Program Evaluation Report

Ventura Countywide Stormwater Quality Management Program (Board Order No. 00-108; NPDES Permit No. CAS004002)

Executive Summary

The Los Angeles Regional Water Quality Control Board, with assistance from Tetra Tech, Inc., through a U.S. EPA contract, conducted a program evaluation of the Ventura Countywide Stormwater Quality Management Program (Program) in October 2001. The purpose of the Program evaluation was to determine compliance with the Ventura County Municipal Storm Water National Pollutant Discharge Elimination System (NPDES) Permit. The evaluation team reviewed the co-permittees' compliance with the NPDES permit requirements and performance criteria and conducted an in-field verification of program implementation. The program evaluation focused on five of the 12 co-permittees—the Ventura County Flood Control District (VCFCD) and the cities of Ojai, Oxnard, Santa Paula, and Simi Valley. Of these five, the VCFCD's program evaluation was broad in scope and did not cover all the areas evaluated in the cities; additional evaluation of the program may be needed in the future. The evaluation results are specific to these co-permittees and are not intended to represent the countywide program as a whole or other co-permittees not evaluated.

This program evaluation report identifies program deficiencies and positive attributes only. No specific potential permit violations were identified. Program deficiencies represent areas of significant concern for successful program implementation. Positive attributes are indications of the co-permittee's overall progress in implementing a multifaceted program to address storm water discharges. Therefore, the evaluation has shown that the co-permittees have limited resources for implementing the Program. Their compliance and accomplishments should be seen in this context.

The following program deficiencies were identified as the most significant:

- Three VCFCD construction sites lacked erosion and sediment controls.
- Handling of hazardous materials at the Oxnard corporation yard is inadequate.
- Criteria for storm water pollution control plans (SWPCPs) for public road construction projects are lacking in Oxnard.
- Criteria are needed to determine where to place illegal dumping signs in Oxnard.
- Inspection of facilities subject to the General Industrial Permit (GIP) has yet to begin in Santa Paula.
- Storm water controls at the Santa Paula corporation yard are inadequate.
- Improved coordination is needed in the Simi Valley program.

- The Ventura Countywide Storm Water Quality Urban Impact Mitigation Plan (SQUIMP) conditioning process and on-site implementation lacks continuity in Simi Valley.

- SWPCP review and field inspections in Simi Valley focus on sediment control, not erosion control at sites visited.

Several elements of the co-permittees' programs were particularly notable:

- A countywide management committee and five subcommittees help provide program direction, consistency, and guidance to co-permittees.

- Comprehensive plan review procedures and SQUIMP conditioning are in place in the VCFCD and Oxnard.

- A sound organizational structure for storm water management is present in Oxnard.

- A source control inspector has been dedicated for construction site inspections in Oxnard.

- The evaluation has shown that the co-permittees have limited resources for implementing the Program.

- Although not reporting this information in the co-permittees annual report, the Del Norte Regional Recycling and Transfer station located in the City of Oxnard recycles tons of trash that otherwise could have impacted receiving waters.

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1.0 Introduction

1.1 Program Evaluation Purpose

The primary goal of the program evaluation was to determine the overall compliance status of selected co-permittees with conditions and requirements contained in the NPDES permit (Board Order 00-108 and EPA NPDES Permit No. CAS004002) and the Ventura Countywide Storm water Management Plan (Ventura County SMP). Secondary goals included the following:

- Acquire data to assist in reissuing the permit;
- Identify and document positive elements of the program that could benefit other Phase I and Phase II municipalities; and
- Review the overall effectiveness of the program.

40 CFR 122.41(i) and Part 6.H of the NPDES permit provide the authority to conduct the program evaluation.

The Program includes 12 co-permittees with the Ventura County Flood Control District (VCFCD) serving as the Principal Co-permittee. The program evaluation reviewed the practices and permit compliance status of five of the 12 co-permittees—the VCFCD and the cities of Ojai, Oxnard, Santa Paula, and Simi Valley.

1.2 Permit History

The NPDES permit was issued on July 27, 2000, and is scheduled to expire on July 27, 2005. This is the second NPDES permit issued to the co-permittees under the storm water Phase I regulations.

1.3 Logistics and Program Evaluation Preparation

Before initiating the on-site program evaluation, Tetra Tech, Inc., conducted a review of available program materials. The goals for the file review were (1) to gain greater knowledge of the existing program, permit requirements, performance criteria, and past activities and (2) to prepare for on-site activities. The following materials were reviewed:

- Board Order 00-108, NPDES Permit No. CAS-004002;
- Ventura County SMP (revised January 2001);
- SQUIMP;
- Annual Report for Year ending July 2001 (dated October 1, 2001);
- County and co-permittee web sites; and
- File correspondence with the co-permittees and the permitting authority.

The authority, scope, and schedule of the program evaluation were communicated to the co-permittees by written notice on October 15, 2001. On October 29-November 1, 2001, the Los Angeles Regional Water Quality Control Board (Regional Board), with assistance from Tetra

Tech, Inc., conducted the program evaluation. The evaluation schedule which was modified slightly in the field, was as follows:

Monday, October 29	Tuesday, October 30	Wednesday, October 31	Thursday, November 1
All Parties - Program evaluation kick-off. *VCFCD* - Program management, annual reporting, financial reporting, and measuring progress.	*Ojai* – Development planning, construction, illicit discharge control, and industrial and commercial businesses. *Oxnard and Simi Valley* – Development planning, construction, and public agency activities.	*Santa Paula* - Development planning, construction, illicit discharge control, and industrial and commercial businesses. *Oxnard and Simi Valley* – Illicit discharge control and industrial and commercial inspections.	*VCFCD* – Development planning, construction, and program coordination. *All Parties* - Exit interview and presentation of preliminary findings.

Upon completion of the evaluation, an exit interview was held with the co-permittees to discuss the preliminary findings. During the exit interview, the co-permittees were informed that the findings were to be considered preliminary pending further review by EPA and the Regional Board.

1.4 Program Areas Evaluated

The following program areas were evaluated:

- Program management.
- Programs for industrial and commercial businesses.
- Programs for planning and land development.
- Programs for construction sites.
- Programs for public agency activities.
- Programs for illicit discharge control.
- VCFCD overall program coordination.

1.5 Program Areas Not Evaluated

The following areas were not evaluated in detail as part of the program evaluation:

General – Countywide

- Programs for residents (public education/involvement)
- Monitoring program details (e.g., sample location, types, frequency, parameters, etc.)
- Monitoring reports (e.g., analytical methods, QA/QC or interpretations)

- Other NPDES permits issued to the permittees (e.g., industrial or construction NPDES storm water permits)

- Legal authority. (The Regional Board reviewed the legal authority when the permit was initially issued)

- Inspection reports, plan review reports, and other relevant files. The program evaluation team did not conduct a detailed file review to verify that all elements of the programs were being implemented as described. Rather, observations by the evaluation team and statements from the co-permittees' representatives were used to assess overall compliance with permit requirements and performance criteria. A detailed file review of specific program areas could be included in a subsequent evaluation

Other Co-permittees

- County of Ventura
- City of Camarillo
- City of Fillmore
- City of Moorpark
- City of Port Hueneme
- City of San Buenaventura
- City of Thousand Oaks

1.6 Program Areas for Additional Review

The evaluation team recommends the following program areas for additional review:

Countywide

- The co-permittees not evaluated as part of this evaluation

- Procedures for reporting co-permittee program implementation results to the VCFCD

- Monitoring results, the identification of pollutants of concern, and current and future plans for addressing identified pollutants of concern

- Countywide assessment of dry-weather flows as they relate to illicit connections and illicit discharges

- Compliance assessment of those program areas with implementation deadlines of July 27, 2002, including (1) industrial and commercial business inspections, (2) placement of no dumping signs, (3) implementation of Land Development Guidelines, and (4) implementation of SWPCPs for corporation yards

City of Simi Valley

- Evaluation of overall program organization and management approach

- Verification of program continuity between development planning and development construction activities

2.0 Program Evaluation Results

Evaluation results for each co-permittee are presented below and are organized by program area. The population, relative size, growth rates, business composition, and municipal resources vary considerably among the co-permittees.

This evaluation report identifies only program deficiencies and positive attributes and not potential permit violations. Program deficiencies represent areas of concern that could significantly affect program effectiveness. Positive attributes are indications of the city's overall progress in implementing a multifaceted program to address storm water discharges. The evaluation team identified only positive attributes that were innovative (i.e., beyond minimum requirements).

As indicated in Section 1.0, the evaluation team did not review all components of each co-permittee's program. Therefore, the co-permittees should not consider the enclosed list of program deficiencies, or the evaluation report itself, as a shield against undetected violations nor as a comprehensive endorsement of individual program elements. This report does not preclude or in any way limit EPA's or the Regional Board's authority to identify additional program deficiencies and potential permit violations.

The most significant program deficiencies and positive attributes identified during the evaluation are listed in the Executive Summary and are identified below with text boxes.

2.1 Ventura County Flood Control District

The VCFCD is designated as the principal permittee for the Ventura Countywide Storm Water Management Program. An implementation agreement between the VCFCD and the co-permittees obligates the VCFCD to perform specific coordination and reporting duties, along with implementing the permit requirements in unincorporated parts of Ventura County. Programs for industrial and commercial businesses are not applicable to the VCFCD.

The following program elements were reviewed in the VCFCD, and deficiencies and positive attributes were noted.

2.1.1 Evaluation of Program Management

Deficiency Noted:

- *Improvements are needed in the countywide data management system*.
  Several deficiencies in the existing countywide data management system were identified, including the following: the inability to modify previously entered values and to continually add data; the inability to access or review submitted information until the contractor prepares and delivers the annual report; and the lack of detail of selected data elements, which results in an inability to identify and present significant differences among the co-permittees. In its current condition, the data management

system is used solely to collect and compile co-permittee program implementation data for inclusion in annual reports. The system would provide greater value if it could be used to assist the co-permittees with evaluation of their compliance with permit conditions and track overall program performance. The VCFCD acknowledged these deficiencies and plans to redesign the existing system to better accommodate the needs of the general program and co-permittees.

Positive Attributes:

- *Programs are funded in part through a benefit assessment levied on parcels of land that benefit from flood control projects and programs*.
  The legal statute requires that benefit assessments be based primarily on the proportionate storm water runoff from each parcel of land in the county, measured as a Basic Assessment Unit. Revenues from the assessments are used to finance the cost of routine operation and maintenance of flood control facilities and implementation of the countywide NPDES program. The benefit assessment is collected twice per year along with property taxes and is then distributed back to the individual cities. Although the benefit assessment does not cover the total costs for program implementation, it does provide a significant funding source for the program. The VCFCD produces an annual report, *Report on Benefit Assessment Program for Flood Control,* which describes the program in detail.

- *A countywide management committee and five subcommittees help provide program direction, consistency, and guidance to co-permittees*.
  As the principal permittee, the VCFCD provides coordination and support through the management committee and five subcommittees established on specific program areas. The management committee and subcommittees have provided invaluable assistance to all the cities in the program by developing standard forms, reports, and other information for use, saving all cities time and money, while ensuring consistency. The subcommittee structure also allows all co-permittees to share implementation successes and problems. This coordinated management committee and subcommittee structure could be a model for Phase II cities in a common area wishing to share resources and information.

2.1.2 Evaluation of Programs for Industrial and Commercial Businesses

Not Applicable (Industrial and commercial business inspections in unincorporated areas of the county are conducted by the Ventura County Environmental Health Department).

2.1.3 Evaluation of Programs for Planning and Land Development

Positive Attributes:

- *Comprehensive plan review procedures and SQUIMP conditioning are in place.*
  The VCFCD has a comprehensive set of procedures for plan reviews and has been aggressively implementing SQUIMP requirements on appropriate sites. The VCFCD, as part of the subcommittee process, has also developed and is using a set of sample storm water management conditions of approval for discretionary land

development activities. These sample conditions, consisting of 30 conditions in five categories, allow plan reviewers to consistently require appropriate storm water controls for proposed land development.

2.1.4 Evaluation of Programs for Construction Sites

Deficiencies Noted:

- *A VCFCD construction site lacked erosion and sediment controls.*

  The evaluation team visited a VCFCD project designed to increase the capacity and improve the stability of a flood control channel. This project lacked adequate erosion and sediment controls. Stabilized construction entrances were not provided, and a nearby storm drain inlet was not protected, which resulted in a previous discharge of a significant amount of sediment to the inlet and ultimately to the VCFCD channel. Two other construction sites had similar problems. The VCFCD needs to provide additional training for inspection and project staff on proper erosion and sediment controls and to ensure that such controls are in place and maintained at all sites.

- *Inspections inadequate to ensure compliance with approved plans*

  As described above, the VCFCD conditions development and construction projects for storm water quality management when a project is in unincorporated Ventura County or when a project in an incorporated city discharges directly to a VCFCD channel. In incorporated cities, the VCFCD inspects only the final outlet structure that discharges to the VCFCD channel and not any additional upstream controls that they might have included in the plan. It was not clear during the program evaluation whether incorporated cities are ensuring that the additional upstream VCFCD controls are being implemented. The VCFCD needs to work with the incorporated cities to ensure that all controls are implemented in accordance with the approved plan.

2.1.5 Evaluation of Public Agency Activities

Adequate.

2.1.6 Evaluation of Programs for Illicit Discharge Control

Deficiency Noted:

- *Countywide IC/ID form needs to include identification of illicit discharges*

  The countywide form the co-permittees use for Illicit Connection/Illicit Discharge (IC/ID) incident reporting does not provide for the identification of dry-weather illicit discharges as a designated category. Dry-weather flows exist throughout the county and an improved form could be helpful in assessing the frequency and magnitude of these flows and provide baseline data for prioritizing elimination. Although exempt from storm water regulations, co-permittees indicated that agricultural runoff is widespread throughout the county and is a likely contributor of pollutants of concern to the storm drain system. The IC/ID incident reporting form could also be modified to collect baseline information on such flows (e.g., including new fields for location, visual and field observations, and origin) that might enable targeted educational efforts in the future.

2.1.7 Program Evaluation

Deficiency Noted:

- *Program evaluation is based on programmatic and social indicators only, not environmental performance.*
  The countywide program, like most municipal storm water programs nationwide, relies heavily on programmatic and social indicators to determine the program's success. This information is reported annually, with each of the major program elements measured against the number of employees trained, number of subcommittee meetings attended, number of inspections conducted, and so forth. The countywide program has yet to significantly integrate water quality indicators as a measure of success. The program should use the programmatic and social indicators, **along with water quality monitoring data**, to evaluate performance and modify the Ventura County Stormwater Management Plan, as appropriate.

2.2 City of Ojai

Ojai, with a population of approximately 8,000 people, is a small, rural city north of Oxnard. It is primarily residential, with limited commercial development and very little industrial activity. Growth is low, and construction activity is limited. The city has budgeted $150,800 for storm water programs in fiscal year 2001-2002.

The following program elements were reviewed in the city of Ojai, with deficiencies and positive attributes noted.

2.2.1 Evaluation of Program Management

Positive Attributes:

- *Innovative utilization of resources.*
  As a small city with limited staff, Ojai carefully leverages its resources to meet its storm water requirements. Examples include the following: (1) youth groups assist with storm drain system maintenance and catch basin cleaning; and (2) the city contracts with the County Environmental Health Department to conduct inspections of automobile service industries.

2.2.2 Evaluation of Programs for Industrial and Commercial Businesses

Potential Deficiency Noted:

- *Food service facility inspections are not being conducted.*
  The permit requires co-permittees to inspect all automotive, food service, and other facilities subject to the State Board General Industrial Permit by July 27, 2002. The city has not yet initiated inspections of its 23 restaurants and indicated that they planned to contract with a retired county inspector to complete them in the required time frame. The city needs to complete all of the required inspections before July 27, 2002.

2.2.3 Evaluation of Programs for Planning and Land Development

Deficiency Noted:

- *Documentation of the plan review process is lacking.*
  The plan review process is not formalized and is largely the responsibility of a single individual. If the rates of development increase or staff turnover occurs, a more formalized process will be needed. Therefore, the city could benefit by documenting its plan review process.

2.2.4 Evaluation of Programs for Construction Sites

Adequate.

2.2.5 Evaluation of Public Agency Activities

Adequate.

2.2.6 Evaluation of Programs for Illicit Discharge Control

Adequate.

2.3 City of Oxnard

Oxnard is the largest city in Ventura County with a population of about 170,000 people. The city is located on the coast and occupies about 25 square miles. Significant growth is occurring in this community and industrial, commercial and residential construction is widespread. The industrial and commercial base is also significant. Oxnard has budgeted $2,269,485 for storm water programs in fiscal year 2001-2002.

The following program elements were reviewed in the city of Oxnard, with deficiencies and positive attributes noted.

2.3.1 Evaluation of Program Management

Positive Attributes:

- *A sound organizational structure for storm water management is present*.
  The organizational structure for storm water management in the city ensures interdepartmental coordination and could be a model for other Phase I and Phase II municipalities. Storm water management is largely the role of the Waste Water Division's Source Control Program, which shares some responsibilities with the Waste Water Division's Maintenance Section, Development Services Department, and Construction Services. The city holds monthly meetings to discuss the status of its existing storm water programs and future needs, and it reports the activities occurring at the countywide subcommittee meetings. Good communication and coordination among the individual departments has resulted in a comprehensive program for illicit discharge control, SQUIMP implementation, construction oversight, and industrial and commercial inspections.

2.3.2 Evaluation of Programs for Industrial/Commercial Businesses

Positive Attribute:

- *Organized and integrated industrial and commercial business inspection program.* The city's industrial and commercial business inspection program is well organized and coordinated within the Source Control Program. The city maintains a comprehensive database of applicable facilities, past inspection dates, and concise inspection reports detailing deficiencies and required remedies. Additionally, the city determines whether the inspected facility has submitted a Notice of Intent for coverage under the General Industrial Permit and periodically submits a list of potential "non-filers" to the Regional Board for their review and follow-up.

2.3.3 Evaluation of Programs for Planning and Land Development

Positive Attribute:

- *Comprehensive plan review procedures and SQUIMP conditioning.*

The Development Services Department had been including storm water quality structural controls in plan reviews and approvals even before the development and adoption of the SQUIMP conditioning requirements. The countywide subcommittee process further standardized these procedures in the plan review and approval process. On-site field visits identified SQUIMP-compliant controls in place at applicable light industrial facilities, residential developments, and gasoline retail outlets. Coordination with Construction Services and Source Control ensures proper installation, operation, and maintenance of structural controls.

2.3.4 Evaluation of Programs for Construction Sites

Positive Attribute:

- *A source control inspector is provided to conduct construction site inspections.*

Unique among municipal storm water programs, Source Control provides a dedicated construction inspector who works closely with Development Services and Construction Services to ensure that adequate storm water quality controls are in place during the planning, construction, and post-development phases of each project. Source Control participates in the plan review, inspects ongoing projects on a weekly basis, and works with other city construction inspectors to identify and remedy erosion and sediment control deficiencies. Also unique, Source Control inspectors often educate the tenants of newly constructed facilities on the operational and maintenance requirements of constructed water quality controls at their facilities.

2.3.5 Evaluation of Public Agency Activities

Deficiencies Noted:

- *Handling of hazardous materials at the corporation yard is inadequate.*

The hazardous materials handling practices at the city corporation yard need improvement. Various city crews routinely collect hazardous materials and wastes discarded by residents. These materials are then left outside the gate of the hazardous

materials storage area in the corporation yard. At the time of the evaluation, batteries, paints, solvents, and other miscellaneous materials were being stored outside, without cover or secondary containment. Additionally, the hazardous materials structure was open-sided, with materials stored directly adjacent to the surrounding fence. The NPDES permit prohibits the discharge of untreated storm water runoff to the storm drain system from toxic or hazardous material storage areas after July 27, 2001. The city needs to modify the structure immediately to prevent the accumulation of and contact with rainwater and provide a covered and contained area for the placement of collected hazardous materials and wastes.

- *Housekeeping practices at the corporation yard are poor.*
  Six city departments occupy the corporation yard, each maintaining responsibility for its own operations. On-site observations indicated that the adequacy of housekeeping varied from tenant to tenant, with poor housekeeping observed for several tenants. The corporation yard is scheduled to undergo a significant capital improvement project in 2002, and the city indicated than an SWPCP would be developed in conjunction with that project. The NPDES permit requires implementation of an SWPCP for corporation yards no later than July 27, 2002. Therefore, the city needs to develop and implement a comprehensive SWPCP, including housekeeping and operational practices for the entire facility. The SWPCP should also designate a single point of responsibility for the yard.

- *Criteria for SWPCPs for public road construction projects are lacking.*
  The city lacks criteria to determine whether an SWPCP is needed for public road construction projects between 1 and 5 acres. The NPDES permit requires "…implementation of an SWPCP prior to issuance of a grading permit for construction projects that will result in soil disturbance of 1 acre or more in size." The NPDES permit also states "co-permittees shall prepare and implement an SWPCP on co-permittee construction projects, as required above." Observations made during the evaluation and discussions with the city's Senior Construction Supervisor indicate that while best management practices (BMPs) are routinely implemented, the development and implementation of SWPCPs has been sporadic. The city indicated that the failure to develop and implement SWPCPs for all applicable projects is largely due to misunderstandings regarding "line and grade" exemptions in the State Board Construction General Permit and a lack of criteria for determining applicable acreage for linear projects. The "line and grade" exemptions are not applicable to these projects and the State Water Resources Control Board (State Board) has developed guidance for determining the site acreage for linear projects. The city needs to obtain the State Board's guidance and needs to develop and implement SWPCPs for all projects greater than 1 acre.

  For projects subject to a bid process, the city needs to require the development of an SWPCP and should consider including specific sediment and erosion control measures in the job specifications to ensure that contractors provide adequate funds for erosion and sediment controls. Alternatively, the city could include a set cost for applicable controls to provide a level cost structure for all bidders. Job specifications

without an SWPCP might result in construction projects that do not contain adequate erosion and sediment controls.

2.3.6 Evaluation of Programs for Illicit Discharge Control

Deficiency Noted:

- *Criteria are needed to determine where to place illegal dumping signs.*

  The city is required to place signs with prohibitive language discouraging illegal dumping at public access points to creeks and other relevant water bodies and channels by July 27, 2002. On-site tours of selected open channels and water bodies in the city indicated that the city lacks criteria to determine (1) applicable water bodies, (2) public access points, and (3) the frequency and location of signage. At the time of the evaluation, no signs had been placed within the city. The IC/ID subcommittee is working on the prohibitive language for the signs but had yet to focus on placement considerations. Criteria are likely needed in other communities in the county as well.

2.4 City of Santa Paula

Santa Paula is 14 miles east of Ventura, approximately in the center of Ventura County. Santa Paula is an older, built-out city with most development occurring as in-fill development. There is limited industrial and commercial activity within the city limits. The city is about 4 square miles in size and has a population of 28,500. Santa Paula budgeted $326,959 for storm water programs in fiscal year 2001-2002.

The following program elements were reviewed in the city of Santa Paula, with positive attributes and deficiencies noted.

2.4.1 Evaluation of Program Management

Adequate.

2.4.2 Evaluation of Programs for Industrial and Commercial Businesses

Deficiency Noted:

- *Inspection of facilities subject to the General Industrial Permit has yet to begin.*

  The permit requires co-permittees to inspect automotive, food service, and other facilities subject to the State Board General Industrial Permit by July 27, 2002. At the time of the evaluation, the city had conducted a small portion of the automotive and food service inspections, but it has yet to initiate inspections of other facilities subject to the General Industrial Permit. The city is preparing to meet this requirement by compiling a list of applicable industrial facilities. The city needs to finalize its list and complete all of the required inspections prior to July 27, 2002.

2.4.3 Evaluation of Programs for Planning and Land Development

Deficiency Noted:

- *Documentation of the plan review process is lacking.*

The plan review process is not formalized and if the rates of development increase or staff turnover occurs, a more formalized process will be needed. Therefore, the city could benefit by documenting its plan review process.

Positive Attribute:

- *There is coordination during preliminary plan review.*
  To address cross-departmental issues early in the planning process, preliminary plan reviews, which are similar to Design Advisory Committee reviews in larger cities, are conducted by four departments (Public Works, Planning, Fire, and Building) before a formalized development plan is distributed to the appropriate city departments for review and approval. Individuals participating in the preliminary plan reviews are trained in the selection and implementation of appropriate storm water quality controls. This process ensures coordination and implementation of appropriate storm water quality controls for new development projects.

2.4.4 Evaluation of Programs for Construction Sites

Deficiency Noted:

- *Erosion and sediment controls for single-family home construction are lacking.*
  A number of the active construction projects in the city are small, single-family developments conducted by the landowner without the involvement of a dedicated builder or contractor. Erosion and sediment controls at many of these sites were nonexistent, and the city was having difficulty ensuring that adequate controls are used. The city should develop a plan for improved compliance at these sites.

2.4.5 Evaluation of Public Agency Activities

Deficiencies Noted:

- *Storm water controls at the corporation yard are inadequate.*
  The corporation yard next to the city's wastewater treatment plant had significant storm water concerns that need to be addressed. Although there was no runoff present during the evaluation, it appeared that runoff from the facility runs directly through the area where vehicles are maintained, resulting in a possible source of pollutants to the storm drain system. The permit prohibits the discharge of untreated storm water runoff to the storm drain system from vehicle maintenance and repair facilities after July 27, 2001, and requires an SWPCP to be developed for the yard by no later than July 27, 2002. The city needs to immediately address the storm water problems present in the yard and develop and implement an SWPCP prior to July 27, 2002.

- *A new Storm Water Pollution Prevention Plan (SWPPP) is needed for the wastewater treatment plant.*
  Although this observation is not directly related to the NPDES permit, the evaluation team noted that the SWPPP for the wastewater treatment plant was old and needed to be updated. Additionally, the sludge handling practices at the site need improvement

because the sludge drying beds exhibited evidence of past overflows that could contaminate runoff from the site.

2.4.6 Evaluation of Programs for Illicit Discharge Control

Adequate.

2.5 City of Simi Valley

Simi Valley is in eastern Ventura County and has a population of about 115,000. Significant growth is occurring in this community and industrial, commercial and residential construction is widespread. The industrial and commercial base is also significant. The city reported an annual storm water budget of $1,268,200 for the 2001-2002 fiscal year.

The following program elements were reviewed in the City of Simi Valley, with positive attributes and deficiencies noted.

2.5.1 Evaluation of Program Management

Deficiency Noted:

- *Improved coordination is needed.*
  The industrial and commercial businesses, IC/ID, and public agency activity program elements are located under the Source Control directorate in the city's Department of Public Works. The Planning and Land Development and Construction Site program elements are administered through the City Engineer's office, also within the Department of Public Works. Enhanced coordination between the two groups (and perhaps among other city programs) would improve the effectiveness of the Simi Valley storm water management program. This could be accomplished either through organizational changes or by other mechanisms.

2.5.2 Programs for Industrial and Commercial Businesses

Deficiency Noted:

- *Improved data management is needed.*
  The city would benefit from having its list of applicable businesses entered into a relational database (which could still be exported to a spreadsheet for reports) to handle the variety of fields necessary to manage data for storm water, hazardous materials, and pretreatment. City staff indicated that such software had been recently purchased and installed, but that they had not yet been trained in its use.

Positive Attribute:

- *An integrated industrial and commercial business inspection program is in place.*
  The industrial and commercial education and site inspection program occurs in conjunction with hazardous waste and pretreatment inspections, where applicable. This approach allows inspectors to combine other inspection responsibilities, such as pretreatment inspections, with their storm water inspections. Although the permit requirement is to inspect applicable businesses once every 2 years, the Source Control

Group's goal is to perform inspections of all applicable businesses annually. Educational outreach efforts administered as part of the inspection process are also commendable.

2.5.3 Evaluation of Programs for Planning and Land Development

Deficiency Noted:

- *The SQUIMP conditioning process and on-site implementation lacks continuity.*
  The planning and development process initially relies on a Development Advisory Committee (DAC), which provides for comprehensive evaluation of development proposals at the conceptual stage by appropriate elements of city government. This approach is sound and has been proven to be an effective method for getting storm water issues identified early in the process, which benefits all concerned parties. After preliminary evaluation by the DAC, the interactive process among the developer and city reviewers continues. This process may ultimately result in the submission of an acceptable preliminary drainage study along with a conceptual development plan that might eventually be approved by the City Planning Commission and/or the City Council. SQUIMP conditioning occurs at this early stage and, assuming the city approves the conceptual plan, it enters the plan check review process. At this point there appears to be a lack of continuity between the SQUIMP conditioning process and the plan check review and inspection process as the need for and design of the SQUIMP compliant controls and BMPs is often not communicated to city staff tasked with on-site construction supervision and inspection. This lack of continuity has appeared to result in the construction of flood control structures instead of the water quality controls envisioned by the SQUIMP.

- *There is a lack of understanding regarding SQUIMP standards.*
  SQUIMP training has been provided by the Principal Co-permittee and numerous discussions/training sessions have been held among the countywide development planning subcommittee. However, planning and development review staff in the City Engineer's Office indicated that they still "need adequate standards" to get the development community on board with pollutant-specific water quality BMPs in accordance with the SQUIMP. Adequate standards do exist in the SQUIMP and city staff need to meet with planning department staff from other Ventura County cities and/or meet with the Regional Board to remedy their apparent lack of understanding on this issue.

2.5.4 Evaluation of Programs for Construction Sites

Deficiencies Noted:

- *Construction site erosion and sediment controls are not consistent with plans.*
  The evaluation team observed that "as-built" construction and postconstruction erosion and sediment controls do not match the controls specified in the approved plans. For example, on one of the sites visited during the program evaluation, a construction crew was observed cleaning off a portable cement mixer without using the dedicated concrete wash water area. The city should verify through inspection

that construction site BMPs specified in plans are actually being implemented and should enforce compliance with the plans.

- *SWPCP reviews and field inspections focus on sediment control, not erosion control*

  Erosion control BMPs, particularly on slopes, were lacking at one of the two sites visited. At the other site, erosion control BMPs were being used but had not been identified in the SWPCP. The emphasis of the construction site review/inspection program appears to be sediment control rather than erosion control. At one of the construction sites, the city inspector conducting an inspection in conjunction with evaluation team visit, stated that he was concerned only with keeping sediment off the city streets by ensuring a properly designed and maintained construction entrance. The city needs to revise its construction inspection activities to ensure that both proper erosion and sediment control BMPs are installed and maintained on all construction sites and needs to enhance the training program for city construction inspectors.

2.5.5 Evaluation of Public Agency Activities

Adequate:

- *Source control staff are located at the corporation yard.*

  The Source Control Program's offices are co-located with the city corporation yard. Source Control Program staff are readily available to train and otherwise heighten awareness about storm water issues with city crews and employees working at the corporation yard.

2.5.6 Evaluation of Programs for Illicit Discharge Control

Adequate.