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MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) COMPLIANCE INSPECTION

CITY OF SANTA ROSA AND SONOMA COUNTY, CALIFORNIA

INSPECTION REPORT

Inspection Dates:

February 27–March 1, 2012

Report Date:

October 11, 2012

EXECUTIVE SUMMARY

On February 27–March 1, 2012, representatives from the U.S. Environmental Protection Agency (EPA), the California Regional Water Quality Control Board, North Coast Region (hereinafter, Regional Water Board), and an EPA contractor, PG Environmental, LLC (hereinafter, collectively, the EPA Inspection Team) conducted inspections of the City of Santa Rosa (City) and Sonoma County (County) Municipal Separate Storm Sewer System (MS4) Programs.

This inspection report identifies potential Permit violations, program deficiencies, program recommendations, and positive attributes. It is not a formal finding of violation.

The EPA Inspection Team identified several positive attributes of the City and County's Storm Water Quality Management Programs, including the following:

1. The County holds free weekly community household hazardous waste collection events, and has a permanent collection center. The County also runs a household hazardous waste "rover" collection program that for a fee, will go to individual houses by appointment.
2. The County uses both live and decoy surveillance cameras in known problem areas, as well as signage and fencing to deter roadside dumping of waste material.
3. The City constructed a new facility for proper disposal of liquid waste removed from the MS4.
4. The City's Police Department has an Environmental Crimes Investigator who has completed at least 40 investigations in the 2010-2011 reporting period. The City's Environmental Crimes Unit works with various departments, including the City's Attorney's Office and the District Attorney to address findings.
5. The City has an active spill response team with members from various departments, all of whom can initiate and coordinate appropriate spill response activities through a mobile group text-messaging program called "Group Me."

The following potential Permit violations and program deficiencies are considered the most significant and are further discussed within the report:

1. The co-permittees had not entered into a cooperative agreement among themselves or within other MS4 entities to control the contribution of pollutants from one portion of the MS4 to another portion of the MS4.
2. The County did not maintain a database or inventory of all categories of industrial/commercial facilities specified in the Permit.
3. The County's public reporting system for illicit connection and illicit discharge complaints was not functioning in accordance with illicit connection and illicit discharge procedures.
4. The County needs to ensure that it is on schedule to develop a complete storm drain system map and conduct field screening of storm drain outfalls.

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SECTION 1.0 INTRODUCTION

On February 27, 2012, through March 1, 2012, representatives from the U.S. Environmental Protection Agency (EPA), the California Regional Water Quality Control Board, North Coast Region (hereinafter, Regional Water Board), and an EPA contractor, PG Environmental, LLC (hereinafter, collectively, the EPA Inspection Team) conducted inspections of the City of Santa Rosa (City) and Sonoma County (County) Municipal Separate Storm Sewer System (MS4) Programs.

Section 1.1 Permit and Storm Water Quality Management Program

Discharges from the City and County MS4s are regulated under *Waste Discharge Requirements for the City of Santa Rosa, the County of Sonoma, and the Sonoma County Water Agency, Storm Water and Non-Storm Water Discharges from Municipal Separate Storm Sewer Systems, Sonoma County,* National Pollutant Discharge Elimination System (NPDES) No. CA0025054, Order No. R1-2009-0050 (hereinafter, the Permit), issued October 1, 2009. The Permit is the third NPDES MS4 Permit issued to the City and the County. The City, County, and the Sonoma County Water Agency are the three regulated co-permittees. According to the MS4 Permit, not all requirements of the Permit are applicable to the Sonoma County Water Agency because it does not have the land use authority necessary to enforce grading ordinances, regulate industrial and commercial facilities, or to impose controls on new development. The Sonoma County Water Agency was not inspected at this time.

The Permit authorizes the City and County to discharge storm water runoff and certain non-storm water discharges from the MS4s to waters of the State, under the Permit terms and conditions. Section D, Part 1-2 of the Permit, *Storm Water Quality Management Program Implementation*, requires the City and County to implement programs and control measures to reduce the discharges of pollutants in storm water to the maximum extent practicable and achieve water quality objectives.

The area covered by the Permit includes the Mark West Creek and Laguna de Santa Rosa watersheds that are controlled by the co-permittees, in addition to County-controlled MS4 areas located in Graton and urban clusters outside of Healdsburg. According to the 2010 U.S. Census, the population of the County was about 483,878 people and the population of the City was about 167,815 people. The City, which encompasses approximately 41 square miles, is nested within the County, which has approximately 1,575 square miles of total land area.

Section 1.2 Purpose of Inspection

The purpose of the inspections was to obtain information that will assist EPA in assessing the City and County's compliance with the Permit. The notification letters and inspection schedules sent by EPA to the City and County are included in Appendix A.

Section 1.3 Program Areas Evaluated

The EPA Inspection Team evaluated the City and County's compliance with portions of Section D and with key areas of Special Provision E of the Permit, including: (1) vehicle maintenance/material storage facilities/corporation yards management, (2) storm drain operation and management, (3) street and roads maintenance, (4) employee training and (5) the illicit connections and illicit discharges elimination program. Additionally, the EPA Inspection Team evaluated the County's industrial/commercial facilities program. The Inspection Team did not evaluate all components of the Permittees' MS4 Programs and this report should not be considered a comprehensive evaluation of all individual program elements.

SECTION 2.0 PROGRAM EVALUATION RESULTS

This inspection report includes background information and presents inspection findings in the following categories: potential Permit violations, program deficiencies, and positive attributes. Although this report includes potential Permit violations, it is not a formal finding of violation. This report is supported by interviews, observations, and documentation obtained before, during, and after the inspection. All referenced documentation used as supporting evidence is provided in Appendix B. The MS4 Permit, the County's 2010–2011 Phase I MS4 Annual Report and the City's 2010–2011 MS4 Annual Report are included as Appendices C, D, and E, respectively.

The EPA Inspection Team conducted a series of site visits, record reviews, and field verification activities. During the inspection of the County, the EPA Inspection Team obtained information through a series of interviews with representatives from the following County departments: Permit and Resource Management; Transportation and Public Works; Fire and Emergency Services; Regional Parks; Health Services; and Waste Management. During the inspection of the City, the EPA Inspection Team obtained information through a series of interviews with representatives from the following City departments: Utilities; Transportation and Public Works; Fire; Police; Recreation, Parks, and Community Services; Facilities; and Community Development. This inspection report does not attempt to comprehensively describe all aspects of the Permit or co-permittees' MS4 Programs, fully document all lines of questioning conducted during personnel interviews, or document all in-field verification activities conducted during site visits.

Section 2.1 Program Implementation

Section D, Part 2-2(a) of the Permit requires that co-permittees enter into an inter-agency agreement to control the contribution of pollutants from one portion of the MS4 to another portion of the MS4 (i.e., interconnections between adjoining MS4 systems or contributions across jurisdictional boundaries).

Potential Permit Violation:

The co-permittees had not entered into an inter-agency agreement to control the contribution of pollutants from one portion of the MS4 to another portion of the MS4, as required by Section D, Part 2-2(a) of the Permit.

The City and County entered into a cooperative agreement on or around December 17, 2003, which, by its terms, remained in effect for the duration of the previous Permit (see Appendix B, Exhibit 2). During the office discussion with City staff on February 27, 2012 and County staff on February 28, 2012, the respective City and County officials explained that the co-permittees had not entered into a cooperative agreement for the current Permit term, but had developed a draft cooperative agreement for this purpose (see Appendix B, Exhibit 3). Recital B in the draft agreement states that it is intended "to specifically identify the roles and responsibilities of each co-permittee for the activities identified in Permit that do not lie in the sole jurisdiction of a single co-permittee." The City Storm Water Financial Analyst stated that until the draft agreement is adopted, the co-permittees were operating under the previous agreement. The City's Storm Water Coordinator stated during a June 18, 2012 call with EPA Inspector Rick Sakow that the Cooperative Agreement will be formally approved and adopted by all co-permittees in the coming weeks.

Section 2.2 Industrial/Commercial Facilities Program

The EPA Inspection Team evaluated the County's compliance with Special Provision E, Part 3 of the Permit entitled *Industrial / Commercial Facilities Program*. The Permit specifies that each co-permittee identify, inspect and track compliance of industrial / commercial facilities. The Permit also requires that

the co-permittees maintain a database or watershed-based inventory of facilities that are critical sources of storm water pollution. The Permit defines critical sources in Provision E, Part 3-2(a)(1) to include, among others, restaurants, automotive service facilities, retail gasoline outlets, nurseries and landscape materials yards, pre-production plastic pellet (nurdle) facilities, and automotive dealerships.

The Permit requires that all critical sources be inspected twice during the Permit term, with the first inspection occurring no later than October 1, 2012. The inspections must ensure that specific storm water BMPs are implemented at each facility, as required by Provision E, Part 3-3.

Potential Permit Violation:

The County did not maintain a database or inventory of all critical sources as required by Special Provision E, Part 3-2 of the Permit.

During the in-office interviews, the Sonoma County Storm Water Coordinator explained that the County Health Services Department inspects food facilities, including restaurants, while the County Fire and Emergency Services Department inspects hazardous material storage operations under the Certified Unified Program Agencies (CUPA) program. Due to this division of labor, the County maintains separate databases for food facilities and facilities with hazardous materials. Because the databases do not include critical sources that are not food service or hazardous materials related, it is incomplete. The County does not have a business license requirement, so the Permit Resources Management Department (PRMD) notifies County Fire of new facilities that may be subject to inspections. The EPA Inspection Team asked County staff whether there was a database or inventory of nurseries and landscape material yards, both of which are defined as critical sources. The County Storm Water Engineer explained the County had not inventoried such facilities and further stated that the County would need to use the "Yellow Pages" business listings to identify these facilities. County staff also noted that nurseries are regulated by the County Agricultural Commissioner, who is also charged with enforcing pesticide laws and regulations and administering the agricultural hazardous materials program. County staff should coordinate with the County Agricultural Commissioner or others to obtain a list of nurseries and landscape material yards in order to determine if any of those nurseries or landscape material yards, are required to be inspected per the MS4 Permit. In a similar manner, the County could not produce a list of facilities that store, use, or transport pre-production plastics.

Program Deficiency:

The County had not identified the staff that would be responsible for conducting inspections of all critical sources described in the MS4 Permit.

The County had not identified who would inspect commercial nurseries or landscape material yards. The County needs to ensure it is on schedule to conduct inspections twice during the five-year Permit term as required by Special Provision E, Part 3-3(a)(1) of the Permit, with the first inspection occurring no later than October 1, 2012.

Program Deficiency:

The County inspectors may not fully utilize the County storm water ordinance as required by Section D Part 2-2 of the Permit.

Special Provision D, Part 2-2 of the Permit states that co-permittees must require dischargers within its jurisdiction comply with relevant ordinances and co-permittees must use progressive and consistent enforcement procedures. During the office interview with Sonoma County, the County Supervising Environmental Health Specialist and the County Assistant Chief of Hazardous Materials Management

indicated that they do not typically cite or utilize the County's storm water quality ordinance when conducting storm water inspections at industrial and commercial facilities. The EPA Inspection Team recommends that the County utilize its storm water quality ordinance (Chapter 11A) including the enforcement response mechanism to ensure that non-compliant facilities return to compliance.

Section 2.2.1 Non-Filer Referrals to the Regional Board

Special Provision E, Part 3-1(d) of the Permit requires co-permittees to refer non-filers under the Industrial General Permit to the Regional Water Board. County staff could not recall any instances where the County had referred non-filers to the Regional Water Board. This may indicate that County staff may not be aware of the requirement to detect and report non-filers to the Regional Water Board. EPA encourages the County and Regional Water Board to use the local CUPA meetings as a forum to train CUPA inspectors to identify and report Industrial General Permit non-filers.

Section 2.2.2 Industrial / Commercial Inspection Program for Restaurants

Special Provision E, Part 3-3(b) of the Permit requires each co-permittee to inspect all restaurants within its jurisdiction twice during the Permit term to confirm that BMPs are effectively implemented and are in compliance with State law, and County and municipal ordinances. In addition, the Permit specifies the areas at restaurants to be evaluated during inspections. The County conducts restaurant inspections within the City's jurisdiction. According to the Sonoma County 2010-2011 Annual Report, County Environmental Health inspectors conducted 226 Restaurant BMP inspections in Santa Rosa and 60 Restaurant BMP inspections within the unincorporated portions of the County covered by the Permit.

On February 29, 2012, the EPA Inspection Team accompanied Sonoma County Department of Health Services inspectors as they evaluated Mary's Pizza Shack, located within the City of Santa Rosa's MS4 jurisdiction. The County inspectors utilized a Food Facility Storm Water Inspection Report Form, which required evaluation of the following areas:

- Equipment Cleaning,
- Dumpsters and Recycling Containers,
- Spill Response, and
- Illicit Discharge to the Municipal Storm Drain System.

The County inspectors completed the Facility Storm Water Inspection Report immediately after the inspection and noted that the restaurant was in compliance, except spill response equipment was not present on site. A copy of the completed report is presented in Appendix B, Exhibit 4.

Program Deficiency:

The County's Food Facility Storm Water Inspection Report form did not include all pollutant-generating activities listed in Special Provision E, Part 3-3, Table 4.

While the inspector appeared to evaluate all areas at the facility, the Facility Storm Water Inspection form did not include Hazardous Materials Storage, Handling, and Disposal; Outdoor Storage of Raw Materials; and Parking and Storage Area Maintenance. EPA recommends the County add these activities to the form to ensure County staff complete inspections as required by the Permit.

Section 2.3 Public Agency Activities Program

Special Provision E, Part 9 of the Permit, entitled Public Agency Activities Program, requires each co-permittee to minimize storm water pollution impacts from public agency activities. The EPA Inspection Team evaluated the City and County's compliance with selected Special Provisions of the Permit as

described below. Summaries of EPA inspections performed at City and County facilities are presented below. Detailed inspection write-ups and photographs are included in Appendix F.

Section 2.3.1 Vehicle Maintenance / Material Storage Facilities / Corporation Yards Management / Long Term Maintenance Programs

The Permit requires each co-permittee to implement BMPs for specific activities listed in Table 10 of Special Provision E, Part 9-2 of the Permit, which includes vehicle and equipment cleaning, painting activities and materials storage, among other municipal activities. For activities not listed in Table 10, the co-permittee may use BMPs from the CalTrans Storm Water Quality Handbook Maintenance Staff Guide or other industry-accepted BMP manuals such as FishNet 4C or CASQA.

County of Sonoma Transportation and Public Works Airport Corporation Yard – 2175 Airport Boulevard, Santa Rosa

On March 1, 2012, the EPA Inspection Team inspected the Sonoma County Transportation and Public Works Airport Corporation Yard (TPW Airport Corp. Yard), which is used for vehicle and equipment storage, minor vehicle maintenance, material storage (hazardous waste, road building equipment and signs, aggregate, etc.), and painting / traffic stenciling. The TPW Airport Corp. Yard also contains a wash rack that was decommissioned in Fall 2011 (the MS4 Permit requires each co-permittee to eliminate discharges of untreated equipment and vehicle wash water to the MS4 no later than October 1, 2011). However, according to the Sonoma County Storm Water Coordinator, the vehicle wash rack was used to wash a Sheriff vehicle during January 2012.

The EPA Inspection Team observed loose road building material pushed beyond stockpile containment berms in the northwest portion of the TWP Airport Corp Yard. A Roads Crew staff member provided the EPA Inspection Team with a Materials Safety Data Sheet (MSDS) for the stockpiled asphalt material (Appendix B, Exhibit 5), which meets the definition of a hazardous material and may be toxic to fish and other aquatic life, as well as impede the growth of vegetation. Additionally, the EPA Inspection Team observed evidence of past paint spills outside the sign shop. Table 10 of Special Provision E, Part 9-2 of the Permit requires the co-permittees to implement specific BMPs for the storage of hazardous materials (see BMP B-82) and for outdoor storage of raw materials (see BMP B-85), which includes preventing spills of such materials.

The EPA Inspection Team also conducted an inspection of the Sonoma County Schulz Airport to evaluate its compliance with the California Industrial General Permit. The Sonoma County Schulz Airport falls under the County's MS4 jurisdiction under the Public Agency Activities Program as it is a County-owned facility with vehicle maintenance, cleaning and fueling. However, the EPA Audit Team inspected this facility strictly under the Industrial General Permit, and a copy of the inspection report was sent to the Airport and to the County separate from this MS4 Report.

County of Sonoma Parks Maintenance Yard – 300 Fiscal Drive, Santa Rosa

On February 29, 2012, the EPA Inspection Team inspected the Sonoma County Parks Department Maintenance Yard, which is used to store and repair landscape maintenance vehicles, equipment, tools and supplies. The County Parks Department produced a BMP guidance document entitled Maintenance Facilities Stormwater Best Management Practices. In accordance with this guidance document, equipment stored outside was covered with tarps, and liquids, including oil, grease, fuels, and solvents were labeled and stored under cover.

City of Santa Rosa Main Maintenance Yard / Utilities Field Operations Building – 35 Stony Point Road, Santa Rosa

On March 1, 2012, the EPA Inspection Team inspected the City of Santa Rosa's Main Maintenance Yard / Utilities Field Operations Building. The Main Maintenance Yard is owned and operated by the City and is used for vehicle washing, emptying vactor trucks and material storage. The entire Main Maintenance Yard and parking lot area is engineered to drain into a vegetated treatment bioswale. The vehicle wash system utilizes tertiary treated wastewater reclaimed from the Laguna Treatment Plant to wash City vehicles. Before discharging to the sanitary sewer, the rinsate passes through a 3-stage filtration system. During the inspection, the Main Maintenance Yard was free of debris and sediment. A City Utilities Department employee stated during the inspection that this facility is swept weekly.

Positive Attribute:

The City constructed a new facility for proper disposal of liquid waste removed from the MS4.

The City's Main Maintenance Yard / Utilities Field Operations facility has two bays for separate handling and disposal of vacuum truck decant. One bay is used by the Public Works Department to dispose the liquid wastes collected from storm drain cleaning and street maintenance, which typically generates finer particulates and trash. The second bay, used by the Utilities Department, is engineered to accommodate the larger rock and debris collected during its maintenance activities. The EPA Inspection Team views the City's vacuum truck decant bays as a model method for proper disposal of liquid waste removed from the MS4.

Additionally, the EPA Inspection Team observed a field crew remove debris from storm drains in a residential neighborhood utilizing a vacuum and water-jetting truck. The storm drain maintenance crew noted that the storm drains were intentionally plugged downstream of the truck to capture any rinsate that may have drained from the connections being cleaned.

City of Santa Rosa Municipal Service Center North - 55 Stony Point Road, Santa Rosa

On March 1, 2012, the EPA Inspection Team inspected the City of Santa Rosa Municipal Service Center North (MSCN), which is used for vehicle maintenance, hazardous materials storage, and warehousing and storage of materials. The City sought coverage for this facility under California Multi-Sector General Storm Water Permit under Standardized Industrial Code 4213 (Trucking, Except Local-Con) and the City had developed a SWPPP for this facility. A City Utilities Department employee stated during the inspection that the yard is swept weekly. The facility was free of debris and sediments during the inspection. Storm drains throughout the MSCN were equipped with filter fabric. The power washing area located at the MSCN was covered and bermed. City staff stated that power-washing rinsate passes through a sand and oil separator before discharging to the sanitary sewer.

Program Recommendation:

The co-permittees did not consistently use BMPs identified in Table 10 of Special Provision E, Part 9-2 of the Permit.

For example, the Sonoma County Board of Supervisors formally adopted use of BMPs for all County road maintenance activities from the FishNet 4C Manual, Guidelines for Protecting Aquatic Habitat and Salmon Fisheries for County Road Maintenance, December 2004 (see Appendix B, Exhibit 6). The Sonoma Agenda Item Summary Report notes that County road maintenance staff participated fully in the development of the FishNet 4C Manual. In most instances, the BMPs used by the co-permittees were appropriate and well-maintained, however, the Permit specifies that permittees must implement BMPs

from the CalTrans Storm Water Quality Handbook Maintenance Staff Guide for road maintenance activities, material storage facilities and corporation yards. EPA recommends the City and County work with the Regional Board to determine if equivalent BMPs can be an acceptable alternative to the BMPs in Table 10.

Section 2.3.2 Street and Road Maintenance

Special Provision E, Part 9-5(a) of the Permit requires each co-permittee to sweep curbed streets six times per year in high trash generation areas and four times per year in residential and commercial areas. The City and the County both subcontract street sweeping to the North Bay Corporation, which disposes the collected material to a landfill.

The Sonoma County TPW Roads Operations Manager explained during the office session that North Bay Corporation sweeps 90% of the Phase 1 Permit area six times per year. Sonoma County utilizes a computerized maintenance management system to track sweeping.

The City maintains a sweeping schedule map on its website explaining that residential streets are swept monthly and commercial streets are swept more frequently.

Section 2.3.3 Stockpile Management

Special Provision E, Part 9-6 of the Permit requires each co-permittee to protect debris and material stockpiles from rain or wind erosion with a cover or sediment barriers.

Potential Permit Violation:

The County did not protect material stockpiles from rain with a cover or sediment barrier, as required by Special Provision E, Part 9-6 of the Permit.

The EPA Inspection Team inspected the Sonoma County TWP Corporation Yard during a rain event on February 29, 2012. The stockpiled asphalt material located in the northwest portion of the yard was not protected by a cover and the inspectors observed materials outside the containment barrier.

Section 2.3.4 Employee Training

Special Provision E, Part 9-11 of the Permit requires co-permittees to provide annual storm water training to all employees whose job activities may affect storm water quality and additional training to employees who have the potential to use pesticides or fertilizers, or for employees who may investigate illicit connections and illicit/illegal discharges (IC/ID).

County of Sonoma

The County provided sign-in sheets for annual storm water training for staff, with the most recent training occurring on January 18, 2012. The 2010-2011 Annual Report for Sonoma County states that the Permit and Resource Management Department supervisors and lead staff are trained annually on BMPs and storm water quality issues. The County Roads Maintenance Crew provided a copy of an email, which directed all members of the Vegetation Crew to attend a Vegetation Spray Conference as mandatory training requirement of their license.

The Sonoma County Regional Parks Storm Water Coordinator described the additional training and discussions that Parks staff receive. During the inspection of the Parks Maintenance Yard, he stated that new Parks staff are initially trained on spill procedures and general storm water operations and that Parks

staff discuss spill cleanup procedures during "Safety Tailgate Meetings," which occur weekly or every 10 days.

City of Santa Rosa

The City of Santa Rosa provided sign-in sheets of trainings and described their tracking system during the office interviews. The City representative from the Stormwater Program explained that training is tracked through Outlook and added that there is not a formal matrix of training groups. According to their 2010-2011 Annual Report, the City, in collaboration with the Russian River Watershed Association, developed and offered erosion control training, which addressed the new requirements of California's Construction General Permit. Additionally, the City has trained several staff to become Qualified SWPPP Practitioners.

Section 2.4 Illicit Discharge Detection and Elimination

Special Provision E, Part 10 of the Permit, Illicit Connections and Illicit Discharges Elimination Program, requires each co-permittee to "implement a program to eliminate all illicit connections and illicit discharges (IC/ID) to the storm drain system." Among other requirements, each co-permittee must map their system, maintain a database and establish a hotline, as discussed below.

Section 2.4.1 Storm Drain Mapping

Special Provision E, Part 10-2(b) of the Permit requires all co-permittees to map or document all permitted connections (new connections and historic connections if documentation exists) by October 1, 2013.

County of Sonoma

A County of Sonoma GIS Technician from the Transportation and Public Works Division described the County's GIS program during the in-office interview. The GIS Technician described attributes stored in the GIS, including the locations of drop inlets, curb inlets, pipe openings and manholes. He attempted to demonstrate the mapping system during the in-office interview, however at that time, several of the attributes would not display properly. The GIS Technician stated that it would be helpful to add a Digital Elevation Model to all of the existing map features to show the direction of flow for conveyances. Sonoma County has been able to use the existing map to respond to spills: a representative of Sonoma County Fire stated that the storm drain maps were used to inform staff on where to place booms downstream of a spill released near the Kaiser Airport in the summer of 2011.

The County Storm Water Coordinator explained that the County intends to utilize information included on drainage and grading permits, but had not yet assessed the data. Furthermore, the County was not requiring electronic drainage plan submissions; therefore, drainage plans for new development were not submitted in a format that can be readily transferred into the GIS. Plans for new development projects must be scanned by a third party in order for the associated connections to be added to the GIS.

Program Deficiency:

The County needs to ensure that it is on schedule to develop a complete storm drain system map and conduct field screening of storm drain outfalls.

The County Transportation and Public Works GIS Technician stated that he could readily "tag" outfalls in the GIS by visually identifying the location where the storm drain pipes terminated. However, the EPA Inspection Team reviewed the County storm drain system map during the demonstration and determined

that outfalls were not labeled in the GIS. The County Transportation and Public Works GIS Technician further explained that he is recording pipe size during field activities, but had not yet obtained information on the age of storm drain features and segments. The EPA Inspection Team views the MS4 map as a critical tool that the County needs to complete by the Permit-specified compliance dates.

City of Santa Rosa

A City employee from the Utilities Division described Santa Rosa's mapping program during the in-office interview, stating that the City has mapped the entire jurisdiction. Using GIS, the City has mapped all major outfalls as well as parts of the system that are 50 years or older and adds connections from approved encroachment permits. Additionally, the City assigns flow direction for streets and storm water conveyances.

The City continually updates its map. It provided the EPA Inspection Team with a flowchart of its procedures to update and ensure accuracy of the system map from scanned improvement plans, existing 2009 Autocad maps and comments from vactor truck operators. The City adds new permitted connections to its GIS when encroachment permits are received, and the associated drainage maps are sent to the Utilities Division to be added into the GIS. The Utilities Coordinator explained that the slowing economy has led to several uncompleted private developments, which may have unmapped connections.

Program Recommendation:

The City and County should communicate to ensure that storm sewer connections at jurisdictional boundaries are mapped.

2.4.2 Public Reporting

Special Provision E, Part 10-3(a) requires co-permittees to establish and maintain a phone hotline and internet site to receive all reports of IC/ID complaints within their jurisdiction.

County of Sonoma

The Sonoma County Stormwater Coordinator explained that spills are reported through a regular business line operated by the PRMD, 911, and the Redwood Empire Dispatch Communications Authority (REDCOM). County Fire and Emergency Services Department has developed the Sonoma County Non-Storm Water Discharge Response Plan, dated September 2011(hereinafter, County Non-Storm Water Discharge Response Plan.) The purpose of the document is to delineate responsibilities and appropriate levels of response to incidents involving non-storm water discharges reported to the County. It includes a routing flowchart and table to be used to ensure appropriate personnel respond, based on the nature and type of the incident. For example, Environmental Health responds to sewage spills, Sonoma County Fire responds to spills of hazardous materials, and Transportation and Public Works Division respond to spills of sediment and silt. Spill reports are recorded by individual County departments and are compiled by the PRMD annually to be submitted with the Annual Report.

Program Deficiency:

The County's public reporting system for IC/ID complaints was not functioning in accordance with established IC/ID procedures.

Regional Water Board staff had received reports that the REDCOM IC/ID reporting system was not functioning properly. During the inspection, the County Storm Water Engineer placed a call to

REDCOM to test the system, using a false report of an IC/ID incident involving sediment. REDCOM staff incorrectly directed the County Storm Water Engineer to call the County Sheriff. According to the routing flowchart and table in the County Non-Storm Water Discharge Response Plan (see Appendix B, Exhibit 7), IC/ID incidents involving sediment should be routed to the County's Permit and Resource Management Department. Regional Board staff also stated that, prior to this evaluation, REDCOM operators have misinformed callers who reported discharges of non-hazardous materials.

In these instances, the routing process used by REDCOM staff was not in accordance with the response plan flow-chart and which indicates additional training of REDCOM staff is needed. Special Provision E, Part 9-11(d) of the Permit requires the co-permittees to annually train all employees who are responsible for investigating illicit connections and illicit discharges. EPA recommends the County communicate with REDCOM staff to review the County Non-Storm Water Discharge Response Plan.

City of Santa Rosa

The City has an established public number for reporting spills, additionally, residents can report spills to 911. The City has an active spill response team made up of members from various City departments. The City has established a spill response team phone number (a.k.a., "Group Me") that is used to initiate a conference call or text message, which is received by everyone in the spill response group, to coordinate an appropriate response.

After responding to spill incidents, data, including documents and pictures are entered into the City's database for tracking purposes. The City's 2010–2011 MS4 Annual Report includes a pie chart that identifies the types of spill incidents, and provides a historical tally of spill responses over time. The City Stormwater Coordinator explained that the number of spill response incidents has increased in recent years, and attributed this increase to the City's efforts to report a broader array of incidents that could potentially affect the storm drain system. The City's Civil Engineering Technician further explained that although the City has been tracking the types of spill incidents and analyzing data for years, they have had trouble in utilizing the data to inform the program due to fluctuations from year to year, and an overall lack of trends.

Section 2.4.3 Storm Drain Screening

Special Provision E, Part 10-4(a) of the Permit requires the co-permittees to conduct field screening of their storm drain outfalls that have not already been screened by October 1, 2014, for illicit connections and discharges including:

(A) All storm drain outfall pipes 36 inches in diameter or greater;
(B) Areas identified during the visual flow monitoring in Monitoring and Reporting Program R1-2009-0050; and
(C) All portions of the storm drain systems 50 years or older in age.

The County Storm Water Engineer explained that this was the first Permit term in which field screening of outfalls was required, and stated that he was not aware of field screening being conducted during the current or past Permit terms.

Program Recommendation:

EPA recommends that the County develop plans to identify how and when they will perform necessary screening of outfalls by October 1, 2014 to identify illicit connections and discharges.

The City Stormwater Coordinator explained that the City samples flowing outfalls three times to determine the composition of the flow. She added that the City was unable to conduct composite

sampling for outfalls that are usually dry, and the City is proposing to the Regional Board to collect grab samples instead.

The City has done some research on the sources of dry weather flows. For example, the City is developing a program to disseminate outreach materials to property owners who may over-irrigate their lawn. Additionally, the City has met with waste haulers for portable toilets to discuss feasible BMPs to contain possible spills and to develop useful outreach materials. The Storm Water Coordinator also explained that she is developing outreach materials for all power-washers and painters.