programs in order to comply with permit requirements and includes information on the funding sources used by the Co-permittees. The total cost to each Co-permittee is the sum of *shared* costs and *individual* costs.

2.5.1 Program Costs for Permit year 2008/09

In 2008/09 the projected cost of the activities undertaken by the Co-permittees implementing the stormwater program within their jurisdictions are estimated to be 31,910,727. This is a large increase over previous years' budgets of \$15,365,736 in 2008/09, \$16,739,303 in 2007/08, \$19,158,359 in 2006/07, \$15,429,018 in 2005/06, and \$14,205,276 in 2004/05.

The Countywide budget for stormwater quality is \$31,910,727

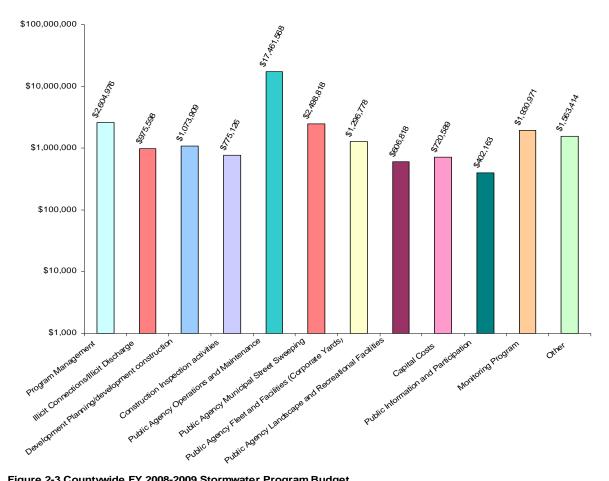


Figure 2-3 Countywide FY 2008-2009 Stormwater Program Budget

SECTION 2.0 PROGRAM MANAGEMENT

Table 2-2														
Agency Annual	Budget Update for Stor	mwater Manage	ement Progran	n - Fiscal Ye	ear 2009-201	10								
	Item	Co-Permittee												
		Camarillo	County of Ventura	Fillmore	Moorpark	Ojai	Oxnard	Port Hueneme	Ventura	Santa Paula	Simi Valley	Thousand Oaks	VCWPD	Principal Co- Permittee
1.	Program Management	\$323,566	\$485,126	\$35,205	\$119,461	\$105,000	\$280,907	\$45,000	\$177,000	\$37,020	\$193,711	\$165,944	\$117,125	\$519,911
II.	Illicit Connections/ Illicit Discharge	\$50,201	\$182,655	\$29,495	\$3,000	\$0	\$85,058	\$5,000	\$222,000	\$84,713	\$232,051	\$68,528	\$5,631	\$7,266
III.	Development Planning	\$75,126	\$116,545	\$53,893	\$75,000	\$7,000	\$91,404	\$5,000	\$253,000	\$11,187	\$37,136	\$185,610	\$6,889	\$156,119
IV.	Construction Inspection Activities	\$68,167	\$79,945		\$75,000	\$5,000	\$180,894	\$5,000	\$40,000	\$8,762	\$95,843	\$196,030	\$17,345	\$3,140
V.	Public Agency Activities													
V.a.	Operations and Maintenance	\$258,317	\$800,000	\$92,865	\$39,000	\$4,000	\$467,809	\$15,000	\$225,000	\$159,187	\$165,472	\$232,848	\$15,000,000	\$2,070
V.b.	Municipal Street Sweeping	\$255,000	\$150,000		\$111,850	\$45,000	\$525,000	\$78,500	\$200,000	\$130,125	\$313,060	\$690,283	NA1	NA2
V.c.	Fleet and Public Agency Facilities (Corporate Yards)	\$5,194	\$3,000	\$101,791	\$1,000	\$4,000	\$33,581	\$5,000	\$0	\$4,116	\$1,067,759	\$2,231	\$69,106	\$0
V.d.	Landscape and Recreational Facilities	\$11,378	\$1,500		\$1,500	\$200,000	\$8,179	\$354,700	\$22,000	\$2,165	\$3,821	\$1,575	NA1	\$0
VI.	Capital Costs	\$144,000	\$0		\$10,000	\$6,000	\$390,000	\$10,000	\$95,000	\$0	\$65,589	\$0	0	\$0
VII.	Public Information and Participation	\$14,977	\$6,000	\$24,967	\$10,680	\$0	\$17,294	\$15,000	\$40,000	\$4,391	\$21,691	\$58,427	0	\$188,736
VIII.	Monitoring Program	\$149,625	\$10,000	\$15,000	\$0	\$0	\$29,144		\$331,000	\$0	\$6,502	\$0	0	\$1,389,700
IX.	Other (Business)	\$42,132	\$1,026,355		\$67,757	\$0	\$185,998	\$20,000	\$0	\$0	\$96,101	\$62,990	0	\$62,081
	Totals	\$1,397,683	\$2,861,126	\$353,216	\$514,248	\$376,000	\$2,295,268	\$558,200	\$1,605,000	\$441,666	\$2,298,736	\$1,664,466	\$15,216,095	\$2,329,023

Table 2.2 Agency Annual Budget Update for Stormwater Management Program - Fiscal Year 2008-2009

SECTION 2.0 PROGRAM MANAGEMENT

2.5.2 Fiscal Resources

Each Co-permittee prepares a stormwater budget annually and allocates resources to be applied to the stormwater program. **Table 2.2** presents the projected stormwater budget for each Co-permittee for Fiscal Year 2008/09 and **Figure 2-3** 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 Co-permittees. This variability is due in part to the accounting practices utilized by each Co-permittee and the allocation of activity costs amongst programs implemented by each Co-permittee.

In addition, the Co-permittees vary significantly in their jurisdictional area and population (**Table 2.3**), which may explain some differences in resources dedicated to various program areas. Yet, a review of the annual budgets produces some nominal findings. In general, Co-permittees with the largest populations tend to have budgets greater than the budgets reported by Co-permittees with the smallest populations. However, within the group of cities with the largest populations and within the group with the smallest populations, there is still variation in program budgets.

Table 2.3						
Ventura County Statis	Ventura County Statistics					
Co-permittee	Population	Area (Sq. Mi.)				
Camarillo	62,498	19.6				
County of Ventura	46,328	10.7				
Fillmore	15,128	2.7				
Moorpark	36,200	19.2				
Ojai	8,687	4.4				
Oxnard	197,067	25.3				
Port Hueneme	22,137	4.3				
Ventura	106,744	21.7				
Santa Paula	29,121	4.6				
Simi Valley	121,288	39.4				
Thousand Oaks	128,650	57.2				

2.5.3 Funding Sources

Funding sources to implement the stormwater program, including pre-existing programs that meet permit objectives, include both general and specific funds, taxes, maintenance and user fees and grants. Volunteer groups like Surfrider Foundation help implement some stormwater program elements and thus no fiscal value was attributed to these contributions.

The funding sources used by the Co-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.

3.0 Program Development

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 Co-permittees are building upon the many successes of the current program. Early in the program, the Co-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 Co-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

3.1 Countywide Outreach Efforts

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 website, 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.



3.2.1 Background

The **Community for a Clean Watershed** program was established in 2005 by the Program as a way to consistently brand our stormwater pollution message. 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 website, 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 co-permittees' first step towards creating an effective public outreach campaign was to gain a better understanding of public perception of stormwater pollution, storm drains and watershed protection. The research data, collected through a series of English and Spanish focus groups,

revealed a clear direction to take in order to obtain the behavioral changes desired from the community including:

- Clearly define the watershed and begin to bring it into the mainstream
- Differentiate the message from 'don't litter' and 'water pollution' ads
- Make an emotional, visual connection
- Appeal to the 'local pride' of Ventura County residents
- Provide enough information to empower residents to 'make a difference'
- Provide a place for residents to get informed and to act, i.e. a dedicated website

While it's been five years since this project started, the objectives of the Community for a Clean Watershed program continue to be to:

- 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

Public Outreach Permit Year 08/09

New outreach objectives included in Permit Year 08/09 included:

- Extend outreach to more targeted audiences, including horse owners
- Prepare for new permit which will require outreach to school aged children.

Progress has been made toward the goals of educating the public and creating awareness of the watershed. Through a coordinated effort, the co-permittees are attempting to continue their long-term, multi-media countywide municipal NPDES public education outreach activities to increase the overall effectiveness of the program. In 2008-09, efforts were extended to additional target audiences in a variety of media.

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. The 2008-09 year's efforts included the following key initiatives:

Target: Residents

- Coastal Cleanup Day, September 2008
 - Pollutant of Concern: Trash
 - o Print
 - Public Access Cable
- December 2008 Public Outreach

Pollutants of Concern: Trash/Bacteria

- o Radio
- Newspaper
- o Online banners
- Outdoor bulletin
- Transit Shelters
- May 2009 Public Outreach Pollutant of Concern: Pesticides

- o Cable Television
- o Radio
- o Online Banners
- o Transit Shelters

Target: Auto and Food Service Businesses

Auto Services

Pollutants of concern: trash, automotive fluids, including grease, chemicals, solvents, detergents

- o BMP Posters
- Food Service

Pollutants of concern: illicit disposal of trash, cleaning products, FOG (fats, oils, grease), other solvents

o BMP Posters

Target: Horse Owners

Por Favor Recoge Mi Pupu.



La Cuenca Hidrográfica Solamente Debería Transportar Agua...No Bacterias.

cleanwatershed.org

Spanish Newspaper Ad

December 2008:

In December, an existing radio spot with a broad watershed message and mention of several pollutants of concern provided an umbrella platform from which to launch new elements tackling two specific pollutants of concern. Newspaper ads utilized a familiar Watershed image of a dog, with the call to action "Please Pick up my Poop," while new outdoor signage suggested, "The Watershed Should Only Shed Water.....not Trash" showing a Styrofoam cup that ended up on a beach.



English Transit Shelter



Spanish Transit Shelter



Outdoor Billboard



Images from flash Web Banner

Radio Interviews/Publicity: December 2008

As part of the negotiated value-add, radio Interviews were conducted on both radio stations on the December media buy. Each radio interview was at least five minutes, reviewing the concept of a Watershed as well as offering suggestions for how to keep it clean.

In addition, on December 7, 2008, a press release ran in the local newspaper's "Eye on the Environment column, proclaiming "Follow these steps to cut pollutants flowing to the ocean." The article enumerated several pollutants, giving advice on how to keep each type of contaminant out of local watersheds.

May 2009:

Coinciding with the spring planting season, the Community for a Clean Watershed ran a four-week pesticide campaign utilizing television and radio campaign elements from the previous 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



English Transit Shelter



Spanish Transit Shelter



Frame from web banner

Media Outreach Strategy

As in the past, each media plan was negotiated with the goal to maximize target reach and frequency on a limited budget. In addition, attention was paid to geographical distribution throughout Ventura County as well as adequate coverage in the Latino market. the Agency was able to consistently obtain low rates and significant bonus elements, including bonus radio commercials, newspaper ads and outdoor billboards. Bonus impressions nearly doubled paid impressions.

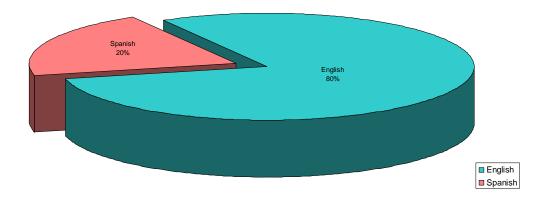
For the three campaigns in the 2008 - 2009 year, the Community for a Clean Watershed media plan achieved a total of 5,342,005 gross impressions broken out as follows:

Campaign	Gross Impressions
Coastal Cleanup Day	1,459,048
December Trash/Bacteria	2,761,613
May Pesticide	1,121,344
Website: cleanwatershed.org	3,724

Bilingual Public Outreach

To reach the significant Hispanic community in Ventura County, all elements of the campaign were created in Spanish. This included the newspaper, transit shelter and radio ads, each of which ran in Spanish media

20% of the Countywide Outreach Effords were in Spanish



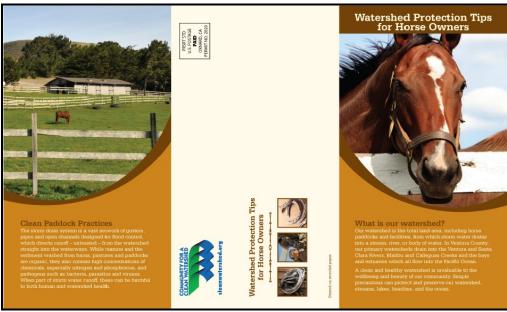
<u>Spanish Media Outreach</u> Using a media mix of Spanish newspaper, radio and transit shelters, Spanish language advertising accounted for 20% of total media impressions: 832,126.

Community for a Clean Watershed

In its third year, 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. 2,101 unique visitors made 3,724 visits and read an average of 2.24 pages. Web visits peaked in May, coinciding with the public outreach campaign.

Horse Owners Best Management Practices (BMP) Direct Mailer

In May, the Watershed continued its best practices campaign with outreach to Ventura County horse owners, equestrians and horse property owners. This mailer, which was delivered twice to more than 6,000 relevant households and businesses, reminded this population of the key actions they can and should take to promote healthier, happier horses as well as to protect the watershed.



Outside of tri-fold mailer



Inside of tri-fold mailer

Eve on the Environment

The Ventura County Star, a local daily newspaper serving all of Ventura County with a Sunday readership of over 240,000 people has generously offered space for a weekly 750-word column to the Ventura County Integrated Waste Management Division. The column is titled Eye on the Environment and runs every Sunday. Focused on all aspects of protecting the environment the column helps promote awareness of stormwater pollution directly and indirectly. Some topics don't discuss stormwater directly but the message is just as helpful to reducing stormwater pollution. example several columns last year provided information on the hazards balloons and plastics bags can cause to environment, the benefits conserving water, or how to properly of household dispose hazardous materials. All clearly issues with a stormwater component. Four columns over the Permit year were written by District staff and directly addressed pollutants stormwater pollution concern and what residents can do to them from entering environment.



Youth Survey

In anticipation for the upcoming permit which includes a component for K-12 outreach, the Community for a Clean Watershed wanted to establish a baseline of understanding before targeted outreach began. A web survey, implemented by Applied Research West, was used as the method for data collection, surveying a total of 330 participants between the ages of 5 and 18 with 30 participants from each city in Ventura County and attention paid to matching the ethnic composition of the area.

Key findings, which will help direct the messaging platform as well as media selection, include:

Awareness of Watershed and Storm-water

- Kids 13–18 have a greater awareness of the terms 'watershed' and 'storm water' with Kids 5–9 significantly lower.
- All age groups (79%) agree that the watershed includes land, rivers, lakes, creeks and beaches. However, 33-35% of Kids 5-9 are less certain it includes their house and yard.
- There is a high awareness that pollutants in their yards could end up miles away, although Kids 16–18 are less like to agree that it could happen.

Conservation Behavior

- Recycling of paper, plastic and cans are commonly practiced although Kids 5–9 are somewhat less likely.
- All age groups show a strong response to turning off water while brushing their teeth. A 10-minute shower is more challenging with an average of 67% complying.
- Most kids, 57%, will ask others to pick up litter or pick it up themselves.

 Litter on the ground is largely ignored by Kids 16-18 whereas half of 5-15 year-olds will always pick it up.

Attitudes and Water Issue Understanding

- Young kids 5-9 and older kids 16-18 are less sure that sewer water is always cleaned and treated.
- 89% of all age groups agree that anything dropped in the gutter or storm drain might end up in the ocean.
- Kids 8-12 are more likely to believe it is okay to use the gutter to throw away trash.
- While almost 40% agreed that it was someone else's job to keep the environment clean, 88% agreed it is their family's job to do so.
- 87% understand that people cannot survive without water. Only half believe the world can run
 out of water.

Polluting Impact of Various Items

- Motor oil was perceived as the most polluting with garden pesticides and trash/litter next.
- Fertilizer and household cleaners are considered moderate polluters.
- Pet and Yard Waste were rated the lowest 'high level' of concern.

Summary of Effectiveness

This was the fourth year of the Community for a Clean Watershed public outreach efforts; and was a year of transition as the co-permittees anticipated the new permit requirements. Working within a reduced budget for outreach, the group was able to maintain awareness with Ventura County residents, extending the original message of "The Watershed Should Only Shed Water" to The Watershed Should Only Shed Water....not (trash/pesticides/bacteria)." Specifically, the following was achieved:

- Add to the arsenal of creative elements that cover the various pollutants of concern. These
 materials are available for collective or individual city use throughout Ventura County.
- Provide consistent messaging throughout the year to residents.
- Persuade the local media to extend the reach of the campaign through bonus placements, thus extending the repetition of the watershed message.
- Provide BMP materials to auto service dealers, food service and horse owners.
- Determine current understanding of watershed terms, conservation, water issues, and key
 pollutant concerns of children in grades K-12, to be used as a baseline for future outreach
 efforts to this population.

3.2.5 Public Reporting

Each Co-permittee has identified staff serving as the contact person(s) for public reporting of clogged catch basin inlets and illicit discharges/dumping. Designated staff is provided with relevant stormwater quality information, including program activities and preventative stormwater pollution control information. Contact information is updated as necessary and published in the government pages of the local phone book and other appropriate locations. In addition, this information is available on the Program's website at www.vcstormwater.org.

3.2.6 Curb Inlet Stenciling

As required by the Permit, Co-permittees have completed labeling or marking the curb inlets to their entire storm drain system. During the reporting period, some Co-permittees maintained their inlet signs by reapplying stencils/markers as they wore out and applying stencils/markers to new inlets as they were installed. **Figure 3-1** depicts the progress the Co-permittees have made in their efforts to install and maintain their curb markers.

100% of Catch basins countywide are marked with a no dumping message

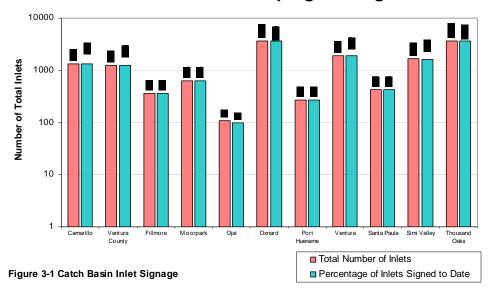


Table 3-2 Public Reporting Pl	none Numbers	
	General Information	Reporting Illicit Discharges
Ventura County Watershed Protection District	805/650-4064	805/650-4064
City of Camarillo	805/388-5338	805/388-5338
County of Ventura	805/650-4064	805/650-4064
City of Fillmore	805/524-1500x109	805/524-3701
City of Moorpark	805/517-6257	805/517-6257
City of Ojai	805/658-6611	805/640-2560
City of Oxnard	805/488-3517	805/271-2220
City of Port Hueneme	805/986-6556	805/986-6507
City of Ventura	805/652-4582	805/667-6510
City of Santa Paula	805/933-4212	805/933-4212
City of Simi Valley	805/583-6462	805/583-6400

City of Thousand {	805/449-2386	805/449-2400
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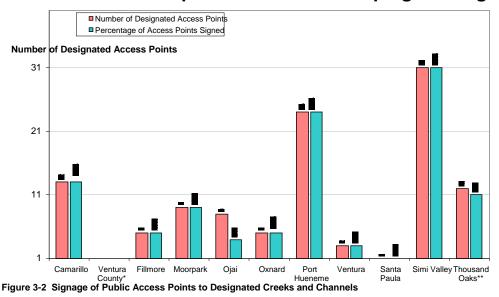
The percentage of inlets signed to date meets the performance criteria established in the SMP for all Co-permittees. Signs at curb inlets have varying useful lives due to the materials from which they are constructed (e.g., paint, thermoplastic), their position (e.g., on top of curb, on face of curb), and wear factors (e.g., traffic, street sweeping, sunlight). As a result, the Co-permittees have different programs to maintain curb inlet signage within their respective jurisdictions. Some Co-permittees replace a portion of their signs each year whereas others re-sign all inlets every few years. Regardless of the specific inlet signage practice, all Co-permittees understand the importance of signage to the education component of their program and are committed to installation and maintenance of signage that meets both the educational goal of the program as well as the 90% performance criteria set forth in the SMP.

3.2.7 Access Points to Designated Creeks & Other Water Bodies

In addition to the Storm Drain Inlet Stenciling Program, the Co-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 Co-permittee is responsible for designating the appropriate access points to creeks and channels within their jurisdiction, which requires some field verification and mapping. This program element also required in some cases, the cooperation between the City and special districts outside the City's jurisdiction.

Figure 3-2 depicts the progress the Co-permittees have made in their efforts to post their signs at appropriate access points to creeks and channels. A review of **Figure 3-2** shows that all the Co-permittees met the performance criteria that 90% of the designated public access points be posted with signs regarding the prohibition of illegal dumping.

95% of all public access points to creeks and other waters have been posted with a no dumping message



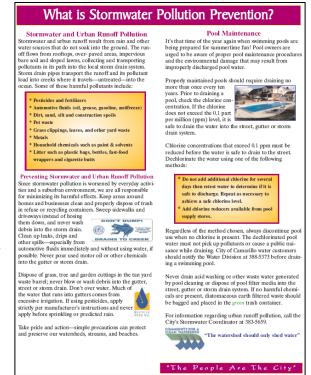
* No updated information on this task for this year

^{**} The designated public access areas to creeks within the City are under the jurisdiction of the Conejo Recreation and Parks District.

3.2.8 Local Community Outreach Efforts

Each of the Co-permittees organized communityoriented outreach events, training and other activities on stormwater quality within their jurisdiction. The Co-permittees emphasized the importance of using environmentally safe practices at home and work to prevent stormwater pollution. Outreach efforts included community newsletters, small group learning activities and other media to deliver a stormwater message that educates and informs the general public.

One such effort is demonstrated by the City of Camarillo. The city regularly publishes *City Scene*, a newsletter for City of Camarillo residents, providing local community and neighborhood focused information. In a recent edition, readers were provided city specific information how to prepare for the rainy season through good housekeeping and proper slope maintenance. It communicated the message that not only can drainage failures damage property,



but the sediment and various pollutants that erode from the slopes or that come out of private drains end up in the storm drain system and ultimately into our creeks and ocean without being treated. Reminding people that pollutants impair water bodies and can be harmful to aquatic life. The City of Thousand Oaks jointly sponsored a semi-annual publication and distribution of a solid waste newsletter. This newsletter was designed to educate readers in recycling and proper waste disposal methods. Distribution was estimated to be more than 33,000.

The City of Thousand Oaks worked with other local agencies, business and groups to promote awareness and education about stormwater pollution. Including:

Camarillo Government Channel TIME WARNER CABLE THE TOWARDER OF THE TOWARDER O

When live meetings or various types of programming are not being aired, the Camarillo Government Channel airs free cable advertisements about community organizations and events 24-hours a day. For Time Warner customers this is channel 10; and channel 29 for Verizon FiOS.

Live meetings are also broadcast on the Government Channel, including those of the Camarillo City Council, Planning Commission, Pleanant Valley School District Board, and other nonprofit organizations. The local talk how CityScene FV (pictured above) is also aired on the Government Channel, as are rebroadcast meetings of the County Board of Supervisors, and the Omard Union High School District Board.

Nonprofit community organizations, schools, and other groups are invited to submit advertisements for the Government Channel. Public service announcements (PSA's) can also be airsel. For information, please call John Fraser at (805) 388-5349.

Water Wise Gardening Website

The City of Camarillo and other cities in the County are building an exciting and practical website to help home-cowers design, maintain, and augment their gardens into beautiful water wise masterpieces. The most intriguing features of the website is the ability to look through sample gardens and use links to determine which plants compose these gardens. You will have the capability of building your own private plant list on the website and print it out to take to the local nursery. Turthermore, the website will include a plant database of more than a thousand available plants that you can search and sort through to find the right plant for the right place. The website will be available in late May 2009. For additional information, please call (805) 388-5338.



Keep Camarillo Beautiful - Properly Dispose of Cigarette Butts

The City of Camarillo would like to inform its residents of the increasing problem of littered eigarette butts. According to the California Coartal Commission, \$406,500 eigarette butts have been found at the California Coatal Cleamup Day annual event since 1985. The eigarette filtent take eighteen months to twelve years to biodegrade. Also, the used filters may have small pieces of tobacco in them as well as tar and other chemicals, which are damaging to our environment. Eighty percent of cigarette butts and up in the water system and within an hour of having contact, chemicals like arsenic, lead, and cadmium are released into our waterways. These chemicals can cause our marine life to become ill or die. Please take this into consideration when disposing of your cigarette butts and put them where they belong, in the water exceptacles that are meant for them.

Thank you for helping to keep our watershed clean! For more information on pollution prevention, please log on to the new countywide website at www.cleanwatershed.org or call the City of Camarillo Streets Division at (805) 383-5659.



 Conejo Open Space Conservation Agency, COSCA, Trail Education Days—On April 30, 2009 about 25 fifth-grade students were given an informational tour through the Wildwood park natural area. During the hike, the children were taught about topics in ecology including urban stormwater impacts and the benefits of recycling.

Amaen Earth Day and Energy Conservation Fair—On April 22, 2009, Amgen Corporation hosted this event to raise awareness about excessive energy use and surface water quality issues. About 2,500 Amgen employees attended the event. The City of Thousand Oaks gave recycled products participants answered questions about informational poster displays. Participants were also given brochures on recycling stormwater topics.

- Baxter Bioscience Earth Day—On June 1, 2009, the City of Thousand Oaks's staff presented
 a Power Point presentation focusing on residential activities that cause surface water
 pollution and how to reduce this contamination. Despite advertisement through internal memo
 from the company's Health & Safety Division, only ten people attended.
- Whole Foods Market—City of Thousand Oaks representatives operated an educational outreach booth on September 20, 2008. The theme was "Going Green." The estimated 300 participants learned about topics such as water conservation, recycling, and storm water quality by spinning a wheel and answering questions.
- Public Works Week—May 21,22, and 23, 2009—About 35 Conejo Valley schools brought more than 1,200 children and 150 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 its residential section. Children participated by simulating rain with spray bottles and saw these suggestive pollutants contaminate the creeks and lake. A simulated curb drain receiving recirculated water and a section of storm drain pipe were there for reference.
- Sports Pro Camp and Boy Scouts- staff gave presentations on recycling and proper disposal
 of waste materials to prevent surface water quality impacts. These events were held on July
 1, 2008 and November 6, 2008, respectively. Combined attendance was 50 children.

Figure 3-3 indicates the number of educational contacts made by the Co-permittees at local community outreach events/activities during this reporting period.

Over 4.5 milion impressions made through countywide public education

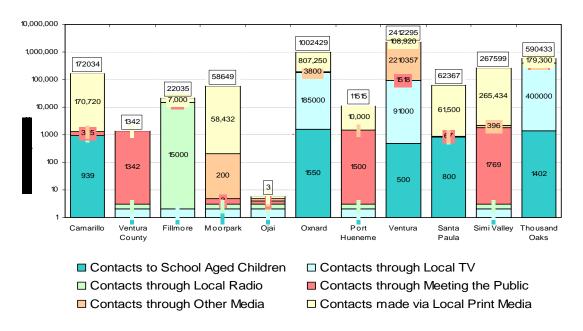


Figure 3-3 Local Community Outreach Efforts



The City of Oxnard provides residents with a quarterly newsletter called *City Works*, which includes articles on Storm Water Pollution Prevention and provides guidance to both the public and private sectors as to how best to reduce storm water pollution. Articles have featured Coastal Clean up Day, Water Conservation, Recycling Household Hazardous Waste, Trapping Trash Before It Reaches the Beach, and Only Rain Should Go Down the Storm Drain. The City of Oxnard will continue to use the quarterly newsletter (*City Works*) to provide the public with the latest stormwater pollution prevention methods.

3.3 Ongoing Program Accomplishments

3.3.3 Community Cleanups

California Coastal Cleanup Day is a premier volunteer event focused on the cleanup of beaches and creeks throughout the country. On this day, more than 50,000 volunteers turn out to over 700 cleanup sites statewide to conduct what has been hailed by the Guinness Book of World Records as "the largest garbage collection." Since the program started in 1985, over 552,000 Californians have removed more than 8.5 million pounds of debris from our state's shorelines and coast. When combined with the International Coastal Cleanup organized by the Ocean Conservancy and taking place on the same day, California Coastal Cleanup Day is one of the largest volunteer events of the year.

Coastal Cleanup Day is also the highlight of the California Coastal Commission's year round "Adopta-Beach" program and takes place every year on the third Saturday of September, the end of the summer beach season and right near the start of the school year. Coastal Cleanup Day is a great way for families, students, service groups and neighbors to join together and take care of our fragile water environments Together they show community support for our shared natural resources, learn about the impacts of marine debris and how we can prevent them.



Beginning in 1996, the Co-permittees have participated in this extremely successful statewide event. This annual event has been an excellent opportunity for volunteers to help clean and beautify local beaches and inland waterways. Over the past ten years, the Co-permittees have worked hard to encourage more volunteer participation in addition to targeting additional beach and inland areas for cleanup. This volunteer program continues to be a huge success, not only in cleaning local sensitive environments but also in creating a heightened awareness on proper trash disposal and its benefit to stormwater quality. This permit

year, a record high of 2,772 volunteers removed over 13,900 pounds of trash and recyclables from close to 50 miles of inland and coastal shorelines in Ventura County. While the number of volunteers was high the amount of trash wasn't, indicating that there is less trash getting out into the environment.

Community Cleanup Day—The City of Thousand Oaks sponsored a collection event of waste materials on May 16, 2009. At the event, about 1794 residents brought 236 tons of trash and green waste; 25,579 pounds of miscellaneous electronic components; 25,882 pounds of video monitors; 9.2 tons of paper from document shredding; and four semi-trailer loads of assorted computer components that were donated to the Goodwill for reuse.

Freeway Ramp and Interchange Collection Program (Adopt-A-Highway)-From July 1, 2007 to June 30, 2008, about



14,625 pounds of trash and debris were removed from 13 freeway on-ramps and exits and one freeway interchange in the City of Thousand Oaks

3.3.2 Pet Waste Program

Pollution Prevention and Your Pets

The City of Camarillo would like to remind pet owners to please pick up after their pets. Pet waste contains bacteria, viruses and parasites that car

THE LAW!

threaten the health of people and wildlife. If the waste is not picked up, rain and irrigation runoff water can carry it into the streets and TRANSMITS DISEASE
CONTAMINATES BRINGING WATER
LEASH-CURB AND CLEAN UP
is not treated to remove pollutants such as AFTER YOUR

bacteria before emptying into the creeks and ocean. Not only does pet waste create problems in our environment, but section 7.32.010 of the Camarillo municipal code stipulates that pet waste be dispo



properly in a trash receptacle, and the deposit of pet waste on public property (including sidewalks, parks, and streets) maybe punishable by

Tips for Bagging Pet Waste

- Reuse plastic newspaper bags, bread bags, sandwich bags or grocery bags.
- * Take advantage of the free pet waste bags provided at all city parks by the Pleasant Valley Recreation & Parks District
- * When walking your pet, bring the bags with you to retrieve the pet waste, tie the bag closed and dispose of it in the

Thank you for helping to keep our watershed clean! For more information on pollution prevention, please visit our new countywide web site at www.cleanwatershed.org or call the City of Camarillo at (805) 383-5659.

Interested in Joining the City Watch Program?

City Watch is an exciting program brought to you by the Camarillo Police City watch is an extring program drought to you by the camazino Fonce Department. This program was designed to utilize email as an avenue to disseminate important information to the community regarding current crimes and crime trends. The goal of the program is to increase public awareness about the existing crime trends so that residents can be better prepared to identify suspicious criminal activity and immediately report to the police by calling 911.

This program was designed as a means to receive feedback on particular crimes and not designed to ask routine questions, or make general complaints regarding traffic problems, neighborhood disputes, etc. Since the email account is not monitored 24-hours a day, residents are encouraged to reply to the emails only if they have questions about the information that was disseminated.

Anyone interested in joining the program can send an email request to camcity.watch@ventura.org. If you have questions about the program, or need additional information, please call the Crime Prevention Officer, Robert Maclean

as Personas Son La Ciudad"

The Pet Waste Program began in 1999 by the Co-permittees to educate pet owners on bacterial contamination to our ocean and streams from pet waste. program began by installing dispensers for pet waste pickup bags at beaches, parks and trail heads. This program has grown to giving out over 2 million pet waste bags a year at a cost of about \$150,000. There are now close to 400 pet waste bag dispensers throughout the county encouraging pet owners to pick up after their pets. This program has been a huge success with the demand for more dispensers and pet waste bags growing annually.

The City of Ventura also replaced the plastic pet waste bags with biodegradable bags. The City made this change to reduce plastic litter. Once plastic enters the rivers and ocean, it poses a significant threat to marine animals. Additionally, plastic does not biodegrade and any plastic that becomes litter will remain in our environment indefinitely. The new biodegradable pet waste bags, made by BioBag, will

completely degrade over time.

3.3.3 TidePool Cruiser

The City of Camarillo sponsors the Tide Pool Cruiser to perform educational visits to eight local schools and at their local Coastal Cleanup Day event. This mobile unit shows an up-close view of the inside of a storm drain and dramatically demonstrates how anything that enters it will drain straight to the environment. The environment is represented by an interactive marine touch tank with live organisms; and our dependence on the ocean is shown through a "general store" that makes the connection between what is placed in the storm drain and its



impact on marine life.

This program is designed to teach children (and by extension their parents) about the hazards of non-point source stormwater pollution. In an innovative, hands-on and exciting manner participants learn of the connection between the introduction of pollutants through the storm drain system and their impact on the marine environment.

Presentations to Young People

The Watershed Protection District, Camarillo and Thousand Oaks also provided the hands on watershed educational tool the EnviroScape® to local schools. The EviroScape® is a portable table-top model that provides unique, interactive learning experiences, the EnviroScape® makes the connection between what we do on earth and environmental quality. Stormwater pollution and runoff are visually apparent when rain falling over the landscape top carries soil (cocoa), chemicals (colored drink mixes) and oil (cocoa and water mixture) through a watershed to a body of water. Stormwater runoff and storm drain function are also addressed.

Best management practices demonstrated include felt buffer strips as vegetation, clay to create berms and other methods to show conservation and water pollution prevention measures at work.

The model shows nonpoint source pollution and the steps everyone can take to help prevent environmental contamination.

3.3.4 Solid Waste Collection/Recycling

The Co-permittees have solid waste collection programs for public, residential, commercial and industrial areas. The Copermittees recognize the public education needs and encouragement to properly dispose of their trash in order to reduce the chance storm drains used be as waste receptacles. The Co-permittees promote these events through a variety of methods including community newsletters, radio and television public service announcements, brochures and utility bill inserts. Many Copermittees have combined recycling, litter control and hazardous materials disposal messages.



The City of Thousand Oaks' sponsored eleven household hazardous waste collection days over the 2008-2009 fiscal year. On average, each month 359 residents brought in an about 917 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. Proper disposal lof these materials ensures that they won't end up in the environment.

3.3.5 Earth Day and Arbor Day

Most Co-Permittees celebrated Earth Day by hosting festivals with educational presentations and environmentally conscience vendors. The City of Thousand Oaks sponsored an Arbor Earth Day on April 25, 2009. 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. Freebies and informational brochures on these topics were available to all. More than 5,000 people attended this event.



3.3.6 Mobile Satellite City Hall Event

In 2009, the City of Oxnard hosted their Helen Putnam award-winning Mobile Satellite City Hall events in centralized city locations in an ongoing effort to educate a greater number of local residents in stormwater pollution prevention methods, and in the importance of taking ownership of their local environment. These events provide Oxnard residents with the opportunity to voice their water quality concerns to the city's department/division appointed representatives. This innovative approach of providing educational outreach to the general public has been extremely successful in promoting a positive environmental awareness, sound stormwater pollution prevention practices, and illicit



discharge identification/ abatement throughout the city's targeted demographic areas.

The daily activities of many businesses create a potential for pollutants to enter a storm drain system. The Co-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, the selection and use of proper BMPs, and the potential for enforcement action and fines if environmental rules are ignored.

The Co-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 Co-permittee cities and other municipal staff from various departments (Environmental Health, Environmental Services and Wastewater Services). Each Co-permittee has implemented an Industrial/Commercial Business Program, which includes the following components to meet the goals and objectives of the program:

- Tracking Critical Sources
- Inspecting Critical Sources
- Ensuring Compliance of Critical Sources

4.1 Program Implementation

The Business Program provides a framework and a process for each Co-permittee to develop its own commercial/industrial program consistent with Permit and SMP requirements. Key program components include:

- Pollution Prevention
- Source Identification and Facility Inventory
- Prioritization for Inspection
- Implementation of Best Management Practices
- Site Education/Inspections
- Enforcement
- Non-compliant Industrial Site Identification and Regional Board Notification Procedures
- Program Reporting

4.1.1 Business Community Site Education/Inspection Program

The goal of the site education/inspection program is to confirm that stormwater Best Management Practices (BMPs) are effectively implemented in compliance with state law, county and municipal ordinances. During site visits, the Co-permittees:

- Consulted with a representative of the facility to explain applicable stormwater regulations;
- Distributed and discussed applicable BMP fact sheets and educational materials; and
- Conducted a site walk-through to inspect for evidence of illicit discharges and illegal connections, appropriate stormwater BMPs, and stormwater quality management education programs for employees.

In addition, the Co-permittees maintain a database of inspected automotive and food service facilities that includes the following information for each facility:

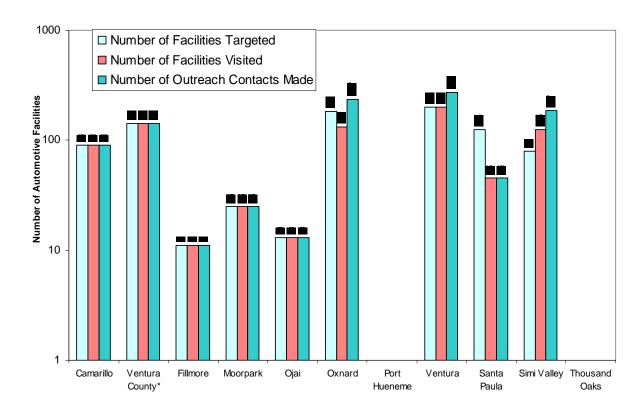
- Name of Facility
- Site Address

- Applicable SIC Code(s)
- NPDES Permit Coverage
- SWPPP Availability
- Facility Contact

A print out of the Co-permittees' database is attached in Appendix 1. The Co-permittees annually update the database with their activities for the current reporting period and provide a copy as part of this Annual Report.

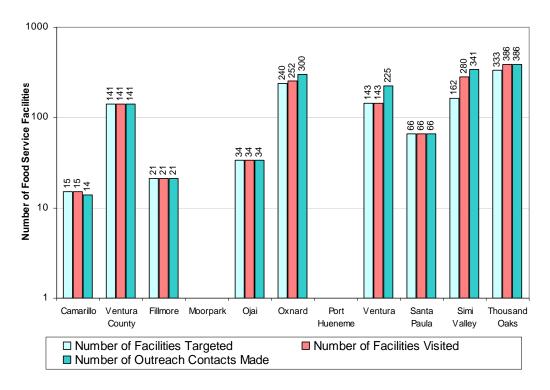
Figure 4-1 shows the total number of targeted automotive service facilities and the total number visited within each Co-permittee's jurisdiction. **Figure 4-2** shows the total number of food service facilities targeted and the total number visited within each Co-permittee's jurisdiction. In some cases the number of facilities visited exceeded the number of targeted for inspection. This situation may result from changes in facility ownership, businesses that move requiring site visits to a facilities new location as well as the one vacated. In many cases the Co-permittees were exceeding their targets in order to assure compliance with the permit requirement to inspect all these facilities once every two years.

Over 600 automotive service facilities were inspected countywide.*



^{*} Data reflects the number of facilities visited in this reporting period only; which is the first year of a two-year reporting period.

Over 100% of targeted restaurants were inspected, 1100 total countywide.



The vast majority of site visits were unannounced providing the inspectors with an honest look at daily activities of the facility. During these site visits, Co-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 Co-permittee determined a facility's stormwater BMPs were insufficient, the Co-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 addition, inspection staff informed facilities' owners/managers that BMP implementation does not guarantee compliance nor relieve them from additional regulations.

Whenever evidence of an illicit discharge was found, facilities were scheduled for follow-up visits within six months of the inspection. If continued stormwater violations were found. another visit was scheduled and/or enforcement actions initiated. Enforcement actions may include any of the following: Warning Notice, Notice of Violation(s), Administrative Civil Liability actions and monetary fines. These actions are reported in Section 8 - Programs for Illicit Discharges.



Site Inspection of a Commercial Facility

4.1.2 New Educational Materials

To facilitate educating business owners and their employees on proper stormwater BMPs the program developed and distributed bmp posters. The posters targeted automotive shops and restaurants and highlighted the most common sources of pollution from each industry. With narrative text describing the problem and solutions to stormwater pollution, the message of what not to do was graphically demonstrated through a serious of drawings of a cartoonish oaf doing everything wrong. Printed on both sides with English on one and Spanish on the other the posters became useful tools during inspections. The business community was receptive to the posters as well because it made their job of training staff and communicating proper best management practices easier.





4.1.2 Targeted Business Outreach Program based on Pollutants of Concern

Individually, the Co-permittees have concentrated their efforts on businesses with the greatest potential to contribute known Pollutants of Concern (ammonia, bacteria, etc.). Businesses that have been targeted for education and outreach include agriculture-related facilities, commercial equestrian stable facilities, car washes, and mobile businesses such as vehicle detailers and concrete pumpers.

• In every jurisdiction a business licence must be obtained before a business begins to operate. This provides an oportunity for Permittees to educate the business on proper BMPs and allows them to easily track new businesses for future inspections.

- The Cities of Camarillo and Thousand Oaks both educate and inspect mobile businesses identified in the field as time permits during their normal inspection duties.
- The City of Simi Valley concentrated their efforts this year on requiring Stormwater Pollution Prevention Plans (SWPCPs) from their major industrial, food, and auto services facilities (160 SWPCPs were received and approved this year). They also perform geographically concentrated pretreatment inspections and issue permits to restaurants to reduce the POCs associated with sanitary sewer overflows (SSOs.)
- The City of Ventura educates and inspects mobile businesses as part of their program, concentrating efforts to make sure that mobile businesses do not discharge to storm drains. They also have established a hotline for illicit discharge reporting that has enabled easy reporting and improved response. Through this they have experienced a drop in reported illicit discharges from mobile businesses this year. Also, as part of their pretreatment inspections they require pumping records for grease traps and interceptors from each restaurant inspected, and hand out educational materials on problems with improperly maintained grease trap/interceptor and sanitary sewer overflows. In addition, Ventura is using educational materials to target the residential community in regards to discharging fats, oils, or grease from their kitchens to the sanitary sewer.
- The cities of Moorpark and Ventura have begun invoicing business for the required inspections. The inspection fees run from \$40 to \$137 an inspection and vary by city and the type of business. The City of Ventura has been able to recoup approximately \$100,000 that would have otherwise come from the general fund.

4.1.3 General Industrial Permit Facility Site Visit Program

The Permit requires each Co-permittee to identify industrial/commercial facilities potentially subject to the General Industrial Permit and target these facilities for education and outreach. Targeted facilities include wastewater treatment plants, landfills, large transportation yards and airports that may be publicly-owned by Co-permittees. However, this does not include public facilities such as municipal maintenance yards that may contain industrial types of activity. Co-permittee-owned facilities are not subject to the Industrial/Commercial Business Program (with the exception of the City of Thousand Oaks' Municipal Service Center). Requirements for these public facilities are discussed in the Section 7 - Program for Public Agency Activities. Inspection and enforcement of the General Industrial Permit is accomplished by the permitting agency, either the SWRCB or the RWQCB.

Co-permittees use a variety of methods to create their lists of facilities subject to this program element. Some of the resources used to facilitate identifying facilities included:

- State Water Resources Control Board (SWRCB) database of facilities covered by the General Industrial Permit;
- Hazardous materials inventories maintained by fire or environmental health departments;
- List of facilities subject to local wastewater utility's industrial pretreatment programs;
- City business license records;
- Commercially available business listings (e.g., the Dun & Bradstreet database);
- Telephone book business listings;
- Non-filers database; and
- Letters/Use surveys/Mailer with response requested/checklist, etc.

Once the list of facilities was compiled, the Co-permittees implemented an education outreach effort that provided an introduction of stormwater pollution prevention to those business owners/operators.

The Co-permittees strongly believe most business representatives are conscientious and want to do the "right thing" after they are made aware of what they need to do and how easy compliance can be achieved with simple changes. An informational site visit, in which an agency representative walks the site with the facility owner/operator, provides useful information about stormwater requirements and BMPs. These efforts have proven to be an effective approach for education and outreach.

In addition to the Co-permittees' efforts, the RWQCB has performed a number of industrial site inspections in Ventura County. This has greatly increased the number of facilities educated about stormwater regulations and requirements. The RWQCB has also indicated an interest in coordinating with VCWPD to host an training workshop on the General Industrial Permit and its requirements. The Co-permittees look forward to this opportunity to work with RWQCB staff.

Over 400 industrial industrial facilities were visited countywide.

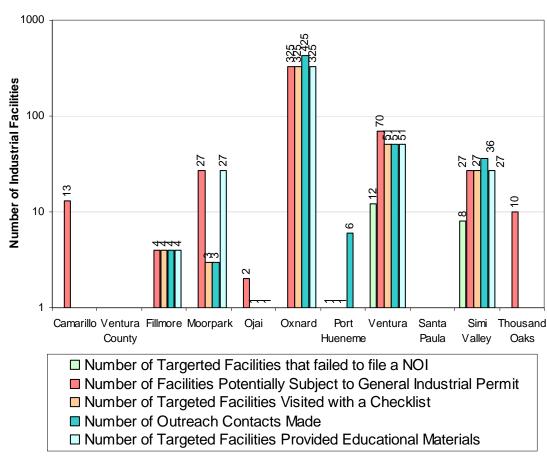


Figure 4-3 Targeted Business facilities subject to General Industrial Permitting

Due to the efforts of the Co-permittees during the last reporting period, many of the facilities targeted through this program have applied for permit coverage and have developed and implemented Storm Water Pollution Prevention Plans (SWPPPs).

Figure 4-3 shows the total number of facilities targeted for an outreach contact and how many were provided educational materials within each Co-permittee's jurisdiction. Note that the data reflect the

number of facilities contacted in this reporting period only, the first year of a two-year performance criterion.

4.1.4 Stormwater Quality Staff Training

Each Co-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.

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.

During this reporting period, the Co-permittees trained 58 inspection staff in stormwater pollution prevention. **Figure 4-4** depicts the number of staff trained in the program area for each Co-permittee. All eleven Co-permittees exceeded the performance criterion established in the SMP and by training more than the required 90% of targeted employees. Some cities such as Santa Paula uses the County Environmental Health Department for their inspections and therefore did not target any of their employees.

52 staff members were trained on business inspections.

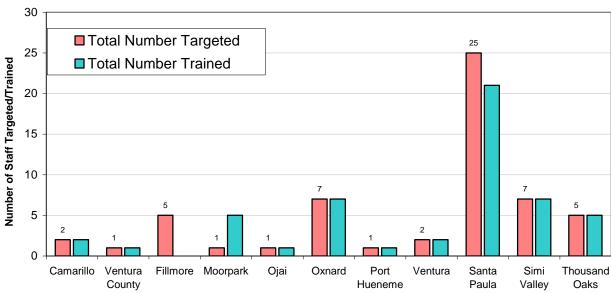


Figure 4-4 Business Inspection Staff Trained

The Co-permittees continued to emphasize consistency among inspection programs, both in terms of stormwater requirements and inspection procedures countywide. The Co-permittees realize the importance of providing a "level playing field" for the business community and of requiring compliance

in a similar and clear manner. In order to facilitate countywide consistency, the Co-permittees met regularly to coordinate efforts and devise strategies for the inspection program at the Business & Illicit Discharge/Illegal Connection Subcommittee. As a part of this effort the Co-permittees encouraged the participation of the County of Ventura Environmental Health Department (EHD) in these discussions and to provide comments and guidance in the development of educational materials.

EHD continues to play an important role in the Co-permittees' efforts to inspect and assure compliance with stormwater regulations in the business community. EHD conducts stormwater inspections of automotive service facilities on the behalf of several Co-permittees, and also performs inspections for the County unincorporated program for food service facilities. Implementation of these program elements required the Co-permittees to spend significant time and resources on communication, coordination and comprehensive training, both for Co-permittee staff as well as EHD inspection staff.

Although the Co-permittees need the flexibility to develop inspection programs that are appropriate for local conditions, the Co-permittees have worked hard to incorporate similar baseline elements in their individual programs.

The Co-permittees will continue to work on coordination and providing the business community of Ventura County a fair, but effective, inspection program.

4.1.5 Educational Brochure for Industrial Facilities

Early on, during the 2001-02 reporting period, the Business & Illicit Discharge/Illegal Connection Subcommittee formed a small work group to develop an educational brochure for the General Industrial Permit Facility Site Visit Program. The work group spent considerable time and effort collecting information on the state's permit and closely examined what other municipalities have done to educate industrial facilities.

The work group consolidated this information and developed a tri-fold brochure that still has valuable use today. It includes the following specific requirements of the General Industrial Permit:

- Facilities subject to the General Industrial Permit must file a Notice of Intent (NOI) with the SWRCB; and
- A Storm Water Pollution Prevention Plan (SWPPP) must be developed and available on site.

4.1.6 Watershed Protection Tips for Business

The Co-permittees revamped a brochure in early 2008 aimed at businesses to provided information on prohibited illicit discharges. Printed in both English and Spanish they detailed preventative methods for controlling illicit discharges, what to do in the event of an illicit discharge and penalties that can be assessed for non-compliance. These brochures were created as part of the *Community for a Clean Watershed* campaign and are distributed during site visits.

Required Activity	Performance Criteria	
Site Education/Inspection	Each Co-permittee will conduct site education/inspections of 90% of automotive, food service and other targeted businesses in their jurisdiction every two years.	
	Businesses will be scheduled for a follow-up visit whenever evidence of an illicit discharge is found, within six months of the education site inspection.	
Targeted Businesses/POCs	Co-permittees will target additional businesses based on Pollutants of Concern (POCs) as appropriate.	
General Industrial Permit Facility Visits	Co-permittees will distribute educational materials to 90% of facilities identified as potentially subject to the General Industrial Permit and perform site visits as locally determined necessary to complete a checklist every two years.	
	The checklist will include the SIC Code of the industrial user; indicate whether an identified site has obtained coverage under the State General Industrial Permit, and if a SWPPP is available on site.	
Stormwater Quality Staff Training	Co-permittees will train 90% of targeted employees by January 27, 2001 and annually thereafter.	

5.1 Program Description

The Co-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. This program, outlined in the Stormwater Quality Management Plan (SMP), describes the minimum standards the Co-permittees are to follow to implement their own development planning programs in compliance with the Permit. The term "development project" as used in this Program encompasses those projects subject

to a planning and permitting review/process by a Copermittee. 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 Co-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 Co-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.



Predevelopment Meeting

5.2 Program Implementation

5.2.1 Project Review and Conditioning

Development and redevelopment projects have the potential to discharge pollutants through stormwater runoff. Recognizing this potential and addressing it throughout the development process can reduce these impacts. The Co-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 Co-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 Co-permittees identify potential stormwater quality problems, communicate design objectives, and evaluate the plan for the most appropriate alternatives and design.

5.2.2 Stormwater Quality Urban Impact Mitigation Plan (SQUIMP)

The Permit requires 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, 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.

5.2.3 BMP Selection and Design Criteria

The Co-permittees require project proponents to follow the countywide 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 Co-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 are not a part of this conditioning process and are addressed through the grading permit process through the Construction Program.

In order to achieve appropriate stormwater quality controls, the Co-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 Co-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.

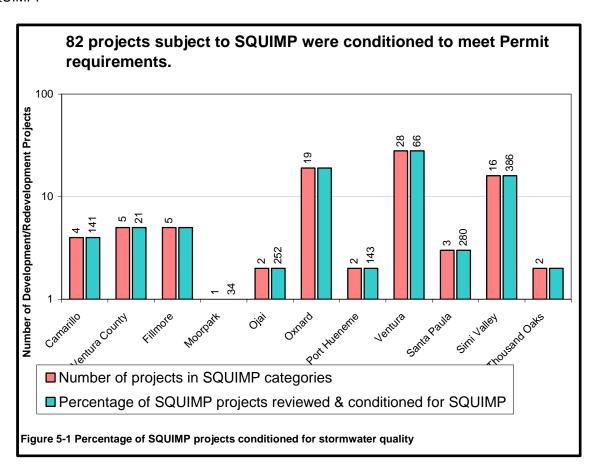


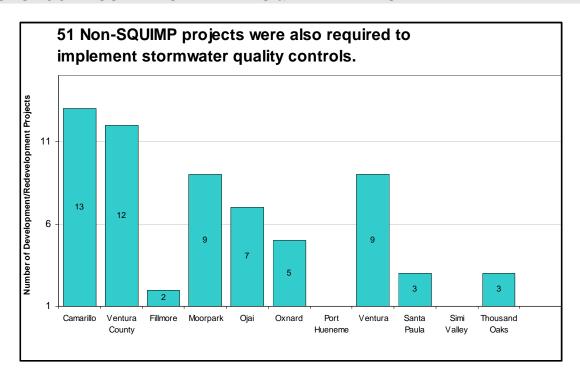
Low Impact Development Grass Swale at an Industrial Site in Oxnard

5.2.4 SQUIMP Implementation

Figure 5-1 indicates the number of SQUIMP category projects that were reviewed and conditioned to meet stormwater and SQUIMP requirements by each Co-permittee. 100% of all development and redevelopment subject to SQUIMP requirements were appropriately conditioned. These results exceed the performance criterion of 90% established in the SMP.

Besides the projects subject to SQUIMP requirements, the Co-permittees reviewed and conditioned 77 additional development projects for stormwater quality. These projects included structural improvement projects that did not qualify as one of the SQUIMP categories, but the Co-Permittees saw a need to protect stormwater quality through the design of the projects. **Figure 5-2** illustrates the total number of projects reviewed by each Co-permittee and how many were conditioned for stormwater quality as SQUIMP or non-SQUIMP.





Although not a permit requirement under the order 00-108, some permittees have begun programs to ensure that permanent BMPs are adequately maintained. This requires cataloging and tracking the BMPs that have been required and an understanding of the proper maintenance necessary. Methods used range from letters and educational visits to property owners and/or management explaining the purpose of the BMPs and the specific maintenance requirements to visual inspections to ensure that proper maintenance is being performed. In many instances, Permittees have found improperly maintained BMPs and followed through with enforcement action to correct the deficiencies.

5.2.5 Environmental Review

The California Environmental Quality Act (CEQA) sets forth requirements for the processing and environmental review of many projects. The Co-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.

Each Co-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 Co-permittees consider stormwater quality issues when processing environmental checklists, initial studies and environmental impact reports.

5.2.6 General Plan Revisions

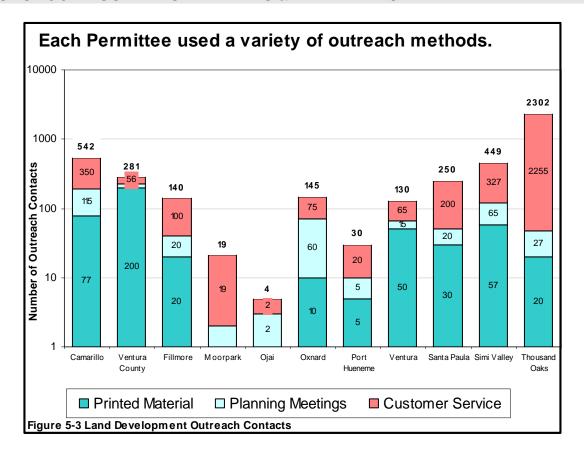
The Co-permittees' General Plans provide the foundation and the framework for land use planning and development. Therefore, the General Plan is a useful tool to promote the policies for protection of stormwater quality. The Co-permittees have included watershed and stormwater management considerations in the appropriate elements of their General Plans whenever these elements are significantly rewritten. **Table 5.1** indicates the scheduled date of a significant rewrite to the Co-permittees' General Plan. Note that some Co-permittees have already modified their General Plan to include stormwater requirements and thus no date is provided.

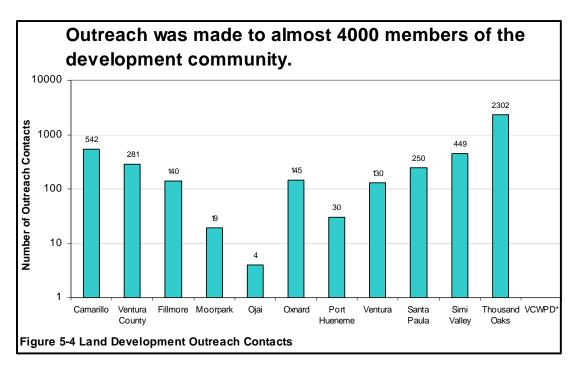
		Scheduled date for significant rewrite of
Co-permittee	Date of General Plan	General Plan
Camarillo	10/2003	Plan already updated to include stormwater
County of Ventura	10/1997	
Fillmore	4/2003	Plan already updated to include stormwater
Moorpark	1/1984	N/A
Ojai	5/1997	Plan already updated to include stormwater
Oxnard	1/1990	2009
Port Hueneme	8/1997	2015
Ventura	8/2005	Plan already updated to include stormwater
Santa Paula	1/1998	2009
Simi Valley	10/1988	12/1/2009
Thousand Oaks	7/1996	2019 - Plan already updated to include stormwater

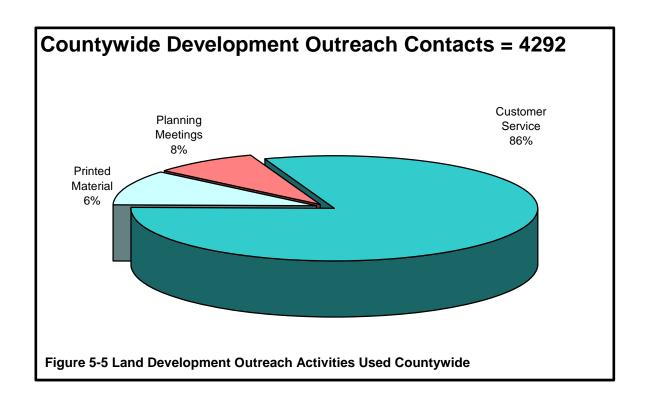
Table 5.1 Co-permittees' General Plan

5.2.7 **Community Outreach Development**

During the reporting period, the Co-permittees made 3292 contacts to development community representatives through customer service (counter assistance, phone conservations, discussions, etc.), professional society presentations, community group presentations, workshops/seminars, and educational outreach materials. These numbers are reflected in **Figure 5-3** which indicates the percentage of outreach methods used, and **Figure 5-4** show the number of contacts made by each Co-permittee.



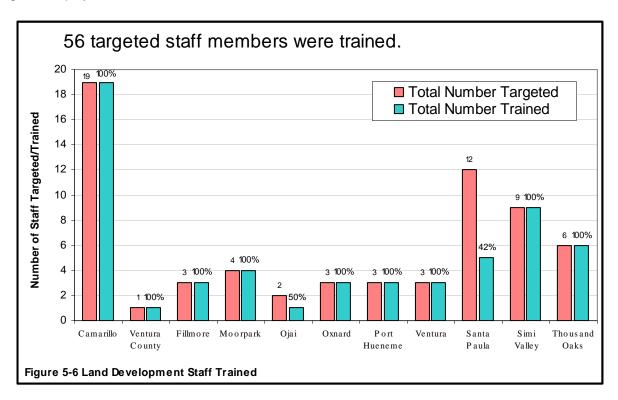




5.2.8 Stormwater Quality Staff Training

The Co-permittees identified employees for training regarding the requirements of the Planning and Land Development Program and SQUIMP requirements. Targeted employees include staff involved with planning, review, conditioning, permitting of development projects and administration of departments that conduct these activities.

Training methods varied amongst the Co-permittees and ranged from informal meetings to formal classroom training or self-guided training. During the reporting period, the Co-permittees trained over 75 development staff in stormwater management, plan review and SQUIMP requirements. **Figure 5-6** depicts the number of staff trained in the program area for each Co-permittee. The majority of the Co-permittees exceeded the performance criterion established in the SMP and trained more than the required 90% of targeted employees.



6.1 Program Implementation

Reducing pollutants from construction activities has been a focus of the Co-permittees' compliance program since the permit's inception. The Co-permittees regulate construction activities and also have responsibility for the construction and renovation of municipal facilities and infrastructure. Major components of the Co-permittee's Construction Program include:

- Inspect sites required to submit SWPPPs for stormwater quality requirements a minimum of once during the wet season;
- Develop and implement a checklist for inspecting stormwater quality control measures at construction sites;
- 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. Furthermore, training and outreach is done regularly to make certain implementation occurs consistently throughout Ventura County.

The Co-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 Stormwater Quality Checklist for Copermittee use. The checklist and the meetings create countywide consistency in the programs, however, the Co-permittees may 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 Co-permittees cities and other municipal staff from various departments (Engineering Services, Planning and Land Development and Inspection Services).

6.1.1 SWPCP/SWPPP Preparation, Certification and Implementation

Prior to receiving a grading permit, the Co-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, Co-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 Co-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, limiting grading during the wet season, 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 Co-permittees have also incorporated SWPCP 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 Co-permittees include provisions delineating contractor responsibilities for SWPCP preparation, implementation and for performance of the work and ancillary activities in accordance with the SWPCP approved by the Co-permittee for the project. In some jurisdictions, SWPCPs were required and submitted for nearly all projects including those not exceeding Permit thresholds. This conservative approach underlines the importance the Co-permittees place on ensuring implementation of stormwater controls at construction sites.

Figure 6-1 indicates the number of construction projects required to submit a SWPCP/SWPPP and the number of projects that submitted a SWPCP/SWPPP. This figure reflects the number of grading permits issued during this reporting period and does not necessarily reflect the number of active construction projects. The Co-permittees have consistently required projects to submit SWPCPs (and SWPPPs when required) with most Co-permittees exceeding the 90% performance criteria established in the SMP. This figure also details the number of inspections conducted at construction sites with a SWPCP during the wet season. The number of active projects requiring inspection does not always match the number of grading permits granted. 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. Most of the Co-permittees met or exceeded the 90% performance criterion established in the SMP. Most Co-permittees inspect more construction sites than were required to submit a SWPCP, and inspect them more frequently for stormwater compliance than the permit requires.

Many construction projects were inspected much more than once per wet season.

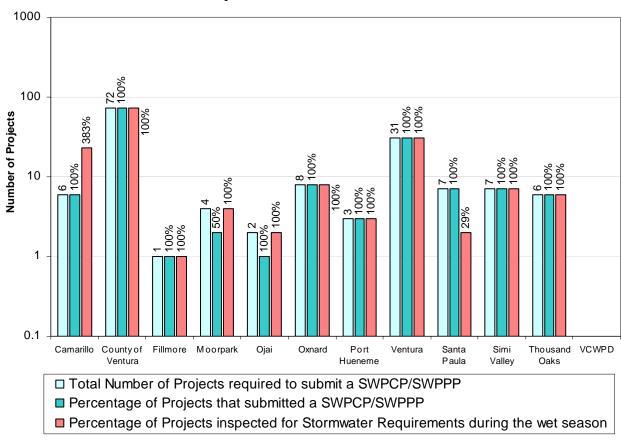


Figure 6-1 Construction Projects Required to Submit a SWPCP

6.1.2 General Construction Permit

As mentioned above, the Co-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 may 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 Co-permittees files NOIs with the SWRCB and pay the appropriate fees whenever Co-permittee construction projects qualify for coverage under the General Construction Permit. The NOIs and appropriate fees are filed 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. Copermittee emergency work and routine Co-permittee maintenance projects do not require preparation of a SWPCP/SWPPP, but are instead performed in accordance with the Program for Public Agency Activities.

100% compliance for projects required to file an NOI and submit an SWPPP.

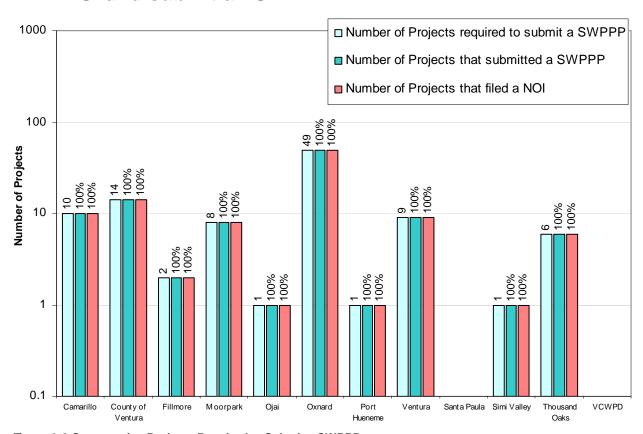


Figure 6-2 Construction Projects Required to Submit a SWPPP

Figure 6-2 presents the number of construction projects that required coverage under the General Stormwater Permit for Construction Activities and prepared a SWPPP. All co-permittees exceeded the 90% performance criterion for verifying the filing of a NOI established in the SMP.

^{*} No projects that required an NOI this permit year.

6.1.3 Construction Site Inspection Program

The Co-permittees inspect all construction sites with SWPPPs a minimum of once during the wet season to determine if the SWPPP is adequately implemented. During this site inspection, 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 Co-permittees will conduct a follow-up inspection within two weeks. But most often it is much sooner.

When a construction site fails to comply with the SWPCP/SWPPP, a Co-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 are also referred to the RWQCB if they fail to achieve compliance in two weeks. 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.

Figure 6-3 indicates the number and types of enforcement actions taken by the Co-permittees countywide. A single construction project can be issued multiple violations, ranging from written notices to RWQCB referrals. There were 294 total enforcement actions countywide this year, overall that is significantly less than in previous years, but the use of notices of violation has increased as percentage of enforcement actions from 7% to 40%.

268 Enforcement Actions at Construction Site Were Taken This Year.

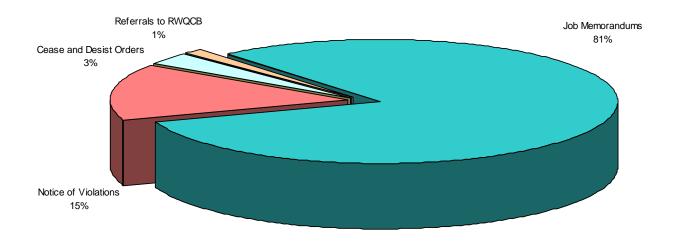


Figure 6.3 Enforcement Actions

Total Number of Outreach Contacts = 3978

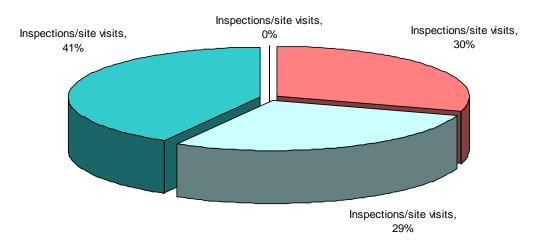


Figure 6-4 Construction Outreach Methods Used Countywide

6.1.5 Stormwater Quality Staff Training

The Co-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 Co-permittees and ranged from informal meetings, to formal classroom training or self-guided training. The Co-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 Co-permittees trained 66 construction inspection staff in stormwater management, construction inspections, SWPCPs, SWPPPs, illicit discharge response, and non-stormwater discharges. **Figure 6-5** depicts the number of staff trained in the program areas for each Co-permittee. All of the Co-permittees exceeded the performance criterion established in the SMP and trained more than the required 90% of the targeted employees.

100% of targeted employees received training on construction BMPs.

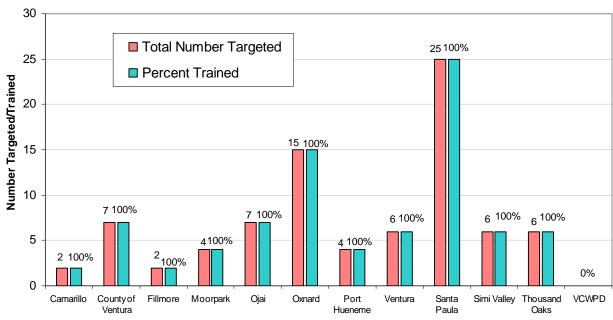


Figure 6-5 Construction Inspection Staff Trained

Table 6.1 Permit Required Activities Construction Site Program		
Required Activity	Performance Criteria	
SWPCP Preparation, Certification & Implementation	Co-permittees will require 90% of construction projects meet the permit requirements, and submit a SWPCP prior to issuing a grading permit.	
	For construction projects that prepare a SWPCP under this program, require implementation of the SWPCP during the entire course of construction.	
Incorporating Best Management Practices (BMPs)	For construction sites requiring a SWPCP, Co-permittees will require the inclusion of the statement specified in the Permit from the project architect, or engineer of record, or authorized qualified designee and the certification specified in the Permit from the landowner.	
	For Co-permittee construction projects requiring a SWPCP, Co-permittees will include the statement specified in the Permit from the project architect, or engineer of record, or authorized qualified designee and the Co-permittees certification specified in the Permit from an elected official, ranking management official or the manager of the construction activity.	
Notice of Intent Requirement	For construction projects subject to the General Construction Permit, Copermittees will require proof a NOI has been filed prior to issuance of a grading permit for 90% of all such projects.	
Construction Site Inspection Program	Develop and implement a checklist for inspecting stormwater quality control measures at construction sites by January 27, 2001.	
	For construction projects that required a SWPCP, inspect sites a minimum of once during the wet season for stormwater quality requirements and complete a stormwater quality control site inspection checklist.	
	For sites having not adequately implemented the SWPCP or where there is evidence of or a reasonable potential for sediment, construction materials or wastes, or non-stormwater runoff to be discharged from the project site, a written notice (Job Memorandum, Notice of Violation, Administrative Compliance Order, Cease and Desist Order) shall be prepared and delivered to the owner or person responsible for implementing the SWPCP.	
	For sites having not adequately implemented the SWPCP, conduct a follow- up inspection within two weeks to ensure compliance and complete a stormwater quality control site inspection checklist.	
	For sites having not achieved compliance after the follow-up inspection and are covered by the General Construction Permit, Co-permittees will notify the RWQCB.	
Construction Community Outreach	During meetings and inspections with developers, contractors, construction workers and others involved in construction projects and activities, discuss stormwater quality controls as appropriate.	
	Notify developers of their responsibility for all discharges from the project site, including discharges from streets and storm drains, until final acceptance of the project by the Co-permittee.	
	Notify developers of their responsibility includes discharges resulting from activities at owner occupied facilities.	
	Co-permittees will develop a "New Owner" brochure and upon request provide these to developers, Home Owner Associations (HOAs), and residents to assist them with their efforts to prevent discharges from owner occupied portions of the project site.	
Stormwater Quality Staff Training	Co-permittees will train 90% of targeted employees by January 27, 2001 and annually thereafter.	

SECTION 7.0 PROGRAM FOR PUBLIC AGENCY ACTIVITIES

7.1 Introduction

The Co-permittees own and operate public facilities, and build and maintain much of the infrastructure of the urban and suburban environment throughout their jurisdictions. Public agencies have a dual role in preventing pollution in the operation and maintenance of these facilities. Some programs help remove pollutants before they reach receiving waters, e.g. street sweeping, and others are source control ensuring all the activities performed do not contribute to stormwater pollution to the maximum extent practicable.

Programs the Co-permittees have that remove pollutants are:

- Drainage facilities inspection and maintenance
 - Catch basin inlets
 - o Open channels
 - Detention basins
- Roadway Operation and Maintenance
- Emergency Spill Response
- Solid waste and hazardous waste collection

All the other field activities have a potential to contribute to stormwater pollution if they are not performed appropriately. With the adoption of the second term permit, the Co-permittees were required to formally evaluate and revise the municipal activities program to prevent stormwater pollution to the MEP. This evaluation was accomplished through the development and implementation of the Model Municipal Activities Program outlined in the SMP. This program covered all aspects of public agency activities from Corporate Yard SWPCP, infrastructure maintenance and staff training. The objective of this model program is to provide the Co-permittees with:

- A program framework for reducing to the maximum extent practicable the adverse impacts that municipal activities may have on water quality;
- An iterative process by which they can effectively monitor and respond to problems as they are discovered; and
- Methodologies to meet permit requirements.

7.2 Pollutant Removal Programs

All Co-permittees routinely conduct preventive maintenance activities widely recognized as effective BMPs for pollutant control. These activities include solid waste collection/recycling, drainage facility maintenance, catch basin stenciling and emergency spill response. These efforts work at both removing pollutants from the storm drain system and prevent them from entering it in the first place.

7.2.1 Drainage Facility Maintenance

As required by the Permit, Co-permittees inspect catch basins and other drainage facilities that are a part of their system. These inspections are scheduled and completed at least once each year before the wet season (Permit-defined wet season begins October 1). 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.

Co-permittees also routinely inspect and clean their drainage facilities during the year on an asneeded 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

SECTION 7.0 PROGRAM FOR PUBLIC AGENCY ACTIVITIES

hydraulic capacity and result in potential flooding. For catch basins, "as-needed cleaning" occurs whenever trash, sediment or debris accumulation is found to be at least 40% of capacity.

Figure 7-1 depicts the number of catch basins/inlets inspected and/or cleaned by Co-permittees this reporting period in relation to the total number of facilities. Most of the Co-permittees achieved the

reporting period in relation to the total number of facilities. Most of the Co-permittees achieved the 90% performance criteria established in the SMP. The major type of material removed by the Co-permittees is depicted in **Figure 7-2** and the source of this material is depicted in **Figure 7-3**.

99% of catch basins were inspected and cleaned, if necessa before the wet season.

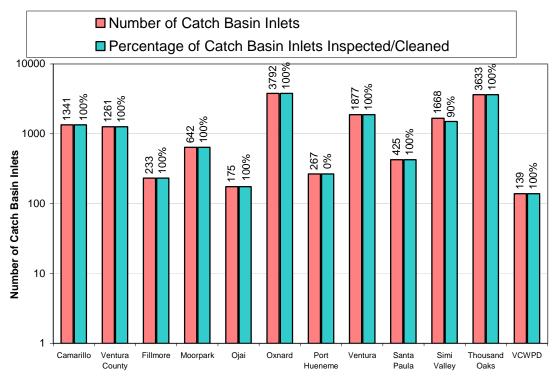


Figure 7-1 Drainage Facilities Cleaned - Catch Basins/Inlets

When performing cleaning activities, Co-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 Co-permittees make a significant contribution in preventing the passage of these materials in downstream receiving waters. During the reporting period, the Co-permittees tallied the collection of over 780 tons of solid debris from drainage facility maintenance activities.

76% of the debris removed from catch basins was sediment and organic material.

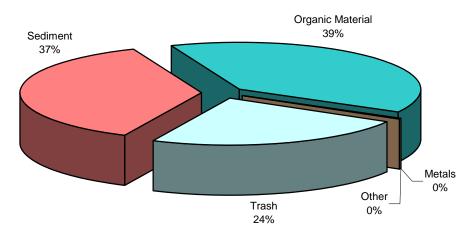


Figure 7-2 Countywide Catch Basin Debris by Material

Because the design of detention and retention basins includes the accommodation of multi-year accumulations of debris and sediment, "routine cleaning" of these facilities, means the removal of barriers from the inlet/outlet of the facility to restore the operational design and efficiency of the facility. The debris/sediment is cleaned whenever the basin has filled to target levels established in the facility design or subsequently adopted operation and maintenance protocols for the facility. In addition, debris basins designed to capture debris in flows upstream of urban areas are not considered to be detention or retention basins for this report as there are no MS4s draining to them. Debris basins are inspected and maintained in accordance with applicable local policies and procedures appropriate for these facilities. Removal of accumulated debris and sediment is carried out either manually or by mechanical methods and in some cases such as large detention basins require special permits from the Department of Fish and Game and the Regional Water Quality Control Board.

Residential sources make up the majority of the debris collected.

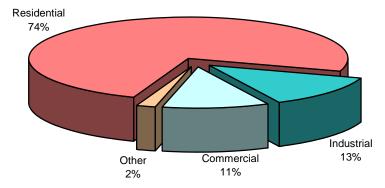


Figure 7-3 Countywide Catch Basin Debris by Source

Over 16,000 Tons of Debris Were Removed from Channels and Ditche Countywide

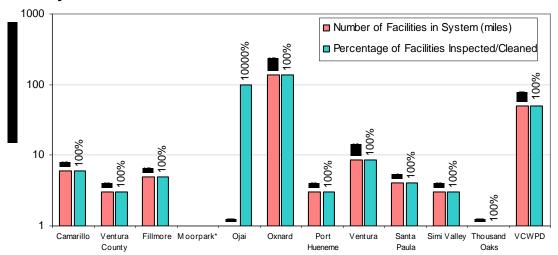


Figure 7-4 Drainage Facilities Cleaned - Channels/Ditches

This reporting period the Co-permittees removed 3500 tons of debris from their detention/retention basins. Year to year variation in debris removal is due to the differing multi-year cleaning and maintenance schedules for each Co-permittee.

In addition to the debris removed from catch basin inlets, Co-permittees removed approximately 16,000 tons of debris from their channels/ditches. Variations in the amount of debris removed are to be expected from year to year as storm patterns, population and plant coverage differs from year to year. **Figure 7-4** depicts the number of channels/ditches inspected and/or cleaned by Co-permittees this reporting period in relation to the total number of facilities. All of the Co-permittees achieved the 90% performance criteria established in the SMP. **Figure 7-5** depicts the number of facilities inspected and/or cleaned by Co-permittees this reporting year in relation to the total number of facilities. All of the Co-permittees achieved the 90% performance criteria established in the SMP.

Over 26000 Tons of Debris was Removed from Detention Basins

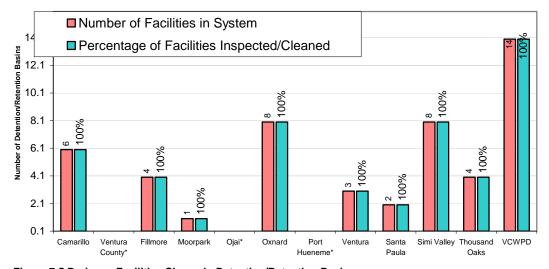


Figure 7-5 Drainage Facilities Cleaned - Detention/Retention Basins

^{*} Note that all channels and/or ditches within the City of Moorpark's jurisdiction are maintained by VCWPD.

7.2.2 Roadway Operation and Maintenance

Co-permittees have identified curbed streets within their jurisdiction and have implemented a sweeping program for these streets. At a minimum the streets are swept by the Co-permittees in accordance with the following classifications:

- High traffic downtown areas: sweep at least four times per month
- Moderate traffic collector streets and residential areas: sweep at least six times per year
- Other continuously bermed public streets: sweep at least one time per year prior to wet season

Over 115,000 curb miles swept countywide.

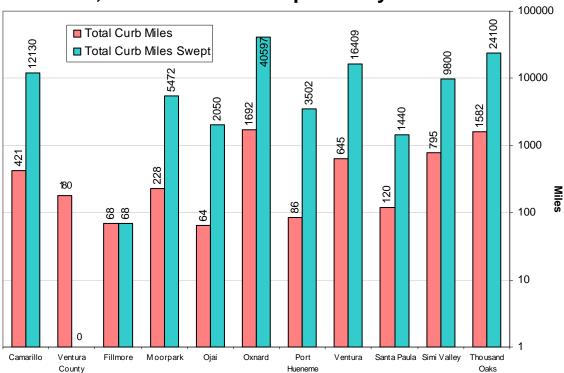


Figure 7-6 Street Cleaning Effort

Figure 7-6 indicates the street cleaning effort in total miles cleaned. Co-permittees have made excellent progress in their street cleaning efforts, with most Co-permittees exceeding the performance criteria established in the SMP.

For the purpose of streets "prior to the wet season" means sweeping the street at least once during the three-month period immediately prior to the wet season (July, August, September). "Continuously bermed" means a street in the permitted area where a berm exists on both sides of the street without breaks.

To increase the efficiency of the street sweeping, Co-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.

^{*} Note: Total miles swept included sections swept more than once

7.2.3 Emergency Spill Response

All Co-permittees have the authority to control releases to the storm drain system through their individual Water Quality Ordinances and each Co-permittee has designated appropriate staff for enforcing their ordinance. Unfortunately, even with the ordinances in place there are occasions where a spill or release will need to be cleaned up. Cleanup can be as simple as dispatching a crew to pick up dumped trash, 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 or unknown materials are involved.



Emergency responses to water pollution incidents are routinely undertaken by Co-permittee designated staff, and other municipal departments and emergency responders may become involved if the material is a suspected hazard. Although each Co-permittee is responsible for responding to complaints and incidents within their jurisdiction, very often neighboring Co-permittees will coordinate their efforts with either very large events and/or spills that cross jurisdictional boundaries. The Co-permittees focus on responding quickly and efficiently to emergency spills with priority on mitigating the spills that have a potential to adversely impact the environment.

7.2.4 Solid Waste Collection/Recycling

The Co-permittees each have solid waste collection programs for public, residential, commercial and industrial areas. Special programs for bulky items and hazardous waste provide the public with legal and economical disposal options and therefore help prevent the illicit disposals that can lead to pollution. The Co-permittees conduct education outreach on these programs through a variety of methods including community newsletters. radio television public service announcements. brochures and utility bill inserts. (For more information on solid waste collection/recycling programs see Section 3).





The City of Ventura's Figueroa storm drain diversion with educational signage.

The City of Ventura, with the support of environmental and regulatory partners, obtained Clean Beaches Initiative funding from the State Water Resources Control Board to improve beach water quality at Surfers Point through the design and construction of two dry weather runoff diversions. Dry weather runoff from the City of Ventura's Figueroa Street and California Street storm drain systems continue to be successfully diverted into the sanitary sewer system, for treatment at the City's wastewater treatment plant, rather than flow directly into the ocean untreated. These diversions have operated year round since 2006, being turned on and off by rain gauges and computers.

7.3 Municipal Activities Program Implementation

A significant portion of the Co-permittees' activities includes the operation and maintenance of municipal infrastructure. These activities have the potential to impact stormwater quality and as such the Co-permittees have implemented a Program for Public Agency Activities. This program addresses the implementation of BMPs to control pollutant discharges to the maximum extent practicable (MEP).

In order to address the Co-permittees' potential impacts on stormwater, the following activities have been targeted:

- Activities at Co-permittee Corporation Yards
- Drainage System Operation and Maintenance Activities
- Roadway Operation and Maintenance Activities
- · Pesticide, Herbicide and Fertilizer Application and Use
- Municipal Staff Training

7.3.1 Corporation Yards

The Co-permittees utilize corporation yards to support operation and maintenance activities within their jurisdiction. Corporation yards are operated and maintained by the Co-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
- Employee support facilities, such as offices, locker rooms and meeting rooms

Table 7.1	Co-permittee	Corporation Ya	ards	
Co-permittee	Corporation Yard Name	Location	SWPCP Developed & Implemented	SWPCP available on site
Camarillo	Camarillo Corporate Yard	283 South Glenn Drive	Yes	Yes
County of Ventura	El Rio Corporate Yard	682 El Rio Drive	Yes	Yes
	Moorpark Yard	7150 Walnut Cyn. Road	Yes	Yes
	Saticoy Public Works Corporate Yard	11251-A Riverbank Drive Saticoy, CA	Yes	Yes
Fillmore	Fillmore Public Works Yard	711 Sespe Avenue	Yes	Yes
Moorpark	Public Works/Parks Yard	675 Moorpark Avenue	Yes	Yes
Ojai	Ojai Corporate Yard	Signal Street	Yes	Yes
Oxnard	Oxnard Corporate Yard	1060 Pacific Avenue	Yes	Yes
	Regional Recycling Center	111 S. Del Norte Blvd.	Yes	Yes
	Oxnard Water Treatment Yard	251 S. Hayes Avenue	Yes	Yes
Port Hueneme	Municipal Service Center	700B E. Port Hueneme Road	Yes	Yes
	Service Yard Annex	746 Industrial Avenue	Yes	Yes
Ventura	SanJon Corporate Yard	336 SanJon Road	Yes	Yes
Santa Paula	Corporation Street Yard	903 Corporation Street	Yes	Yes
	Palm Avenue Yard	180 South Palm Avenue	Yes	Yes
Simi Valley	Simi Public Service Center	500 W. Los Angeles Avenue	Yes	Yes
Thousand Oaks	Municipal Service Center	1993 Rancho Conejo Blvd.	Yes	Yes
VCWPD	El Rio Corporate Yard	682 El Rio Drive	Yes	Yes
	Moorpark Yard	7150 Walnut Cyn. Road	Yes	Yes
	Saticoy Public Works Corporate Yard	11251-B Riverbank Drive Saticoy, CA	Yes	Yes

7.3.2 Storm Water Pollution Control Plan Development

The Permit required the Co-permittees to develop and implement a SWPCP at designated corporation yards by July 27, 2002. As the Principal Copermittee, VCWPD developed a SWPCP template to be used as a guide by the Co-permittees in the development of their plans for each of the designated corporate yard facilities.

As shown in **Table 7.1 Co-permittee Corporation Yards**, all of the Co-permittees have modified and implemented the model SWPCP to suit their specific site's activities at their corporate yards.



The Co-permittees keep a copy of the SWPCP at the facility site and review it annually to see that information is current and accurate. BMPs that have been implemented are assessed to determine if they are working as planned, and any required changes are noted in the SWPCP.

As specified in the permit and reflected in the SWPCPs all hazardous and toxic waste storage areas are prohibited from discharging untreated stormwater runoff to the storm drain system. Fueling areas, vehicle maintenance and repair areas and temporary street maintenance material and waste areas are also prohibited from discharging untreated stormwater. All vehicle and equipment wash areas are to be self-contained and covered, or equipped with a clarifier and properly connected to the sanitary sewer. These specific site BMP requirements and associated deadlines were discussed and reviewed frequently by the Co-permittees during Public Infrastructure Subcommittee meetings. All of the Co-permittees have met the performance criteria established in the SMP, and have implemented appropriate BMPs to their hazardous and toxic waste storage areas, fueling areas, vehicle maintenance and repair areas, street maintenance material and waste areas.

Once implemented, the SWPCP requires annual inspections of the corporate yards to evaluate the implementation and effectiveness of the SWPCP. In order to facilitate this process, the Public Infrastructure Subcommittee began discussions on what components of the SWPCP should be evaluated and how best to conduct inspections. As a product of these discussions, the Subcommittee developed a model inspection form Co-permittees could implement at their yards. The Co-permittees plan to continue to address SWPCP implementation and annual inspections at the Public Infrastructure Subcommittee and utilize the lessons learned for improvement and inclusion in future inspection activities.

7.3.3 Field Maintenance Activities

Street maintenance activities and underground utility work have the potential to discharge pollutants to the storm drain system if appropriate protective measures are not implemented. Therefore, Copermittees require roadway maintenance staff, roadway maintenance contractors and others to implement BMPs to control discharge of pollutants to the storm drain system as a result of roadway and utility maintenance activities. At a minimum, Co-permittees have included the following BMPs:

- Prohibit saw-cutting during a storm event of 0.25 inches or greater;
- Prohibit the discharge of untreated runoff from temporary or permanent street maintenance material and waste storage areas from entering the storm drain system.

Some Co-permittees contract for their street maintenance work and most issue street cut or similar permits for private work done in their streets. Co-permittees have addressed work under these contracts or permits by including contract provisions and/or permit conditions requiring street maintenance or repair work comply with the minimum requirements shown above and other BMPs required for protection of water quality. In the event of an emergency and roadway maintenance work must be conducted immediately in order to protect lives or property, Co-permittees make every effort to work in a manner protective of water quality, but public safety is a priority.

7.3.4 Pesticide, Herbicide and Fertilizer Application and Use

The Permit required the Co-permittees to develop and adopt a standardized protocol for the routine and non-routine application of pesticides, herbicides (including pre-emergents) and fertilizers by July 27, 2001. The standardized protocol includes the following minimum requirements to control the discharge of pollutants to stormwater due to pesticide, herbicide and fertilizer application:

- Prohibit the application of pesticides, herbicides and fertilizers during rain events;
- Prohibit the application of pesticide, herbicides and fertilizers within one day of a rain event forecasted to be greater than 0.25 inches except for application of pre-emergents;

- Prohibit the application of pesticides, herbicides and fertilizers after a rain event where water is leaching or running from the application area; and
- Prohibit the application of pesticides, herbicides and fertilizers when water is running off-site from the application site.

In addition, Co-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. Co-permittees have also restricted the purchase and use of pesticides and herbicides to certified staff.

Co-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.

7.3.5 Pilot Trash Excluder Programs

The City of Ventura started installing trash excluders in known problem areas near the end of the permit term last year. This permit term it has completed its first yearly cycle, with positive results. The five vertical excluders, all located inside of the catch basins and within high trash areas, retained large amounts of trash and added no additional costs to the annual catch basin cleaning. One excluder became fully clogged by grass clippings and caused flooding during a rain event. The source of the one-time, sudden accumulation of grass clippings was investigated, but is not known.



A trash excluder in the City of Ventura.

7.3.6 Stormwater Quality Staff Training

Each Co-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 Co-permittees and range from informal meetings, to formal classroom training or self-guided training. The Co-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).

100 percent of targeted staff received stormwater training.

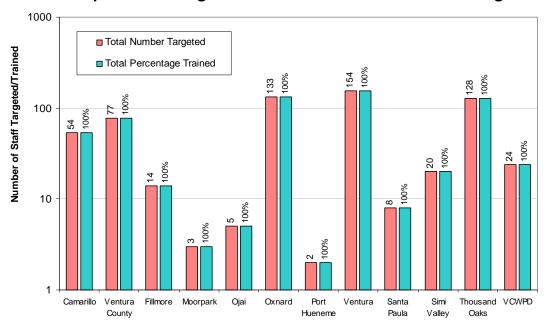


Figure 7-7 Public Agency Staff Trained

During the reporting period, the Co-permittees trained 619 municipal staff in stormwater management, SWPCPs, illicit discharge, response and non-stormwater discharges, this is almost a hundred more employees than last reporting year. **Figure 7-7** depicts the number of staff trained in the program area for each Co-permittee.

8.1 Program Description

Illicit discharges and illegal connections can be concentrated sources of contamination to municipal storm drain systems. An illicit discharge is any intentional or unintentional discharge to a municipal storm drain that is either not composed entirely of stormwater, prohibited in our NPDES permit (Part 1,A,2,b), or not covered by a NPDES Permit. 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



Example of an Illegal Connection

with Police and Sheriffs to catch perpetrators by installing hidden security cameras in areas of frequent illegal dumping.

An illegal connection to the storm drain system is an undocumented and/or un-permitted physical connection from a facility to the storm drain system. An illicit discharge refers to the disposal of non-stormwater materials such as paint or waste oil into the storm drain or the discharge of waste streams containing pollutants to the storm drain system. Categories of non-stormwater discharges not prohibited (exempted or conditionally exempted) under the Permit (and detailed in the SMP) are listed in **Table 8.1**.

Table 8.1 Conditionally Exempt Non-Storm Water Discharges

Non-stormwater Discharges		
Water line Flushing		
Discharges from potable water sources		
Foundation drains		
Air conditioning condensate		
Water from crawl space pumps		
Reclaimed and potable irrigation water		
De-chlorinated swimming pool discharges		
Individual residential car washing		
Sidewalk washing		
Discharges or flows from emergency fire fighting activities		

The term "illicit discharges" used in this program includes several categories as follows:

- 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, 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 illegal connection. These
 typically occur as surface runoff from outside the public right-of-way (e.g., area washdown
 from an industrial site).

To meet the goals and objectives of this program, the Co-permittees have developed a comprehensive illicit discharge/illegal connection program, which includes the following components:

- Public Reporting
- Incidence Response
- Inspections
- Enforcement
- Illicit Discharges/Illegal Connections Staff Training

8.1.1 Public Reporting

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.

Illicit discharges have continually decreased for the last five years.

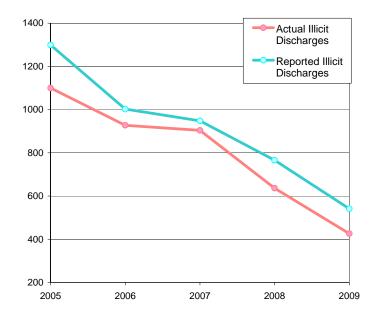


Figure 8-1 Illicit Discharge/Dumping Response

8.1.2 Incidence Response

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 Co-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 Co-permittees have prioritized problem areas (where geographical and/or activity-related) for inspection, cleanup and enforcement using the methods defined in the program.

8.1.3 Inspections

The discovery of potential or likely illicit discharges through business inspections will 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.

8.1.4 Enforcement and Education

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 Co-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 Co-permittee will charge the responsible party for cleanup services provided. 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, 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 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.

8.2 Program Implementation

8.2.1 Source Control

The Co-permittees have a number of programs facilitating the detection of sources of illicit discharges. These programs include business and industrial facility site visits, drainage facility inspection, water quality monitoring and the wide distribution of public education materials that provide phone numbers and web addresses to encourage the reporting of spills.

Staff performing routine maintenance activities within the municipal storm drain system and other Co-permittee field personnel are trained to report suspected problems and/or discharges to the system. In addition to inspections, the Co-permittees receive notifications from a variety of sources such as the public and regional and/or local agencies.



Example of Illegal Dumping

For the first few years as the program evolved and the public became aware of what was not allowed down storm drains reports of illicit discharges increased, however for the last five years reports illicit discharges have decreased. Since the public is more aware of illicit discharges this decrease likely represents a change in behavior and fewer pollutants reaching the storm drains through illicit discharges.

This reporting year, the Co-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; and
- Provide educational materials and contact numbers for reporting illicit discharge/dumping when conducting stormwater inspections.

Figure 8-2 and **Figure 8-3** show the results of the Co-permittees' efforts. All of the illicit discharges reported were resolved countywide (meaning they were cleaned up; referred to another agency; and/or educational material was distributed). The number of incidents investigated and addressed by the Co-permittees reporting discharges exceeds the 90% performance criteria established in the SMP. Note: These figures represent incidents Co-permittees responded to as part of the Stormwater Management Program. Incidents addressed by EHD Hazardous Waste Program or local CUPA may not be included in these figures.

100% of reports of illicit discharges were investigated and 100% of actual illicit discharges were resolved.

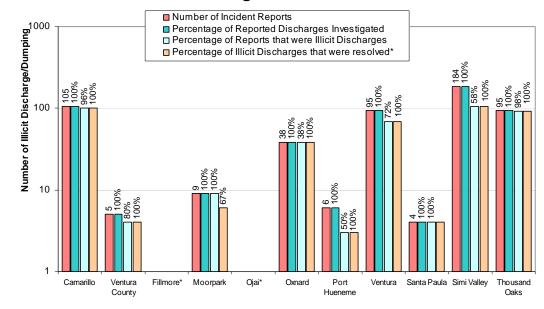


Figure 8-2 Illicit Discharge/Dumping Response

Figure 8-3 indicates the number of illegal connections identified and eliminated. Each Co-permittee detects and eliminates illegal connections within its municipal storm drain system. Any illegal connection identified by the Co-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.

^{*} No illicit Discharges reported this year.

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. Co-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.

■ Number of Illegal Connections Identified ■ Number of Illegal Connections Eliminated **Number of Illegal Connections** 3300% 3 2 1100% 1100% 1 Camarillo* Fillmore* Ojai* Oxnard* Port Ventura* Santa Simi Valley Thousand Hueneme¹ Paula*

100% of illegal connections were eliminated.

Figure 8-3 Illegal Connection Response

If evidence of an illegal discharge is detected in an MS4 and the source is not apparent, a source investigation may be conducted to determine if the discharge is being conveyed through an illegal connection. Depending on the type of illicit connection detected, the Co-permittees may eliminate the connection by means of appropriate legal procedures. Follow-up compliance is conducted to ensure any required abatement activities have been successfully and adequately implemented.

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 Copermittee is responsible for deciding whether to formally accept the connection as part of their public drainage system or cap it off.

8.2.2 Source Determination

As part of their field investigation of reported illicit discharges/dumping incidents, the Co-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, Co-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.

^{*} No illegal connections reported this permit year.

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 Co-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.

The majority of illicit discharges are from residential and commercial/industrial sources.

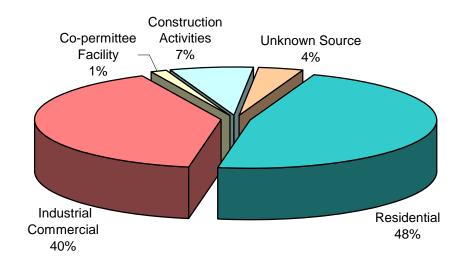


Figure 8-4 Source of Material Discharged during Illicit Discharge Events Countywide

During an illicit discharge investigation the source of the discharge is determined. Residential and industrial sources continue to be the dominate sources of illicit discharges. Since these two sources account for 88% of all illicit discharges, the Co-permittees plan to continue targeting business facilities and residents for comprehensive educational outreach. In addition, Co-permittees continue to crosstrain targeted staff on how to identify and report illicit discharges. **Figure 8-4** presents a breakdown of illicit discharges by source.

Figure 8-5 indicates the likely cause for illicit discharges countywide. The vast majority of incidents resulted from cleaning activities, which the Co-permittees define as *any activity intended to wash, tidy up or make clean*. In order to reduce the number of illicit discharges and to prevent similar incidents from reoccurring, the Co-permittees have taken a variety of actions. Some Co-permittees provide additional training to field staff (such as Building Inspectors, Engineering Inspectors, maintenance personnel) to look for "potential" discharges. When "potential" discharges are found, Co-permittees provide educational material to the appropriate resident, business owner, etc. In addition, other Co-permittees distribute educational material with all encroachment and building permits. Other Co-permittees publish articles in local magazines regarding pool maintenance, vehicle maintenance and

homeowner projects. Some Co-permittees also distribute letters, brochures and informational door hangers directly to homeowners during residential street sweeps in known problem areas.

Cleaning activities are still a major source of illicit discharges.

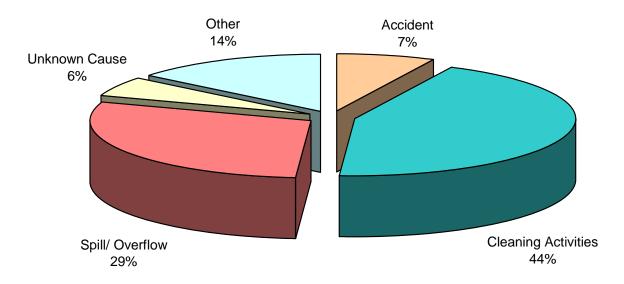


Figure 8-5 Probable Cause of Illicit Discharges Countywide

It is projected that over time there will be a shift in the cause of illicit discharges as the public becomes more educated and encouraged to change their behavior. The number of Illicit discharges due to cleaning activities should drop, and that has been observed. Also, the number due to spills and overflows should lower as better practices are employed to prevent them. Ideally, the majority of discharges will be due to accidents because they are least likely to be changed by the program's efforts. **Figure 8-6** shows how the cause of illicit discharges has changed over the last five years.

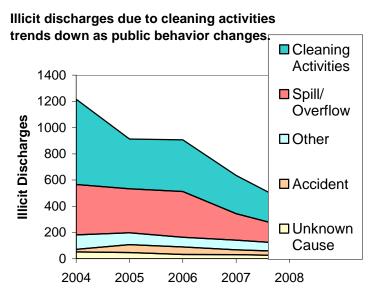


Figure 8-6 Cause of illicit discharges over past five

Figure 8-7 shows the type of material discharged. Wastewater continues to be the most often type of material discharged. For definitions of categories for material type see **Table 8.2**.

Number of Incidents Countywide = 424

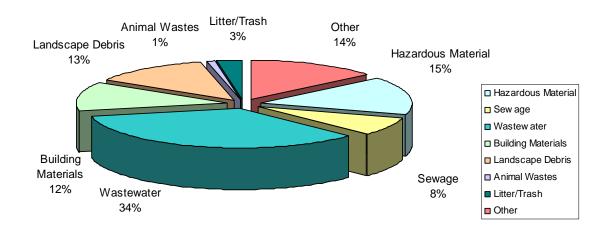


Figure 8-7 Type of Material Discharged during Illicit Dishcarge Events Countywide

Table 8.2 details the categories used by the Co-permittees to describe the material type of an illicit discharge. The definitions of these various categories are solely for facilitating the Co-permittees with their characterization of material type for annual report consistency. The Co-permittees are aware these definitions are by no means all-inclusive nor necessarily how another agency or person would define these categories. The Co-permittees used a variety of resources for assistance in defining these categories including the Ventura County Environmental Health and the RWQCB websites, and the Environmental Protection Agency's glossary of terms and educational outreach materials.

Material Type & Definitions			
TYPE	DEFINITION		
Hazardous Material	By-products of society that can pose a substantial or potential hazard to human health or environment when improperly managed. Posses at least one of the four following characteristics (ignitability, corrosivity, reactivity, or toxicity), or is identified as a listed waste (e.g., oil, used anti-freeze, hydraulic fluid)		
Sewage	The waste and wastewater produced by residential and commercial sources and discharged into sewers, includes the sludge produced by Publicly Owned Treatment Works.		
Wastewater	The spent or used water from a home, community, farm or industry that contains dissolved or suspended matter.		
Building Materials	Any debris associated with construction activities used to construct a building and/or stand/alone facility, such as plaster, dry-wall, nails, wood, etc.		
Landscape Debris	Excessive eroded soils, sediment and/or organic materials.		
Animal Wastes	Discharge from confinement facilities, kennels, pens, recreational facilities, stables, show facilities and residential yards.		
Litter/Trash	Synthetic consumer by-product		
Other	Any remaining materials that do not fit into the above mentioned categories.		

Table 8.2 Illicit Discharge Material Type

8.2.3 Enforcement

Co-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 violations;
- Formal notice of violation or non-compliance with compliance actions and time frames;
- Cease and desist or similar order to comply; and
- 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.

Enforcement activity begins at the appropriate level as determined by the Co-permittees' authorized representative. For incidents more severe or threatening at the outset, enforcement starts at an increased level. 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 Co-permittees' ordinances may include any of the following or a combination thereof:

- Criminal Penalties
- Monetary punishment
- Imprisonment
- Civil Penalties

Figure 8-8 and **8-9** indicate the number and type of enforcement actions taken by the Co-permittees in response to reported illicit discharge/dumping events during this reporting period. The data presented in **Figure 8-8** indicates most Co-permittees issued some form of enforcement action when resolving an illicit discharge and/or dumping event. A total of 424 verified illicit discharges were reported countywide and Co-permittees issued enforcement actions on 84% of these incidents. Generally, enforcement doesn't occur only when a responsible party cannot be identified.

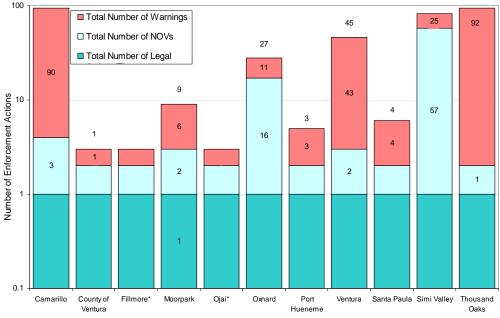


Figure 8-8 Number of Enforcement Actions

Number of Enforcement Actions Countywide = 357

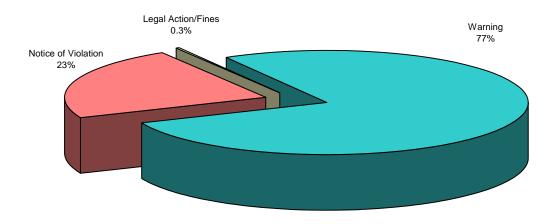


Figure 8-9 Types of Enforcement Actions taken Countywide

Note:

Due to the wide range of number of discharges across the different Co-permittees it was necessary to present on a logarithmic scale. This does not allow accurate representation of values of one or zero.

^{*} No enforcement action taken.

As indicated in **Figure 8-9**, the vast majority of enforcement actions consisted of both verbal and written warnings of violation. Last reporting period had more enforcement actions, but this was due to there being more illicit discharges to enforce against. This year, the Co-permittees issued a total of 123 Notice of Violations (21%), 356 warnings (79%) and 1 legal action. No monetary fines were collected by the Co-permittees this year. This continued enforcement effort underscores the Co-permittees high level of expectations from its residential and business communities. After twelve years of stormwater educational outreach, the Co-permittees believe that additional tools, such as Notice of Violations (NOVs) and fines are appropriate in certain instances to achieve compliance.

In addition, the Co-permittees continue to utilize a database of reported illicit discharge incidents that includes the following information for each event:

- Date of initial inspection
- Type of material discharged
- Source type of discharge
- Probable cause of discharge
- Date of follow-up inspection
- Date of conclusion/clean up/removal/follow up/education
- Enforcement taken action

A printed copy of the Co-permittees' database is attached in Appendix 2. The Co-permittees annually update the database with their activities for the current reporting year and provide a copy as part of the Annual Report.

8.2.4 Education and Outreach

Stormwater pollution prevention is most easily and cost effectively achieved through education and awareness. Over the last five years the number of reported illicit discharges and actual illicit discharges has been trending downward as shown in **figure 8-1**. This is remarkable because over that same time there has been countywide outreach materials with reporting phone numbers distributed to educate the public on how to report discharges. This reporting year, Co-permittees continue to distribute educational material describing illicit discharges, and providing contact numbers for reporting illicit discharges during inspections to automotive, food service and construction sites.

Ongoing Co-permittees illicit discharge educational and outreach efforts:

- The City of Ventura implemented an innovative means to provide city employees and residents with a tool to report illicit discharges. The city developed and distributed to all city vehicles a static-cling windshield sticker that displays the city's Illicit Discharge Hotline phone number and a flyer describing illicit discharges and encouraging employee participation in this program.
- The City of Camarillo identified the phone number to report illicit discharges on the catch basin markers designed to discourage dumping. This combination of two permit-required activities (provide an illicit discharge reporting number to the public and stencil storm drains with a "no dump" message) has proven to be an effective approach, and has proven a great success for the city in their efforts to improve illicit discharge reporting. The city plans to implement the markers citywide.
- The City of Simi Valley on several occasions canvases streets or neighborhoods where illicit discharges were common. They distributed brochures, BMP fact sheets and informational door hangers during these sweeps in an effort to address localized stormwater issues. They have also incorporated stormwater criteria into the pretreatment inspections to aid in identifying illegal connections and stopping illicit discharges before they happen.

 Many Co-permittees host and fund household hazardous waste and electronic waste collection events for their residents. Quarterly or even monthly operations these programs for collecting household hazardous waste serve thousands of participants each year. Thousands of pounds of toxic waste collected may have otherwise have leaked into strom drains after being placed in the trash, or worse illegally dumped straight into the storm drain.

100% of targeted staff were trained.

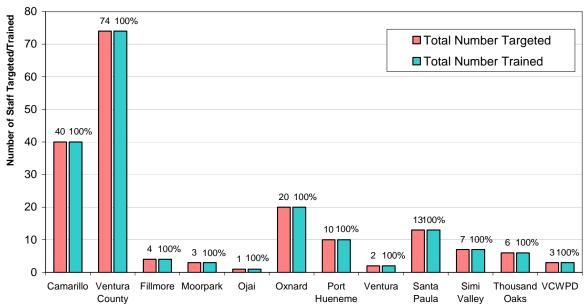


Figure 8-10 Illicit Discharge/Illegal Connection Staff Training

Details on the number of educational contacts made during this reporting period are included in **Section 4** (Program for Industrial/Commercial Business) and **Section 6** (Program for Construction Sites).

8.2.5 Stormwater Quality Staff Training

Each Co-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, Co-permittees trained 162 municipal staff on illicit discharge response and non-stormwater discharges. **Figure 8-10** depicts the number of staff trained. All of the eleven Co-permittees exceeded the performance criterion established in the SMP, and trained more than the 90% of targeted employees.

9.1 Program Summary

Pursuant to NPDES Permit No. CAS004002, the Ventura Countywide Stormwater Quality Management Program (Management Program) must submit a Stormwater Monitoring Report annually by October 1st summarizing and providing a general interpretation of the results from water quality monitoring conducted during the monitoring year. Consistent with this requirement the Management Program has prepared this Report to satisfy the permit requirements and assess the effectiveness of the overall Ventura Countywide Stormwater Monitoring Program (Stormwater Monitoring Program).

This report provides an investigation of stormwater program effectiveness, characterizes the surface water quality of Ventura County, and summarizes available water quality monitoring conducted during 2008/09 season. Analysis of samples collected at various monitoring sites throughout the watershed provides information to assess the impact of stormwater runoff and helps characterize the status of surface water quality for watersheds in Ventura County. The monitoring aids in the identification of pollutant sources as well as the evaluation of the Stormwater Monitoring Program's effectiveness. **Evaluating** the Stormwater Monitoring Program's effectiveness allows for changes to be



made and continual improvement of the overall Program. This adaptive management strategy improves the quality and effectiveness of the Stormwater Monitoring Program and minimizes the impact of stormwater pollutant discharges throughout the watersheds.

For the 2008/09 monitoring season, several key points have been identified and are highlighted below.

- This report presents and discusses the water quality monitoring data collected during four wet weather events and two dry weather events monitored by the Stormwater Monitoring Program. The four wet weather events included monitoring at the Stormwater Monitoring Program's Land Use (Event 1), Receiving Water (Event 1), and Mass Emission (all events) sites. The two dry weather events included monitoring only at the Mass Emission stations. The Stormwater Monitoring Program conducted a thorough QA/QC evaluation of the environmental and QA/QC results generated from its analysis of water quality samples and found the resultant data set to have achieved a 98.1% success rate in meeting program data quality objectives. Overall, the 2009/09 monitoring season produced a high quality data set in terms of the low percentage of qualified data, as well as the low reporting levels achieved by all laboratories analyzing the Stormwater Monitoring Program's water quality samples.
- VCWPD employed the services of CRG Marine Laboratories, Inc., in order to achieve low detection limits for the majority of the water quality parameters evaluated by the Stormwater Monitoring Program. As a means of improving the detection capability of various constituents found in the water quality samples collected by the VCWPD, the Stormwater Monitoring Program has again employed the services of CRG Marine Laboratories, Inc (CRG). CRG began analyzing the majority of the water quality parameters evaluated by the Stormwater Monitoring Program at the beginning of the 2003/04 monitoring season. CRG is known for their ability to measure analytes at concentrations much lower than most water quality laboratories. During the current monitoring year, CRG was able to achieve detection limits for trace organic compounds (i.e., organics, PCBs, and pesticides) that are 100 1000 times lower than laboratories used in the past. Additionally,

CRG typically achieved detection limits for metals that are 10 times lower than historic levels for this class of constituent. Additional laboratories used by VCWPD also possess the ability to measure target analytes at very low levels.

- VCWPD staff evaluated environmental and QA/QC water chemistry data using the *Data Quality Evaluation Plan* and *Data Quality Evaluation Standard Operating Procedures* guidance documents. The *Data Quality Evaluation Plan* (DQEP) describes the multiple step process used by VCWPD staff to identify errors, inconsistencies, or other problems potentially associated with Stormwater Monitoring Program data. Furthermore, the DQEP describes the various data quality objectives (DQOs) to which environmental and QA/QC data are compared as part of the Stormwater Monitoring Program's quality assurance/quality control program. The *Data Quality Evaluation Standard Operating Procedures* document is a set of written instructions that describes both technical and administrative operational elements undertaken by the Stormwater Monitoring Program in carrying out its DQEP.
- VCWPD used its water quality database to store and analyze stormwater quality data. The Stormwater Monitoring Program has invested approximately \$200,000 in the past six years to develop a water quality database to further expedite, standardize, and enhance the Stormwater Monitoring Program's data management and data analysis activities. Key database attributes include automatic importation and cursory evaluation of electronically formatted data, semi-automated QA/QC evaluation, automated comparison of the Stormwater Monitoring Program's data to water quality objectives, and a wide array of hard copy and electronic data reporting features. The database has allowed the Stormwater Monitoring Program to improve its overall data management effort by providing staff with a robust data management tool for the storage, analysis, and reporting of stormwater monitoring data.
- Acute toxicity of *Ceriodaphnia dubia* was observed at Receiving Water sites W-3 (La Vista) and W-4 (Revolon Slough) for the samples collected during Event 1. The permit requires that a TIE Baseline test be initiated for each sample with a TUa >1.0. This test was performed, but by the time the testing was initiated much of the toxicity had dissipated; therefore, no further TIE testing was undertaken.
- No chronic toxicity of Strongylocentrotus purpuratus (Purple Sea Urchin) was observed at any of the Mass Emission stations.
- Toxaphene concentrations exceeded applicable water quality objectives at multiple locations during one
 or more wet weather monitoring events. These exceedances mark the first time that this insecticide has ever
 been detected in Ventura County.
- No samples (water chemistry or aquatic toxicity) were collected for the Ortega Street (I-2) and Swan Street (R-1) Land Use sites. In previous years, the Stormwater Monitoring Program satisfied its NPDES permit condition stating that these two Land Use sites must be monitored a minimum of three times per permit term with respect to the collection of water chemistry samples. Beginning last year (2007/08), the Stormwater Monitoring Program felt that it had obtained enough data to fulfill its regulatory obligation to collect aquatic toxicity grab samples at these sites in order to amass baseline toxicity information related to land use discharges.
- Elevated pollutant concentrations were observed at all monitoring sites during one or more monitored wet weather storm events, and at Mass Emission stations ME-CC and ME-SCR during one or more dry weather events. Constituent concentrations above Los Angeles Region Basin Plan, California Toxics Rule, and/or California Ocean Plan¹ water quality objectives were measured at the following monitoring sites:

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¹ The Stormwater Management Program believes the comparison of stormwater runoff data to the California Ocean Plan is inappropriate based on the following applicability language contained in the plan: "This plan is not applicable to discharges to enclosed bays and estuaries or inland waters, nor is it applicable to vessel wastes, or the control of dredged material." (California Ocean Plan. State Water Resources Control Board. 2005.)

Mass Emission Sites

ME-CC Anion: Chloride

Bacteriological: E. coli, Enterococcus, Fecal Coliform, Total Coliform

Conventional: Total Dissolved Solids

Metal: Aluminum, Chromium, Copper, Lead, Nickel, Zinc

Nutrient: Nitrate as N

Organic: Bis(2-ethylhexyl)phthalate, Total PAH Compounds

Pesticide: 4,4'-DDD, 4,4'-DDE, Total Chlordane Compounds, Total DDT

Compounds

Toxaphene

ME-VR2 Bacteriological: E. coli, Enterococcus, Fecal Coliform, Total Coliform

ME-SCR Bacteriological: E. coli, Enterococcus, Fecal Coliform, Total Coliform

Metal: Aluminum, Chromium, Copper, Lead, Mercury, Nickel, Selenium

Nutrient: Ammonia as N

Organic: Bis(2-ethylhexyl)phthalate, Total PAH Compounds

Pesticide: Toxaphene

Receiving Water Sites

W-3 Bacteriological: *E. coli*, Enterococcus, Total Coliform

Metal: Aluminum, Copper, Lead, Zinc **Organic:** Total PAH Compounds

Pesticide: 4,4'-DDD, 4,4'-DDE, Total DDT Compounds, Toxaphene

W-4 Bacteriological: E. coli, Enterococcus, Fecal Coliform, Total Coliform

Conventional: Total Dissolved Solids

Metal: Aluminum, Copper **Nutrient:** Nitrate as N

Organic: Total PAH Compounds

Pesticide: 4,4'-DDD, 4,4'-DDE, Total Chlordane compounds, Total DDT

Compounds, Toxaphene

Even though receiving water objectives are not directly applicable to constituent concentrations measured at Land Use monitoring stations, the Stormwater Monitoring Program performed comparisons between Land Use water quality data and Los Angeles Region Basin Plan, California Toxics Rule, and California Ocean Plan objectives as a means of identifying potential pollutants of concern.

Land Use Sites

A-1 Bacteriological: *E. coli*, Enterococcus, Fecal Coliform, Total Coliform

Conventional: Total Dissolved Solids

Metal: Aluminum, Copper **Nutrient:** Nitrate as N

Organic: Total PAH Compounds

Pesticide: 4,4'-DDD, 4,4'-DDE, Total Chlordane Compounds, Total DDT

compounds, Toxaphene

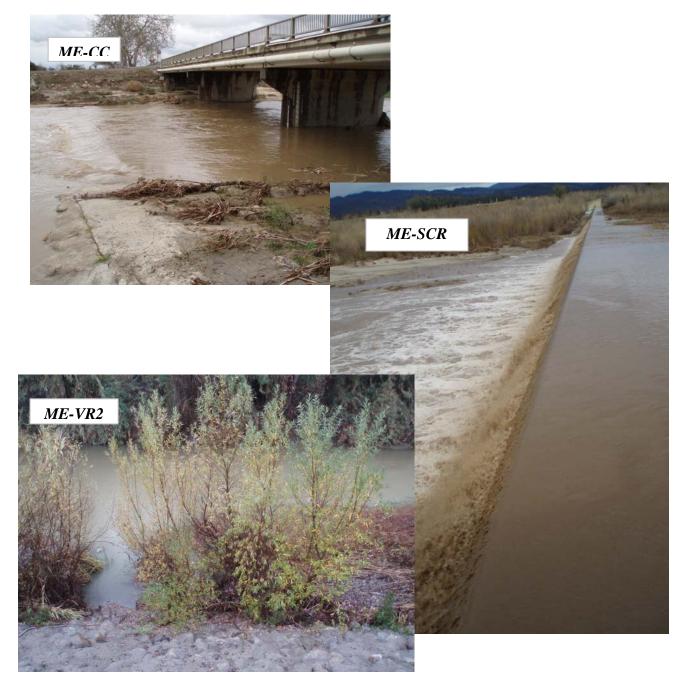


Figure 9-1: Mass Emission Site Photos: ME-CC (Calleguas Creek), ME-SCR (Santa Clara River), and ME-VR2 (Ventura River) during storm flows in January 2008 (Event 3)



Figure 1: ISCO 6712 refrigerated sampler, ISCO 4230 flowmeter, and steel enclosure at Mass Emission site ME-VR2