



Ventura Countywide Stormwater Quality Management Program

Participating Agencies

December 22, 2015

Camarillo

Samuel Unger, P.E.
Executive Officer

County of Ventura

Regional Water Quality Control Board, Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, California 90013

Fillmore

Moorpark

**SUBJECT: RESPONSE TO REQUEST FOR MUNICIPAL ASSISTANCE
WITH IDENTIFYING NON-FILERS UNDER THE INDUSTRIAL
STORMWATER GENERAL PERMIT**

Ojai

Dear Mr. Unger:

Oxnard

This letter serves as a receipt of acknowledgement of your letter, dated October 13, 2015, titled "Municipal Assistance with Identifying Non-Filers Under the Industrial Stormwater General Permit", by the Ventura Countywide Stormwater Quality Management Program (Program) which includes the Ventura County Watershed Protection District, the County of Ventura, and the ten incorporated cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks (Permittees).

Port Hueneme

San Buenaventura

Santa Paula

All Permittees were forwarded your letter and would like to ensure you that our municipalities have well-established and effective processes to identify and refer non-filers within the Industrial Stormwater General Permit (ISWGP) Program. Our review and identification processes include application review, verification, inspection, and progressive enforcement of businesses applying for business licenses, conditional use permits, and sanitary sewer connection permits. Once-a-month, Permittees review business license applications to identify new businesses subject to the ISWGP. In addition, if any new facility is identified during site inspections, surveys of jurisdictional areas, or during response to stormwater hotline reports, it is subject to our ISWGP verification and future inspections as applicable. The Permittees are also following a model used for the Construction General Permit by conducting compliance site inspections, and in the case of non-compliance, implementing a progressive enforcement process.

Simi Valley

Thousand Oaks

Ventura County
Watershed Protection
District

However, as mentioned in your letter, non-filer information of sufficient detail was not included in the previously submitted Annual Reports. Therefore, we propose to improve future reporting to include details about how many non-filers were



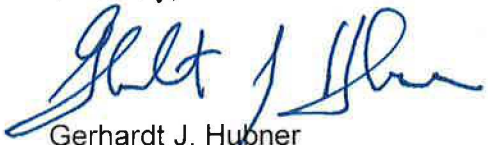
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identified, and if they were brought into compliance within the reporting period. For example, during the last reporting period of 2014-2015, countywide the Permittees identified 32 non-filers and brought them all to compliance.

We have evaluated your request for requiring proof of enrollment in the ISWGP during business license granting or renewal processes before a business license is issued. Unfortunately, this is not a viable option due to potential processing delays and legal implications and different methods and practices each municipality employs with issuing business licenses. Alternatively, we propose to continue our well-established processes and mechanisms and improve our reporting to provide you with documentation that shows that each year applicable businesses are enrolled in the ISWGP.

On behalf of the Ventura Countywide Stormwater Quality Management Program, I thank you for your time to consider this matter. If you have questions, please contact me at (805) 654-5051, or via email at Gerhardt.Hubner@ventura.org.

Sincerely,



Gerhardt J. Hubner
On Behalf of the
Ventura Countywide Stormwater Quality Management Program

cc: Ventura County Stormwater Quality Program Permittees
Solomon Ejigu, RWQCB, Los Angeles Region