



WHITEWATER RIVER REGION STORMWATER MANAGEMENT PLAN

June 2014

January 2015, Revised

**RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT
COUNTY OF RIVERSIDE, COACHELLA VALLEY WATER DISTRICT, and the
CITIES OF BANNING, CATHEDRAL CITY, COACHELLA, DESERT HOT SPRINGS,
INDIAN WELLS, INDIO, LA QUINTA, PALM DESERT, PALM SPRINGS
AND RANCHO MIRAGE**

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1.0 PROGRAM MANAGEMENT

1.1 Purpose

The Whitewater River Region Stormwater Management Plan (SWMP) describes those activities and programs implemented by the Permittees to manage Urban Runoff to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer system (MS4) permit (MS4 Permit) for the Whitewater River Region. A glossary of the terms, abbreviations and acronyms used in this document is provided in Appendix A.

1.2 Regulatory Framework

The effort to control Pollution associated with Stormwater/Urban Runoff is the result of over forty years of legislative effort beginning with the Federal Water Pollution Control Act, which is also referred to as the Clean Water Act (CWA). The CWA was amended in 1972 to provide that the discharge of Pollutants to Waters of the United States is effectively prohibited unless the discharge is in compliance with an NPDES permit. In 1987 Congress enacted the Water Quality Control Act that amended portions of the CWA and included §402(p), which established requirements for permitting Stormwater discharges. CWA §402(p) required that the United States Environmental Protection Agency (USEPA) establish regulations setting forth a program of NPDES applications and corresponding permits for Stormwater discharges associated with industrial activities and for Stormwater discharges from MS4s. CWA §402(p) also requires that NPDES MS4 permits include:

1. A requirement to effectively prohibit Non-Stormwater discharges into the MS4; and
2. Controls to reduce the discharge of Pollutants to the maximum extent practicable (MEP), including management practices, control techniques and systems, design and engineering methods and such other provisions as the Administrator or the State determines appropriate for the control of such Pollutants.

USEPA's Final Rule for NPDES Permit Application Regulations for Stormwater Discharges became effective December 17, 1990 and is often referred to as the "Phase I Stormwater Regulations". The Phase I Stormwater regulations are administered nationwide through the USEPA's NPDES program. The Phase I Stormwater regulations require that the management program for an MS4 include a comprehensive planning process which involves public participation and, where necessary, inter-governmental coordination, to reduce the discharge of Pollutants to the MEP using management practices, control techniques and systems, design and engineering methods, and such other provisions which are appropriate. The Phase I Stormwater regulations also specify who is covered; prescribes a variety of required information-gathering, planning, and reporting activities; and sets forth a schedule for compliance. The Phase I Stormwater regulations also set forth requirements for specific industrial activities.

In response to the Phase I Stormwater regulations, the Riverside County Flood Control and Water Conservation District (District), the County of Riverside (County), the Coachella Valley Water District (CVWD), and the Cities of Banning, Cathedral City, Coachella, Desert Hot Springs, Indian Wells, Indio, La Quinta, Palm Desert, Palm Springs, and Rancho Mirage (collectively, Permittees) submitted Part 1 and Part 2 applications to the California Regional Water Quality Control Board – Colorado River Basin

Region (Regional Water Board). The Regional Water Board issued the first MS4 Permit for the Whitewater River Region (Order No. 96-015) in May 1996. In compliance with the 1996 MS4 Permit, the Permittees prepared and implemented the initial SWMP, and submitted an application for renewal of their area-wide MS4 Permit in December 2000. The Regional Water Board adopted the 2001 MS4 Permit (Order No. 01-077) in September 2001. In May 2008, the Regional Water Board adopted the 2008 MS4 Permit (R7-2008-0001). The 2009 SWMP was developed in compliance with the 2008 MS4 Permit, and a subsequent errata version of the SWMP was finalized and submitted with the 2010-2011 Annual Report (2011 SWMP). In November 2012, the Permittees submitted a Report of Waste Discharge (ROWD) as an application for renewal of the 2008 MS4 Permit, which was due to expire in May of 2013. In June 2013, the Regional Water Board adopted the 2013 MS4 Permit (Order No. R7-2013-0011). As required by Section E.1 of the 2013 MS4 Permit, the Permittees began implementation of the programs described in this 2014 SWMP when it was approved by the Regional Water Board Executive Officer on December 31, 2014.

Programmatic improvements have been incorporated into this 2014 SWMP based on the Permittees' experience in implementing prior versions of the SWMP, findings of the monitoring program, enhancements to the NPDES MS4 compliance programs in the Santa Ana River and Santa Margarita River regions of Riverside County, and implementation of statewide water quality policies. Components of the prior SWMP that have proven most effective have been carried forward and incorporated into the program for the 2013 MS4 Permit. Taking into account the unique nature of the Coachella Valley's desert environment, this 2014 SWMP continues to emphasize source control measures and strong public education/outreach efforts as being the most effective way to manage Urban Runoff in this highly arid region. A copy of the 2013 MS4 Permit, adopted in June 2013, is provided in Appendix B.

1.3 Organization

The 2013 MS4 Permit identifies the District and the County as Principal Permittees, and CVWD and the Cities as Co-Permittees. Under this organizational framework, the Principal Permittees are responsible for coordinating collective Permittee MS4 Permit compliance activities, including report preparation and submittals to the Regional Water Board.

The Permittees established the NPDES Desert Task Force Advisory Committee (DTF) to facilitate coordination of program development and implementation policy and funding issues. The 2013 MS4 Permit requires each Permittee to designate one or more representative to the DTF, and regularly attend meetings. The Permit requires the DTF to meet at least quarterly; however, meetings are generally held monthly or every other month to disseminate information, discuss issues, and coordinate Permittee actions to implement the SWMP and facilitate MS4 Permit compliance.

To set forth the working framework among multiple agencies, the Permittees updated the Implementation Agreement in June of 2014; a copy of the Agreement is provided in Appendix C. The Implementation Agreement reinforces the roles and responsibilities of each Permittee established by the 2013 MS4 Permit. Specific provisions of the Implementation Agreement include cost sharing for Public Education and Outreach Program activities and water quality monitoring.

This 2014 SWMP is organized into the following program elements:

- ♦ **Section 1, Program Management** – This section describes the purpose of the SWMP, the regulatory framework related to Urban Runoff quality management, organization of the SWMP, the Permit Area addressed by the 2013 MS4 Permit and the 2014 SWMP, the area-wide

compliance programs implemented on behalf of the Permittees, legal authority of the Permittees to implement the compliance program, the strategy for enforcing Permittee ordinances and a description of the sources of funding for implementation of the compliance program.

- ◆ **Section 2, Detection and Elimination of Illicit Connections and Illegal Discharges (IC/ID)** – This program involves screening, detection, and elimination to the MEP of IC/IDs to the MS4. This program is implemented at both the area-wide and individual Permittee levels. The SWMP has been enhanced to provide for more formalized inspections of the MS4. In addition, descriptions of existing oversight programs for portable toilets and individual septic systems have been incorporated into the Whitewater River Region program.
- ◆ **Section 3, Commercial/Industrial Facilities Program** – The Commercial/Industrial program is implemented primarily through outreach, education, and facility visits. The program continues to include technical training for the Permittees' staff regarding BMPs and Stormwater management at industrial and commercial sites.
- ◆ **Section 4, New Development/Redevelopment** – New Development/Redevelopment program requirements continue to focus on integrating Stormwater management measures into current development review processes within the Permittees' Planning and Public Works Departments. Priority Development Projects continue to be required to prepare and implement Water Quality Management Plans (WQMPs).
- ◆ **Section 5, Private Construction Activities** – The Construction program is closely linked to the New Development/Redevelopment program, and continues to require construction projects under the jurisdiction of the Permittees to implement appropriate BMPs, and provides for prioritization, inspection, and enforcement for construction site compliance with Stormwater Ordinances.
- ◆ **Section 6, Permittee Facilities and Activities** – This program area is targeted at the Permittees' facilities and operations, including various departments within the Permittee's Public Works frameworks. Employee training activities are a key aspect of Stormwater management at the Permittee level. To provide a consistent, statewide regulatory approach to address Sanitary Sewer Overflows (SSOs), on May 2, 2006 the State Water Resources Control Board (SWRCB) adopted General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems¹ (Sanitary Sewer Order). The Sanitary Sewer Order requires public agencies that own or operate sewage systems to develop and implement Sewer System Management Plans (SSMPs) and report all SSOs through the SWRCB's online SSO database. The SWMP acknowledges that the Permittees will support the implementation of the compliance programs developed by sanitary sewer system operators in response to the Sanitary Sewer Order. Additionally, the Permittees operate facilities that have the potential to contribute Pollutants to Urban Runoff, but which do not fall under the General Industrial Permit. For such facilities, the Permittees prepare and implement Facility Pollutant Prevention Plans (FPPPs) which describe BMPs to manage Pollutants.
- ◆ **Section 7, Public Education and Outreach Program** – The Public Education and Outreach Program includes a media campaign that takes advantage of countywide resources to develop and increase public awareness of Urban Runoff issues on a regional scale, in both English and Spanish. The enhancements to the Public Education and Outreach Program that have been

¹ SWRCB Water Quality Order No. 2006-0003, available at http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2006/wqo/wqo2006_0003.pdf

implemented by the Permittees are reflected in this 2014 SWMP. These enhancements include revisions to the Public Education and Outreach Program to educate the general public regarding residential activities such as vehicle washing and maintenance, landscaping, home maintenance, pet ownership, and illegal dumping. The Public Education and Outreach Program also includes:

- The use of new advertisements, promotional materials, brochures and other media to increase Stormwater awareness; and
 - Updates to the web site, 1-800 line, and other outreach channels.
- ◆ **Section 8, Monitoring Program** – Water quality sampling and analysis is conducted in the Whitewater River Region to characterize Urban Runoff discharges from the MS4, and to determine the impacts of those discharges on Receiving Waters, where applicable and feasible. The District developed and implements a monitoring program based on the requirements outlined in Section L, Monitoring and Reporting, of the 2013 MS4 Permit, with reference to the Water Quality Control Plan, Colorado River Basin (Basin Plan), and the guidance in the Model Monitoring Program (MMP) for Municipal Separate Storm Sewer Systems in Southern California. The MMP was prepared by the Southern California Stormwater Monitoring Coalition (SMC), which consists of the Permittees, Regional Water Quality Control Boards, citizen's groups, Southern California Coastal Watershed Research Project (SCCWRP), private consultants, and other agencies. The Permittees in the Whitewater River Region, in conjunction with the MS4 Permittees of the other major watersheds within Riverside County (Santa Ana River Region and Santa Margarita River Region), have created a Consolidated Monitoring Program to coordinate monitoring programs across the regions.
- ◆ **Section 9, Annual Reporting, SWMP Updates and Regional Program Evaluation/Assessment** – The Permittees prepare Annual Reports as described in Section F of the 2013 Permit for submittal to the Regional Water Board. The Permittees also evaluate the effectiveness of the elements of their respective programs to identify necessary revisions. As necessary, the Permittees review and assess the component program elements of the SWMP to identify improvements that will promote the reduction of Pollutants in Urban Runoff while also supporting the responsible management and allocation of the public resources available to implement the SWMP. The SWMP may be revised by the Permittees, to update dynamic factual information, to improve format and usability, and/or to reflect ongoing program development resulting from the program evaluation process.
- ◆ **Section 10, Total Maximum Daily Load (TMDL) Implementation** – EPA approved a Bacterial Indicator TMDL for the Coachella Valley Stormwater Channel (CVSC) on April 27, 2012. The approved Basin Plan Amendment specifies Waste Load Allocations (WLAs) for Point Sources including the City of Coachella (the only Whitewater River Region MS4 Permittee named as a responsible party), CalTrans, Valley Sanitary District Wastewater Treatment Plant, Coachella Sanitary District Wastewater Treatment Plant, and Mid-Valley Water Reclamation Plant; as well as Load Allocations (LAs) for agricultural runoff, Federal and tribal lands, and septic systems. This SWMP section describes background, requirements, the measures that the City of Coachella is currently implementing to comply with Phase 1 implementation of the TMDL, and also discusses possible future actions.

1.4 Permit Area

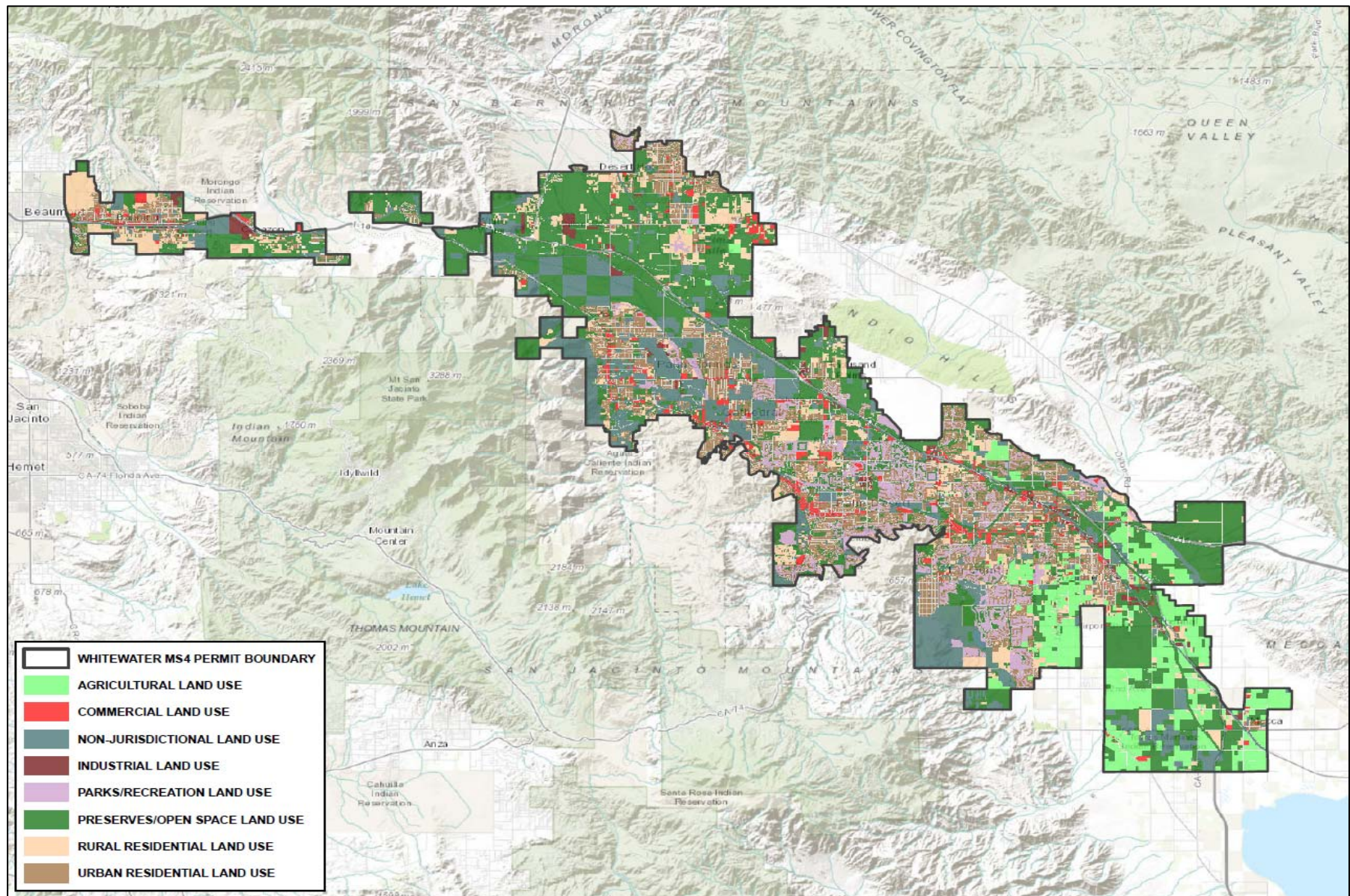
The area covered under the 2013 MS4 Permit, referred to as the "Whitewater River Region", is defined as the area shown in the MS4 Permit Area Map (Figure 1-1). The Permittees update the MS4 Permit Area Map each year in the Annual Report. The Whitewater River Region includes the urbanized areas that lie approximately between Banning and the San Geronio Pass area to the northwest and the Salton Sea to the southeast. It is important to recognize that agricultural activities are exempt from regulation under the CWA and the 2013 MS4 Permit. Additionally, the Permittees do not have legal jurisdiction over discharges into their respective MS4s from:

- ◆ State and Federal facilities,
- ◆ Utilities and special districts, and
- ◆ Native American tribal lands.

Although not included in the Whitewater River Region, discharges from these areas and agricultural activities may significantly affect Receiving Water quality. In addition, other point and non-point source discharges otherwise permitted by or under the jurisdiction of the Regional Water Board may also affect water quality in the Whitewater River Region. The Permittees will apply the Development Planning and Construction program requirements described in Sections 4 and 5 of this SWMP to projects outside of the Whitewater River Region, but within the Whitewater River watershed.

The area of Riverside County in the Whitewater River Region, and under the jurisdiction of the Regional Water Board, is approximately 367 square miles, which is approximately 5 percent of the 7,300 square miles within Riverside County. Thirteen of the 24 municipalities within Riverside County are under the jurisdiction of the Regional Water Board.

Figure 1-1. MS4 Permit Area Map



1.5 Area-wide Programs

The Permittees employ three area-wide programs to implement certain BMPs. Each program is established through an agreement between the District and the agency providing the service.

1.5.1 Hazardous Materials Spill Response

The Riverside County Fire Department Hazardous Materials Emergency Spill Response Team (HAZMAT Team) is a major component of the area-wide source control efforts implemented by the Permittees. The HAZMAT Team responds to incidents of spills and illegal dumping of hazardous material throughout Riverside County. The HAZMAT Team directly oversees and directs incident response and clean-up of hazardous material with the goal of preventing discharges into the environment—including the MS4—whether the source is Illegal Dumping or accidental releases/spills.

1.5.2 Household Hazardous Waste and Anti-freeze, Batteries, Oil, Latex Paint Programs

The Household Hazardous Waste (HHW) and Anti-freeze, Batteries, Oil, Latex Paint (ABOP) programs are principal components of the Permittees' source control efforts. Both programs are implemented by the Riverside County Waste Management Department (RCWMD) and provide practical alternatives to improper disposal of household hazardous wastes that might otherwise be disposed into the MS4.

1.5.3 Conditionally Exempt Small Quantity Generators of Hazardous Waste

The Conditionally Exempt Small Quantity Generators (CESQGs) Program is also managed by the RCWMD and is available to businesses that generate small quantities (27 gallons or 220 pounds) of hazardous waste or 2.2 pounds of extremely hazardous waste (i.e., wastes that would cause death, disabling personal injury, or serious illness) per month. The RCWMD collects hazardous waste from eligible businesses within Riverside County and provides proper labeling and documentation assistance. The CESQG program provides an alternative to improper disposal of hazardous waste that might otherwise be disposed into the MS4.

1.5.4 Public Education and Outreach Program

The Public Education and Outreach Program is broad-based, and communicates the importance of Urban Runoff management and Pollution Prevention to the general public and to targeted construction, commercial, and industrial sources through the use of various media. The goal of the program is to perform outreach to citizens by presenting clear and consistent messages that explain the connections between everyday activities and their impact on water quality.

1.6 Legal Authority

The Permittees are required to establish adequate legal authority to implement the provisions of the MS4 Permit in accordance with Federal regulations at 40 CFR 122.26. The Permittees have established this legal authority to implement the 2013 MS4 Permit. Legal authority is then maintained and exercised by the Permittees with jurisdiction over the MS4. The District and CVWD rely on the principle of "combined legal authority" as outlined in the USEPA Part 2 Permit Application Guidance. As special districts, the District and CVWD lack the "police power" expressly granted to cities and counties by California's constitution from which "land use authority" is derived.

1.7 Enforcement and Compliance Strategy

An Enforcement and Compliance Strategy for ensuring that construction sites, commercial establishments, and industrial facilities operate in compliance with Stormwater Ordinances was developed jointly by the Phase I MS4 Permittees in the Santa Ana and Santa Margarita River Regions. That Enforcement and Compliance Strategy has been incorporated into this Whitewater River Region SWMP to provide guidance for the enforcement approach implemented by the Permittees.

The goal of the Enforcement and Compliance Strategy is to enforce Stormwater Ordinances fairly and consistently throughout the Whitewater River Region. However, there is no clear, standard approach to handling all of the enforcement situations that may be encountered. Generally, the professional judgment of code enforcement staff will guide the appropriate level of response. Sections 1.7.1 through 1.7.3 provide guidelines for Permittees in implementing enforcement actions appropriate for a given violation.

1.7.1 Prioritize Violations

The Permittees' Stormwater Ordinances cover a wide range of prohibited activities with varying magnitudes of potential impact on the Beneficial Uses of Receiving Waters. For example, discharges of either hazardous materials (e.g., solvents and pesticides) or non-hazardous materials (e.g., food wastes, trash, and debris) into the MS4 are violations of Stormwater Ordinances, and subject to enforcement. Similarly, an accidental spill resulting from negligent management of materials or wastes into a catch basin inlet and an IC/ID are both violations. Prioritizing violations is important in focusing local resources on those violations that may have the greatest potential impact on Receiving Water quality.

It is not feasible to quantify the magnitude of violations of the Stormwater Ordinances. Instead, prioritizing violations is based on many factors, including the experience and professional judgment of code enforcement staff. The factors that should be considered in prioritizing violations of Stormwater Ordinances are presented in Table 1-1.

Table 1-2 has been developed to promote consistency in the Permittees' enforcement actions throughout the County. Table 1-2 provides general guidance for categorizing the severity of violations based upon the factors and/or circumstances associated with a violation; it also describes the criteria chosen to characterize the severity of a violation as "high", "medium", or "low". For example, using Table 1-2, the accidental dumping of 20 gallons of trash several hundred yards away from an Ephemeral Stream would be considered a "low" priority violation. However, the intentional discharge of 2,000 gallons of pesticide directly into aquatic wildlife habitat would be a "high" priority violation.

In some cases, based on Permittee evaluation of circumstances, an individual violation may be categorized higher or lower than is indicated in Table 1-2. Violations may also not clearly fall into any single severity priority level described in Table 1-2. It is more likely that a violation would be characterized by factors representing more than one of the priority levels described in Table 1-2. In this case, a subjective evaluation of the violation would be required to select the priority level most representative of the characteristics and circumstances surrounding the violation.

Table 1-1. Prioritization Factors for Violations

Prioritization Factor	Description
Characteristics of the Potential Pollutant	Based on chemical characteristics and potential to impact Beneficial Uses of Receiving Waters. The more toxic, hazardous, or detrimental to the Beneficial Uses of the Receiving Waters a Pollutant is, the higher the priority of the discharge.
Sensitivity of the affected Receiving Waters	The priority of the violation should be considered directly proportional to the sensitivity of the affected Receiving Waters because, for example, a more sensitive Receiving Water may suffer severe adverse effects from the discharge of a particular Pollutant whereas a less sensitive Receiving Water may suffer no adverse effects from the same Pollutant discharge. It is also important to consider that a Receiving Water may be highly sensitive to one Potential Pollutant discharge while, at the same time, completely insensitive to another Potential Pollutant. Examples of Receiving Waters that may be particularly sensitive include those designated with municipal supply or wildlife habitat designated Beneficial Uses.
Proximity of Receiving Waters	The closer a Receiving Water is to the discharge, the less chance there is for dispersion, dilution, or degradation of the Potential Pollutant. Therefore, the closer the discharge is to Receiving Waters, the higher priority of the violation.
Magnitude of discharge (volume and mass)	A larger Illegal Discharge should be of a higher priority than a smaller Illegal Discharge because as the magnitude of the Pollutant discharge increases, the extent of impact of the discharge on the environment increases as well.
Responsiveness of the discharger in taking corrective actions	A discharger who is responsive and implements a good faith effort to correct a violation is more likely to minimize adverse impacts to surface water quality than a discharger who takes no action to correct a violation. Therefore, the priority of a violation should decrease as the responsiveness of the discharger increases.
Intent of the discharger	Is the violation accidental or the result of an accident or a deliberate attempt to circumvent regulations?
Frequency of the violation	Violations of local Stormwater Ordinances and erosion control ordinances that are continuous or reoccurring should be of a higher priority than isolated occurrences of violations. The more frequent a violation, the more likely it is that the discharge will impact surface water quality.
Previous history of non-compliance of the responsible party	A poor history of non-compliance of a discharger should result in a higher prioritization of subsequent violations as compared to a discharger with a good history of compliance because a history of non-compliance is evidence of a discharger's lack of concern for complying with local Stormwater and erosion control ordinances.

Table 1-2. Severity of Violations

Factors Affecting the Severity of Violations	Severity Priority Level		
	High	Medium	Low
Pollutant characteristics	Hazardous materials (e.g., pesticides and solvents)	Metals, nutrients, Sediment, other non-Hazardous Materials	Trash and Debris
Sensitivity of Receiving Waters	Drinking water source, wildlife refuge, Illegal Discharges containing Pollutants identified as Impairing the Receiving Water.	Recreational reservoir, riparian habitat	Dry, ephemeral stream
Proximity of Receiving Waters	Adjacent	Several hundred feet away	Several hundred yards away
Discharge magnitude	1,000's gallons	100's gallons	10's gallons
Responsiveness of discharger	No action to contain or mitigate discharge	Reactive to control discharge when requested (i.e., cooperative)	Implements spill control plan at own initiative or shows good faith effort to respond
Intent of violation	Intentional	Discharge due to lack of controls or negligence	Implemented and maintained controls that failed (i.e., accident)
Frequency of violation	Continuous	Intermittent	Isolated incident
Previous history of discharger	Enforcement and cleanup historically resisted and more than one previous violation	Enforcement and cleanup performed only when threatened with enforcement or one previous violation	Enforcement and cleanup performed when requested and no previous violations

1.7.2 Enforcement and Compliance Responses

The enforcement/compliance response should be based on the severity of the violation. The hierarchy for the types of enforcement/compliance responses available, in order of increasing severity, is:

1. Education and information,
2. Verbal warning,
3. Written warning,
4. Notice of violation or non-compliance,
5. Administrative compliance order,
6. Stop work order or cease and desist order,
7. Civil citation or injunction, including misdemeanors and infractions,
8. Administrative fine, and
9. Referral to the Environmental Crimes Strike Force.

The general use of enforcement responses by the Permittees depending on the severity of the violation is described in Table 1-3.

1.7.2.1 Education and Warnings

To promote voluntary compliance, the Permittees provide education and verbal and written warnings. Education is provided at each step of the enforcement process and is intended to provide guidance regarding methods to achieve compliance. Verbal and written warnings are intended to communicate the compliance requirements and to identify potential administrative and enforcement actions that may result from further non-compliance.

1.7.2.2 Administrative Remedies

Notice of Non-Compliance. The notice of non-compliance constitutes a basic request that the property owner or facility operator rectify the condition causing or threatening to cause non-compliance with a Permittee's Stormwater Ordinance(s). The notice of non-compliance is generally issued when one or more of the following circumstances exist:

- ◆ The violation or threat is not significant and has been short in duration,
- ◆ The responsible party is cooperative and has indicated a willingness to remedy the conditions,
- ◆ The violation or threat is an isolated incident, and
- ◆ The violation or threat does not affect and will not harm human health or the environment.

Administrative Compliance Orders. The administrative compliance order is generally an appropriate enforcement tool in the following circumstances:

- ◆ An actual condition of non-compliance exists, but the condition cannot be remedied within a relatively short period of time.
- ◆ The owner of the property or facility operator has indicated willingness to come into compliance by meeting milestones established in a reasonable schedule.
- ◆ The violation does not pose an immediate threat to human health or the environment.

Stop Work Order or Cease and Desist Order. The stop work order or cease and desist order are appropriate when the immediate action of the owner of property or operator of a facility is necessary to stop an existing discharge, which is occurring in violation of a Stormwater Ordinance. The cease and desist order may also be appropriately issued as a first step in ordering the removal of Nuisance conditions, which threaten to cause an unauthorized discharge of Pollutants if exposed to rain or surface water runoff. The cease and desist order is generally issued when one or more of the following circumstances exist:

- ◆ The violation or threat is immediate in nature and may require an emergency spill response or immediate nuisance abatement if left unattended.
- ◆ The violation or threat exhibits a potential situation that may harm human health or the environment.
- ◆ The inspector's contacts with the property owner or facility operator indicate that further authority of the Permittee may need to be demonstrated before remedial action is forthcoming.
- ◆ The inspector's prior notices of non-compliance have not obtained a favorable response.

Prior to issuance of any administrative compliance order, cease and desist order or commencement of other civil or criminal enforcement action against any Person, the Permittee should deliver to the Person a written notice of non-compliance, which states the act or acts constituting the violation and directs that the violation be corrected. The notice of non-compliance should provide the Person with a reasonable time period to correct the violation before further proceedings are brought against the Person. However, a notice of non-compliance should not be the first enforcement method used if egregious or unusual circumstances indicate that a stronger enforcement method is more appropriate.

1.7.2.3 Criminal Enforcement

Misdemeanors. Criminal enforcement is appropriate when evidence of non-compliance indicates that the violator of the Stormwater Ordinance has acted willfully with intent to cause, allow, continue, or conceal a discharge in violation of the ordinance.

Infractions. At the discretion of the Permittees' attorneys, misdemeanor acts may be treated as infractions. Factors that the attorney may use in determining whether the misdemeanor is more appropriately treated as an infraction may include the:

- ◆ Duration of the violation or threatened violation.
- ◆ Compliance history of the person, business or entity.
- ◆ Effort made to comply with an established compliance schedule.
- ◆ Existence of prior enforcement actions.
- ◆ Actual harm to human health or the environment from the violation.

Issuance of Civil Citation or Injunction. Where criminal enforcement is indicated, the inspector will issue a citation including the:

- ◆ Name and address of the violator,
- ◆ Provisions of the Stormwater Ordinance violated,
- ◆ Time and place of required appearance before a magistrate.

The offending party must sign the citation thereby promising to appear. If the cited party refuses to sign the citation, the inspector may cause the arrest of the discharger, or may refer the matter to the city attorney/county counsel for issuance of a warrant for arrest. Inspectors should be aware that cited parties have the right to demand the immediate review by a magistrate, and such a request must be granted. Inspectors should respond to such a request by referring the request to the Permittee police or sheriff department.

Administrative Fine. An administrative fine may be imposed, after approval, for non-compliance with a Stormwater Ordinance.

1.7.2.4 Referral to Environmental Crimes Task Force

The Riverside County Environmental Crimes Task Force (telephone number 800-304-6100) is a committee designed to pursue enforcement of serious environmental crimes. Referral of a case to the Environmental Crimes Task Force may occur after repeated attempts at obtaining compliance have failed

or if a criminal violation or activity is suspected. Permittees maintain their authority to pursue criminal enforcement of their ordinances in addition to the referral to the Environmental Crimes Task Force.

1.7.2.5 Appropriate Enforcement/Compliance Responses

Permittees will emphasize and encourage voluntary compliance with Stormwater Ordinances to the MEP. Table 1-3 provides an example of appropriate enforcement responses that correspond to the severity priority level of a violation as determined from Table 1-2. Permittees and the Regional Water Board should work cooperatively in implementing enforcement/compliance responses according to their respective authorities. However, the Regional Water Board has substantial abilities to assess fines and penalties under State and Federal law that can be used to augment local enforcement where superior regulatory authority and the ability to assess fines and penalties would be beneficial. In general, the Regional Water Board may be asked to provide support in enforcement actions related to incidents that are or escalate to a high-priority status. The Permittees take the lead in initiating enforcement actions related to medium and low priority incidents. Both the Regional Water Board and the Permittees will enforce their respective regulations and ordinances in support of the enforcement lead. Finally, the Regional Water Board will take all enforcement actions related to compliance with the State General Permits.

Table 1-3. Enforcement Responses for Violations Where Overlapping Authority Exists

Incident Severity Priority Level	Appropriate Enforcement Responses ¹	Lead Enforcement Agency	
		Permittee	Regional Water Board Support
High	Referral to Environmental Crimes Task Force	X	
	Administrative Fine	X	X
	Civil Citation or Injunction	X	X
	Infraction or Misdemeanor	X	X
Medium	Infraction	X	X
	Misdemeanor	X	X
	Stop work order or cease and desist order	X	
	Administrative compliance order	X	
	Notice of non-compliance	X	
Low	Administrative compliance order	X	
	Notice of non-compliance	X	
	Written warning	X	
	Verbal warning	X	
	Education and information	X	

1. Education and information should be incorporated into all enforcement responses.

1.7.2.6 Coordination of Enforcement/Compliance Activities with Other Permittees

Coordination with other Permittees and government agencies, including the Regional Water Board, is essential for successful implementation of an enforcement/compliance program. A single Permittee does not control the entire MS4, nor does any single Permittee have authority to take enforcement action for violations occurring outside of its jurisdiction. Further, other governmental agencies may have additional

enforcement authorities that are appropriate to the situation. Each Permittee will coordinate its enforcement activities, as practicable, with the appropriate Permittee (or Permittees) and agency (or agencies) in accordance with the following guidelines:

- ◆ Enforcement will be coordinated when multiple agencies have jurisdiction and an agency has not been able to obtain compliance by the discharger.
- ◆ Unless otherwise agreed to in writing, the lead enforcement agency role will be assigned on the basis of the origin of the discharge.
- ◆ The Regional Water Board may be asked to be the lead enforcement agency for higher priority Illegal Discharges in areas of overlapping authority and will be lead enforcement agency for all enforcement actions related to compliance with the State General Permits.
- ◆ Investigation and other relevant information will be shared among the participating agencies in a timely fashion.

Lead Enforcement Agency's Responsibilities. The lead enforcement agency will assume the following responsibilities:

- ◆ Coordinating activities and assigning responsibilities (e.g., investigations, site visits, etc.) among participating agencies;
- ◆ Maintaining communication and information exchange among participating agencies; and
- ◆ Ensuring that follow-up actions are implemented.

Enforcement Activities Directory. A list of contact names identifying who should be contacted to coordinate enforcement activities for each Permittee, as well as the Regional Water Board and other potentially interested agencies is submitted with each Annual Report. This list is maintained and distributed to the Permittees and others as appropriate by the District to facilitate coordination of enforcement activities.

1.7.2.7 Coordination with the Regional Water Board

Under the Porter-Cologne Water Quality Control Act, the State has provided the Regional Water Quality Control Boards with overriding authority to manage water quality and administer compliance with State and Federal water quality law. This authority includes the ability to impose more significant fines and other sanctions than the Permittees. With this authority, the Regional Water Board may be more effective in obtaining the cooperation and compliance from those who violate Stormwater regulations. The Regional Water Board will be notified by the Permittees when findings of potential non-compliance with the State's General Stormwater Permits have been identified, or when Permittees have been unable to obtain the compliance of a party responsible for violating Stormwater Ordinances. The list of contact names maintained by the District will identify the appropriate Regional Water Board staff to contact to initiate coordination of enforcement activities or to notify the Regional Water Board of potential findings of non-compliance. Where appropriate, notifications of potential non-compliance should be forwarded to the designated Regional Water Board contact person by the Permittee's Stormwater compliance coordinator.

1.7.2.8 Coordination with Other Agencies

In addition to the Regional Water Board, Permittees may also find it useful or necessary to coordinate or report findings of potential non-compliance to other government agencies with jurisdiction over water quality issues including the California Department of Fish and Wildlife and the United States Fish and Wildlife Service. The list of contact names maintained by the District will identify the appropriate staff at these agencies that should be contacted to initiate coordination of enforcement activities or to notify of potential findings of non-compliance.

1.7.3 Recordkeeping and Reporting of Enforcement Actions

Records that should be retained regarding the Enforcement and Compliance Strategy include the following:

- ◆ Documentation of staff training;
- ◆ Inspection notes or reports;
- ◆ Copies of warning letters, violation notices, etc.;
- ◆ Documentation of follow-up actions;
- ◆ Contact reports from meetings or conversations with violators, Permittees, or other agencies; and
- ◆ Copies of notifications of potential non-compliance.

As required by Section H.8 of the 2013 MS4 Permit, the Permittees maintain compliance records for a minimum of three years.

Each Permittee tracks and summarizes enforcement actions taken in the IC/ID, Commercial/Industrial and Construction Site databases (described in Sections 2, 3 and 5 of this SWMP); database formats are included in Appendix E of this SWMP.

1.7.4 Training for Enforcement

Training is necessary for Permittees' enforcement/compliance program staff so that they can recognize and respond to violations in an appropriate manner. Therefore, staff involved in implementing a Permittee's enforcement/compliance program are made aware of the local, State, and Federal Stormwater regulations, and the procedures developed to enforce these regulations. A variety of training methods may be used to educate staff on Stormwater issues, including but not limited to: video presentations, informal tailgate meetings and formal staff meetings, and informal briefings by code enforcement staff. Each Permittee provides training to applicable staff on respective enforcement procedures and requirements of Stormwater Ordinances. Additionally, the Permittees provide formal Stormwater training workshops to staff who are involved in inspections of industrial and commercial facilities, construction sites, enforcement of Stormwater Ordinances, administration of the enforcement/compliance program, and other staff as appropriate.

Formal Stormwater training workshops address the following areas:

- ◆ Requirements of the 2013 MS4 Permit and 2014 SWMP;
- ◆ Requirements of the General Industrial Permit and Construction General Permit;
- ◆ Proper BMP implementation; and

- ◆ Identification of IC/IDs associated with the area of training.

Knowledge of the applicable requirements and the overall Stormwater program helps inspectors and other staff to recognize potential violations, respond with appropriate levels of enforcement, and effectively coordinate with other agencies. The Permittees individually maintain a log of trained staff, and this information is summarized in the Annual Reports.

1.8 Fiscal Analysis

The Permittees use three sources of fiscal resources to implement the SWMP:

- ◆ Whitewater River Watershed Benefit Assessment Area
- ◆ County Service Area 152
- ◆ General Fund

The Permittees intend to continue to use these existing funding sources to implement the SWMP during the 2013 MS4 Permit term.

1.8.1 Whitewater River Watershed Benefit Assessment Area

The Whitewater River Watershed Benefit Assessment Area (WWBAA) was established in 1991 as the District's funding source for MS4 Permit compliance program activities. The WWBAA covers the northwesterly portion of the Whitewater River Region including County and city jurisdictions that lie within the District's service area. Assessments are calculated on the basis of proportional Stormwater runoff, and are enrolled on the property tax bills generated by the County Tax Assessor's office. WWBAA revenues fund both area-wide MS4 program and the District's individual MS4 Permit compliance activities.

1.8.2 County Service Area 152

County Service Area 152 (CSA 152) was formed in December 1991 to provide funding for compliance activities associated with the MS4 Permit. Under the laws that govern CSAs, sub-areas may be established within the overall CSA area with different assessment rates set within each sub-area. Initially, the County and the Cities of Banning, Cathedral City, Coachella, Desert Hot Springs, Indio, La Quinta, Palm Desert, Palm Springs and Rancho Mirage assessed through CSA 152. However, with the passage of Proposition 218 in 1996, the County and the Cities of Banning, Cathedral City, Coachella, Indio, and Palm Desert discontinued assessing.

1.8.3 General Fund / Other Revenues

A portion of the ad valorem property taxes received by CVWD, together with minimal revenues generated by flood management and new subdivision fees, are the only financial resources available for CVWD's Stormwater programs. The County and the Cities of Banning, Cathedral City, Coachella, Indian Wells, Indio, and Palm Desert currently utilize general fund revenue to finance MS4 Permit compliance activities.

2.0 DETECTION AND ELIMINATION OF ILLICIT CONNECTIONS AND ILLEGAL DISCHARGES

This program element is designed to detect and eliminate IC/IDs to the MS4 to the MEP. Three types of IC/IDs are addressed under this program:

- ◆ Illicit Connection: An Illicit Connection is any connection to the MS4 that is prohibited under local, State, or Federal statutes, ordinances, codes, or regulations. The term Illicit Connection includes all Non-Stormwater discharges and connections except discharges pursuant to an NPDES permit, allowable Non-Stormwater discharges identified in Section C of the 2013 MS4 Permit, and other discharges authorized by the Executive Officer of the Regional Water Board. Examples of Illicit Connections could include sanitary sewer connections, industrial process waters, and floor drains.
- ◆ Illegal Discharge: An Illegal Discharge is any discharge to the MS4 that is not composed entirely of Stormwater except discharges pursuant to a separate NPDES Permit, allowable Non-Stormwater discharges identified in Section C of the 2013 MS4 Permit, and other discharges authorized by the Executive Officer of the Regional Water Board. Examples of Illegal Discharges could include boiler blowdown, contact cooling water, commercial vehicle wash water, residential engine degreasing, and drainage from secondary containment or waste dumpsters.
- ◆ Illegal dumping: Illegal dumping is any discharge of Pollutants into the MS4 through either legal connections, such as catch basins, or by direct dumping into creeks, streams, and channels. In addition, illegal dumping includes the illegal disposal of Pollutant material in the drainage channels, creeks, and streams throughout the Whitewater River Region such that Stormwater has the potential to mobilize and carry the Pollutant material to other portions of the MS4 and to Receiving Waters. Examples of illegal dumping could include the disposal of used oil, paint, improper management of pet waste, and wash water from a mobile carpet cleaner or mobile auto detailer.

The IC/ID program element addresses:

- ◆ Discharge limitations and prohibitions;
- ◆ Allowable Non-Stormwater Discharges;
- ◆ BMPs to manage Stormwater/Urban Runoff and Non-Stormwater discharges;
- ◆ Training for the Permittees' staff in IC/ID identification, investigation, elimination and BMPs;
- ◆ Program tracking, reporting, evaluation and assessment.

2.1 Discharge Limitations and Prohibitions

The following discharge limitations and prohibitions are implemented by the Permittees:

1. The Permittees, to the MEP, prohibit Illicit Connections and Illegal Discharges to the MS4 through their Stormwater Ordinances.
2. The discharge of Urban Runoff from the Permittee's MS4 to Waters of the United States containing Pollutants which have not been reduced to the MEP is prohibited.
3. The discharge of waste to Waters of the State in a manner causing or threatening to cause, a condition of Pollution, Contamination, or Nuisance, as defined in CWC Section 13050, except in compliance with the terms and conditions of Section D of the 2013 MS4 Permit, is prohibited.
4. The discharge of Pollutants or dredged or fill material to Waters of the United States, except as authorized by an NPDES permit or a dredged or fill material permit subject to the exemption described in CWC Section 13376, is prohibited.
5. Discharges to the MS4 which are not composed entirely of Stormwater are prohibited, unless authorized by Section C of the 2013 MS4 Permit.
6. The unauthorized discharge of treated or untreated sewage to Waters of the State, or to the MS4, is prohibited.
7. The discharge of oil, gasoline, diesel fuel, or any other petroleum derivative or any toxic chemical or Hazardous Waste into the MS4 is prohibited.

2.2 Allowable Non-Stormwater Discharges

The Permittees must continue to prohibit the discharge of Non-Stormwater into their respective MS4 facilities unless such discharge is specifically allowed by the following provisions. The Permittees need **not** prohibit the following discharges unless identified by the Permittees as a significant source of Pollutants to the Receiving Waters:

- a. Discharges covered by NPDES permits or written clearances issued by the Regional Water Board or SWRCB;
- b. Air conditioning condensate;
- c. Potable water line flushing and other potable water sources;
- d. Passive foundation drains;
- e. Passive footing drains;
- f. Water from crawl space pumps;
- g. Discharges from landscape irrigation, lawn/garden watering and other irrigation waters;
- h. Dechlorinated swimming pool discharges;
- i. Non-commercial vehicle washing (e.g., residential car washing (excluding engine degreasing) and car washing fundraisers by non-profit organizations);
- j. Diverted stream flows;
- k. Rising ground waters and natural springs;

- l. Ground water infiltration as defined in 40 CFR 35.2005(20) and uncontaminated pumped groundwater;
- m. Flows from riparian habitats and wetlands;
- n. Street wash water;
- o. Emergency water flows (i.e., firefighting flows and other flows necessary for the protection of life and property) do not require BMPs and need not be prohibited.
- p. Waters not otherwise containing wastes as defined in California Water Code §13050 (d); and
- q. Other types of discharges identified and recommended by the Permittees and approved by the Regional Water Board.

A discharge may include Stormwater and other types of discharges as indicated above. If the Permittees identify an allowable discharge category from the list above that causes or contributes to an exceedance of Water Quality Standards, or is a significant contributor of Pollutants to Waters of the United States, the Permittees will either prohibit the discharge category from entering the MS4, or ensure that appropriate BMPs are implemented to the MEP to reduce or eliminate Pollutants associated with the discharge. The Permittees will also provide a report to the Regional Water Board in accordance with Section D.2 of the 2013 MS4 Permit.

2.3 Surveillance and Source Identification

2.3.1 Field MS4 Surveillance

Field surveillance of the MS4 consists of: Source identification, routine field screening and MS4 inspection, and quarterly Dry Weather IC/ID monitoring at select MS4 Outfall sites.

The Permittees report new major MS4 Outfall locations, and additions or modifications to major structural controls in MS4 Permit Area map updates with each Annual Report. Each Permittee also maintains a jurisdiction-specific database of:

- ◆ Active construction sites which require coverage under California's General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), and
- ◆ Industrial facilities requiring coverage under California's General Industrial Activities Stormwater Permit (General Industrial Permit), and targeted commercial establishments as documented through respective commercial/industrial survey programs.

These source identification efforts are further described in Section 3, Commercial/Industrial Facilities Program, and Section 5, Private Construction Activities Program.

The Permittees:

- ◆ Implement IC/ID MS4 field inspection schedules as established within each Permittees' respective jurisdiction. At the regional scale, field screening is conducted at major MS4 Outfalls specified in Section L of the 2013 Permit as part of the Monitoring and Reporting Program.
- ◆ Document field inspections during the performance of existing field activities, including recording and forwarding IC/ID observations to appropriate jurisdictions when necessary.

- ◆ Maintain a database of IC/ID investigations which includes case specifics.

District and CVWD maintenance staff, and County staff of the Transportation Land Management Agency–Transportation Department, Code Enforcement Department, Building and Safety Department, other designated County departments, Lighting and Landscape Maintenance Districts, or County Service Areas routinely patrol and inspect the MS4 facilities and infrastructure that they own and operate, and report IC/ID incidents. Co-Permittees have also instructed staff, including building inspectors, street or road maintenance staff, code enforcement officers and community service staff to identify and report IC/ID incidents while in the field performing their specific duties. Inspections of Permittee-owned catch basins are performed by public works and/or street maintenance staff on a schedule, as part of routine maintenance activities. The District and CVWD also perform field inspections of their respective elements of the MS4 as part of ongoing facility maintenance programs. If an IC/ID is observed during field inspections of the MS4, the observation is documented.

On behalf of the Permittees, the District and CVWD conduct water quality monitoring in accordance with Section L of the 2013 MS4 Permit. One component of the monitoring program is quarterly Dry Weather IC/ID monitoring at the two Major MS4 Outfall sites specified by the Permit. Additionally, as part of compliance with the Coachella Valley Stormwater Channel Bacterial Indicators Total Maximum Daily Load (CVSC TMDL) the City of Coachella conducts monthly monitoring at its three major MS4 Outfalls. If evidence of irregular flow or water quality conditions is observed during these monitoring activities, and IC/ID activity is suspected, monitoring staff document case information, and forward that information on to the Permittee with jurisdiction over the tributary area of the MS4 Outfall to conduct a follow-up investigation.

Each Permittee maintains a database of jurisdictional IC/ID investigations. The IC/ID database tracks case specifics, outcomes and enforcement actions. The model IC/ID database format is included in Appendix E.

2.3.2 Reporting

The Permittees have developed a program for reporting and documenting IC/IDs and spills. IC/IDs are usually reported to code enforcement, public works, spill response or fire department staff. Within 24 hours of receipt of notification or observation by staff or a third party, the Permittees initiate an investigation of all spills, leaks, and/or Illegal Discharges to the MS4. For sewage spills, the Permittees refer to a Sanitary Sewer Overflow Guidance Document (Appendix F). All sanitary sewer overflows are reported to the sewerage agency with jurisdiction.

2013 MS4 Permit Section F.1.a.xi. requires that Permittees with jurisdiction over a spill report all discharges that endanger human health or the environment to the Regional Water Board at 760-346-7491, and the California Office of Emergency Services (Cal OES) at 800-852-7550. At a minimum, the following types of spills, leaks, and/or Illegal Discharges will be reported immediately (within 24 hours of becoming aware of the circumstances):

- ◆ Any sewage spill above 1,000 gallons or that could impact water contact recreation
- ◆ Any oil spill that could impact wildlife
- ◆ Any hazardous material spill where residents are evacuated
- ◆ Any spill of reportable quantities of hazardous waste (as defined in 40 CFR 117 and 40 CFR 302)

- ◆ Any other spill or discharge that is reportable to the Cal OES, such as:
 - Any spill or other release of one barrel or more of petroleum products at a tank facility
 - Discharges of any hazardous substances or sewage, into or on any Waters of the State
 - Any found or lost radioactive materials
 - Discharges of oil or petroleum products, into or on any Waters of the State
 - Hazardous liquid pipeline releases and every rupture, explosion or fire involving a pipeline.

Incidents involving hazardous materials are documented using the Cal OES Emergency Release Follow-up Notice Reporting Form (304) (see Appendix D). Permittees with jurisdiction over IC/ID or spill incidents that endanger human health or the environment will include in their Annual Report, an incident report which contains a description of the spill, its causes, duration, enforcement steps that the Permittee has taken or intends to take, and the actual or anticipated time for the violator to achieve compliance.

Other spill incidents, including unauthorized discharges that are not reportable to Cal OES, are also documented. 2013 Permit Sections F.1.a.ii and F.1.a.xvii.1 require the Permittees to utilize standardized reporting forms when documenting IC/ID cases; however, Regional Water Board staff have recognized that case documentation can vary widely among agencies and their departments, with no one method being superior to another given a varying set of circumstances. As such, Regional Water Board staff agreed during an email conversation on December 30, 2013, that the IC/ID reporting forms located in Appendix D may be utilized by the Permittees to document IC/ID cases; however, other incident documentation methods may be utilized as well. Where other documentation methods are utilized, the following information is gathered, at a minimum:

- ◆ Date the complaint was received or IC/ID identified;
- ◆ Date incident was responded to;
- ◆ Type of complaint or IC/ID identified (i.e., spill, illicit connection complaint, etc.);
- ◆ Source owner name, operator or facility name, or responsible party;
- ◆ Street address, city, zip code, and APN (if applicable) of the complaint or IC/ID location, along with any other obtained location information/specifics (i.e., GIS coordinates, cross streets, etc.);
- ◆ Where applicable, information on any municipal permits that the responsible party might hold (i.e., business license, wastewater discharge permit, etc.);
- ◆ A description of the non-compliance, the cause, the duration, actual or anticipated time for achieving compliance, and the enforcement steps that the Permittee has taken, or intends to take, in order to prevent recurrence;
- ◆ Where applicable, agencies which the Permittee has notified for the incident (i.e., Cal OES, City code enforcement, etc.);
- ◆ Actions taken during investigation and abatement (i.e., educational materials provided, spill cleaned up, field samples taken, etc.); and
- ◆ At Permittee discretion, other findings and/or outcomes which will assist in accurate documentation of the case.

This required IC/ID incident documentation may be maintained by the Permittees in a database, computer file, hard file, or other storage format. IC/ID incident records are kept for a period of at least three years from the date of the incident.

2.3.3 Detection, Response, Investigation, Cleanup, and Enforcement

The Permittees have programs in place to survey their MS4 facilities to identify and eliminate Illicit Connections; these programs are described in Section 2.3.1 above. Some Permittees conduct this aspect of their MS4 Permit compliance program as a part of existing business and/or inspection programs, or during routine maintenance of their MS4 facilities.

The Permittees actively seek to eliminate and prohibit IC/IDs to the MS4. In addition, the Permittees implement and improve routine inspection and monitoring and reporting programs for their MS4. If routine inspections or Dry Weather monitoring indicate IC/IDs, they are investigated and eliminated or permitted² as soon as possible. However, Illicit Discharges that are a serious threat to public health or the environment are eliminated immediately and reported to Cal OES. The Permittees may also pursue enforcement actions against those that have caused IC/IDs, pursuant to Section 1.7 above.

Co-Permittee public works and/or code enforcement staff receive notification of Illegal Discharges by taking phone calls and/or emails, or by receiving complaints at the counter. Upon response, an assessment of the magnitude of the discharge is conducted, and then either direct follow-up is initiated, or County HAZMAT is notified to respond (where significant quantities of hazardous materials are reported). The Permittees continue to support HAZMAT crews responding to IC/ID incidents.

Permittees meet the following minimum guidelines when responding to reports of IC/IDs:

- ◆ If the reported incident is outside of a Permittee's jurisdiction, referral to the appropriate agency and/or the Regional Water Board is made.
- ◆ Permittees respond to reports of IC/IDs within their jurisdiction.
- ◆ When appropriate, samples of Illegal Discharges are collected. The procedure for collecting IC/ID samples is provided in Volume V of the Consolidated Monitoring Program, which is available on the District's website, at: http://rcflood.org/downloads/NPDES/Documents/Monitoring/CMP_Vol_V.pdf.
- ◆ Enforcement actions are taken, if necessary.
- ◆ IC/ID case specifics are documented in accordance with the guidelines specified in Section 2.3.2 above. Each Permittee maintains a database of their IC/ID investigations, including types of enforcement action taken and the resolution of the case.

A toll-free "hotline" (800-506-2555) has been established to specifically receive area-wide public complaint calls regarding improper discharges. The hotline staff is trained to notify the appropriate responders of any hazardous or non-hazardous material released to the MS4.

² Unauthorized Non-Stormwater discharges to surface waters and a MS4 must be permitted through the applicable Regional Water Board.

2.3.4 Sanitary Waste Management

To provide a consistent, statewide regulatory approach to address Sanitary Sewer Overflows (SSOs), on May 2, 2006, the SWRCB adopted General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems³ (Sanitary Sewer Order). The Sanitary Sewer Order requires public agencies that own or operate sewage systems to develop and implement Sewer System Management Plans (SSMPs) and report all SSOs through the SWRCB's online database, known as the California Integrated Water Quality System (CIWQS).

As required by the Sanitary Sewer Order, each Permittee that owns or operates a sanitary sewage system has developed and implemented a SSMP. The SSMP includes provisions for proper and efficient management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost benefit analysis. Additionally, the SSMP includes a spill response plan that establishes standard procedures for immediate response to a SSO in a manner designed to minimize water quality impacts and potential nuisance conditions.

Within the Whitewater River Region, all areas which have sanitary sewer access fall under the jurisdiction of a sewerage agency which has an SWRCB approved SSMP. Sewerage agencies which service the MS4 Permit area include the City of Banning Wastewater Utility, Mission Springs Water District, the City of Palm Springs Wastewater Treatment Plant, Coachella Valley Water District, Valley Sanitation District, and Coachella Sanitary District. In the event that an SSO does occur, the sewerage agency with jurisdiction is immediately notified by Permittee staff, or directly from a third party. Response, clean-up and reporting requirements associated with the SSO are addressed by the sewerage agency, per their respective SSMP.

The Permittees take feasible steps to assist with containment and mitigation of impacts associated with SSOs. As detailed in the Sanitary Sewer Spill Response Procedure (Appendix F), Permittees with land jurisdiction over an area where an SSO has occurred work collaboratively with sewerage agencies to provide access to MS4 facilities when needed, and may also supply requested information, and instigate case investigation and enforcement where necessary.

County DEH regulates septic tanks and portable toilets under County Ordinance No. 712. This ordinance requires sanitary waste haulers to inform residential septic tank pumping customers in writing of:

- ◆ The number of compartments within the system to be pumped.
- ◆ An assessment of tank condition as to necessity for pumping chambers, in addition to the primary chamber. For routine maintenance, all compartments of a septic tank should be made available for pumping of liquid and solids.
- ◆ The number of compartments actually pumped.
- ◆ The number of gallons removed.
- ◆ The pH value of the load.

In 2013, the Regional Water Board amended the Basin Plan to incorporate the SWRCB's On-Site Wastewater Treatment and Siting Policy (OWTS Policy); County DEH is currently developing a Local Agency Management Plan (LAMP) to address OWTS Policy requirements. Until such time that the

³ SWRCB Water Quality Order No. 2006-0003.

County receives Regional Water Board approval for the LAMP, it will continue to implement regulations adopted by the SWRCB pursuant to California Water Code §13290-13291.7 through terms described in the Basin Plan; design review of septic systems is also performed by DEH through these terms.

In addition, Ordinance No. 650 establishes local construction requirements for septic systems, and in conjunction with the California Health and Safety Code §5411 and §5461, establishes the authority and responsibility of the DEH to investigate septic system failures. Primarily a complaint driven process, the DEH investigates all suspected incidents of improper discharge. DEH staff use a variety of enforcement tools including citation, criminal prosecution and summary abatement to mitigate discharges from septic system failures.

The majority of septic system failures are confined to the owner's property and are effectively abated, providing minimal impact to the MS4. In cases where there are clustered failures or violations indicating a previously unknown or deteriorating geological condition, DEH has and continues to provide additional investigations to identify the geological condition and its extent. Where necessary for the ongoing control of on-site waste generation, DEH provides support to efforts to bring sewers to the community.

2.3.5 Swimming Pool Discharges

In addition to MS4 inspections, the Permittees may address swimming pool discharges in one of the following ways:

- ◆ Permittees with land use authority may issue permits for swimming pool drainage that require the pool owner/operator to stop chlorinating the pool for three to seven days, and to test the dechlorinated water for confirmation of an acceptable level of total chlorine residual (0.1 mg/L) in the water prior to discharge.
- ◆ Permittees may encourage the pool owner/operator to hire a professional pool draining company to haul the water offsite for proper disposal.
- ◆ Permittees may encourage or require the pool owner/operator to reuse/recycle the pool water by draining it gradually onto a landscaped area.
- ◆ Permittees may encourage the pool owner/operator to drain their pool to the sanitary sewer; however, where the discharge of pool water to the sanitary sewer is not allowed or not feasible, Permittees may conditionally allow the release of dechlorinated swimming pool water into the MS4. In general, the guidelines for such releases require that pool owners/operators ensure that all the following criteria are met:
 - The total residual chlorine does not exceed 0.1 mg/L (parts per million).
 - The pH is between 6.5 and 8.5.
 - By visual observation the water is free of filter media, vegetative debris, and other materials.
 - There is no discharge of pool cleaning wastes.
- ◆ Each Permittee has adequate legal authority to halt an IC/ID incident that results in the improper disposal of swimming pool discharges.

2.4 Litter and Pet Waste Control

The Permittees implement control measures to reduce and/or eliminate the discharge of Pollutants, including trash and debris, from the MS4 to Receiving Waters to the MEP. Information related to trash and debris control measures is included in each Permittees' Annual Report. As a matter of general public health and safety, applicable Permittees provide, collect and maintain litter receptacles at public areas, and during public events. Additionally, each Permittee with land use authority and code enforcement powers has developed, and currently implements and enforces leash laws and/or other pet laws to assist further with source control of potential pollutants. Other typical litter and debris control activities may include public education, street sweeping, code enforcement activities targeted at illegal dumping, watershed cleanup events and/or other activities implemented by the Permittees collectively or individually.

2.5 Household Hazardous Waste (HHW) Collection and Anti-freeze, Batteries, Oil, and Latex Paint (ABOP) Collection Programs

The Permittees participate in the HHW and ABOP collection programs in conjunction with the Riverside County Waste Management Department (RCWMD). The RCWMD took over operation of the HHW and ABOP collection programs in 2007 from County DEH. The programs have been in existence since 1993 to discourage illegal disposal and to assist residents in properly disposing potentially hazardous or toxic materials.

The District supports three permanent HHW/ABOP collection sites, one of which is located in the Whitewater River Region. The site is open Saturdays from 9:00 AM until 2:00 PM with the exception of holiday weekends. Mobile and permanent site locations are also offered at various locations throughout the watershed. Details, site locations, maps and schedules of operation for both the HHW and ABOP collection events are available on the Internet at <http://www.rivcowm.org/opencms/hhw/schedule.html> or by calling 800-304-2226 or 951-486-3200.

Examples of wastes that are accepted at HHW collection events include the following items:

- ◆ Bathroom – chlorine bleach, deodorizers, air fresheners, disinfectants, mercury-containing devices, nail polish remover, shoe dye, toilet/tub/tile cleaners, hair dye.
- ◆ Kitchen – aerosol cans, aluminum cleaner, ammonia, drain openers, floor care products, furniture polish, oven cleaner, microwave oven.
- ◆ Workshop & Hobby – Caulking, gun cleaner, fiberglass & epoxy resins, latex paint, oil-based paint, paint stripper, paint thinner/turpentine, photographic chemicals, varnish, wood preservative, glue, roof coating, hobby chemicals pool/spa chemicals, lighter fluid, paint stripper with solvent, paint thinner, caulking material, latex & oil based paints.
- ◆ Gardening – fertilizer, fungicide, insecticides/pesticides, aerosol insecticides, slug and snail poison, weed killer/herbicides, rodent bait/poison, BBQ propane tanks.
- ◆ Garage – antifreeze, auto batteries, carburetor cleaner, chrome polish, engine degreaser, gasoline, diesel fuel, motor oil, oil filters, transmission & brake fluid, fluorescent tubes/bulbs, televisions, computers, rodent poison

- ◆ Miscellaneous – artist's paints, camp propane tanks, batteries (all), flea powder, kerosene/lamp oil, lighter fluid, moth balls/flakes, pool/spa chemicals, rug cleaner, sharps/needles, spot remover w/solvent, electronic devices.

Wastes from businesses or non-profit facilities or activities are not accepted at HHW collection events. Examples of wastes that are not accepted at HHW collection events include the following items: ammunition, asbestos or other remediation waste, compressed gas cylinders greater than 40 pounds, explosives, infectious or medical waste other than home-generated sharps, radioactive waste, non-residentially generated waste, waste generated by businesses, non-profit facilities, or wastes generated outside of Riverside County.

2.6 Program for Conditionally Exempt Small Quantity Generators of Hazardous Waste (CESQG)

Another program designed to eliminate improper and illegal disposal of hazardous waste is the Conditionally Exempt Small Quantity Generators (CESQGs) Program. The CESQGs Program is also managed by the RCWMD and is available to businesses that generate small quantities (27 gallons or 220 pounds) of hazardous waste or 2.2 pounds of extremely hazardous waste per month.

The RCWMD collects hazardous waste from eligible businesses within Riverside County and provides proper labeling and documentation assistance. Hazardous waste collected by the CESQG Program is transported to a State-permitted processing facility. The waste is further processed and packaged for off-site recycling (oil filters, oil, latex paint, antifreeze, and batteries) or destructive incineration (pesticides, corrosives, flammables, oil-based paint).

The most common CESQGs in Riverside County are dry cleaners, painters, home improvement contractors, furniture refinishers, print shops, photo-finishing, auto shops, photographers, educational and vocational shops, builders, landscapers, nonprofit organizations, (including city governments/agencies, school districts and churches) and property managers.

For further information, businesses can call the RCWMD at (888) 722-4234 or (951) 358-5055. Additional information on the CESQG Program is also available on the RCWMD website:

http://www.rivcowm.org/opencms/hw_info/hhw_business.html

2.7 Training

During routine MS4 facility inspections, maintenance staff may come across evidence of potential IC/ID. Therefore, training Permittee staff to recognize and respond appropriately to Stormwater pollution problems is an integral part of the IC/ID program.

For the Permittees, a variety of training methods can be used to educate personnel on Urban Runoff issues, including video presentations, informal tailgate meetings, formal staff meetings, informal briefings by code enforcement staff, and fire department "First Responder Courses". The Permittees have also developed formal employee training workshops for maintenance staff, commercial/industrial inspectors, new development/redevelopment staff and construction inspectors. The workshops address 2013 Permit requirements, duty-specific NPDES issues, proper BMP implementation, and IC/ID identification and elimination. The workshops are periodically assessed and updated when necessary, and are generally offered in the spring and in the fall.

The Permittees' NPDES coordinators track their respective formal and informal staff training activities, and record pertinent information such as: training date, the number of staff in attendance and the type of training received; this information is included in each Permittee's Annual Report.

2.8 Program Data Tracking, Annual Reporting and Evaluation/Assessment

Evaluation and assessment of BMP performance is performed through year-round program documentation, annual analysis of program data, and Annual Reporting. The Permittees maintain the following IC/ID program records:

1. IC/ID incident documentation, as described in Section 2.3.2 above;
2. An up-to-date IC/ID database.

For some Permittees, the program records listed above may be one and the same. To prepare Annual Reports, the Permittees extract data from the program records specified above, and provide the following information on the Annual Report forms included in Appendix M:

1. Total number of IC/ID complaints received during the reporting year;
2. Total number of IC/ID complaints requiring response during the reporting year;
3. Total number of enforcement actions (including type of enforcement) resulting from IC/ID complaints during the reporting year;
4. Any report(s) for incident(s) reportable to Cal OES, if applicable;
5. A narrative summarization of IC/ID program accomplishments or issues encountered during the reporting year, if any;
6. A narrative summarization of trash and debris removal activities conducted during the reporting year; and
7. A narrative summarization of MS4 inspected throughout the reporting year, by MS4 facility type.

Each year in the Annual Report, the Permittees evaluate their respective IC/ID programs by utilizing the reported data specified above to assess whether the following program goals have been achieved:

1. Reduce the discharge of trash and debris from respective MS4s to Receiving Waters;
2. Confirm that IC/ID cases are reviewed and responded to in a timely manner; and
3. Ensure that confirmed IC/ID events are expeditiously eliminated.

If a Permittee finds that any of the above stated program goals have not been achieved during the reporting year, that Permittee will review applicable BMPs to identify program modifications which may be necessary. A workplan and schedule which addresses proposed program modifications will be developed and implemented by the Permittee, and included in its Annual Report. Because many program modifications will take time to completely implement, applicable Permittees will provide status updates in their Annual Report, as necessary.

3.0 COMMERCIAL/INDUSTRIAL FACILITIES PROGRAM

The purpose of this program area is to conduct source identification and outreach to reduce discharges of Pollutants from targeted commercial businesses and industrial operations to the MEP.

3.1 Inspection and Source Identification

The Permittees utilize their respective municipal permit programs, and also continue to coordinate with County Department of Environmental Health (County DEH), Regional Water Board staff, and others as necessary, to maintain a database of targeted commercial and industrial facilities which are potential sources of Pollutant loads to the MS4. In addition, the County Department of Building and Safety maintains the business registration and licensing program database that includes commercial and industrial businesses in the unincorporated area.

In 1999, County DEH began implementing the Compliance Assistance Program (CAP) through agreement with the District. As the Certified Unified Program Agency (CUPA) in Riverside County, County DEH regularly inspects all facilities within the County that handle Hazardous Waste, including but not limited to, businesses that conduct automobile mechanical repair, maintenance, fueling or cleaning operations, automobile or other vehicle body repair or painting operations, and painting or coating operations; County DEH's Retail Food Service program also inspects all retail food service restaurants within the County. Under the CAP, County DEH inspectors added a NPDES Stormwater compliance survey to their regular inspection processes, and thereby implemented a large part of MS4 Permit commercial/industrial requirements on behalf of the Permittees, on a region-wide scale. During its time, the CAP proved to be an effective way for the Permittees to conduct initial Stormwater compliance surveys at commercial and industrial businesses; however, on December 31, 2014, the agreement between County DEH and the District expired, and the CAP was subsequently terminated.

Beginning January 1, 2015, applicable Permittees took over direct responsibility for conducting Stormwater compliance surveys at targeted commercial and industrial facilities within their respective jurisdictions; some Permittees utilize existing inspection programs (e.g. pretreatment/source control inspection, public works inspection, code enforcement, etc.) to achieve compliance with this requirement, others have elected to bring on additional staff or seek consultant support. The Permittees' programs continue to survey at hazardous material permit and retail food service facilities, and at frequencies originally established and achieved by the CAP: All hazardous material permit facilities (permitted under the Unified Program, Title 27 of the California Code of Regulations) are surveyed for NPDES compliance at least twice during the MS4 Permit term; retail food facilities are surveyed for NPDES compliance at least once per MS4 Permit term. Under the CAP, County DEH inspectors conducted surveys at various Permittee facilities (i.e. wastewater treatment plants, public works yards, etc.) per Title 27 requirements; however, the Permittees have determined that these facilities are already inspected under 2013 MS4 Permit requirements (see Section 6, Permittee Facilities and Activities, below); therefore, inspection of these facilities will continue only under the Permittee Facilities and Activities Program going forward. Each Permittee conducts follow-up inspections to ensure compliance with their respective Stormwater Ordinances at facilities for which an initial survey was noted as "requires follow-up" or "needs improvement". Where necessary, enforcement action may be implemented as described in Section 1.7 of

the SWMP. Completed facility surveys are kept for a period of at least three years from the date of inspection.

During stormwater compliance surveys of hazardous materials permit facilities, the following BMPs are verified:

- ◆ Hazardous waste/materials storage areas are clean, no signs of leakage, and protected from rainfall and runoff;
- ◆ Trash bin areas are clean, the bin lids are present and not missing or in disrepair, the bins are not filled with liquid, and no signs of leakage from the trash bins;
- ◆ Aboveground tanks have been properly maintained including no signs of leakage, and secondary containment is in good condition;
- ◆ Onsite storm drain inlets are protected from prohibited Non-Stormwater discharges;
- ◆ Oil/water separators are connected to sanitary sewer and not a septic system;
- ◆ Wash water from wash pads (steam cleaning or high pressure cleaning) is directed to the sanitary sewer and not a septic system, and does not discharge to parking lot, soil, or the MS4;
- ◆ Mop bucket wash water is discharged to sanitary sewer via clarifier;
- ◆ Parking lot areas are free of trash, debris, and fluids other than water; and
- ◆ Facility has coverage under the General Industrial Permit, if appropriate.

These specific topics are addressed in questions 1-11 of the "Hazardous Waste/Hazardous Materials Facility Stormwater Compliance Survey" form included in Appendix G.

During stormwater compliance surveys of retail food facilities, the following minimum BMPs are verified:

- ◆ Oil and grease wastes are properly handled, and not discharged onto a parking lot, street or adjacent catch basin;
- ◆ Trash bin areas are clean, the bin lids are closed, the bins are not filled with liquid, and the bins have not been washed out into the MS4;
- ◆ Floor mats, filters and garbage containers are not washed in adjacent parking lots, alleys, sidewalks, or streets and that no wash water is discharged to MS4s; and
- ◆ Outdoor seating areas, sidewalks, and drive-through lanes are cleaned by sweeping, not by hosing down, and that the facility operator uses dry methods for spill cleanup.

These specific topics are addressed in questions 1-8 of the "Retail Food Facility Stormwater Compliance Survey" form included in Appendix G.

The Riverside County Department of Building and Safety was tasked with developing a pilot project to establish a standalone Stormwater Compliance Inspection and Enforcement Program (CIEP) for Industrial and Commercial Facilities in the unincorporated areas of the County. Ordinance 857 (Business Registration and Licensing) was adopted on September 12, 2006 by the County Board of Supervisors, and provides the basis for registering all businesses that are within the unincorporated areas of the County. A

database has been established to register businesses, and inspections take place to determine the compliance status of the registrants with the County's Stormwater Ordinance.

3.2 General Industrial Permit Coordination

Many manufacturing and industrial operations are subject to the requirements of the General Industrial Permit. The Permittees may utilize respective commercial/industrial survey programs to identify facilities lacking General Industrial Permit coverage within their respective jurisdictions. The Permittees also require proof of coverage under the General Industrial Permit prior to issuance of a business license or a certificate of occupancy for new industrial facilities.

In addition to compliance inspection, each Permittee's commercial/industrial survey program includes educational outreach to facilities. In conducting a facility survey, if it appears that a facility may be required to have coverage under the General Industrial Permit and the facility operator indicates that a Stormwater Pollution Prevention Plan (SWPPP) is not onsite, the inspector provides the facility operator with an informational brochure on the requirements of the General Industrial Permit, and makes note on the compliance survey that the SWPPP was not available onsite. The District offers Industrial and Commercial Facilities informational brochures for Permittee inspectors to hand out while conducting compliance inspections.

3.3 Regional Water Board Notification Requirements

The Permittees notify the Regional Water Board when staff observes potential non-compliance with the General Industrial Permit, including failure to obtain coverage, or failure to keep a SWPPP at the facility site. Upon providing notification to the Regional Water Board, no further action is taken by Permittee staff with respect to enforcement of the General Industrial Permit. However, the Permittee continues with progressive enforcement of its ordinances at the site as described in Section 1.7 of the SWMP.

3.4 Commercial/Industrial Facilities Database

Each Permittee with land use authority develops and maintains a source database of commercial and industrial facilities within their respective jurisdictions. Permittee maintenance of the source database includes regularly updating the database for information obtained during facility inspections or other sources. The Permittees' source databases of commercial and industrial facilities include the following categories:

- ◆ Restaurant
- ◆ Automotive Service
- ◆ Industrial
- ◆ Mobile Cleaning Business (tracked by Permittees through a business license or some other process/procedure)

A model commercial and industrial source database format is included in Appendix E.

3.5 Training

Permittee staff that conduct commercial/industrial inspections attend training workshops annually regarding the following topics:

- ◆ Selection, implementation, and maintenance of appropriate BMPs for industrial and commercial facilities;
- ◆ General Industrial Permit requirements;
- ◆ Identification of IC/IDs that may be associated with industrial and commercial facilities;
- ◆ Applicable requirements of the 2013 MS4 Permit and the 2014 SWMP; and
- ◆ How to provide guidance to facility operators on proper selection, implementation and maintenance of industrial/commercial BMPs.

The training workshops are generally offered semi-annually—in the spring and in the fall. Where commercial/industrial inspection staff are unable to attend one of the semi-annual training workshops, in-house or tailgate training may also be provided which addresses the training topics detailed above. The Permittees' track their respective staff training activities, and record pertinent information such as: training date, the number of staff in attendance and the type of training received; this information is included in each Permittee's Annual Report.

3.6 Program Data Tracking, Annual Reporting and Evaluation/Assessment

Evaluation and assessment of BMP performance is performed through year-round program documentation, annual analysis of program data, and Annual Reporting. The Permittees maintain the following Commercial/Industrial Facilities Program records:

1. An up-to-date commercial/industrial facilities database.

To prepare Annual Reports, the Permittees extract data from the program records specified above, and provide the following information on the Annual Report forms included in Appendix M:

1. Total number of commercial and industrial facilities inspected during the reporting year;
2. Total number of commercial and industrial facilities which required follow-up inspection during the reporting year; and
3. Total number and type of enforcement actions issued to commercial and/or industrial facilities during the reporting year.

Each year in the Annual Report, the Permittees evaluate their respective Commercial/Industrial Facilities programs by utilizing the reported data specified above to assess whether the following program goals have been achieved:

1. Maintain an updated database of commercial and industrial facilities;
2. Confirm that commercial and industrial facilities targeted for inspection have implemented BMPs that comply with Permittee Stormwater Ordinances; and
3. Implement enforcement measures at commercial and industrial facilities as necessary to reduce the occurrence and recurrence of violations of respective Permittee Stormwater Ordinances.

If a Permittee finds that any of the above stated program goals have not been achieved during the reporting year, that Permittee will review applicable BMPs to identify program modifications which may be necessary. A workplan and schedule which addresses proposed program modifications will be

developed and implemented by the Permittee, and included in its Annual Report. Because many program modifications take time to completely implement, applicable Permittees will provide status updates in their Annual Report, as necessary.

4.0 NEW DEVELOPMENT/REDEVELOPMENT PROGRAM

4.1 Introduction

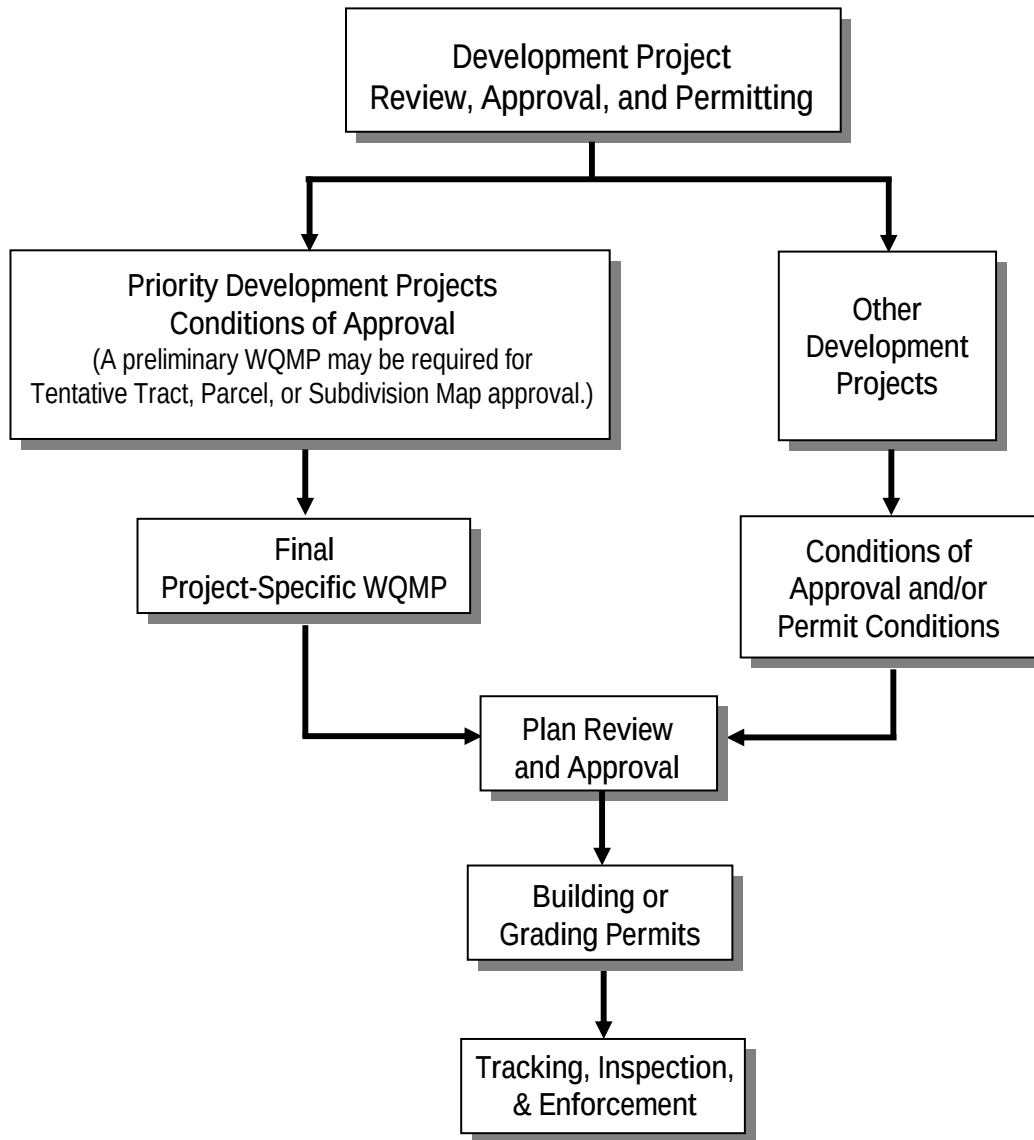
The Permittees have revised the SWMP to address 2013 MS4 Permit requirements related to the planning and permitting of New Development and Redevelopment Projects within their jurisdictions that:

- ◆ Are discretionary and fall into one or more of the following Priority Development Project categories:
 - Single-family hillside residences that create 10,000 square feet or more of impervious area where the natural slope is 25% or greater;
 - Single-family hillside residences that create 10,000 square feet of impervious area where the natural slope is 10% or greater where erosive soil conditions are known;
 - Commercial and industrial developments of 100,000 square foot or more;
 - Automotive repair shops (with Standard Industrial Classification (SIC) codes 5013, 7532, 7533, 7534, 7537, 7538, and 7539);
 - Retail gasoline outlets disturbing greater than 5,000 square feet;
 - Restaurants disturbing greater than 5,000 square feet;
 - Home subdivisions with 10 or more housing units; and
 - Parking lots of 5,000 square feet or more, or with 25 or more parking spaces and potentially exposed to Urban Runoff.

Or

- ◆ Discharge into the MS4 and disturb an area of one acre or more, or disturb less than one acre, but are part of a larger common plan of development or sale (referred to as Other Development Projects).

The objective of the New Development/Redevelopment Program is to ensure that controls are in place to prevent or minimize water quality impacts from New Development and Redevelopment Projects to the MEP. The development approval and permitting processes carries forth project-specific requirements in the form of conditions of approval, design criteria, tracking, inspection, and enforcement actions. Figure 4-1 is a flow diagram that generally depicts the development planning and permit process.

Figure 4-1. Development Planning and Permit Process

It must be noted that each respective Permittee has the option to require a WQMP (preliminary or final) on any project. Since some Priority Development Projects are subject to discretionary approval during the planning phase (land use entitlement) and ministerial approval for subsequent grading or building permits, project applicants may be required to submit a preliminary project-specific WQMP for discretionary project approval (land use entitlement). The level of detail in a preliminary project-specific WQMP submitted during the land use entitlement process depends upon the level of detail known about the overall project design at the time project approval is sought. Project applicants are required to submit for Permittee review and approval, a final project-specific WQMP that is in substantial conformance with the preliminary project-specific WQMP prior to the issuance of any building or grading permit.

4.2 Identifying Development Projects Requiring a Project-Specific WQMP

Priority Development Projects⁴ submitted to the Permittees on or after the effective date of the 2014 Whitewater River Region WQMP Guidance document (December 31, 2014) are conditioned to require the preparation, review, and approval of a project-specific WQMP that is in conformance with the 2014 Whitewater River Region WQMP Guidance document, prior to issuance of the first approval or permit. The primary objective of the 2014 WQMP Guidance document is to ensure that the land use approval and permitting process of each Permittee will minimize the impact of Urban Runoff to the MEP through application of Site Design BMP concepts, Source Control, and LID/Site Design and/or Treatment Control BMPs on a project-specific and/or sub-regional or regional basis.

To ensure that Priority Development Projects are identified as early in the planning process as possible, the Permittees utilize a checklist to document the determination as to whether a project requires a project-specific WQMP or not. An example checklist that may be used by the Permittees for this purpose is shown in Figure 4-2. The Permittees use the standardized WQMP database (Appendix E to this SWMP) to track all projects which have been conditioned to submit a project-specific WQMP throughout the year; this information is provided in each Annual Report.

⁴ "Priority Projects" as defined in Section F.1.c.iii of the 2013 MS4 Permit and shown in Figure 4-2.

**Figure 4-2. Checklist – Projects Requiring Project-Specific WQMPs:
Whitewater River Region**

**Checklist for Identifying Discretionary New Development or Redevelopment Projects
as Priority Development Projects Requiring a Project-Specific WQMP
Whitewater River Region**

Project File No.	
Project Name	
Project Location	
Project Description	
Project Applicant Information (Name, Address, Telephone No.)	

Proposed Project Consists of or Includes:	Yes	No
Single-family hillside residences that create 10,000 square feet, or more, of impervious area where the natural slope is 25% or greater.		
Single-family hillside residences that create 10,000 square feet, or more, of impervious area where the natural slope is 10% or greater where erosive soil conditions are known.		
Commercial and industrial developments of 100,000 square feet or more.		
Automotive repair shops (with Standard Industrial Classification (SIC) codes ¹ 5013, 7532, 7533, 7534, 7537, 7538, and 7539).		
Retail gasoline outlets disturbing greater than 5,000 square feet.		
Restaurants disturbing greater than 5,000 square feet.		
Home subdivisions with 10 or more housing units.		
Parking lots of 5,000 square feet or more, or with 25 or more parking spaces, and potentially exposed to Urban Runoff.		
Project designated as a "Priority Development Project" due to situation-specific reasons at discretion of Permittee.		

¹ Descriptions of SIC codes can be found at <http://www.osha.gov/pls/imis/sicsearch.html>.

DETERMINATION: Circle appropriate determination.

Any question answered "YES" —→ Project requires a project-specific WQMP.

All questions are answered "NO" —→ Project requires incorporation of Site Design BMPs and Source Control BMPs imposed through Conditions of Approval or Permit conditions.

4.2.1 Other Development Projects

The Permittees require Other Development Projects (projects that are not Priority Development Projects, but discharge into the MS4 and disturb an area of one acre or more) to incorporate a combination of Structural and Non-Structural Source Control BMPs, as applicable and feasible, into project plans through conditions of approval or building/grading permit conditions. A summary of the BMP requirements for Other Development Projects is shown in Table 4-1 below. Brief descriptions of the Non-Structural and Structural Source Control BMPs are provided in Appendix H, the 2014 Whitewater River Region Water Quality Management Plan Guidance document, Sections 3.5.2.1 and 3.5.2.2, respectively.

Table 4-1. Summary of BMPs for Other Development Projects

Source Control BMPs	
Non-Structural (See SWMP Appendix H, Section 3.5.2.1)	Required for all Other Development Projects ◆ Education/Training for Property Owners, Operators, Tenants, Occupants, or Employees ◆ Activity Restrictions ◆ Irrigation System and Landscape Maintenance ◆ Common Area Litter Control ◆ Street Sweeping Private Streets and Parking Lots ◆ Drainage Facility Inspection and Maintenance
Structural (See SWMP Appendix H, Section 3.5.2.2)	Required for all Other Development Projects that incorporate the target project features (e.g., fueling areas, maintenance bays, loading docks, outdoor storage areas, etc.) ◆ Storm Drain Inlet Stenciling and Signage ◆ Landscape and Irrigation System Design ◆ Protection of Slopes and Channels ◆ Provide: – Community Car Wash Racks – Wash Water Controls for Food Preparation Areas ◆ Proper Design and Maintenance of: – Fueling Areas – Air/Water Supply Area Drainage – Trash Storage Areas – Loading Docks – Maintenance Bays – Vehicle and Equipment Wash Areas – Outdoor Material Storage Areas – Outdoor Work Areas or Processing Areas

4.2.2 Conditions of Approval

The Permittees have reviewed and revised their standard conditions of approval to ensure that the standard conditions are not in conflict with any provisions of the 2013 MS4 Permit, the 2014 SWMP, the Construction General Permit, the General Industrial Permit, and adopted Total Maximum Daily Load allocations within their jurisdiction. For example, a condition requiring "sweeping or washing public

access points within 30 minutes of dirt deposition" should be revised to specify that "washing" must include capture and proper disposal of all wash water.

To minimize the short-term and long-term impacts of Urban Runoff on Receiving Water quality from Priority Development Projects and Other Development Projects, Permittees have reviewed and will revise, or supplement their standard conditions of approval or building/grading permit conditions that may be used to include the following conditions or the equivalent, as deemed appropriate:

- ◆ Prior to the issuance of a building or grading permit, the applicant shall submit to the Permittee for review and approval a project-specific WQMP that:
 - Addresses Site Design BMP concepts such as minimizing impervious areas, maximizing permeability, minimizing directly connected impervious areas, creating Self-Treating and/or Self-Retaining areas, and conserving natural areas to the extent feasible, as described in Sections 3.5.1.3 and 3.5.1.4 of the WQMP Guidance document;
 - Incorporates the applicable Source Control BMPs as described in Section 3.5.2 of the Whitewater River Region WQMP Guidance document, and provides a detailed description of their implementation;
 - Incorporates LID/Site Design BMPs in lieu of Treatment Control BMPs where feasible, as described in Section 3.5.1 of the Whitewater River Region WQMP Guidance document, and provides information regarding design considerations;
 - Where applicable, incorporates the 50% rule requirement, which states that where a Priority Redevelopment Project (defined as a project that falls under one of the eight Priority Development categories and will take place on a previously disturbed parcel) will replace less than 50% of the impervious surfaces on an existing developed site, and the site was not previously subject to Priority Development Project requirements, the WQMP design standards will apply only to the addition or replacement. However, where a Priority Redevelopment Project replaces 50% or more of the impervious surfaces on the existing developed site, the WQMP design standards shall apply to the entire development;
 - Describes the long-term operation and maintenance requirements for BMPs; and
 - Describes the mechanism for funding the long-term operation and maintenance of the BMPs.
- ◆ Prior to issuance of any building or grading permits, the property owner shall record with the County Assessor-County Clerk-Recorder a "Covenant and Agreement", BMP Maintenance Agreement, or other instrument acceptable to the Permittee to inform future property owners of the requirement to implement the approved project-specific WQMP. Other alternative instruments for requiring implementation of the approved project-specific WQMP include: requiring the implementation of the project-specific WQMP in Home Owners Association or Property Owner Association Conditions, Covenants and Restrictions (CC&Rs); formation of Landscape, Lighting and Maintenance Districts, Assessment Districts or Community Service Areas responsible for implementing the project-specific WQMP; or equivalent. Alternative instruments must be approved by the Permittee prior to the issuance of any building or grading permits.

- ◆ Prior to the issuance of any grading or building permits for projects that will result in soil disturbance of one or more acres of land, the applicant shall demonstrate that coverage has been obtained under the Construction General Permit, as appropriate, by providing a copy of the site's SWRCB issued Waste Discharge Identification (WDID) number.
- ◆ If the project will cause soil disturbance of one acre or more, the project must comply with the Construction General Permit and shall prepare and implement a Stormwater pollution prevention plan (SWPPP). Where applicable, the project applicant shall cause the approved final project-specific WQMP to be incorporated by reference or attached to the project's SWPPP as the Post-Construction Management Plan. A copy of the up-to-date SWPPP shall be kept at the project site and be available for review upon request.
- ◆ Prior to grading or building permit close-out and/or the issuance of a certificate of use or a certificate of occupancy, the applicant shall:
 - Demonstrate that all structural BMPs have been constructed and installed in conformance with approved plans and specifications; and
 - Demonstrate that applicant is prepared to implement all non-structural BMPs included in the approved project-specific WQMP, conditions of approval, or building/grading permit conditions.
 - Demonstrate that an adequate number of copies of the approved project-specific WQMP are available for the future owners/occupants (where applicable).
- ◆ For industrial facilities subject to the General Industrial Permit as defined by Standard Industrial Classification (SIC) code, prior to grading or building permit close-out and/or the issuance of a certificate of use or a certificate of occupancy, the applicant shall demonstrate that coverage has been obtained by providing a copy of the facility's SWRCB issued Waste Discharge Identification (WDID) Number.

4.2.3 Review and Approval of Project-Specific WQMPs

Project-specific WQMPs may be submitted as "preliminary" during the discretionary or land use entitlement phase, depending upon the level of detail known about the overall project design at the time project approval is sought. However, prior to issuance of grading or building permits, the project applicant must submit the final project-specific WQMP for review and approval by the Permittee. The review and approval of a final project-specific WQMP is one of the last critical points at which a Permittee can impose conditions or standards that will minimize the impacts of Urban Runoff. To assist the Permittees in conducting thorough and consistent reviews of project-specific WQMPs, the Permittees utilize a WQMP Review Checklist. An example Project-Specific WQMP Review Checklist is included as Appendix I to this SWMP. Also, for purposes of tracking project-specific WQMPs, the Permittees have developed a standardized WQMP database, which is included in Appendix E to this SWMP.

When reviewing a project-specific WQMP submitted for approval, Permittees assess the project's potential impacts on Receiving Waters, and ensure that the project-specific WQMP adequately identifies such impacts, including all Pollutants and Hydrologic Conditions of Concern. The Permittees assess, as a whole, the BMPs identified in the project-specific WQMP to ensure that the applicant has adequately addressed the potential Pollutants and Hydrologic Conditions of Concern associated with the proposed

project, and also the existing developed site, if the project proposes to replace 50% or more of the impervious surfaces on an existing developed site. The project-specific WQMP is a project planning level document, and as such is not expected to contain final BMP design drawings and details (these will be in the construction plans). However, the project-specific WQMP must identify and denote the location of selected structural BMPs, provide design parameters including hydraulic sizing of LID/Site Design and/or Treatment Control BMPs, and convey final design concepts. Guidance for designing structural BMPs to manage runoff consistent with the design sizing requirements, Q_{BMP} and/or V_{BMP} , are described in the 2014 Whitewater River Region Stormwater Quality Best Management Practice Design Handbook, which can be found at:

http://rcflood.org/downloads/NPDES/Documents/WW_SWMP_WQMP/WWR_BMP_Design_Handbook_Jan2015.pdf

BMP fact sheets can be used in conjunction with project-specific design parameters and sizing to convey design intent. BMP fact sheets typically contain detailed descriptions of each BMP, applications, advantages/disadvantages, design criteria, design procedure, and inspection and maintenance requirements to ensure optimal performance of the BMPs.

4.2.4 Plan Review and Approval: Issuance of Grading or Building Permits

4.2.4.1 Standard Construction Requirements

Each Permittee requires proponents of applicable projects to obtain coverage under the Construction General Permit as part of standard conditions of project approval; proof of coverage must be furnished prior to the issuance of any building or grading permits. Proponents seeking coverage must file all required documentation to the SWRCB, including their site SWPPP, online via the SMARTS system. The Construction General Permit specifies minimum BMPs that site operators must implement dependent upon their construction site's calculated risk.

The Permittees specify that erosion and sediment controls must be implemented on applicable construction sites through their grading and/or Stormwater Ordinances; construction waste controls can be required through standard conditions of approval, stated in project specifications and/or on standard notes that appear on grading plans.

4.2.4.2 Plan Review and Approval for Priority Development Projects

Construction plans submitted by the applicant for plan review must incorporate the structural BMPs identified in the approved final project-specific WQMP. Once a Priority Development Project⁵ reaches the plan review phase, the project applicant should have an approved final project-specific WQMP in accordance with the 2014 Whitewater River Region Water Quality Management Plan Guidance document (Appendix H to this SWMP).

To gain an understanding of the water quality issues and structural BMPs required, Permittees review additional permits or approvals which may be required for the project (i.e., CWA Section 401 Water Quality Certification, California Department of Fish and Wildlife, Fish and Game Code, §1602 Streambed Alteration Agreement, etc.), the relevant CEQA documentation (including the Mitigation Monitoring and Reporting Program) if applicable, the conditions of approval, and the project-specific

⁵ "Priority Development Projects" as defined in Section F.1.c.iii of the 2013 MS4 Permit and shown in Figure 4-2.

WQMP as part of the plan review process. Construction plans are reviewed for consistency with the project-specific WQMP. If the selected BMPs were approved in concept during the land use entitlement process, the applicant is required to submit detailed construction plans showing locations and design details of all BMPs that are in substantial conformance with the preliminary approvals. The construction plans are reviewed to assure that the plans are consistent with the BMP design criteria and guidance provided in Appendix H, the 2014 Whitewater River Region Water Quality Management Plan Guidance document.

4.2.4.3 Plan Review and Approval for Other Development Projects

For Other Development Projects (projects that do not qualify as Priority Development Projects, but discharge into the MS4 and disturb an area of one acre or more), applicants will typically submit a grading or building permit application with construction plans that incorporate the Source Control BMPs required by the conditions of approval.

4.2.5 Permit Closeout, Certificates of Use, and Certificates of Occupancy

The end of the construction phase is typically accompanied by the close out of permits and issuance of certificates of use and/or occupancy. The Permittees use this juncture to assure satisfactory completion of all requirements in a project-specific WQMP or the conditions of approval for Other Development Projects by requiring the applicant to demonstrate, where applicable, that:

- ◆ All structural BMPs have been constructed and installed in conformance with approved plans and specifications.
- ◆ A mechanism or agreement acceptable to the Permittee has been executed for the long-term funding and implementation, operation, maintenance, repair, and/or replacement of BMPs.
- ◆ The applicant is prepared to implement all non-structural BMPs. For example, an HOA can show that they have educational materials available; or an owner/operator of a commercial or industrial facility can show that they have training materials available for their employees and a training schedule; or an owner/operator or an HOA can show that they have documented either through policy and procedure or through contract the responsibilities of maintenance staff.
- ◆ An adequate number of copies of the project-specific WQMP, if applicable, are available onsite.
- ◆ Industrial facilities subject to the General Industrial Permit as defined by Standard Industrial Classification (SIC) code provide a copy of the facility's SWRCB issued Waste Discharge Identification (WDID) number. Additionally, Permittees may verify coverage by accessing a searchable database of construction sites with coverage under the Construction General Permit, known as SMARTS. The SMARTS database is maintained by the SWRCB, and is searchable by Regional Water Board, WDID number, owner name or city, developer name or city, and county. The website address for the database is:

<https://smarts.waterboards.ca.gov/smarts/faces/SwPublicUserMenu.jsp>

BMPs for Priority Development Projects and Other Development Projects cannot be considered effective unless a mechanism is in place to provide for long-term reliability, which is achieved through proper implementation, operation, and maintenance. Therefore, once construction of a project is complete,

assurance is required for the long-term implementation, operation and maintenance of BMPs, and most particularly for LID/Site Design and Treatment Control BMPs.

The responsibility for implementation, operation, and maintenance of BMPs may be with a private entity or a public agency (for example, a Permittee) under various arrangements and with various funding sources. The responsibility to provide for the long-term implementation, operation, and maintenance of BMPs associated with Priority Development Projects or Other Development Projects may:

- ◆ Remain with a private entity (property owner, home owners association, etc.); or
- ◆ Be transferred to a public entity (e.g., a city, county, special district, etc.) through dedication of the property; or
- ◆ Be transferred to a public entity, or another private party through a contract.

Following satisfactory inspection, the Permittee may accept structural BMPs within public right-of-ways, and may accept structural BMPs on land dedicated to public ownership. Upon acceptance, responsibility for operation and maintenance will transfer from the developer or contractor to the appropriate entity, including the funding mechanism identified in the approved final project-specific WQMP for Priority Development Projects or the conditions of approval or building/grading permit conditions for Other Development Projects.

If a property owner or a private entity retains or assumes responsibility for implementation, operation, and maintenance of BMPs, the Permittee will require an agreement that can take the form of:

- ◆ A Covenant and Agreement recorded with the County Recorder,
- ◆ A Home Owners Association or Property Owners Association, Covenants, Codes, and Restrictions,
- ◆ The formation of, or annexation to, a maintenance district or assessment district, or
- ◆ BMP maintenance agreement or other instrument sufficient to guarantee long-term implementation, operation, and maintenance of BMPs.

Examples of requirements for typical maintenance mechanisms and a sample of a Covenant and Agreement are provided in Appendix H (2014 Whitewater River Region Water Quality Management Plan Guidance document, Exhibits 3 and 4, respectively).

4.3 Training

4.3.1 Educational Program for Developers and Contractors

The 2014 Whitewater River Region Water Quality Management Plan Guidance document contains the legal, administrative, and technical information needed to acquaint developers and contractors with the requirements for post construction BMPs in Priority Development Projects. It also provides information relevant and useful to Other Development Projects. The 2014 Whitewater River Region Water Quality Management Plan Guidance document is available through the Permittee websites, and as part of the review process for project planning and permitting. The Permittees may also coordinate with other groups (e.g., agencies, building or planning industry associations, etc.) to provide training to the property owners, developers, builders, architectural and engineering firms, planning firms, etc.

4.3.2 Training Programs for Municipal Development Planning Staff

To support an effective program, the Permittees have developed and provide informational workshops to staff responsible for implementing the New Development/Redevelopment requirements of the 2013 MS4 Permit. New Development/Redevelopment staff attend training annually, which addresses the following topics:

- ◆ Applicable requirements of the 2013 MS4 Permit, the General Industrial Permit, and the Construction General Permit,
- ◆ Proper BMP implementation; and
- ◆ Implementation of the 2014 Whitewater River Region Water Quality Management Plan Guidance document and Template.

The semi-annual training for New Development/Redevelopment staff is generally offered in the fall and spring; staff attend at least one workshop annually. Where inspection staff are unable to attend one of the semi-annual training workshops, in-house or tailgate training may also be provided which addresses the training topics detailed above. Permittee staff with New Development/Redevelopment responsibilities may also attend training sponsored by industry associations (e.g., Building Industry Association, American Society of Civil Engineers, etc.), the California Stormwater Quality Association, or training sponsored by other entities in lieu of Permittee sponsored training. The Permittees individually maintain a log of trained staff and type of training, and then include this information in the Annual Reports.

4.4 Program Data Tracking, Annual Reporting and Evaluation/Assessment

Evaluation and assessment of BMP performance is performed through year-round program documentation, annual analysis of program data, and Annual Reporting. The Permittees maintain the following New Development/Redevelopment program records:

1. An up to date WQMP tracking data base.

To prepare Annual Reports, the Permittees extract data from the program records specified above, and provide the following information on the Annual Report forms included in Appendix M:

1. Total number of projects conditioned for WQMPs during the reporting year;
2. A summary of Other Development Projects conditioned to require implementation of Source Control BMPs during the reporting year;
3. Percent of Priority Development Projects which met the goal of achieving 100% of the Treatment Control BMP requirement through the use of LID/Site Design BMPs during the reporting year.

Each year in the Annual Report, the Permittees evaluate their respective New Development/Redevelopment programs by utilizing the reported data specified above to assess whether the following program goals have been achieved:

1. Confirm that WQMPs are in place at Priority Development/Redevelopment Projects, to prevent or minimize water quality impacts to the MEP;
2. Encourage the use of LID/Site Design BMPs to address the Treatment Control BMP requirement for Priority Development/Redevelopment Projects; and

3. Confirm that Other Development Projects are conditioned to require implementation of Source Control BMPs.

If a Permittee finds that any of the above stated program goals have not been achieved during the reporting year, that Permittee will review applicable BMPs to identify program modifications which may be necessary. A workplan and schedule which addresses proposed program modifications will be developed and implemented by the Permittee, and included in its Annual Report. Because many program modifications take time to completely implement, applicable Permittees will provide status updates in their Annual Report, as necessary.

5.0 PRIVATE CONSTRUCTION ACTIVITIES

5.1 Private Development Construction Activities

Construction related activities conducted at project sites, such as clearing and grubbing, soil import or export, grading operations, storage and handling of materials, fueling, equipment maintenance, etc. present opportunities for potential pollutants to be introduced into the MS4. The 2013 MS4 Permit requires that Permittees continue to implement and enforce a program to reduce pollutants in Urban Runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre or more, and from construction activities that disturb less than one acre but are part of a larger common plan of development or sale. Therefore, the Permittees implement the following related to construction activities:

- ◆ Verify that applicants for private construction projects requiring coverage under California's General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities⁶ (Construction General Permit) have filed a Notice of Intent (NOI) prior to the issuance of a building or grading permit. Additionally, Permittees may verify coverage by accessing a searchable database of construction sites with coverage under the Construction General Permit, known as SMARTS. The SMARTS database is maintained by the SWRCB, and is searchable by Regional Water Board, WDID number, owner name or city, developer name or city, and county. The website address for the database is:

<https://smarts.waterboards.ca.gov/smarts/faces/SwPublicUserMenu.jsp>

- ◆ Ordinances or other regulatory mechanisms to require erosion and sediment controls, as well as sanctions or other effective mechanisms, to ensure compliance to the extent allowable under State or local law.
- ◆ Procedures for site plan review which incorporate consideration of potential water quality impacts.
- ◆ Requirements for construction site operators to control waste such as discarded building materials, concrete truck wash-out, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.
- ◆ Procedures for construction site inspection and enforcement control measures. Each Permittee conducts construction site inspections for compliance with its ordinances, regulations, codes and the Water Quality Management Plan (WQMP).

5.2 Construction Site BMPs

Each Permittee requires applicable project proponents to obtain coverage under the Construction General Permit as part of standard conditions of project approval; proof of coverage must be furnished prior to the issuance of any building or grading permits. Proponents seeking coverage must file all required documentation to the SWRCB, including their site SWPPP, online via the SMARTS system. The

⁶ SWRCB Order No. 2009-0009-DWQ, as amended by 2010-00140DWQ and 2012-006-DWQ; NPDES No. CAS000002.
http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo_2009_0009_complete.pdf

Construction General Permit specifies minimum BMPs that site operators must implement dependent upon their site's calculated risk.

The Permittees specify that erosion and sediment controls must be implemented on applicable construction sites through their grading and/or Stormwater Ordinances; construction waste controls can be required through standard conditions of approval, stated in project specifications and/or on standard notes that appear on grading plans.

5.3 Construction Site Prioritization

The Permittees have identified construction site prioritization criteria that are used to assign either high priority or low priority to construction sites that disturb areas equal to or greater than 1 acre. In order to standardize site prioritization, the Permittees developed a matrix to detail the relationship between priority ratings, threat to Receiving Water quality, and inspection frequency; this Construction Site Prioritization Matrix is presented in Table 5-2. After each inspection, the priority assigned to the construction site is reassessed based upon the prioritization matrix shown in Table 5-2 and the subsequent inspection frequency is determined. This information is used to update the Construction Site database.

Table 5-1. Construction Site Prioritization Matrix

Priority	Criteria	Wet Season ^(a) Inspection Frequency
High	<u>Project Size</u> Sites that disturb an area greater than 50 acres <u>Project Location</u> Sites that disturb greater than one (1) acre and directly discharge to a 303(d) listed waterbody identified as impaired by sediment, siltation, or turbidity ^(b) <u>Soil Erosion Potential</u> Hillside sites that disturb an area greater than five acres <u>History of Compliance</u> Sites that disturb an area greater than one (1) acre with a low-range (0-50%) compliance history noted on respective City/County construction site inspection forms and/or database(s)	Once each month
Low	<u>Project Size</u> Sites that disturb an area of one (1) acre or greater and equal to or less than 50 acres, and do not directly discharge to a 303(d) listed waterbody identified as impaired by sediment, siltation, or turbidity ^(b) <u>History of Compliance</u> Sites noted as being predominantly in compliance on respective City/County construction site inspection forms and/or database(s)	Once per wet season

(a) Wet season: August 1 – October 1 and November 1 – May 1 (Consistent with Caltrans definition of rainy season for the eastern desert areas.)

(b) See http://www.waterboards.ca.gov/coloradoriver/water_issues/programs/tmdl/rb7_303d_list.shtml

5.4 Construction Site Inspections

Each Permittee conducts construction site inspections within their existing building/grading inspection framework. At a minimum, the following items are addressed during construction site inspections:

- ◆ For applicable projects, verify coverage under the Construction General Permit. Verification is typically made by requesting the SWRCB issued Waste Discharge Identification (WDID) Number for the site. Additionally, Permittees may verify coverage by accessing the SMARTS system. The database is maintained by the SWRCB and is searchable by Regional Water Board, WDID number, owner name or city, developer name or city, and county. The website address for the database is:

<https://smarts.waterboards.ca.gov/smarts/faces/SwPublicUserMenu.jsp>

- ◆ For applicable projects, confirm that a SWPPP is onsite;
- ◆ Confirm compliance with the Permittee's ordinances including the Stormwater Ordinance, and the WQMP;
- ◆ Check for active Non-Stormwater discharges or potential IC/IDs to the MS4.

During the course of inspecting construction sites, if it appears that a construction site is required to obtain coverage under the Construction General Permit, the Permittee's inspector asks the construction site manager whether or not a WDID has been issued to the site by the SWRCB. If not, the inspector notifies the appropriate Permittee Stormwater program representative, who in turn notifies Regional Water Board staff. Permittees may also choose to request a current listing from the Regional Water Board of all construction sites within their jurisdiction covered under the Construction General Permit to facilitate this aspect of construction site compliance. Permittee inspectors also provide educational materials and information on upcoming training and/or educational workshops to contractors at inspected sites, as necessary.

Some Permittees have chosen to document construction site inspection information on internal inspection forms, while other Permittees have chosen to utilize the Whitewater River Region template construction site inspection form (Appendix J). Based on inspection findings, the Permittees implement follow-up actions as necessary.

5.5 Site Inventory Database

In conformance with Section F.1.d.vii.1 of the 2013 Permit, each Permittee maintains an inventory database (or databases) of Construction Sites which result in a Land Disturbance of greater than or equal to one acre, for which they have issued a building or grading permit. The database is updated with new projects added when the project is issued a building or grading permit, or when the pre-construction meeting has occurred. Projects may be removed from the database when construction is completed and the project's building or grading permit is closed. At a minimum, the Permittees' databases include the following project information:

- ◆ Facility/Project name;
- ◆ Facility/Project address;
- ◆ Tract number(s) or Assessor Parcel Number (APN);
- ◆ Watershed;
- ◆ Project type;
- ◆ Project priority;

- ◆ Number of inspections performed;
- ◆ Site size;
- ◆ WDID number;
- ◆ Grading Permit number;
- ◆ Other permits;
- ◆ Developer's information;
- ◆ Site contact information; and
- ◆ Enforcement status.

5.6 Enforcement

If it is determined during a routine inspection or an inspection in response to a complaint that a site/project is non-compliant with the Permittee's Stormwater or erosion control ordinance, the Permittee begins enforcement procedures that may include:

1. Education and information,
2. Verbal warning,
3. Written warning,
4. Notice of non-compliance,
5. Administrative compliance order,
6. Stop work order or cease and desist order,
7. Civil citation or injunction,
8. Administrative fine, and
9. Referral to the Environmental Crimes Strike Force.

Enforcement procedures are described in more detail in Section 1.7 of the SWMP. As described in Section 1.7, the severity of the violation is based on various factors. After considering the various factors, the Permittee determines the level of enforcement required consistent with the enforcement levels described in Table 1-3 of Section 1.

5.7 Regional Water Board Notification Requirements

The Permittees notify the Regional Water Board when staff observe potential non-compliance with the Construction General Permit, including failure to obtain coverage, or failure to keep a SWPPP at the construction site. Such notifications are made by telephone (760-346-7491) and email within 2 working days of receiving notice from staff or third party. Upon providing notification to the Regional Water Board, no further action is taken by Permittee staff with respect to enforcement of the Construction General Permit. However, the Permittee continues with progressive enforcement of its ordinances and permits at the site as described in Section 1.7 of the SWMP.

5.8 Training Requirements

To support effective Stormwater and Non-Stormwater pollution prevention, the Permittees have developed and provide informational workshops to staff conducting construction site inspections.

Construction training modules provide a construction Stormwater orientation for field inspectors and address the following topics:

- ◆ Applicable 2013 MS4 Permit requirements,
- ◆ Proper BMP implementation;
- ◆ Construction General Permit requirements as they pertain to Permittee compliance with the 2013 MS4 Permit;
- ◆ Identification of IC/IDs which may be associated with active Construction sites; and
- ◆ Site inspection criteria and priorities.

The semi-annual training for construction site inspectors is generally offered in the fall and spring; inspection staff attends at least one workshop annually. Where inspection staff are unable to attend one of the semi-annual training workshops, in-house or tailgate training may also be provided which addresses the training topics detailed above. The Permittees individually maintain a log of trained staff, and report training in their Annual Reports. The training program is reviewed and updated as necessary to address concerns in the Whitewater River Region.

5.9 Program Data Tracking, Annual Reporting and Evaluation/Assessment

Evaluation and assessment of BMP performance is performed through year-round program documentation, annual analysis of program data, and Annual Reporting. The Permittees maintain the following Private Construction Activities Program records:

1. An up-to-date construction site inspection database.

To prepare Annual Reports, the Permittees extract data from the program records specified above, and provide the following information on the Annual Report forms included in Appendix M:

1. Total number of construction site inspections conducted during the reporting year;
2. Total number and type of enforcement action(s) issued during the reporting year, including referrals to the Regional Water Board; and
3. Confirm that the construction site inspection database has been implemented to track inspection activities during the reporting year.

Each year in the Annual Report, the Permittees evaluate their respective Private Construction Activities programs by utilizing the reported data specified above to assess whether the following program goals have been achieved:

1. Maintain an updated database of active construction sites which includes site prioritization;
2. Perform inspections to confirm construction site compliance with respective Permittee ordinances; and
3. Implement enforcement measures as necessary to reduce the occurrence of violations of respective Permittee ordinances.

If a Permittee finds that any of the above stated program goals have not been achieved during the reporting year, that Permittee will review applicable BMPs to identify program modifications which may be necessary. A workplan and schedule which addresses proposed program modifications will be developed and implemented by the Permittee, and included in its Annual Report. Because many program modifications take time to completely implement, applicable Permittees will provide status updates in their Annual Report, as necessary.

6.0 PERMITTEE FACILITIES AND ACTIVITIES

6.1 Planning for Post-Construction BMPs in Permittee Public Works Projects

The requirement for managing the quality and quantity of Stormwater runoff applies to Permittee public works projects in the Whitewater River Region meeting the definition of New Development or Redevelopment just as it applies to private development. Although the Permittees do not plan, design, or construct most of the Priority Development Project categories⁷ per se (see SWMP Section 4.1), some Permittee public works projects may have similar functions or characteristics, or may conduct similar activities after construction is completed. For example, a corporation yard may include a vehicle and equipment maintenance facility, which is very similar to an automotive repair shop. Other examples are a civic center or library that is very similar in its characteristics to that of a commercial office building, and a senior citizens center or a jail may have a cafeteria, which is similar to a restaurant. Additionally, public works projects that discharge into the MS4 and disturb an area of one acre or more, or disturb less than one acre, but are part of a larger common plan of development (referred to as Other Development Projects) will incorporate permanent structural and non-structural Source Control BMPs that prevent or minimize water quality impacts to the MEP. This approach is also consistent with the SWRCB's Construction General Permit post-construction requirements.

The process for planning, design, approval, and construction oversight of Permittee projects differs from the process of planning and permitting for private sector development projects. For example, typically private sector projects are regulated through a process of a development plan approval (i.e., conditions of approval); building or grading permit applications, and permit conditions. In comparison, Permittee projects may undergo design review by the Permittee's own internal department, or contracting agency; be issued permits or similar administrative authorizations; and are then regulated through the enforcement of contract terms and approved plans and specifications.

For those public works projects that qualify as a Priority Development Project, the planning and design conforms to 2013 MS4 Permit Section F.1.c.v (WQMP Design Standards) that addresses (1) peak discharge rates where applicable, (2) Site Design BMP concepts, (3) Source Control BMPs, and (4) Treatment Control BMPs. Treatment Control BMPs are implemented through utilization of LID/Site Design BMPs to meet the measurable goal (see Section 4 above) where feasible. Where a Permittee requires retention of Urban Runoff via on site retention ordinance for its public works projects as it does for private development, additional LID/Site Design BMPs and/or Treatment Control BMPs are not required.

Where applicable, the operation and maintenance procedures for the project-specific Structural Source Control, LID/Site Design and/or Treatment Control BMPs included in a Permittee's public works project are incorporated into the site's Facility Pollution Prevention Plan (FPPP). Upon completion of construction and when contract close-out occurs, the responsibility for implementation, operation, and maintenance of BMPs will transfer from the contractor to the appropriate Permittee department and become part of the Permittee Facilities and Operations Program (see SWMP Section 6.3).

⁷ Permit Section F.1.c.iii

Each Permittee has developed and implemented policies and procedures to ensure that the planning and design of its public works projects reflect these requirements for managing the quality and quantity of Stormwater runoff to prevent or minimize water quality impacts to the MEP.

6.2 Permittee Construction Activities

The Permittees implement the applicable components of Section 5 of this SWMP in the construction of public works projects; therefore, Permittee public works construction projects one acre or larger, or which are part of a public works construction project one acre or larger, comply with the Construction General Permit. Prior to commencement of construction activities, the Permittees file Permit Registration Documents by using the SMARTS System, and submit the annual coverage fee(s). Upon completion of the construction project, a NOT and other project close-out documentation is filed via the State Board SMARTS. SMARTS can be accessed at:

<https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.jsp>

The Construction General Permit defines routine maintenance activities that are exempt from coverage. Specific maintenance activities, which include BMPs implemented as part of a Permittee's MFPPP or model municipal maintenance BMP fact sheets, can be considered as meeting "routine maintenance activities", as defined in the Construction General Permit.

As described in Section 6.1 above, the Permittees implement 2013 Permit WQMP design standards (Permit Section F.1.c.v) for applicable public works projects; this is consistent with the post-construction requirements detailed in the Construction General Permit. During construction closeout, the Permittees assure satisfactory completion of the requirements of the project-specific WQMP by:

- ◆ Verifying that structural post-construction BMPs have been constructed and installed in conformance with approved plans and specifications;
- ◆ Assuming responsibility for the long-term funding and implementation, operation, maintenance, repair, and/or replacement of BMPs; and
- ◆ Confirming that procedures are in place to implement non-structural BMPs.

6.3 Operation and Maintenance of Permittee Facilities

6.3.1 Sewage Systems

To provide a consistent, statewide regulatory approach to address Sanitary Sewer Overflows (SSOs), the SWRCB adopted General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems⁸ (Sanitary Sewer Order) on May 2, 2006. The Sanitary Sewer Order requires public agencies that own or operate sewage systems to develop and implement Sewer System Management Plans (SSMPs) and report all SSOs through the SWRCB's online SSO database, known as the California Integrated Water Quality System (CIWQS). As required by the Sanitary Sewer Order, each Permittee that owns or operates a sanitary sewage collection system greater than one mile in length must develop a SSMP. The SSMP includes provisions for proper and efficient management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost benefit analysis. Additionally, an

⁸ SWRCB Water Quality Order No. 2006-0003.

SSMP includes a spill response plan that establishes standard procedures for immediate response to a SSO in a manner designed to minimize water quality impacts and potential nuisance conditions.

Within the Whitewater River Region, all areas which have sanitary sewer access fall under the jurisdiction of a sewerage agency which has a SWRCB approved SSMP. Sewerage agencies which service the MS4 Permit area include the City of Banning Wastewater Utility, Mission Springs Water District, the City of Palm Springs Wastewater Treatment Plant, Coachella Valley Water District, Valley Sanitation District, and Coachella Sanitary District. In the event that an SSO does occur, the sewerage agency with jurisdiction is immediately notified by Permittee staff, or directly from a third party. Response, clean-up and all reporting requirements associated with the SSO are addressed by the sewerage agency, per their respective SSMP.

The Permittees take feasible steps to assist with containment and mitigation of impacts associated with SSOs. As detailed in the Sanitary Sewer Overflow Guidance Document (Appendix F), Permittees with land jurisdiction over an area where an SSO has occurred work collaboratively with sewerage agencies to provide access to MS4 facilities when needed, and may also supply requested information, and instigate case investigation and enforcement where necessary.

6.3.2 Landscape Maintenance

Each Permittee requires that pesticides be applied in conformance with existing State and Federal regulations. Additionally, some Permittees have developed and implement an Integrated Pest Management (IPM) program.

6.3.3 Streets and Roads

The Permittees utilize BMP Fact Sheet SC-70 (Road and Street Maintenance) from the California Stormwater BMP Handbook—Municipal⁹ as a model for common road maintenance activities, and implement the BMPs specified therein for streets and roads maintenance activities conducted by Permittee staff. Additionally, the Permittees incorporate applicable BMPs from BMP Fact Sheet SC-70 into streets and roads maintenance contracts.

6.3.4 MS4 Facilities

The Permittees have developed and implement maintenance schedules for their MS4 facilities, keep and maintain those maintenance schedules as part of regular program data tracking, and report on MS4 maintenance activities annually. MS4 maintenance schedules address clean-out schedules and frequencies for the Permittees' catch basins, Stormwater conveyance structures, open channels, debris basins, and retention/detention basins. Stencils, markers, and signs to discourage illegal dumping to the MS4 are replaced or reapplied as necessary. As described in SWMP Section 2.3.1, the Permittees implement a field program for the detection and elimination of illegal discharges and illicit connections to the MS4. Wastes and materials removed are disposed of per applicable laws and appropriate BMPs are implemented to minimize impacts to Receiving Waters.

⁹ <http://www.cabmphandbooks.com/Municipal.asp>

6.3.5 Other Permittee Facilities and Operations

The Permittees have identified the types of facilities they operate, the activities conducted at those facilities, and those activities conducted that have the potential to contribute Pollutants to Urban Runoff as shown in Table 6-1. Identification of the Potential Pollutants at each type of Permittee facility was necessary in order to select appropriate candidate BMPs. Table 6-2 identifies Pollutants of Concern that may be associated with activities conducted at or based from Permittees' municipal facilities.

Where applicable, Permittee facilities such as wastewater treatment plants, airports, and landfills already have coverage under the General Industrial Permit, or are under an individual NPDES permit or Waste Discharge Requirements, and have developed and implemented an industrial facility SWPPP when required by the applicable permit; such facilities do not require an MFPPP. MFPPPs are prepared, implemented, and maintained for Permittee facilities that have outdoor materials storage or maintenance areas; such Permittee facilities are listed in Table 6-3. MFPPPs are reviewed annually, and updated by the Permittees when necessary to reflect changed conditions. The Permittee facilities listed in Table 6-3 are inspected annually with regard to appropriate BMP implementation. Re-inspections and corrective actions are taken where deficiencies are found. Inspection reports and documentation of resulting corrective actions are kept for a period of at least three years, and are incorporated into the facility-specific MFPPP. A template facility-specific Pollution Prevention Plan for Permittee facilities, including an annual inspection form, is provided in Appendix K.

Based on the facilities, associated activities, and the Pollutants of Concern that were identified, a list of potential Source Control BMPs was developed (Table 6-4). The Permittees have identified BMPs for municipal activities including street sweeping, catch basin cleaning, maintenance yards, vehicle and equipment maintenance areas, waste transfer stations, corporation and storage yards, parks and recreational facilities, landscape maintenance, swimming pool operation and maintenance, and the application of pesticides.

This list utilizes the BMP designations used in the 2003 California Stormwater Best Management Practice Handbooks¹⁰ (Industrial and Municipal Handbooks), and includes the following potential Source Control BMPs:

Industrial Handbook References

- | | | | |
|---------|---|---------|----------------------------------|
| ◆ SC-10 | Non-Stormwater Discharges | ◆ SC-34 | Waste Handling and Disposal |
| ◆ SC-11 | Spill Prevention, Control and Cleanup | ◆ SC-35 | Safer Alternative Products |
| ◆ SC-20 | Vehicle and Equipment Fueling | ◆ SC-40 | Contaminated or Erodible Areas |
| ◆ SC-21 | Vehicle and Equipment Cleaning | ◆ SC-41 | Building & Grounds Maintenance |
| ◆ SC-22 | Vehicle and Equipment Repair | ◆ SC-42 | Building Repair and Construction |
| ◆ SC-30 | Outdoor Loading /Unloading of Materials | ◆ SC-43 | Parking/Storage Area Maintenance |
| ◆ SC-31 | Outdoor Liquid Container Storage | ◆ SC-44 | Drainage System Maintenance |
| ◆ SC-33 | Outdoor Storage of Raw Materials | | |

¹⁰ California Stormwater Quality Association. January 2003. <http://www.cabmphandbooks.com/> or CASQA, P.O. Box 2105, Menlo Park, California, 94026-2105.

Municipal Handbook References

◆ SC-10	Non-Stormwater Discharges	◆ SC-43	Parking/Storage Area Maintenance
◆ SC-11	Spill Prevention, Control and Cleanup	◆ SC-60	Housekeeping Practices
◆ SC-20	Vehicle and Equipment Fueling	◆ SC-61	Safer Alternative Products
◆ SC-21	Vehicle and Equipment Cleaning	◆ SC-70	Road and Street Maintenance
◆ SC-22	Vehicle and Equipment Repair	◆ SC-71	Plaza and Sidewalk Cleaning
◆ SC-30	Outdoor Loading/Unloading	◆ SC-72	Fountains & Pools Maintenance
◆ SC-31	Outdoor Container Storage	◆ SC-73	Landscape Maintenance
◆ SC-32	Outdoor Equipment Maintenance	◆ SC-74	Drainage System Maintenance
◆ SC-33	Outdoor Storage of Raw Materials	◆ SC-75	Waste Handling and Disposal
◆ SC-34	Waste Handling and Disposal	◆ SC-76	Water and Sewer Utility Maintenance
◆ SC-41	Building and Grounds Maintenance		

This list is not intended to be all-inclusive. However, the BMPs listed are both effective and widely accepted. Permittees may also consult other sources of BMP information and consider implementation of additional methods and measures as appropriate. These BMPs are incorporated into the facility-specific MFPPPs, as appropriate. A matrix identifying potential BMPs that may be appropriate to implement for Permittee facilities and their associated activities is presented in Table 6-4. Fact sheets describing each of the Source Control BMPs can be viewed or downloaded from <http://www.cabmphandbooks.com/>.

Table 6-1. Permittee Facilities and Operations

Type of Permittee Facility	Operations of Concern Conducted
Corporate Yards ¹	Loading, unloading, handling, and storage of animal wastes, anti-freeze, asphalt, batteries, chemicals, concrete, diesel wastes, emulsions, fertilizer, fuel, green wastes, hazardous materials, new and used oil, paint products, pesticides, scrap metal, solvents, trash and debris, and wash water
	Filling of aboveground and underground storage tanks (ASTs and USTs) with fuels
	Dispensing of fuels to vehicles, equipment, and portable fuel containers
	Vehicle and equipment parking and storage
	Vehicle, equipment, and material washing and steam cleaning
	Leak and spill cleanup
	Landscape, garden, and general maintenance and cleaning
Parks & Recreation Facilities, including Golf Courses	Landscape, garden, and general maintenance and cleaning
	Paving, Painting, solid waste management, fertilizer and pesticide application, reclaimed water application
Civic or Community Centers & Libraries	Landscape, garden, and general maintenance and cleaning
Warehouses	Loading, unloading, handling, and storage of materials
	Landscape, garden, and general maintenance and cleaning
Fire and Police Stations, including Fire Training Facilities	Loading, unloading, handling, and storage of antifreeze, chemicals, new and used oil, scrap metal, and trash and debris
	Filling of ASTs and USTs with fuels
	Dispensing fuel
	Vehicle and equipment maintenance
	Vehicle and equipment parking and storage
	Vehicle washing and steam cleaning
	Leak and spill cleanup
	Landscape, garden and general maintenance and cleaning
	Fire retardant use/cleanup
	Equipment storage, maintenance and cleaning
Hazardous Materials Storage Facilities ²	Loading, unloading, handling, and storage of potentially hazardous materials
	Leak and spill cleanup
Animal Shelters	Loading, unloading, handling, and storage of animal wastes, chemicals, and fuel
	Vehicle, equipment, and material washing
	Leak and spill cleanup
	Landscape, garden, and general maintenance and cleaning

Type of Permittee Facility	Operations of Concern Conducted
Swimming Pools	Storage and use of chemicals, including chlorine
	Filter maintenance and backwashing
	Landscape, garden, and general maintenance and cleaning
Potable Water Treatment Facilities	Loading, unloading, handling, and storage of materials
	Filling of ASTs and USTs with fuels
	Vehicle washing and steam cleaning
	Leak and spill cleanup
	Landscape, garden, and general maintenance and cleaning

- 1 Corporation yards include equipment, transit maintenance, public works, fleet maintenance, and parks and recreation equipment yards.
- 2 Includes permanent household hazardous waste collection facilities

Table 6-2. Potential Pollutants of Concern

Potential Pollutants	Material Loading, Unloading, Handling, or Storage	Filling of ASTs & USTs	Dispensing Fuel	Vehicle & Equipment Maintenance	Vehicle & Equipment Parking and Storage	Vehicle & Equipment Material Washing & Steam Cleaning	Leak & Spill Cleanup	Landscape, Garden, and General Maintenance & Cleaning
Animal Wastes	X							
Anti-freeze	X			X	X		X	
Asphalt	X							
Acid	X			X				
Chemicals	X			X	X		X	
Concrete	X						X	
Diesel Wastes	X			X			X	
Emulsions	X						X	
Fertilizer	X						X	
Fuel		X	X	X			X	
Green Wastes	X							X
Hazardous Materials	X			X	X		X	X
Herbicides	X						X	X
New/Used Oil	X			X			X	
Oil and Grease Spills	X			X	X	X	X	
Paint Products	X						X	X
Pesticides	X						X	X
Scrap Metal	X			X				
Solvents	X			X			X	
Trash and Debris	X							X
Wash Waters						X		

Table 6-3. Permittee Facilities Inventory

Note: *This inventory reflects only those Permittee facilities that have outdoor materials storage or maintenance areas. This inventory does not include Permittee facilities having coverage under individual NPDES permits or the General Industrial Permit.*

Permittee	Corporate Yards	Parks & Recreation Facilities	Civic or Community Centers & Libraries	Ware-houses	Fire Stations	Police Stations	Hazardous Materials Storage Facilities*	Animal Shelters	Swimming Pools	Potable Water Treatment Facilities
County of Riverside	5	1	0	0	22	0	0	0	5	3
Banning	1	0	0	0	0	0	0	0	0	1
Cathedral City	1	8	3	0	3	1	0	0	0	0
Coachella	1	5	0	0	1	0	1	0	2	5
Desert Hot Springs	1	5	1	0	2	1	1	0	1	0
Indian Wells	1	1	1	0	1	1	1	0	0	0
Indio	1	0	0	0	0	0	0	0	0	0
La Quinta	1	12 Parks 1 Golf Course 1 Fitness Center	4	0	3	2	0	0	1	0
Palm Desert	1	1	0	0	0	1	0	0	1	0
Palm Springs	1	2 Rec Center; 1 golf course	0	0	4	1	1	1	1	0
Rancho Mirage	1	4	3	0	2	1	0	0	0	0
Coachella Valley Water District	2	0	0	2	0	0	0	0	0	0
Riverside County Flood Control & Water Conservation District	0	0	0	0	0	0	0	0	0	0

* Includes household hazardous waste collection facilities.

Table 6-4. Potential Source Control BMPs for Permittee Facilities and Activities

Activities	BMP References from Industrial & Commercial Handbook ⁽¹⁾																BMP References from Municipal Handbook ⁽²⁾																					
	SC-10	SC-11	SC-20	SC-21	SC-22	SC-30	SC-31	SC-32	SC-33	SC-34	SC-35	SC-40	SC-41	SC-42	SC-43	SC-44	SC-10	SC-11	SC-20	SC-21	SC-22	SC-30	SC-31	SC-32	SC-33	SC-34	SC-41	SC-43	SC-60	SC-61	SC-70	SC-71	SC-72	SC-73	SC-74	SC-75	SC-76	
Material Loading/Unloading/Handling/Storage						X	X	X	X									X				X	X		X													
Waste Handling and Disposal	X							X		X							X									X				X							X	
Filling of ASTs/USTs			X															X	X																			
Dispensing Fuel			X															X	X																			
Vehicle/Equipment Maintenance/Repair					X						X							X			X			X														
Vehicle/Equipment Parking and Storage																																						
Vehicle and Equipment Cleaning	X			X				X			X						X			X										X								
Leak and Spill Cleanup	X	X					X	X									X	X											X									
Construction														X																								
Landscaping, Garden, and General Maintenance and Cleaning	X										X	X	X	X	X	X	X										X	X	X	X	X	X	X	X	X		X	

Notes:

- (1) California Stormwater Quality Association. January 2003. California Stormwater Best Management Practice Handbook – Industrial and Commercial. <http://www.cabmphandbooks.com/> or CASQA, P.O. Box 2105, Menlo Park, California, 94026-2105.
- (2) California Stormwater Quality Association. January 2003. California Stormwater Best Management Practice Handbook – Municipal. <http://www.cabmphandbooks.com/> or CASQA, P.O. Box 2105, Menlo Park, California, 94026-2105.

6.4 Fire Fighting Agency BMPs

In coordination with the Riverside County Fire Agencies, the Permittees developed a list of appropriate BMPs to be implemented to reduce Pollutants from firefighting training activities, fire hydrant/sprinkler testing or flushing, and BMPs feasible for emergency firefighting flows. These firefighting agency BMPs and the strategy for providing training and updating the list of BMPs are described in Appendix L.

6.5 Training for Permittee Maintenance Employees

Staff involved with implementing a Permittee's maintenance program attend annual training on the following topics:

- ◆ Applicable requirements of the 2013 MS4 Permit and 2014 SWMP
- ◆ Applicable requirements of the General Industrial, and General Construction Permits
- ◆ Source Control BMPs listed in SWMP Section 6.3.5
- ◆ Identification of IC/IDs
- ◆ Permittee Municipal Facilities Pollution Prevention Plans
- ◆ Proper use and management of pesticides, fertilizers and herbicides

Permittee streets and roads maintenance staff also conduct tailgate training every other year at a minimum, to review the model fact sheet of BMPs (BMP Fact Sheet SC-70: Road and Street Maintenance) for common road maintenance activities.

Permittee staff responsible for restricted use pesticide application are trained and certified under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) requirements and the California Food and Agriculture Code. The Permittees maintain a list of pesticide application personnel and their certifications. Additionally, landscape maintenance contractors contracted by Permittees for pest management or pesticide application are required to be certified.

Formal training workshops are offered twice a year, in the fall and spring; Permittee maintenance staff attends at least one training workshop annually. The training program is reviewed and updated as necessary to address concerns in the Whitewater River Region. Where municipal staff are unable to attend one of the semi-annual training workshops, in-house or tailgate training may also be provided which addresses the training topics detailed above. Permittee staff may also attend training sponsored by third parties (for example, California Stormwater Quality Association) in lieu of Permittee-sponsored training. The Permittees individually maintain a log of trained staff and report training in their Annual Reports.

6.6 Program Data Tracking, Annual Reporting and Evaluation/Assessment

Evaluation and assessment of BMP performance is performed through year-round program documentation, annual analysis of program data, and Annual Reporting. The Permittees maintain the following Permittee Facilities and Activities program records:

1. An up-to-date inventory of respective Permittee facilities with outdoor materials storage or maintenance areas;
2. Completed inspection forms from inspections conducted at Permittee facilities requiring MFPPPs;
3. An up-to-date MS4 inspection and maintenance schedule; and

4. An up-to-date list of pesticide application personnel and their certifications.

To prepare Annual Reports, the Permittees extract data from the program records specified above, and provide the following information on the Annual Report forms included in Appendix M:

1. Total percentage of facilities requiring MFPPPs that were inspected during the reporting year;
2. A narrative summary of municipal facilities inspection results, including a summary of deficiencies noted and corrective actions taken, if any; and
3. A summary of MS4 facilities maintained (by MS4 facility type) during the reporting year.

Additionally, a map of the Whitewater River Region which identifies the most current MS4 Permit boundary, Receiving Waters and Major MS4 Outfalls will be submitted collectively by the Permittees with each Annual Report.

Each year in the Annual Report, the Permittees evaluate their respective Permittee Facilities and Activities programs by utilizing the reported data specified above to assess whether the following program goals have been achieved:

1. Maintain a current map of Major MS4 Outfalls, Receiving Waters, and the MS4 Permit boundary;
2. For facilities with outdoor materials storage or maintenance areas, confirm that BMPs described in each facility's MFPPP are implemented; and
3. Confirm that basins, inlets and open channels that are part of the Permittee's MS4 are maintained on the schedule developed by the Permittee.

If a Permittee finds that any of the above stated program goals have not been achieved during the reporting year, that Permittee will review applicable BMPs to identify program modifications which may be necessary. A workplan and schedule which addresses proposed program modifications will be developed and implemented by the Permittee, and included in its Annual Report. Because many program modifications take time to completely implement, applicable Permittees will provide status updates in their Annual Report, as necessary.

7.0 PUBLIC EDUCATION AND OUTREACH PROGRAM

7.1 Introduction

Public education and outreach is an essential part of a MS4 permit compliance program. Developing programs to increase public awareness and to involve the public can be an effective method for controlling pollution associated with Urban Runoff. Emphasizing the relevant impact of Urban Runoff to target audiences increases the likelihood that messages will be noticed and that the audiences will support and participate in program implementation. The Permittees have developed a strong area-wide Public Education and Outreach program.

To leverage finite resources, the Public Education and Outreach program may partner with various entities, including Riverside County's Waste Management Department, the Natural Resources Conservation Service, Resource Conservation Districts and University of California Cooperative Extension, to promote pollution prevention and environmental awareness. The Public Education and Outreach program maintains an Internet website that provides information to residents and businesses about the problem of Urban Runoff Pollution and offers simple Urban Runoff Pollution Prevention activities. The website also provides materials order forms for educational materials. The website also has a tracking mechanism for the number of queries. The website address is: <http://www.floodcontrol.co.riverside.ca.us/stormwater/>.

7.2 MS4 Permit Requirements

The 2013 MS4 Permit requires the Permittees to:

- ◆ Conduct education/outreach to the general public on impacts to Receiving Waters from littering, illegal dumping and other improper disposal of Wastes; and leakage or dumping of gasoline, oil and grease, antifreeze and hydraulic fluid from vehicles into the streets. (Section F.1.f.i.1)
- ◆ Conduct education/outreach to the general public on the impacts of dumping Pollutants, including Pollutants from landscaping and home maintenance activities, into MS4 facilities. (Section F.1.f.i.2)
- ◆ Conduct education/outreach to the general public about BMPs for residential car washing. (Section F.1.f.i.4)
- ◆ Conduct education/outreach to the general public on the proper application and management of pesticides, fertilizers and herbicides. (Section F.1.f.ii.1)
- ◆ Conduct education/outreach to the general public on the proper management of irrigation systems to prevent runoff to the MS4. (Section F.1.f.ii.2)
- ◆ Conduct education/outreach to the general public regarding the need to clean-up and properly dispose of pet waste. (Section F.1.f.iii.1).
- ◆ Make construction activities program public education materials available to contractors, operators, and Permittee staff, as appropriate. (Section F.1.f.iv.1).

- ◆ Conduct education/outreach to landowners, tenants, business owners, and industrial operations regarding the need to implement appropriate BMPs to control Non-Stormwater discharges and properly maintain outdoor material storage areas. (Section F.1.f.v.1).
- ◆ To promote the 1-800 hotline for reporting clogged storm drains, faded or missing catch basin decals or markers, illegal dumping from residential, industrial, construction and commercial sites into public streets, the MS4 and water bodies, and providing general Urban Runoff and BMP information.

7.3 Objectives

The Public Education and Outreach program element has established the following guiding objectives:

Outreach Objectives:

- ◆ Foster broad public awareness of water Pollution concerns;
- ◆ Increase public acceptance of Pollution Prevention activities to curtail everyday human behaviors that contribute to water quality problems;
- ◆ Educate/inform the general public, regulators and key local government and State decision makers on Urban Runoff conditions in Riverside County; and
- ◆ Promote stewardship of local water resources.

Program Management Objectives:

- ◆ Encourage/educate/inform the regulators, Permittee personnel and other key local government and State decision makers on the purpose, use and elements of the SWMP;
- ◆ Solicit public involvement in the development of local water quality programs;
- ◆ Focus on water quality issues specific to the Whitewater River Region;
- ◆ Coordinate public education efforts with adjacent Urban Runoff management programs and other related education programs to share resources, coordinate outreach efforts, and avoid duplication of effort; and
- ◆ Adapt public education programs and objectives, based on feedback surveys, monitoring data, and other methods, to address changing MS4 program needs and objectives.

Program management objectives serve as a management strategy for Public Education and Outreach program implementation and development. These objectives are achieved through techniques such as local coordination meetings, participation in regional organizational efforts, advertising and outreach to adjacent programs. Table 7-1 identifies secondary objectives and typical techniques used to implement them.

Table 7-1. Public Management Methods

Category	Potential Outreach Methods
SWMP Education (Section 7.5.2.1)	• NPDES Desert Task Force Committee • Personnel Training Programs • Coordination Meetings with other Departments/Agencies • Comments on CEQA Documents
Public Participation (Section 7.5.2.2)	• Information at Public Permit Counters • Public Workshops • Public Notifications • Posting Notices on Web Sites • Notification to Interested Parties
Program Coordination (Section 7.5.2.3)	• Participation in California Association of Stormwater Quality Agencies • Participation in various Watershed Management Efforts • Direct contact with adjacent or overlapping program managers (Stormwater, Waste, others)
Adaptive Management (Section 7.5.2.4)	• Surveys of attendants of public fairs and events • Online web surveys • Review of monitoring data • Participation in surveys organized and coordinated by other local/State agencies • Staff Feedback • Incorporation of new State or Federal guidelines or information

7.4 Implementation

7.4.1 NPDES Desert Task Force Advisory Committee

The DTF provides oversight and guidance for the implementation of the Public Education and Outreach program in the Whitewater River Region. The District's Public Education Coordinator works directly with the DTF on the development and implementation of the Public Education and Outreach program in the Whitewater River Region.

7.4.2 Program Framework

The Public Education and Outreach program is implemented at a countywide, regional and local level. The following subsections describe how the Public Education and Outreach program is implemented at each level.

7.4.2.1 Countywide Level

As Principal Permittee for the County's three MS4 permits, the District is the administrator for the Public Education and Outreach program and is responsible for developing a consistent and effective message on Urban Runoff Pollution prevention throughout the County. This countywide program consists of developing a program image and core message, implementing countywide education programs, and coordinating countywide events and interagency activities. The Public Education and Outreach program maintains a consistent look, theme and focus of the public education materials in each region to promote familiarity in most communities. Countywide public education activities coordinated by the District can include school education programs, distribution of public education materials to countywide inspection programs, participation in State organizations such as CASQA, coordinating with and taking the lead with other county agencies on various advertising campaigns, developing a look and theme for all public education materials and operation of the County's 24-hour toll-free pollution hotline (800-506-2555).

7.4.2.2 Regional Level

The Public Education and Outreach program is also tailored for each of the three regions in the County. This approach integrates elements of the countywide program while focusing on the specific geography and water quality issues of the area and allows the program to address the impacts of local activities on local water quality. The District incorporates regional public education requirements established by each

region's MS4 permit. Regional public education needs are established through formal and informal public education committees who discuss public education requirements and funding requirements each year. Regional public education programs may include participation in large community fairs, customized public education materials to address regional water quality issues, and participation in other local agencies' regional public education efforts.

7.4.2.3 Local Level

Each Permittee may also undertake public education activities to address local needs or MS4 Permit requirements. These local activities may include distribution of public education information during construction site, and commercial and industrial facilities inspections; distribution of public education materials at front counters, local fairs and other community activities; and/or development of specific public education programs/materials to address specific local needs.

7.5 Program Components

The following subsections identify specific programs implemented by the Permittees to address program objectives. These programs are adaptively managed by the Permittees to meet the changing needs of the Public Education and Outreach program based on changing regulations, water quality conditions, and feedback surveys.

7.5.1 Outreach Objectives

7.5.1.1 Public Behavior Education Program

The following programs are implemented to foster broad public awareness of water Pollution concerns, increase public acceptance of Pollution Prevention activities to curtail everyday human behaviors that contribute to water quality problems, and to promote stewardship of local water resources:

- ◆ **School Education Outreach.** Outreach to school children fosters an environmental ethic in the next generation that may help prevent Pollution of Urban Runoff. Implementation of this element may combine multiple elements – assembly presentations, teacher workshops and field events. The program is implemented through a contract with S. Groner Associates, Inc., and currently focuses on 3rd through 5th grade.
- ◆ **Partnerships.** As appropriate, the Permittees may partner with several agencies, including:
 - Animal Care Services. Riverside County Community Health Services provides independent and various pet owner services, including pet licensing and patrol services to contracted cities and unincorporated areas of the County. County Community Health Services may partner with the Public Education and Outreach program to distribute educational materials that provide guidelines for pet care activities.
 - Riverside County Waste Management Department. Riverside County Waste Management Department (RCWMD) manages the recycling and composting programs and utilizes a variety of educational materials to recommend alternatives for reducing, reusing and recycling of unwanted hazardous products and food wastes. The Public Education and Outreach program may coordinate with RCWMD to promote the proper disposal of unwanted waste in media print as well as at outreach events. For example, the Permittees contribute funds towards the operation and maintenance of several Antifreeze, Battery, Oil and Paint

(ABOP) and HHW Recycling centers, both fixed and mobile, throughout the Region. In further support of this activity, the Permittees, RCWMD and Environmental Health coordinates the development of several outreach materials that identify the times and locations of HHW/ABOP recycling activities. These materials may include distribution of an environmental calendar at public events, as well as a brochure regarding HHW/ABOP disposal that describes how and where to properly dispose of HHW/ABOP items.

- Public Outreach Events. Participation in several public outreach events that may include the Tamale Festival and Date Festival.

7.5.1.2 Business Specific Education Program

The business education program consists of the development and distribution of formal BMP guidance for target business activities including mobile detailing businesses, automotive service center and restaurant cleaning operations, and outreach to business associations. The business specific public education program also provides education to the business community regarding the State Board's General Industrial Permit. The business specific education efforts currently include:

- ♦ **Retail Food Services Inspection Program.** This program focuses on the inspection of retail food facilities. During stormwater compliance surveys, retail food establishments can be provided with brochures identifying BMPs that should be employed while performing various maintenance activities. In addition, Permittee inspection staff discuss common Pollution Prevention activities that retail food services facilities can undertake to prevent Pollution of Urban Runoff. The inspectors generally review appropriate methods for cleaning of dumpster and grease bin areas, replacement of leaking or dirty dumpsters, reducing liquid waste in trash and double bagging trash to prevent leaks, encouraging dry sweeping and using dry methods for spill clean-up; disposing of wash water to the sanitary sewer rather than the MS4, stopping spills at their source, and proper maintenance of outdoor grease interceptors.
- ♦ **Industrial/Commercial Business Inspection Program.** As described in Section 3.1 above, Permittee inspection staff routinely inspect hazardous material permit facilities (permitted under the Unified Program, Title 27 of the California Code of Regulations) for compliance with their Stormwater Ordinances. During inspections, inspectors routinely distribute appropriate Stormwater Pollution Prevention brochures and/or posters to business owners, as appropriate. They also distribute brochures regarding the requirements of the General Industrial Permit. In addition, inspectors discuss common Pollution Prevention BMPs that facilities can undertake to prevent Stormwater Pollution. Common activities discussed include proper disposal of automotive fluids, working on transmissions, engines, and miscellaneous repairs, preventing and cleaning up leaks and spills/dry method clean up; control of wastewater discharges, vehicle fueling and battery removal and storage, solvent and grease management, metal grinding and finishing; storing and disposal of waste, outdoor parking and wash water management during outdoor cleaning, and steam cleaning practices.
- ♦ **Construction Inspection Program.** Construction project inspections ensure compliance with Permittee ordinances and coverage under the Construction General Permit. During these inspections, the inspectors discuss appropriate methods to prevent Pollutants from being mobilized at Construction Sites. In addition, Permittees inform contractors, operators, and staff about upcoming educational and training workshops on construction site erosion control and

construction materials management sponsored by professional organizations and public agencies. Permittees also make associated public education materials available at the public counter, as appropriate.

- ◆ **New Development Reviews.** The Permittees review development projects for compliance with the WQMP and Section 4 of the SWMP. During this review, the Permittees discuss appropriate BMPs with developers and engineers to ensure that reasonable Site Design BMP concepts, Source Control, and LID/Site Design and/or Treatment Control BMPs are incorporated to protect downstream Receiving Waters.

7.5.1.3 Potential Pollutants Education Program

The District has developed a number of brochures and outreach methods to address specific targeted pollutants such as fertilizers, pesticides, household hazardous waste chemicals, antifreeze, oil, batteries, and paint.

- ◆ **Partnerships.** The District often partners with several agencies to communicate program messages, including:
 - Riverside County Waste Management Department
 - Riverside County Agricultural Commissioner
 - Riverside County Code Enforcement
 - Air Quality Management District
 - Coachella Valley Water District
 - Natural Science Collaborative
 - Groundwater Guardians

7.5.2 Program Tools

Pollution Prevention based education BMPs is a major focus of the outreach program. Table 7-2 identifies typical audience and outreach programs for the three categories of the outreach program.

Table 7-2. Public Education and Outreach Methods

Category	Audience	Potential Outreach Methods
Public Behavior	Residents; General Public	• Pamphlets • Brochures • Calendar • Radio • TV/Cable • Billboards • Utility Bill Inserts • Door Hangers • Newspaper Inserts • Direct Mail • Advertisements • Community Events • Surveys • Community Presentations • Internet Website • 1-800 line
	Students	• Classroom Presentations • DVDs & Videos • Workbook Materials • Children's Workshops • Contests • Internet Website
	Home Gardeners	• Focused Brochures • Posters • Composting Workshops • Newspaper Inserts • Home & Garden Shows • Flower Shows
Business Activity	Commercial; Industrial (restaurants, automotive service centers, gasoline service stations, pavement cutting, etc.)	• Brochures • Posters • Site Inspections • Trade Shows • Shelf Talkers
	Mobile Operators (auto maintenance; vehicle washing; mobile carpet, drape and furniture cleaning; mobile steam cleaning)	• Brochures • Information at Public Permit Counters • Site Inspections (base of operations) • Trade Shows • Chambers of Commerce • Business License Counters
	Groundskeepers, landscape installation, nurseries, greenhouses	• Focused Brochures • Posters • Workshops • Newspaper Inserts
	Architects; Developers	• Focused Brochures • Information at Public Permit Counters • WQMP Workshops • Information at Public Planning Counters • Riverside County Stormwater Quality BMP Design Handbook for Low Impact Development
	General Contractors; Construction Contractors	• Focused Brochures • Information at Public Permit Counters • Site Inspections
Potential Pollutants	Users or Generators of fertilizers, pesticides, chemicals, and other pollutants	• Pamphlets • Brochures • TV/Cable • Utility Bill Inserts • Newspaper Inserts • Advertisements • Community Events • Community Presentations • Surveys • Internet • Licensing

The potential outreach methods and applications include:

- ◆ **Brochures and other Printed Materials.** As appropriate, brochures, posters, pamphlets and fliers are developed and distributed to address topics including illegal dumping, disposal of HHW and Antifreeze, Batteries, Oil and Paint, car washing, fertilizer, pesticide and household chemical use, pet care, mobile businesses including outdoor cleaning, pool and spa maintenance, septic tank maintenance, home lawn and garden care, construction site supervision, automotive maintenance and car care, industrial and commercial facilities, and the food service industry. Additionally, various materials including shop cloths, dust pans, U Mix-it spray bottles, etc., are provided free of charge to the public at community events to promote pollution prevention activities.
- ◆ **1-800 Hotline.** The District operates a countywide 1-800 hotline number to encourage the public to report clogged storm drains and illegal dumping from residential, industrial, construction and commercial sites into public streets, MS4 facilities and water bodies. This hotline is capable of receiving reports in both English and Spanish 24 hours per day seven days per week.
- ◆ **Website.** The District operates a website that provides information on how to report illegal dumping and clogged storm drains, as well as provides information on upcoming activities, opportunities for public participation in program development, and general information about Urban Runoff pollution prevention. The website also provides information for children and

teachers, as well as an online media library and materials order form. The link to the District's Stormwater website can also be found on many of the Permittees' individual web pages for the public to access:

<http://www.floodcontrol.co.riverside.ca.us/stormwater/>

- ◆ **Community Events.** Participation in several public outreach events may include the Tamale Festival and Date Festival. Additionally, information and materials may be delivered to business people during trade shows, trade meetings, or other appropriate community events.
- ◆ **Media Outreach.** The Permittees may implement radio, television and/or billboard campaigns to deliver Pollution Prevention concepts and information to the public.

7.5.3 Management Objectives

The general public is provided opportunities to participate in the development of compliance documents, to train Permittee staff on the purpose, requirements and implementation of the programs outlined in the SWMP, to ensure that a consistent and cost effective message is brought to the public by coordinating with other regional education programs, and to ensure that the public education message is adaptively managed to ensure that it keeps up with the most recent regulatory requirements, watershed information, and changing MS4 program needs and objectives.

7.5.3.1 SWMP Education

The District has incorporated methods into their SWMP programs to ensure that regulators, Permittee personnel and other key local government and State decision makers are educated regarding the purpose, use and requirements of the SWMP. The following paragraphs describe some of the specific practices used:

- ◆ **DTF** – At least quarterly, the Whitewater River Region Permittees meet to discuss progress on SWMP development, upcoming activities, changes to the regulatory framework, and to present information on available latest BMP technologies. Special presentations are also occasionally made by other NPDES permit holders to discuss their programs and how they inter-relate with our programs. These meetings are open to the public, and members of regulatory agencies and other local government and State agencies are invited to attend, particularly when issues affecting their operations are addressed.
- ◆ **Permittee Staff Training Programs** – The District offers training at least twice a year for groups of Permittee staff that follow four broad categories of activities: Construction Inspection, New Development Review, Municipal Activities, and Industrial and Commercial Facility Inspection. These training programs provide a broad overview of the NPDES regulatory framework, discuss other State permits that impact Permittee activities and discuss SWMP requirements and BMPs to be deployed during those activities. The Permittees continue to review and improve the adequacy of the existing staff training programs. The Permittees may also seek to work with neighboring MS4 programs to cooperate in the development of staff training materials.
- ◆ **Coordination Meetings with Other Agencies/Departments** – As needed, the Permittees may coordinate with other local governments and State agencies to discuss the requirements of the SWMP and the MS4 programs. These meetings are used to coordinate agency activities.

- ◆ **Comment on CEQA Documents** – Each Permittee reviews CEQA documents for public and private projects in their jurisdictions. The CEQA review includes specific questions regarding water quality and compliance with the SWMP and local ordinances. These questions help to ensure that other public and private entities are aware of requirements for management of Urban Runoff.

7.5.3.2 Public Participation

In order for the SWMP to be an effective planning tool for reducing Pollutants in Urban Runoff, it is essential to educate both the general public and other agencies on the purpose, requirements and implementation of programs outlined in the SWMP. The public participation process integrates public values into the planning, decision-making and problem-solving process. Under the public participation approach, interested and affected persons are afforded opportunities to influence the planning and decision-making process prior to the identification of a recommended solution. This approach allows solutions to public sector problems to be developed that are much more likely to be acceptable to the public, and therefore, implementable. The following methods are used to facilitate the public participation process:

- ◆ **Open Meetings** – The Permittees currently hold DTF meetings regarding the ongoing implementation of the SWMP and related water quality regulatory programs. These meetings are open to the public, and they may provide comment on any activity that the District is undertaking in support of the SWMP.
- ◆ **Public Notice** – The Regional Water Board posts public notices on their website and in local newspapers, to notify the public of the release of draft compliance documents. These notices identify the period in which public comment will be accepted, where public comments may be submitted, and where printed copies of documents or supporting information is available for review.
- ◆ **Public Workshop** – The Permittees may use formal or informal public workshops to facilitate an interactive discussion on draft compliance documents. These public workshops are usually publicly noticed at least two weeks prior to their date and are usually held in conjunction with publicly noticed comment periods.
- ◆ **Community Meetings** – The District may use community meetings, such as city council meetings, Board of Supervisors meetings, or other forums, to solicit comments from the public and staff from other agencies.

7.5.3.3 Program Coordination

The public education program is coordinated with related programs at the local, State and national level. Such programs include Stormwater Pollution programs being developed in counties adjacent to Riverside County and throughout California; environmental education programs at the community level offered through other local agencies, environmental organizations, or schools; and county-wide or municipal efforts to promote ride-sharing, recycling, water conservation, and proper Household Hazardous Waste disposal. These programs are coordinated to deliver a consistent message regarding Urban Runoff to the public.

The Permittees may coordinate activities with several agencies and entities including the San Bernardino County MS4 Program; San Diego County MS4 Program; Orange County MS4 Program; CASQA; RCRCDD, and Mission Resource Conservation District; County DEH, County Agriculture, Building Industry Association, RCWMD, County Economic Development Agency, County Auditor-Controller's Office, the Regional Water Quality Control Boards, Air Quality Management District and Caltrans.

7.5.3.4 Adaptive Management

The success of the Public Education and Outreach program will depend on its ability to assess its effectiveness and adapt to changing water quality issues within each region of Riverside County. The following tools may be used by the Permittees to assess the effectiveness of the Public Education and Outreach program or to determine changing needs:

- ◆ **Monitoring Data** – The Permittees are collecting Urban Runoff monitoring data from each region of Riverside County. This data is analyzed for trends in Pollutant loading and to see if Pollutant problems can be tied to particular activities or land uses. This data may be used to modify the Public Education and Outreach Program to address potential Pollutant problems or activity problems within specific regions or countywide.
- ◆ **Public Surveys** – The Permittees either conduct surveys, or may coordinate with others who have conducted surveys to assess the effectiveness of Permittee public education outreach activities. Where feasible, the Permittees conduct a Stormwater survey of attendees at community fairs. Results from these surveys are used to adaptively manage the Public Education and Outreach program.
- ◆ **Staff Feedback** – The Permittees may modify the Public Education and Outreach program based on staff feedback or knowledge of water quality issues affecting Riverside County or specific regions of Riverside County.
- ◆ **Incorporation of New State or Federal Guidelines** – The Permittees may modify the Public Education and Outreach program to address changes to the regulatory framework or regulatory requirements for specific SWMP related programs or activities.

7.6 General Education and Outreach

General education and outreach focuses on activities such as vehicle washing and maintenance, landscaping, home maintenance, illegal dumping, and pet ownership.

7.6.1 Vehicle Washing and Maintenance

The Public Education and Outreach program can provide information on vehicle washing and maintenance related Pollution Prevention BMPs through distribution of brochures, and flyer advertisements, presentations to student and adult audiences, etc.

The Public Education and Outreach program informs the general public of Pollution Prevention BMPs related to vehicle washing and maintenance. The RCWMD implements motor oil recycling programs to encourage the proper disposal of used motor oil. The Public Education and Outreach Program provides education to the general public on the impacts of the following activities on Receiving Waters:

- ◆ Leakage or dumping of gasoline, oil and grease, antifreeze and hydraulic fluid from vehicles into the streets.

7.6.2 Landscaping

The Public Education and Outreach program has developed a landscape and gardening brochure to inform residents of the adverse effects of Pollution of Urban Runoff caused by improper landscaping techniques, and to offer environmentally safe alternatives such as Integrated Pest Management and composting. The brochures are distributed to the general public via local nurseries, garden workshops conducted by the Agricultural Commissioner and UC Riverside Cooperative Extension.

The Public Education and Outreach program provides display units with information on Urban Runoff Pollution, household hazardous waste, less toxic home gardening alternative products, etc. at public outreach events, and will continue to implement the following activities to promote landscaping activities that are protective of Receiving Waters:

- ◆ Conduct education/outreach to the general public on the proper application and management of pesticides, fertilizers and herbicides, as well as the proper management of irrigation systems to prevent runoff to the MS4. Where appropriate, the Public Education and Outreach program will coordinate with the Soil Conservation Service, Resource Conservation Districts, and UC Cooperative Extension.
- ◆ Conduct education/outreach to the general public of the impacts of dumping Pollutants into the MS4.

7.6.3 Home Maintenance

The Public Education and Outreach program has developed a brochure to educate residents on the importance of proper disposal of household hazardous wastes, as well as offer less toxic alternatives to commonly used household products. The Permittees also sponsor HHW collection events and ABOP centers to encourage the proper disposal of household hazardous wastes.

The District addresses home maintenance related issues through the HHW collection events and ABOP centers. The public education efforts may include newspaper inserts, brochures, presentations, etc. as methods to inform the general public of the proper disposal of household hazardous wastes and to offer less toxic alternative products. The Public Education and Outreach program will continue to implement the following activities to promote home maintenance activities that are protective of Receiving Waters:

- ◆ Conduct education/outreach to the general public on the impacts of dumping Pollutants into the MS4.
- ◆ Continue to support the efforts of the HHW Program to provide a convenient means to properly dispose of oil, antifreeze, pesticides, herbicides, paints, solvents, and other potentially harmful chemicals.

7.6.4 Illegal Dumping

Environmental educational tools including brochures and video have been developed to inform the general public of the impacts on Receiving Waters resulting from the improper disposal of Pollutants. In addition, an MS4 facility marking program has also been implemented to remind residents that no dumping is allowed. The Public Education and Outreach program implements the following activities to promote residential waste management activities that are protective of Receiving Waters:

- ◆ Conduct education/outreach to the general public on the impacts of littering, illegal dumping and other improper disposal.
- ◆ Educate/inform the general public on the impacts of dumping Pollutants into the MS4.

7.6.5 Pet Ownership

The importance of proper clean-up and disposal of pet waste has been addressed and emphasized throughout the Public Education and Outreach program campaign in various formats including educational brochures, flyers, and related promotional materials. The intent is to increase awareness of the adverse effects of improper disposal of pet waste and to promote responsible pet care to prevent Pollution of Urban Runoff.

The Permittees will continue to use an area-wide Public Education and Outreach Program to inform pet owners of the importance of responsible pet care and to curtail the improper disposal of pet wastes. The Public Education and Outreach program also distributes a "focused" brochure for pet owners on proper disposal of pet wastes. The Public Education and Outreach Program will continue to implement the following activities to promote pet ownership activities that are protective of Receiving Waters:

- ◆ Conduct education/outreach to the general public regarding the need to clean-up and properly dispose of pet waste.
- ◆ Continue to implement and enforce leash laws and other pet laws (i.e., pet waste clean-up, no pets in public areas) in selected public-use areas.

7.7 Program Data Tracking, Annual Reporting and Evaluation/Assessment

Evaluation and assessment of BMP performance is performed through year-round program documentation, annual analysis of program data, and Annual Reporting. The Permittees maintain the following Public Education and Outreach program records:

1. Number of public education outreach events conducted, by type (construction, industrial, residential, new development, schools, general public, etc.), including approximate attendance where applicable;
2. HHW collection program activities including:
 - Event dates and number of days per event;
 - Type and amount of material collected; and
 - Advertisement impressions by type (newspaper, television, radio, banners, flyers, etc.).
3. Records of Permittee staff trained, including topic, date and number of staff trained;
4. Usage (call volume) of the "Only Rain Down the Storm Drain" Pollution Prevention Program hotline;
5. Copies or records of public education materials utilized and/or made available to the general public and target audiences during Permittee education/outreach activities; and
6. Public surveys and impression counts, to be gathered where feasible.

To prepare Annual Reports, the Permittees extract data from the program records specified above, and provide the following information on the Annual Report forms included in Appendix M:

1. A narrative summary of Public Education and Outreach program accomplishments or issues encountered during the reporting year;
2. The number of public education outreach events conducted during the reporting year, by type (construction, industrial, residential, new development, schools, general public, etc.), including approximate attendance where applicable;
3. A summary of type(s) and numbers, where feasible, of outreach materials distributed during the reporting year; and
4. Number of Permittee staff trained during the reporting year; including topic (municipal, industrial/commercial, construction, New Development) and date.

Each year in the Annual Report, the Permittees evaluate their respective Public Education and Outreach programs by utilizing the reported data specified above to assess whether the following program goals have been achieved:

1. Conduct education/outreach to the general public on the impacts of improper disposal of pollutants into MS4s;
2. Develop and distribute targeted BMP guidance for specific pollutants and residential and business activities; and
3. Confirm that Permittee employees are trained to implement MS4 Permit compliance programs.

If a Permittee finds that any of the above stated program goals have not been achieved during the reporting year, that Permittee will review applicable BMPs to identify program modifications which may be necessary. A workplan and schedule which addresses proposed program modifications will be developed and implemented by the Permittee, and included in its Annual Report. Because many program modifications take time to completely implement, applicable Permittees will provide status updates in their Annual Report, as necessary.

8.0 MONITORING PROGRAM

8.1 Introduction

The overall goal of the Permittees' water quality monitoring program for the Whitewater River Region is to collect data for the ultimate purpose of characterizing Urban Runoff discharges from the MS4 and to determine the impacts of those discharges on Receiving Waters, where applicable and feasible. The District and the CVWD jointly implement the monitoring program and each district conducts monitoring activities in its respective jurisdiction. The District coordinates monitoring in the Whitewater River Region with required surface water quality sampling activities in two other MS4 Permit areas in Riverside County through the Consolidated Program for Water Quality Monitoring (CMP).

The current water quality monitoring program was established when the Regional Water Board adopted Monitoring and Reporting Program No. 96-015 with the first-term MS4 Permit in 1996. Since inception, the program has included monitoring the quality of wet and dry weather MS4 discharges and Receiving Waters.

8.2 Goals and Objectives

Since inception of the Whitewater MS4 Urban Runoff program in 1996, the objectives of the monitoring program have continually been evaluated and adjusted as necessary to best support the direction of the Urban Runoff program, and reflect lessons learned through regional program implementation and analysis of water quality data. For the 2013 MS4 Permit term, the major objectives of the Whitewater River Region monitoring program are:

- ◆ Objective 1: Develop and support an effective Urban Runoff management program;
- ◆ Objective 2: Collect monitoring data from designated MS4 Outfall stations in order to characterize Pollutants associated with Urban Runoff in the region;
- ◆ Objective 3: Determine the impact of Urban Runoff on the Beneficial Uses of regional Receiving Waters;
- ◆ Objective 4: Collect monitoring data from the only perennially flowing Receiving Water in the region (i.e., the lower 17-mile reach of CVSC) during Wet and Dry Weather conditions to evaluate the health of the CVSC; and
- ◆ Objective 5: Analyze and interpret the collected data to identify long term trends, if any, both to maintain existing Receiving Water quality through the implementation of BMPs, and to track water quality improvements which may be observed as a result of the MS4 management program.

Based on these objectives, the monitoring program of the 2013 MS4 Permit includes:

- ◆ In lieu of Dry Weather sampling, an IC/ID program that encourages identification and elimination of sources of illicit Dry Weather flows;
- ◆ The removal of requirements to analyze for those Priority Pollutants which have seldom or never been detected in regional MS4 discharges;

- ◆ Requirements to maintain more detailed records of field observations at monitoring sites, in an effort to track and substantiate the ephemeral nature of the watershed;
- ◆ Removal of the Upper Whitewater River Receiving Water monitoring station in favor of focused monitoring at the Region's one perennially flowing Receiving Water monitoring station at CVSC; and
- ◆ A streamlined Annual Monitoring Report format which, for the 2015-2016 reporting year, will additionally include analysis of long term trends and BMP effectiveness. The findings of the 2015-2016 Annual Monitoring Report will be used to support development of the 2017 Report of Waste Discharge.

8.3 Whitewater River Region Water Quality Monitoring Program

8.3.1 Data Management

Chemical data allow for comparisons with Basin Plan Water Quality Objectives, other benchmarks, and for comparisons between the monitoring stations. However, an understanding of potential water quality impacts on Receiving Waters requires an understanding of the flows throughout the MS4 and Receiving Waters.

The District uses a proprietary integrated hydrology/water quality data management system known as Hydstra¹¹. The Hydstra system supports the export of water quality and hydrologic data to a variety of commonly used electronic formats. The District's monitoring database contains approximately 8,000 discrete samples, including analysis results for over 75 chemical constituents for most samples and as extensive as over 200 chemical constituents per sample.

The measurement of chemical constituents in Urban Runoff at the trace level is often difficult due to inherent variability of environmental samples, field sampling techniques, and analytical techniques. The CMP outlines the quality assurance/quality control (QA/QC) procedures implemented to protect the integrity of water quality data gathered for the monitoring program. The QA/QC program is designed to enable an evaluation and validation of the analytical data for representativeness, accuracy, and precision. The CMP includes separate descriptions for the field and laboratory portions of the QA/QC program.

Records containing monitoring information include:

- ◆ The date, exact place, and time of sampling or measurement(s);
- ◆ The individual(s) performing sampling or measurement(s);
- ◆ For MS4 Outfall monitoring, visual observations of:
 - 1) The presence or absence of discharge from the monitored Outfall;
 - 2) Presence or absence of surface flow in the Receiving Water which the Outfall discharges to;
 - 3) Conditions permitting, presence or absence of connectivity of flow from the Outfall being monitored to its associated Receiving water; and

¹¹ The use of company, trademark or brand names does not constitute a recommendation of a particular product.

- 4) If conditions are safe enough, estimations of flows of both the Outfall being monitored and its associated Receiving Water.
 - ◆ The date(s) analyses were performed;
 - ◆ The analytical techniques or method used; and
 - ◆ The results of such analyses.

Records of monitoring information, including calibration and maintenance records, and copies of reports required by the 2013 MS4 Permit will be retained for a period of at least three years from the date of the sample, measurement, report, or application.

8.3.2 Source Identification

The monitoring program includes Dry Weather MS4 Outfall sampling to characterize non-storm Urban Runoff throughout the region, and to support efforts to identify and eliminate IC/IDs to the MS4. If evidence of irregular flow or water quality conditions is observed during these monitoring events, and IC/ID activity is suspected, monitoring staff document case information, and forward that information on to the Permittee having jurisdiction over the tributary area of the MS4 Outfall to conduct a source investigation. Additional monitoring may be conducted if necessary to characterize or document the IC/ID (oil and grease, etc.) or for use in follow up enforcement actions against sources of an IC/ID.

8.3.3 MS4 Characterization

The District has developed a system of MS4 maps to show District facilities using a Geographic Information System (GIS) application known as ArcGIS. The ArcGIS format includes the MS4 depicted over aerial photographs of the Whitewater River Region. Primary regional features are shown on the map, such as Receiving Waters, MS4 Outfalls and the MS4 Permit boundary. The MS4 maps are annually updated to include the MS4 facilities of all Permittees; updated MS4 maps are submitted with the Annual Report.

8.3.4 Water Quality Monitoring

An effective monitoring program characterizes Urban Runoff discharges, identifies problem areas, and determines the impact of Urban Runoff on Beneficial Uses of Receiving Waters. However, due to the limited annual rainfall and the ephemeral nature of most Receiving Waters within the Whitewater River Region, collecting sufficient wet and dry weather data to characterize discharges from the MS4 and assess improvement or degradation in water quality due to Urban Runoff can be challenging at best. There is only one Receiving Water with perennial flow that may be impacted by Urban Runoff under normal hydrologic conditions in the Whitewater River Region, the lower 17-mile reach of CVSC.

Although local climate and hydrology make consistent sample collection difficult, it is feasible to safely collect data from MS4 outfalls and certain Receiving Water stations during daylight hours of Wet Weather monitoring events that do not result in flash flood warnings and/or watches. Continual efforts to collect data for the ultimate purpose of characterizing Urban Runoff discharges, assessing the effectiveness of implemented BMPs, and determining the impacts of those discharges on Beneficial Uses of Receiving Waters, will continue where applicable and feasible.

Table 8-1 outlines all monitoring stations implemented under the CMP since the initial MS4 permit application in 1995-1996. Of these sites, two MS4 Outfall and one Receiving Water station will be used

throughout the term of the 2013 MS4 Permit. MS4 Outfall data gathered by the City of Coachella in accordance with Phase I implementation of the CVSC Bacterial Indicator TMDL will be incorporated into Annual Monitoring Reports by reference.

Table 8-1. Historical Whitewater River Region Sampling Sites

ID	Site Name	Receiving Water	Type	Years Sampled (Fiscal Years, July 1 - June 30)																	
				1995 1996	1996 1997	1997 1998	1998 1999	1999 2000	2000 2001	2001 2002	2002 2003	2003 2004	2004 2005	2005 2006	2006 2007	2007 2008	2008 2009	2009 2010	2010 2011	2011 2012	2012 2013
				Application	1st Term Permit (1996 Permit)					2nd Term Permit (2001 Permit)							3rd Term Permit (2008 Permit)				
407	Palm Springs Line 27, Sunrise SD	Tahquitz Wash	Outfall <i>Background</i>	X	X	X	X	X	X	X	X	X	X	X	X	X					
782	Ramsey St Storm Drain	San Geronio River	Outfall	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
785**	Ave 52 SD**	CVSC	Outfall					X		X	X	X				X	X	X	X	X	X
798	Whitewater River at I-10	Whitewater River	Receiving Water	X																	
799	Whitewater River at Sinatra Dr.	Whitewater River	Receiving Water			X												X			
802	Farrel Basin	Chino Cyn Wash	Outfall		X	X	X	X		X	X										
810	Chino Cyn Wash at Hwy 111	Whitewater River	Receiving Water <i>Background</i>		X	X				X								X			
811	Date Palm Dr	Whitewater River	Outfall		X				X			X	X			X					
812	Tahquitz Cyn Wash at Hwy 111	Whitewater River	Receiving Water <i>Background</i>		X	X	X			X								X			
813	Upper Whitewater River at Cyn Rd.	Whitewater River	Receiving Water <i>Background</i>		X	X	X	X			X	X	X	X	X	X	X	X	X		
814	Whitewater River at Ave 72	Salton Sea	Receiving Water		X	X	X	X	X												
815	Palm Cyn Wash at Araby Dr.	Whitewater River	Receiving Water <i>Background</i>														X	X			
817	Portola Ave SD	Whitewater River	Outfall		X					X				X			X	X	X	X	X
819	Monroe St. SD	CVSC	Outfall				X				X				X						
884	CVSC at Ave 52	CVSC	Receiving Water														X	X	X	X	X

Site Names in **bold type** indicates monitoring stations for the 2013 MS4 Permit term.

** Denotes site which will be monitored by the City of Coachella in accordance with Phase I implementation of the CVSC Bacterial Indicators TMDL.

8.4 Program Implementation

Monitoring will be conducted for field parameters and Constituents of Concern as described in the following:

Field Parameters

- ◆ Water temperature (°C);
- ◆ pH;
- ◆ Electrical Conductivity (EC, mS/cm or µS/cm);
- ◆ Turbidity (NTU); and
- ◆ Dissolved Oxygen (DO, mg/L).

Additional parameters may be collected if necessary to characterize or document the IC/ID (oil and grease, etc.) or for use in follow-up enforcement actions against sources of an IC/ID. The minimum levels of analysis for the field parameters will be monitored at the appropriate minimum levels and units for comparison with Basin Plan Water Quality Objectives.

Constituents of Concern

Total Metals	Pathogen Indicator	Nutrients & Other
Antimony	<i>E. coli</i>	Nitrate as Nitrogen
Arsenic		Nitrite as Nitrogen
Barium		Total Kjeldahl Nitrogen
Beryllium		Total Nitrogen
Cadmium		Ammonia as Nitrogen
Chromium		Total Suspended Solids (TSS)
Chromium ⁶⁺		Total Dissolved Solids (TDS)
Copper		Total Phosphorous
Lead		Ortho Phosphorous
Mercury		Total Petroleum Hydrocarbons (TPH)
Nickel		Methylene Blue Activated Substances (MBAS)
Selenium		Ethylene Glycol
Silver		Oil and Grease
Thallium		
Zinc		

The minimum levels of analysis for the metals in the above table are as listed in Attachment C of the 2013 MS4 Permit; all other constituents will be monitored at the appropriate minimum levels and units for comparison with Basin Plan Water Quality Objectives.

Field Data Sheets

Sampling visits, including visits in which no water samples were collected, will be documented on field data sheets. At a minimum, the following will be documented:

- ◆ The date, exact place, and time of sampling or measurement(s);

- ◆ The individual(s) performing sampling or measurement(s);
- ◆ For MS4 Outfall monitoring, visual observations of:
 - 1) The presence or absence of discharge from the monitored Outfall;
 - 2) Presence or absence of surface flow in the Receiving Water which the Outfall discharges to;
 - 3) Conditions permitting, presence or absence of connectivity of flow from the Outfall being monitored to its associated Receiving water; and
 - 4) If conditions are safe enough, estimations of flows of both the Outfall being monitored and its associated Receiving Water.
- ◆ The date(s) analyses were performed;
- ◆ Type of sampling (wet weather, dry weather, IC/ID, grab or composite, bacteria);
- ◆ Results of field analyses (field parameters outlined above);
- ◆ Flow estimation or measurement;
- ◆ Other field observations and/or conditions; and
- ◆ Any procedural variances due to site conditions at the time of the event.

8.4.1 Wet Weather Monitoring

MS4 Outfall Monitoring – Wet Weather MS4 Outfall Monitoring is conducted for the purposes of evaluating long term trends in Whitewater River Region Urban Runoff. Results of Wet Weather MS4 Outfall Monitoring are discussed in the Annual Monitoring Report as described in Section 8.7.

The following stations will be monitored as indicated:

Outfall Monitoring Location	Minimum No. Events/Year	Sample Type	Constituents
Ramsey Street Storm Drain (Hydron # 782) 33° 48' 35.0", -116° 51' 31.5"	2	Grab	Field Parameters Constituents of Concern
Portola Ave Outfall (Hydron # 817) 33° 44' 16.8", -116° 22' 24.6"	2	Grab	

Limited annual rainfall within the Whitewater River Region can place constraint on collection of Wet Weather data. As such, the Permittees can only conduct Wet Weather MS4 Outfall monitoring during qualifying storm events that meet EPA's criteria and the CMP's Wet Weather mobilization criteria. As described in USEPA's NPDES Stormwater Guidance Document (USEPA 833-B-92-001[1]), a qualifying Wet Weather event meets the following criteria:

- ◆ The depth of the storm must be greater than 0.1 inch accumulation;
- ◆ The storm must be preceded by at least 72 hours of Dry Weather; and
- ◆ Where feasible, the depth of rain and duration of the event should not vary by more than 50 percent from the average depth and duration.

Receiving Water Monitoring – Wet Weather Receiving Water Monitoring assesses the health of the perennial reach of the CVSC during Wet Weather conditions. Results of the Wet Weather Receiving Water Monitoring are discussed in the Annual Monitoring Report as described in Section 8.7.

The following stations will be monitored as indicated:

Receiving Water Monitoring Location	Minimum No. Events/Year	Type of Sample	Constituents
CVSC at Avenue 52 Bridge (Hydron # 884) 33° 40' 20.9", -116°08'57.8"	1	Grab	Field Parameters Constituents of Concern

8.4.2 Dry Weather Monitoring

Dry Weather monitoring focuses on the field identification and elimination of IC/IDs.

MS4 Outfall IC/ID Monitoring – Due to the general ephemeral nature of the Whitewater River Region during Dry Weather conditions, IC/IDs to Receiving Waters from MS4 Outfalls can be identified by field inspections, using visual and/or olfactory indicators.

Where evidence of irregular flow or water quality conditions are observed during a MS4 Outfall IC/ID monitoring event, the Permittee(s) with jurisdiction over the outfall's tributary area will be notified of the potential IC/ID and be requested to conduct a follow-up IC/ID investigation. Results of IC/ID investigations are documented in the IC/ID database (see model format in Appendix E). SWMP Section 2.0 (Detection and Elimination of Illicit Connections and Illegal Discharges) describes requirements and procedures including identification, detection, investigation, enforcement, and reporting related to IC/ID. Volume V, Section 5 of the CMP (WWR Monitoring Plan) provides IC/ID inspection and field reconnaissance guidance that may be used to assess if a Pollutant source is potentially contributing to Receiving Water impairment.

Dry Weather samples from the following MS4 Outfall stations will be collected as indicated below. IC/ID monitoring will be conducted on a *quarterly* basis at the following stations to look for evidence of non-typical flow and water quality conditions for each site. Results of Dry Weather Monitoring are discussed in the Annual Monitoring Report as described in Section 8.7.

IC/ID Outfall Monitoring Location	Minimum No. Events/Year	Sample Type	Constituents
Ramsey Street Storm Drain (Hydron # 782) 33° 48' 35.0", -116° 51' 31.5"	4	Grab	Field Parameters <i>E. coli</i>
Portola Ave Outfall (Hydron # 817) 33° 44' 16.8", -116° 22' 24.6"	4	Grab	

Receiving Water Monitoring – Dry Weather Receiving Water Monitoring is conducted for the purposes of evaluating the health of the perennial portion of the CVSC during Dry Weather conditions. Results of Dry Weather Receiving Water Monitoring are discussed in the Annual Monitoring Report as described in Section 8.7.

The following station will be monitored as indicated:

Receiving Water Monitoring Location	Minimum No. Events/Year	Sample Type	Constituents
CVSC at Avenue 52 Bridge (Hydron # 884) 33° 40' 20.9", -116° 08' 57.8"	2	Grab	Field Parameters Constituents of concern

8.5 Special Studies

The MS4 Permit allows the Permittees, either individually or collectively, to continue participation in regional monitoring and scientific studies conducted by the Southern California Monitoring Coalition (SMC), the California Stormwater Quality Association (CASQA), and/or other regional groups or efforts in order to improve monitoring program design, parameter test methods, laboratory calibration, evaluate the effectiveness of BMPs, and/or advance the science and understanding of urban runoff impacts on Receiving Waters.

8.6 Total Maximum Daily Load (TMDL) Monitoring at CVSC

The perennial section of the CVSC, which begins at Valley Sanitation District's outfall in Indio and continues to the Salton Sea, has a Bacterial Indicator TMDL which received final approval from EPA on April 27, 2012. The City of Coachella is the only Whitewater River Region MS4 Permittee with Major MS4 Outfalls to the CVSC; therefore, the June 17, 2010 Basin Plan Amendment which establishes the TMDL names the City of Coachella as a responsible party.

In accordance with its Quality Assurance Project and Monitoring Plan (QAPMP) and Phase I of TMDL implementation, the City of Coachella performs monthly monitoring at each of its three (3) MS4 Outfalls to CVSC; gathered monitoring data is provided to the Regional Water Board on a quarterly basis. The monitoring data gathered by the City of Coachella in accordance with Phase I of the TMDL is incorporated into the Permittees' Annual Monitoring Report by reference.

8.7 Reporting

The Monitoring Report is a section of the Annual Report due to the Regional Water Board each year on March 1st. The monitoring report will include:

- ◆ Monitoring station locations;
- ◆ Frequency of sampling;
- ◆ Reference to quality assurance/quality control procedures utilized;
- ◆ Sampling and analysis protocols;
- ◆ Summary of the data/results;
- ◆ Methods of evaluating the data;
- ◆ Graphical summaries of the data; and
- ◆ Reference to the City of Coachella's monitoring data gathered in accordance with Phase I of the CVSC Bacterial Indicator TMDL.

In addition, monitoring reports include an analysis of the findings of each monitoring year. The analysis will identify water quality parameters which may have been measured outside of normal ranges for that parameter based on historic water quality data.

All monitoring reports shall use a standard report format and shall include the following:

- ◆ An introduction;
- ◆ Summary of Special Studies participated in during the reporting period;
- ◆ Comprehensive interpretations and conclusions; and
- ◆ Recommendations for necessary future actions.

The 2015-2016 Annual Monitoring Report will include identification and analysis of long term trends in Stormwater or Receiving Water quality and analyze long term trends for signs of Chronic Water Quality Concerns, if it is determined that any exist. The analysis will include identification of potential urban sources of chronic concerns, effectiveness of existing BMP control measures, and recommendations for necessary next steps. Next steps may include allowing for additional time to statistically confirm a Chronic Water Quality Concern, additional data collection necessary to examine urban sources, potential revisions to the SWMP to address urban sources found to be contributing to the chronic condition, or other similar measures necessary to confirm and/or address the condition. The analysis provided in the 2015-2016 Annual Monitoring Report will be used to facilitate preparation of the 2017 ROWD.

9.0 ANNUAL REPORTING, SWMP UPDATES AND REGIONAL PROGRAM EVALUATION/ASSESSMENT

9.1 Annual Reporting and Individual Program Evaluation/Assessment

By March 1st of each year, the Permittees prepare an Annual Report summarizing the implementation of the component program elements described in the SWMP for submittal to the Regional Water Board. Each Permittee utilizes the "Program Data Tracking, Annual Reporting and Evaluation/Assessment" sections located at the end of each chapter of this SWMP in preparing their individual reports, as these SWMP sections describe the targeted program information to be reported, and also provide guidance on how each Permittee should conduct annual evaluation and assessment of their respective program elements.

To support preparation of the Annual Report, the Permittees submit their individual reports to the District utilizing standardized reporting forms (see Appendix M). The reporting forms are amended by the Permittees, as needed, to facilitate changes in compliance programs or more accurate reporting of compliance programs. In addition to the reporting requirements specified in the, "Program Data Tracking, Annual Reporting and Evaluation/Assessment" sections of this SWMP, the Annual Reports provided by each Permittee include:

- ◆ A list of contact names identifying: a primary point of contact for the Permittee, the Permittee representative(s) designated to the Desert Task Force, and also who should be contacted to coordinate enforcement and inspection activities for the Permittee.
- ◆ Where applicable, Permittees which have entered into a land use agreement with the Agua Caliente Band of Cahuilla Indians (as described in 2013 MS4 Permit Finding #17) will include a brief description of SWMP implementation on those applicable tribal lands in their Annual Report.
- ◆ A certification statement page signed by a duly authorized representative of the Permittee.
- ◆ Other information as requested on the Annual Reporting forms sent out to Permittees.

The Co-Permittees work with the District to update the MS4 Permit Area Map (includes Receiving Waters, new MS4 Outfall locations and additions or modifications to major structural controls) each year; an updated MS4 Permit Area map is submitted with each Annual Report. Additionally, an executive summary describing significant regional Urban Runoff management program accomplishments or issues encountered during the reporting year is submitted collectively by the Permittees with the Annual Report.

9.2 SWMP Revisions and Updates

As necessary, the Permittees review and assess the component program elements of the SWMP to identify improvements that will promote the reduction of Pollutants in Urban Runoff while also supporting the responsible management and allocation of the public resources available to implement the SWMP. The SWMP may be revised by the Permittees to update dynamic factual information, to improve format and usability, and/or to reflect ongoing program development resulting from the program evaluation process. When revisions are made to the SWMP, the revised SWMP is submitted to the Regional Water Board with the Annual Report.

9.3 Regional Program Evaluation/Assessment

In addition to annually assessing the effectiveness of each individual Permittee's program, the Permittees will collectively conduct an assessment of the effectiveness of the Whitewater River Region program. This assessment will take place in the 2017 Report of Waste Discharge (ROWD), and will include:

- ◆ Changes in land use and/or population;
- ◆ Significant changes to MS4, major Outfalls, detention and/or retention basins or dams, and other major structural controls, including MS4 Permit Area map updates;
- ◆ Proposed revisions to the SWMP, based on program data gathered throughout the 2013 MS4 Permit term, and the data and analysis detailed in the 2015-2016 Annual Monitoring Report; and
- ◆ New or revised program elements and compliance schedules(s) necessary to comply with Sections D (Receiving Water Limitations) and G (Total Maximum Daily Loads) of the 2013 MS4 Permit.

Major accomplishments and changes proposed to be implemented during the subsequent MS4 Permit term to improve the effectiveness of the program may also be included in the evaluation.

10.0 TMDL IMPLEMENTATION

10.1 Introduction

Federal Clean Water Act Section 303(d) requires that States identify Receiving Waters that do not or are not expected to meet Water Quality Standards (Beneficial Uses, Water Quality Objectives (WQOs) and the antidegradation policy). Once a waterbody has been identified and placed on the 303(d) List of Impaired waters, States are required to develop a TMDL to address each Pollutant causing Impairment. A TMDL defines how much of a Pollutant a waterbody can tolerate and still meet Water Quality Standards (WQSs). Each TMDL must account for all sources of the Pollutant, including: discharges from wastewater treatment facilities; runoff from homes, forested lands, agriculture, and streets or highways; contaminated soils/sediments, legacy contaminants; onsite disposal systems (septic systems); and aerial deposition.

Federal regulations require that the TMDL, at a minimum, account for contributions from Point Sources (permitted discharges) and contributions from Non-Point Sources, including natural background. In addition to accounting for past and current activities, TMDLs may consider projected growth that could increase Pollutant levels. TMDLs allocate allowable Pollutant loads to each source, and identify management measures that, when implemented, will assure that WQSs are attained. State Water Code Section 13000 also requires the Regional Water Boards to develop implementation plans to define schedules, dischargers, tasks, and other actions necessary to attain WQSs.

This section summarizes applicable Permittees' programs to comply with TMDL WLAs and TMDL implementation plan tasks assigned to applicable Permittees through the incorporation of Water Quality Based Effluent Limits (WQBELs) into the 2013 MS4 Permit. It should be noted that TMDLs are waterbody specific, and, therefore, do not regulate all of the Permittees in the Whitewater River Region.

10.2 TMDL Implementation Strategy

USEPA's Interim Permitting Approach for Water Quality Based Effluent Limitations in Stormwater Permits, 61 Federal Register 43761 (Aug. 26, 1996) recognizes the need for an iterative BMP approach to control Pollutants in Stormwater discharges. In addition, USEPA recommends the use of the term "phased TMDLs" for TMDLs with significant data uncertainty where the State expects that the loading capacity and allocation scheme will be revised in the near future as additional information is collected¹².

The Regional Water Board describes the TMDL WLA and implementation requirements in the TMDL implementation plan. TMDL implementation plans assign responsibilities to specific dischargers to identify sources of Impairment, to propose BMPs to address those sources, and to monitor, evaluate and revise BMPs based on the effectiveness of the BMP implementation program. Once a TMDL is approved by USEPA, the Regional Water Board is then required to amend existing NPDES Permits to incorporate either narrative or numeric WQBELs consistent with the intent of the TMDL. In many cases efforts to address the underlying TMDL impairment are already underway prior to approval of the TMDL.

There is currently one USEPA approved TMDL in the Whitewater River Region, a bacterial indicators (E. coli) TMDL in the Coachella Valley Stormwater Channel (CVSC). The TMDL implementation plan

¹² US EPA 2006. Clarification Regarding "Phased" Total Maximum Daily Loads,
http://www.epa.gov/owow/tmdl/tmdl_clarification_letter.html

specifies that WQBELs described in the MS4 Permit are to be expressed as narrative management practices; therefore, the 2013 MS4 Permit includes BMP-based interim WQBELs, and also BMP-based final WQBELs which are based on the WLA for the TMDL.

10.3 CVSC Bacterial Indicator TMDL

10.3.1 Background

The perennial section of the CVSC, which begins at Valley Sanitation District's outfall in Indio and continues to the Salton Sea, was originally listed as impaired for bacterial indicators on the 1998 303 (d) List of Impaired Waterbodies for California. At that time, only a small portion of the listed reach of the CVSC was actually located within the MS4 Permit area – the portion beginning near Valley Sanitary District, to the City of Coachella's eastern boundary. Presently, the City of Coachella is the only Whitewater River Region MS4 Permittee with Major MS4 Outfalls to the CVSC.

Stakeholders, including the MS4 Permittees, coordinated with Regional Water Board staff during development of the TMDL, and the Regional Water Board subsequently adopted the TMDL at their May 16, 2007 Board meeting. However, for the SWRCB March 18, 2008 Board meeting, the Regional Water Board Executive Officer requested that the SWRCB wait to adopt, and withdraw the TMDL from its agenda for approximately 18 months. In a letter addressed to the SWRCB Executive Director, the Regional Water Board Executive Officer explained that the withdrawal was needed to address comments and concerns raised by the Coachella Valley agricultural community regarding the appropriateness of being named as a responsible party in the TMDL implementation plan without sufficient data.

To address this data gap, agricultural dischargers and CVWD formed a Task Force, the Coachella Valley Agricultural Stakeholder Water Quality Task Force (CVAS), which developed a monitoring plan; water quality monitoring data was then gathered over a 12-month period, and a final report of monitoring results was submitted to the Regional Water Board on August 17, 2009.

On June 17, 2010, the Regional Water Board approved an amendment to their Basin Plan to establish the CVSC Bacterial Indicator TMDL, which subsequently received final approval from the SWRCB on July 19, 2011, the Office of Administrative Law on February 2, 2012, and finally EPA, on April 27, 2012. The approved Basin Plan Amendment specifies WLAs for Point Sources including the City of Coachella (the only Whitewater River Region MS4 Permittee named as a responsible party), CalTrans, Valley Sanitary District Wastewater Treatment Plant, Coachella Sanitary District Wastewater Treatment Plant, and Mid-Valley Water Reclamation Plant; as well as Load Allocations (LAs) for agricultural runoff, Federal and tribal lands, and septic systems.

The CVSC Bacterial Indicator TMDL implementation plan is divided into two phases. On October 8, 2012, the Regional Water Board provided notification to responsible parties that Phase I implementation of the TMDL had been initiated. Phase I actions take three years to complete, and focus on monitoring to assess individual contributions of bacteria to CVSC from each identified source. Each party was given 90 days from the date of notification by the Regional Water Board to develop and submit respective Quality Assurance Project Monitoring Plans (QAPMPs), which would describe their monitoring activities. The Regional Water Board exempted the agricultural community and CVWD from having to complete Phase I monitoring actions regarding agricultural discharges, and acknowledged that the monitoring completed by CVAS in 2008-2009 accurately characterized the contribution of irrigated agriculture to the bacterial indicator impairment in the CVSC. However, agricultural dischargers and CVWD did not receive

exemption from completing Phase II actions, should Phase II actions become necessary, and available data indicate that discharges into the CVSC from irrigated agriculture exceed E. coli WQOs.

Within seven years after the end of Phase I, the Regional Water Board will analyze monitoring data gathered from responsible parties, tribal and Federal dischargers, and the three POTWs which discharge to the impaired reach of the CVSC, to assess whether WQOs have been achieved, sources have been identified, and whether additional actions are required in Phase II.

10.3.2 Interim WQBELs

Consistent with SWRCB Compliance Schedule Policy (Resolution No. 2008-0025), the 2013 MS4 Permit defines the TMDL's interim and final WQBELs. As previously mentioned, the City of Coachella is the only Whitewater River Region MS4 Permittee with Major MS4 Outfalls to the CVSC, and has, therefore, been named as a responsible party to the TMDL.

The City of Coachella addresses the interim WQBELs, which are consistent with the requirements of Phase I of the TMDL implementation plan. The City was given 90 days from the date that Regional Water Board staff announced initiation of Phase I implementation to develop and submit its Quality Assurance Project Monitoring Plan (QAPMP); the City's QAPMP describes its TMDL compliance monitoring activities over the next three years. The City submitted its QAPMP to the Regional Water Board on January 6, 2013; final approval was received on May 9, 2013, thus, beginning the City's three year monitoring period.

As a proactive measure, the City of Coachella recently completed construction of drywell diversions at each of their three outfalls to CVSC, thereby eliminating the City's dry weather discharges to the channel. However, in accordance with its QAPMP and Phase I of TMDL implementation, the City performs monthly monitoring at each of these outfalls, and gathered monitoring data is provided to the Regional Water Board on a quarterly basis. The monitoring data gathered by the City of Coachella in accordance with Phase I of the TMDL is also incorporated into the Permittees' Annual Monitoring Report.

By January 31, 2016, the City of Coachella will submit to the Regional Water Board a Quality Assurance Project Plan and summary report (2016 QAPP), which includes the following:

1. A description of whether Urban Runoff discharges from the City's MS4 to the CVSC are in compliance with the City's WLA;
2. Whether sources of exceedances, if any, are controllable;
3. Recommendations for additional BMPs, if required, that are appropriate given background conditions, cost factors and the status of Regional Water Board efforts to revise WQOs for the CVSC to address the City's WLA as required by the TMDL. If recommendations for additional BMPs are provided, then the following information will be provided:
 - ◆ The specific additional BMPs implemented to reduce the concentration of bacterial indicators from controllable urban sources and the water quality improvements expected to result from these BMPs;
 - ◆ The specific regional treatment facilities and the locations where such facilities will be built to reduce controllable urban bacterial indicators and the water quality improvements to result when the facilities are complete;

- ◆ The scientific and technical documentation used to conclude that the additional BMPs, once fully implemented, are expected to achieve the City's WLA;
- ◆ A schedule for implementing the additional BMPs including identification of milestones to assess satisfactory progress toward achieving the City's WLA;
- ◆ The specific metrics that will be used to demonstrate the effectiveness of the additional BMPs; and
- ◆ Identification of additional BMPs that may be required if the initial plan does not achieve the City of Coachella's WLA as required by the TMDL.

10.3.3 Final WQBELs

Once submitted, the City of Coachella's 2016 QAPP will undergo review and comment by Regional Water Board staff, followed by a 30-day period for public review and comment. Once the City's 2016 QAPP receives approval by the Regional Water Board Executive Officer, it will be incorporated into the 2013 MS4 Permit and the 2014 SWMP as the City's final WQBEL for the CVSC Bacterial Indicator TMDL. In this instance, implementation of the requirements described in the 2016 QAPP will constitute the City's compliance with the final WQBEL and Phase II of the CVSC Bacterial Indicator TMDL implementation plan.

Alternatively, if the Regional Water Board Executive Officer does not approve the City's 2016 QAPP by June 30, 2016, the WLAs described in the CVSC Bacterial Indicator TMDL will become the City's final WQBEL. In this instance, compliance with the final WQBEL will entail Regional Water Board staff working with the City to develop alternate BMPs (i.e., BMPs which may not have been described in the City's submitted 2016 QAPP) which would be implemented in accordance with Phase II of the CVSC Bacterial Indicator TMDL implementation plan.