



September 10, 2015

Ms. Kathleen H. Johnson  
Director, Enforcement Division  
United States Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Subject: **Response to City of Lake Elsinore Municipal Separate Storm Sewer System (MS4) Compliance Audit Report**

Dear Ms. Johnson:

The City has reviewed the EPA's July 21, 2015 final audit report ("Report") for the City's Storm Water Management Program (the "Program") and appreciates the opportunity to provide a response. Below, the City addresses the EPA's recommendations as well as potential permit violations.

#### City Response

The City's response to the Report follows the order of the Report and will address each potential permit violation and recommendation. The response also includes City actions that have been taken and, if appropriate, an implementation schedule.

#### **3.1.1 Illicit Connection and Illegal Discharge Routine Inspection and Monitoring.**

##### **Potential Permit Violation:**

*The City identified dry-weather flow at the Pete Lehr Drive outfall in 2011 and in June 2014. Additionally, the EPA Inspection Team observed visible flow from the outfall during the inspection. The City had not investigated or eliminated the dry weather flow at the Pete Lehr Drive Outfall within sixty (60) calendar days, as required by Part IX.A of the Permit.*

*Following the inspection, the City confirmed that dry-weather flows at the Pete Lehr Drive outfall are attributed to a permitted connection (i.e. sump) to its MS4 at Diamond Stadium. The City's follow-up investigation confirmed that the sump discharges flow from both the "working/storage"*

951.674.3124

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*areas of the stadium and the playing field. Given the likely use of nutrients among other potential pollutants for turf management at the Stadium, the City should expand its investigation of this discharge to include sampling and analysis for pollutants of concern, as required by Section IX.E.c of the Permit.*

Response/Actions: In 2011, City staff investigated to determine the source of the dry weather discharge at the Pete Lehr Drive Outfall. This investigation included review of the storm drain plans along with a thorough field recognizance. Based on this investigation, City staff determined that the source of the discharge was irrigation runoff from the landscape areas in the vicinity of the adjacent Diamond Stadium parking lot. The source of the discharge was evidenced by irrigation runoff in the gutter traced back to the adjacent Diamond Stadium. In that irrigation runoff is a permitted discharge, City staff closed the investigation.

Following the 2014 EPA site visit in which water was noted from an outfall pipe to Lake Elsinore, the City conducted additional investigation. The Diamond Stadium groundskeeper informed City staff that the sump referenced in the EPA's Report has only functioned once in the last six years and it was during the rainy season.

The Report suggests that the source of the flows into the outfall could not be traced. We do not concur with that observation. Discoloration within the Stadium parking lot confirmed that flows from over-irrigation continued to occur. During our interview with the Stadium's head groundskeeper, we learned that the operator was converting these turf grass areas to drought tolerant vegetation with drip irrigation and/or more efficient sprinkler irrigation heads in conjunction with a program of the local water district, Elsinore Valley Municipal Water District.

In addition, the pipe flows were tested and found consistent with irrigation runoff. A copy of the test results are attached as Attachment No. 1.

Implementation Schedule: In light of the EPA's concern, the City has scheduled October 1, 2015 to retest the flows, if any (assuming continued dry weather).

### **3.1.2 Illicit Connection and Illegal Discharge Investigation and Elimination**

#### **Recommendation for Improvement:**

*EPA recommends the City develop SOPs for communications with the other Co-Permittees on how to respond to and investigate IC/IDs*

Response/Actions:

This recommendation from the audit report is appreciated. The City has relied on the strong working relationship among the Principal Permittee and the Co-Permittees and, in our experience, the monthly updates to the contact roster provided by the Principal Permittee has enabled staff to reach the appropriate IC/ID person. However, in light of EPA's recommendation, the City will develop written SOPs.

Implementation Schedule: The City will implement this recommendation within the next 60 days.

**Potential Permit Violation:**

*The City failed to respond to all reports of IC/IDs within 24 hours as required by Part IX.B of the Permit.*

Response/Actions: City staff has been diligent in their efforts to meet the response requirements in Part IX.B of the Permit but acknowledges that responses have in some cases been delayed. The Program Coordinator can now directly request the assistance of the Building Division inspectors and Code Enforcement officers to ensure response times are met. Additionally, in an effort to provide for improved documentation of investigation activity, an Investigation Report Form has been created and implemented to aid staff in tracking activity to include dates, action, contacts, photos, etc. A copy of the Investigative Report Form is attached as Attachment No. 2.

To further develop the City's response program, an awareness/training program is being scheduled with the City's building inspectors and code enforcement officers regarding storm water management topics and identification of IC/IDs. The training, sponsored by the Co-Permittees and generally held at the offices of the Riverside County Flood Control District, is held annually and will be scheduled in the Fall 2015.

Implementation Schedule: Partially Completed. Additional training will be completed in the Fall.

**3.1.3 Illicit Connection, Illegal Discharge Investigation Schedule, Tracking, and Training**

**Potential Permit Violation:**

*The City had not developed or submitted a schedule to implement systematic investigations of open channels and major outfalls within 18 months of Permit adoption as required by Part IX.E.b of the Permit.*

Response/Actions: The City has consistently conducted regular inspections of open channels and major outfalls annually between the months of June and September, beginning at the northern reaches of the City and systematically moving south, completing a check list for each outfall. The City has completed these inspections for 2015. For 2016 and thereafter, the City will prepare a schedule setting a specific date for inspection of each outfall.

Implementation Schedule: The 2016 schedule for inspection of outfalls will be completed within the next 60 days. A copy of the calendar showing the scheduled dates is attached as Attachment No. 3.

**Program Deficiency:**

*The City was using multiple databases to track IC/ID incident response, resulting in inconsistencies potentially impacting program implementation. The City should create a single database for IC/ID investigations that includes both the IC/ID complaints received and the IC/IDs investigated. The database should include all relevant dates (e.g. date complaint originated, date investigated, date resolved), location, contact information of parties involved, actions taken, and any other pertinent information.*

Response/Actions: At the time of the audit in 2014, the City was working towards refining its database to track IC/ID incident responses and includes all of relevant information noted above. A new software program developed by CBI Systems and known as MS4web has been implemented. This state of the art program was also recently selected by the County of Riverside as part of its MS4 compliance program.

Implementation Schedule: Completed.

**3.2.1 Establish Priorities for Industrial Facility Inspections**

**Potential Permit Violation:**

*The City had not established risk-based inspection priorities for the industrial facilities in its jurisdiction as required by Part XI.C.1 of the Permit.*

Response/Actions:

Prior to the EPA's audit, in February 2014 the City identified areas in which its tracking, inspection and rating of industrial facilities could be improved. Thereafter, the City implemented a series of steps to implement those improvements.

The City contracted with an experienced compliance consultant, Lynn Merrill, Consulting to Municipal Government, for inspection of all commercial and industrial facilities in the City. In connection with that service, the City developed an inspection procedure and form focused on source and treatment control, BMPs and stormwater permit compliance. Copies of the inspection procedure and form are attached as Attachment No. 4. The City's consultant then began the process of rating each industrial facility as to risk in order to develop a priority based inspection protocol. Currently, all industrial facilities in the City have been entered into the City's new MS4 compliance database, inspected, rated and a date set for the next inspection.

In addition, the City's Business License Division consults directly with the Program Coordinator before issuance of new business licenses in order to identify potential source polluters. The Program Coordinator communicates with the applicant, often in person, providing information regarding compliance requirements and thereafter enters the business into the MS4 database with a date set to perform an initial inspection.

We believe this program has shown significant success and the inspection services carried on by Lynn Merrill have been renewed for Fiscal Year 2015/16.

Implementation Schedule: Completed.

### **3.2.2 Perform Priority-based Inspection of Industrial Facilities**

#### **Potential Permit Violation:**

*The City was not conducting industrial facility inspections consistent with frequencies specified in Part XI.C.3 of the Permit.*

#### Response/Actions:

Please see response to Section 3.2.1 above. As of this response, all industrial facilities in the City have been inspected and rated. The contract for inspection of facilities has been renewed for Fiscal Year 2015/16.

Implementation Schedule: Completed.

### **3.2.3 Implement Source Control for Industrial Facilities**

#### **Potential Permit Violation:**

*The City failed to require industrial facilities within its jurisdiction to implement source control and pollution prevention measures as required by Part XI.C.5 of the Permit.*

Please see response to Section 3.2.1 above. As of this response, all industrial facilities in the City have been inspected and rated. The contract for inspection of facilities has been renewed for Fiscal Year 2015/16.

Implementation Schedule: Completed.

### **3.3.1 New Development and Redevelopment Permit Approval Process**

#### **Potential Permit Violation:**

*The City was relying on the expertise of environmental consulting firms as opposed to the detailed guidelines within Section 7.1 of the 2007 DAMP for determining the adequacy of proposed erosion and sediment control and post-construction BMPs for private new development and significant redevelopment projects, as required by Section XII.A.2 of the Permit.*

#### Response/Actions:

The City does not concur that it relies on the “expertise” of an environmental consulting firm for determining the adequacy of proposed erosion and sediment control and post-construction BMP’s for private new development and significant redevelopment projects rather than detailed guidelines.

Grading and improvement plans are subject to a vigorous review as to erosion and sediment control. Erosion and sediment controls are identified on a separate sheet of the grading and improvement plans as well as the SWPPP (when applicable). Upon submittal to the City, those plan sets are reviewed by the City’s consulting engineering firm. Following plan check approval, the plans are returned to the City for final review and approval by the City Engineer. The City’s consulting engineering firms employ Qualified SWPPP Developers to ensure they are utilizing the most current guidelines.

For post-construction BMP’s, during the design review phase of a project, a preliminary WQMP (PWQMP) is submitted to the City. The PWQMP is sent out to a City consulting engineering firm for plan check review and approval. When the Final WQMP (FWQMP) is submitted, it is sent out for

review and approval to the same consulting engineering firm. Once either the PWQMP or FWQMP is approved, it is returned to the City for final review and approval by the City Engineer.

Finally, WQMP's are prepared in compliance with the WQMP Template and WQMP Technical Guidance Document, both of which have been reviewed and approved by the Santa Ana Regional Water Quality Control Board.

**Potential Permit Violation:**

*The City failed to ensure, through conditions of approval and/or as-built inspections, that private, post-construction BMPs were being operated and maintained in such a manner as to minimize vector breeding as required by Section XII.K.1 and 2 of the Permit.*

Response/Actions: Once facilities are constructed and operational, the City takes action to minimize vector breeding on a case by case basis, including performing a same day inspection of the site, notifying the property owner to maintain and/or repair the facility to eliminate ponding and of the potential for vector breeding. If vector breeding is suspected, the City will notify the Northwest Mosquito and Vector Control District (NWMVCD) which provides vector control services to the City. NWMVCD's staff are dispatched to the site, take samples and then treat as necessary.

Following the EPA site visit in 2014, the City contacted the property owner at the Family Dollar Store and also contacted NWMVCD. Follow-up inspections revealed that the likely source of the standing water was landscape mulch clogging the filter. The Program Coordinator visited the site in late August, 2015 and did not find any standing water.

The City will closely monitor this site during the upcoming rainy season to assure that the standing water problems do not re-appear. In addition, as noted above, the City's building inspectors and code enforcement officers will receive training in the Fall to become an additional resource for early identification of BMP deficiencies in existing facilities.

Implementation Schedule: The City has schedule an inspection for this site on December 1, 2015.

**Potential Permit Violation:**

*The City was not using a WQMP checklist for review and approval of WQMPs for public projects as required by Part XII.H1 of the Permit.*

Response/Actions: The City acknowledges that it has not used a WQMP checklist for public projects sponsored by the City. Because the City has a high familiarity with such projects at their inception, the City has not generally employed a checklist procedure to gather information given its inherent knowledge about such projects. We note that the City's public works projects are subject to a vigorous review process through our Public Works Department to ensure compliance. However, the City will immediately implement a requirement that all public works project in the City be subject to the WQMP checklist on a going forward basis.

Implementation Schedule: Completed.

**Recommendation of Improvement:**

*The City should include long-term maintenance requirements for post-construction BMP's in all O&M agreements for public projects.*

Response/Actions: We request clarification on this recommendation. We understand this recommendation to be that the City prepare an O&M agreement for public projects and that such agreement be recorded as a deed restriction on City owned property. Because there is no private party involvement, the recommendation appears to suggest that the City enter into an O&M "agreement" with itself. The City is already mandated to maintain its public facilities consistent with the approved BMP's and it unclear to us how having an "agreement" will improve compliance.

Conclusion

The City of Lake Elsinore appreciates the input from the EPA regarding our storm water management program. The City acknowledges the cited deficiencies and is

Ms. Kathleen H. Johnson, Director  
September 11, 2015  
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committed to the improvements already made and the future improvements noted above. Please contact program coordinator, Rita Thompson at (951) 674-3124, ext. 308 or [rthompson@lake-elsinore.org](mailto:rthompson@lake-elsinore.org) if you have any questions or comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Grant Yates", with a long horizontal flourish extending to the right.

Grant Yates  
City Manager

Attachments

CC: via email (w/ encl.)  
Milasol Gaslan, Santa Ana Regional Board

# ATTACHMENT 1



**BABCOCK Laboratories, Inc.**  
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Client Name: City of Lake Elsinore  
Contact: Rita Thompson  
Address: 130 S. Main Street  
Lake Elsinore, CA 92530

Analytical Report: Page 1 of 3  
Project Name: Dryweather Discharge Quote 5-1  
Project Number: Dryweather Discharge Quote  
5-2015  
**Work Order Number: B5F0612**

Report Date: 15-Jun-2015

Received on Ice (Y/N): Yes Temp: 4 °C

Attached is the analytical report for the sample(s) received for your project. Below is a list of the individual sample descriptions with the corresponding laboratory number(s). Also, enclosed is a copy of the Chain of Custody document (if received with your sample(s)). Please note any unused portion of the sample(s) may be responsibly discarded after 30 days from the above report date, unless you have requested otherwise.

Thank you for the opportunity to serve your analytical needs. If you have any questions or concerns regarding this report please contact our client service department.

**Sample Identification**

<u>Lab Sample #</u>	<u>Client Sample ID</u>	<u>Matrix</u>	<u>Date Sampled</u>	<u>By</u>	<u>Date Submitted</u>	<u>By</u>
B5F0612-01	Dry Weather Sampling ---SPECIAL---	Liquid	06/04/15 09:45	Omar Sosa	06/04/15 15:15	Omar Sosa



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 Contact: Rita Thompson  
 Address: 130 S. Main Street  
 Lake Elsinore, CA 92530

Analytical Report: Page 2 of 3  
 Project Name: Dryweather Discharge Quote 5-;  
 Project Number: Dryweather Discharge Quote  
 5-2015  
**Work Order Number: B5F0612**

Report Date: 15-Jun-2015

Received on Ice (Y/N): Yes Temp: 4 °C

Laboratory Reference Number  
**B5F0612-01**

<u>Sample Description</u>	<u>Matrix</u>	<u>Sampled Date/Time</u>	<u>Received Date/Time</u>
Dry Weather Sampling	Liquid	06/04/15 09:45	06/04/15 15:15

Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag
<b>Anions</b>							
Nitrate as N	ND	0.20	mg/L	EPA 300.0	06/05/15 05:54	DCB	
<b>Aggregate Properties</b>							
pH	7.6	1.0	pH Units	SM 4500H+ B	06/08/15 10:20	ybv	
<b>Solids</b>							
Total Dissolved Solids	680	20	mg/L	SM 2540C	06/09/15 23:40	miv	
<b>Aggregate Organic Compounds</b>							
Oil & Grease (HEM)	5.4	4.6	mg/L	EPA 1664A	06/14/15 16:25	mcm	
<b>General Inorganics</b>							
Dissolved Oxygen	1.5	0.10	mg/L	SM4500 O C	06/04/15 15:30	jma	
<b>Nutrients</b>							
Nitrite as N	ND	0.10	mg/L	SM 4500NO2 B	06/05/15 16:15	ybv	
Ammonia-Nitrogen	28	5.0	mg/L	SM4500NH3H	06/05/15 15:36	JMA	
Kjeldahl Nitrogen	45	4.0	mg/L	EPA 351.2	06/12/15 13:58	JMA	
Total Nitrogen	45	5.0	mg/L	Calculation			
Total Phosphorus	1.4	0.50	mg/L	SM 4500P B E	06/09/15 17:55	slp	
<b>Metals and Metalloids</b>							
Cadmium	ND	2.0	ug/L	EPA 200.8	06/08/15 17:13	ERA	
Total Chromium	23	20	ug/L	EPA 200.8	06/08/15 17:13	ERA	
Copper	85	10	ug/L	EPA 200.8	06/08/15 17:13	ERA	
Lead	16	10	ug/L	EPA 200.8	06/08/15 17:13	ERA	

*mailing*  
 P.O. Box 432  
 Riverside, CA 92502-0432

*location*  
 6100 Quail Valley Court  
 Riverside, CA 92507-0704

P 951 653 3351  
 F 951 653 1662  
 www.babcocklabs.com

NELAP no. 02101CA  
 CA Elap no. 2698  
 EPA no. CA00102



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Client Name: City of Lake Elsinore  
Contact: Rita Thompson  
Address: 130 S. Main Street  
Lake Elsinore, CA 92530

Analytical Report: Page 3 of 3  
Project Name: Dryweather Discharge Quote 5-  
Project Number: Dryweather Discharge Quote  
5-2015  
**Work Order Number: B5F0612**

Report Date: 15-Jun-2015

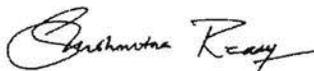
Received on Ice (Y/N): Yes Temp: 4 °C

**Notes and Definitions**

- pH: Regulatory 15 minute holding time exceeded B5F0612-01
- ND: Analyte NOT DETECTED at or above the Method Detection Limit (if MDL is reported), otherwise at or above the Reportable Detection Limit (RDL)
- NR: Not Reported
- RDL: Reportable Detection Limit
- MDL: Method Detection Limit
- \* / ' ' : NELAP does not offer accreditation for this analyte/method/matrix combination

**Approval**

Enclosed are the analytical results for the submitted sample(s). Babcock Laboratories certify the data presented as part of this report meet the minimum quality standards in the referenced analytical methods. Any exceptions have been noted. Babcock Laboratories and its officers and employees assume no responsibility and make no warranty, express or implied, for uses or interpretations made by any recipients, intended or unintended, of this report.

 Digitally signed by: Sushmitha Reddy  
 DN: CN = Sushmitha Reddy C = US  
 O = Babcock Labs, Inc.  
 Date: 2015.06.19 11:06:19 -07'00'

cc:

*mailing*  
P.O. Box 432  
Riverside, CA 92502-0432

*location*  
6100 Quail Valley Court  
Riverside, CA 92507-0704

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e-Short\_No Alias

NELAP no. 02101CA  
CA Elap no. 2698  
EPA no. CA00102



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Client Name: City of Lake Elsinore

Contact: Rita Thompson

Address: 130 S. Main Street  
Lake Elsinore, CA 92530

Report Date: 15-Jun-2015

Analytical Report: Page 1 of 2

Project Name: Dryweather Discharge Quote 5-;

Project Number: Dryweather Discharge Quote

Work Order Number: B5F0612

Received on Ice (Y/N): Yes

Temp: 4 °C

### Chain of Custody & Sample Information Record



E.S.BABCOCK & Sons, Inc.

6100 Quail Valley Court Riverside, CA 92507  
(951) 653-3351 • FAX (951) 653-1662  
www.babcocklabs.com

Client: City of Lake Elsinore Contact: Rita Thompson Fax No. \_\_\_\_\_  
Phone No. \_\_\_\_\_ email: \_\_\_\_\_  
Project Name: \_\_\_\_\_ Turn Around Time: Routine \*72 Hour Rush \*48 Hour Rush \*24 Hour Rush  
Project Location: Pete Lake Dr. of Diamond Ave \*Lab TAT Approval: \_\_\_\_\_ By: \_\_\_\_\_ \*Additional Charges Apply \_\_\_\_\_  
Additional Reporting Requests  
Include OC Data Package:  Yes  No  
FAX Results:  Yes  No  
Email Results:  Yes  No  
State EDT:  Yes  No  
(Include Source Number in Notes)

Sampler Information			# of Containers & Preservatives							Sample Type			Analysis Requested		Matrix	Notes				
Name:	Employer:	Signature:	Unpreserved	H <sub>2</sub> SO <sub>4</sub>	HCl	HNO <sub>3</sub>	Na <sub>2</sub> S <sub>2</sub> O <sub>5</sub>	NaOH	NaOH/Zn Acetate	NH <sub>4</sub> Cl	MCAA	Total # of Containers	Routine	Resample	Special					
<u>Owner Serv</u>	<u>ESB</u>	<u>[Signature]</u>										6							DW = Drinking Water WW = Waste Water GW = Ground Water S = Source SG = Sludge L = Liquid M = Miscellaneous	<u>SL 350.00</u>
Sample ID	Date	Time																		
<u>Reg Weather Sampling</u>	<u>6/4</u>	<u>0945</u>	X	X																<u>PH 7.22</u>

Relinquished By (sign)	Print Name / Company	Date / Time	Received By (sign)	Print Name / Company
<u>[Signature]</u>	<u>OSM 1583</u>	<u>6/4/15 1515</u>	<u>[Signature]</u>	<u>V. Fize Vozny/OSB</u>

(For Lab Use Only) Sample Integrity Upon Receipt/Acceptance Criteria

Sample(s) Submitted on ice?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Sample meets laboratory acceptance criteria?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Custody Seal(s) Intact?	<input checked="" type="radio"/> Yes <input type="radio"/> No <u>(NA)</u>	Permission to continue:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Sample(s) Intact?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Deviation/Notes:	
Temperature: _____ °C	<input type="checkbox"/> Cooler Blank	Signature/Date:	

Lab No. B5F0612KU  
Logged In By/Date: \_\_\_\_\_  
Page JUN 04 2015 of \_\_\_\_\_  
Rev. 3/09

mailing  
P.O. Box 432  
Riverside, CA 92502-0432

location  
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NEIAP no. 02101CA  
CA Elap no. 2698  
EPA no. CA00102



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Analytical Report: Page 2 of 2  
 Project Name: Dryweather Discharge Quote 5-  
 Project Number: Dryweather Discharge Quote  
 5-2015  
**Work Order Number: B5F0612**

Report Date: 15-Jun-2015

Received on Ice (Y/N): Yes Temp: 4 °C

**Project Information**

**City of Lake Elsinore**

130 S. Main Street  
 Lake Elsinore, CA 92530  
 Laboratory PM: Sushmitha Reddy

Phone:(951) 674-5170  
 Fax:(951) 471-2791

**0968**  
 6/4/2015

<b>Project Name:</b>	Dryweather Discharge Quote 5-2015	<b>Invoice To:</b>	City of Lake Elsinore
<b>Project Number:</b>	Dryweather Discharge Quote 5-2015	<b>Invoice Bid:</b>	Dryweather Discharge Quote 5-2015
<b>Client PM:</b>	Rita Thompson	<b>Invoice Manager:</b>	Rita Thompson
<b>Comments:</b>	** Lab will provide sample collection on-site by CADPH certified technician. ** Subcontracted test is Chlorophyll-a.		

Analysis	Comment
----------	---------

CD_ICPMS_WW	
CR_ICPMS_WW	
CU_ICPMS_WW	
DO	
Ammonia-N	
Nitrogen-Tot Calc	
Subout	
Oil and Grease-HEM	
PB_ICPMS_WW	
pH	
Phos-Total	
Sample Charge-350	
Solids-Total Diss	

**Nitrogen-Tot Calc subanalyses:**

NO3-N
Nitrite-N
Nitrogen-Kjeldahl

November 2015

SU	MO	TU	WE	TH	FR	SA
25	26	27	28	29	30	31
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

December 2015

SU	MO	TU	WE	TH	FR	SA
	1	2	3	4	5	
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31	1	2
3	4	5	6	7	8	9

- My Calendars
  - Calendar 8
- Team: Jim Smith
- Shared Calendars
  - CONF\_RM\_ENG
  - CONF\_RM\_A
  - CONF\_RM\_R
  - CONF\_RM\_CTYMGR
  - Catherine Eakins ...
  - Calendar - CONF...
- Other Calendars

Retest - Pete Leht Dr. Rows

Location: [Dropdown]

Start time: Thu 10/1/2015 12:00 AM [All day event]

End time: Thu 10/1/2015 12:00 AM

1 week reminder - Schedule retest by Babcock Labs

In Shared Folder: Calendar

# ATTACHMENT 2

[VICINITY MAP BOX]

Site Information: (location/discharge)			
Active Discharge	<input type="checkbox"/> Hazardous	<input type="checkbox"/>	Other Agency Contacted:
Reported By:			
Date Received:		Date Resolved:	

RESPONSE DATE	INITIALS	INVESTIGATION

Attach separate sheets as needed for more information and/or photographs of discharge.

# ATTACHMENT 3

FILE HOME SEND / RECEIVE FOLDER VIEW ADDGET PDF

New Appointment Meeting Items New Skype Meeting Today Next 7 Days Day Work Week Month Schedule View Open Calendar Groups E-mail Share Publish Calendar Permissions

Search People Address Book

June 2016

SU	MO	TU	WE	TH	FR	SA
29	30	31	1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

July 2016

SU	MO	TU	WE	TH	FR	SA
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31	1	2	3	4	5	6

- My Calendars
  - Calendar 8
- Team: Jim Smith
- Shared Calendars
  - CONF\_RM\_ENG
  - CONF\_RM\_A
  - CONF\_RM\_B
  - CONF\_RM\_CTYMGR
  - Catherine Eakins - ...
  - Calendar - CONF\_...
- Other Calendars

Subject: Conduct Outfall Inspections

Location: \_\_\_\_\_

Recurrence: Occurs every June 15 between 08:00-09:00

In Shared Folder: Calendar

# ATTACHMENT 4

**COMMERCIAL/ INDUSTRIAL  
NPDES INSPECTION  
PROCEDURES**

- 1) Introduce as representative of the City of Lake Elsinore
  - a. Provide business card
- 2) Request to speak with owner or manager
- 3) Explain purpose for visit
  - a. Inspect exterior of facility for stormwater pollution prevention
  - b. Requirement of the State of California Water Board
  - c. Provide handout (s)
  - d. Obtain copy of business card or flyer
- 4) Conduct inspection using City provided Form – PLEASE PRINT LEGIBLY
  - a. Fill in:
    - i. City Inspector – Name & Phone number
    - ii. Business Name
    - iii. Date
    - iv. Street Address – Include cross street if known
    - v. Mailing Address if different from Street Address
    - vi. “Own/Lease” check appropriate box
    - vii. Contact Name & Title
    - viii. Contact Phone No. & EMAIL
    - ix. “Nature of Business” check applicable
    - x. LIST PRODUCT or SERVICE of business
    - xi. “Type of Inspection” – check applicable box
    - xii. WALK SITE – complete review of items 1 through 14
      1. If area of improvement needed, write DATE, 30 days from date of inspection in ‘CORRECTION DUE BY’ column
      2. If ‘DISCHARGE VIOLATION’ (active discharge) is noted, check column
        - a. Check “\*\*NOTICE OF VIOLATION” in yellow box on form and list date of correction
          - Active discharge – SAME DAY correction.
          - Evidence of past discharge – up to 30 DAYS for correction
    - xiii. “Business License” – check yes or no
    - xiv. “Overall Rating” – check applicable box
    - xv. “Facility Rating” – fill out form on back of ‘pink’ copy; circle appropriate rating level.
    - xvi. “Comments” – Note any specifics regarding violations / areas in need of improvement here as well as direction to contact Regional Board for coverage
      1. If directed to contact the Regional Board, provide handout(s) IP1 and/or NONA
    - xvii. Obtain signature of business representative
- 5) DISTRIBUTE FORM:
  - a. White – business owner/manager
  - b. Yellow – Lynn Merrill Consulting
  - c. Pink – City
- 6) Lynn Merrill Consulting – enter data in MS4 Database under Facility Inspections.



NPDES COMMERCIAL/INDUSTRIAL COMPLIANCE INSPECTION

ENGINEERING DIVISION
130 SOUTH MAIN STREET, LAKE ELSINORE, CA 92530
Phone: 951-674-3124 x 241

City Inspector: \_\_\_\_\_ Phone No.: \_\_\_\_\_

Business Name: \_\_\_\_\_ Date: \_\_\_\_\_

Street Address: \_\_\_\_\_

Table with 2 columns: Own, Lease

Mailing Address (if different): \_\_\_\_\_

Contact, Name: \_\_\_\_\_ Title: \_\_\_\_\_

Contact Phone: \_\_\_\_\_ EMAIL: \_\_\_\_\_

Nature of Business: Retail Sales \_\_\_ Wholesale \_\_\_ Distributor \_\_\_ Lawn&Garden \_\_\_ Auto Repair \_\_\_ Recycling \_\_\_ Scrap Metal/Salvage Yard \_\_\_ Service \_\_\_
Professional \_\_\_ Manuf \_\_\_ List Product / Service: \_\_\_\_\_

Main inspection table with columns: Type of Inspection, YES, NO, Correction Due / Re-Inspection Date, Violation\*\*

Business License? Yes No \*Overall Rating: Good Average Needs Improvement // Facility Rating: Low Med High

\*Overall Rating: Good: 0 Corrections, 0 Violations // Average: 1-2 Corrections, 0 Violations // Needs Improvement: 3 or more Corrections and/or 1+Violations

\*\*NOTICE OF VIOLATION (see above) - Violation of LEMC 14.08 / Correction Due On or Before:

COMMENTS:

In the event inappropriate material, waste handling or storage practices are observed, or there is evidence of past or present unauthorized, non-storm water discharges, a written enforcement order may be issued at the time of the initial inspection, a written enforcement order shall be issued at the time of the follow-up inspection, if the Facility is still not in compliance.

Signature of receiver / Print Name

STAFF USE: Cross Street: \_\_\_\_\_ Decimal Latitude/Longitude: \_\_\_\_\_
SIC Code: \_\_\_\_\_ /Acres: \_\_\_\_\_ APN: \_\_\_\_\_



NPDES COMMERCIAL/INDUSTRIAL COMPLIANCE INSPECTION

ENGINEERING DIVISION
130 SOUTH MAIN STREET, LAKE ELSINORE, CA 92530
Phone: 951-674-3124 x 241

City Inspector: \_\_\_\_\_ Phone No.: \_\_\_\_\_

Business Name: \_\_\_\_\_ Date: \_\_\_\_\_

Street Address: \_\_\_\_\_

Mailing Address (if different): \_\_\_\_\_

Own | Lease
[ ] [ ]

Contact, Name: \_\_\_\_\_ Title: \_\_\_\_\_

Contact Phone: \_\_\_\_\_ EMAIL: \_\_\_\_\_

Nature of Business: Retail Sales \_\_\_/ Wholesale \_\_\_/ Distributor \_\_\_/ Lawn&Garden \_\_\_/ Auto Repair \_\_\_/ Recycling \_\_\_/ Scrap Metal/Salvage Yard \_\_\_/ Service \_\_\_/ Professional \_\_\_/ Manuf \_\_\_/ List Product / Service: \_\_\_\_\_

Table with 4 columns: Type of Inspection (circle one), YES, NO, Correction Due / Re-Inspection Date: Violation\*\*. Rows 1-14 list various inspection criteria like 'Are commercial or industrial process activities conducted outdoors?' and 'Are raw materials, equipment, or wastes that have a potential to impact stormwater quality stored outside?'.

Business License? Yes No \*Overall Rating: Good Average Needs Improvement // Facility Rating: Low Med High

\*Overall Rating: Good: 0 Corrections, 0 Violations // Average: 1-2 Corrections, 0 Violations // Needs Improvement: 3 or more Corrections and/or 1 +Violations

\*\*NOTICE OF VIOLATION (see above) - Violation of LEMC 14.08 / Correction Due On or Before:

COMMENTS:

Multiple blank lines for handwritten or typed comments.

In the event inappropriate material, waste handling or storage practices are observed, or there is evidence of past or present unauthorized, non-storm water discharges, a written enforcement order may be issued at the time of the initial inspection, a written enforcement order shall be issued at the time of the follow-up inspection, if the Facility is still not in compliance.

Signature of receiver / Print Name

STAFF USE: Cross Street: \_\_\_\_\_ Decimal Latitude/Longitude: \_\_\_\_\_
SIC Code: \_\_\_\_\_ /Acres: \_\_\_\_\_ APN: \_\_\_\_\_



**NPDES COMMERCIAL/INDUSTRIAL  
COMPLIANCE INSPECTION**

**ENGINEERING DIVISION**  
130 SOUTH MAIN STREET, LAKE ELSINORE, CA 92530  
Phone: 951-674-3124 x 241

City Inspector: \_\_\_\_\_ Phone No.: \_\_\_\_\_

Business Name: \_\_\_\_\_ Date: \_\_\_\_\_

Street Address: \_\_\_\_\_

Mailing Address (if different): \_\_\_\_\_

Own	Lease
<input type="checkbox"/>	<input type="checkbox"/>

Contact, Name: \_\_\_\_\_ Title: \_\_\_\_\_

Contact Phone: \_\_\_\_\_ EMAIL: \_\_\_\_\_

**Nature of Business:** Retail Sales  Wholesale  Distributor  Lawn&Garden  Auto Repair  Recycling  Scrap Metal/Salvage Yard  Service   
Professional  Manuf  **List Product / Service:** \_\_\_\_\_

Type of Inspection (circle one): Commercial Industrial Complaint Follow-Up <i>(Write "N/A" across Yes/No boxes if not applicable to site)</i>	Correction Due /		Violation**
	YES	NO	
1 Are commercial or industrial process activities conducted outdoors?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1.a. Are BMP's Implemented in outdoor process areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2 Are raw materials, equipment, or wastes that have a potential to impact stormwater quality stored outside?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.a. Are BMP's Implemented in outdoor storage areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3 Is there a spill containment plan in place and spill kits?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4 Are there storm drain inlets on site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.a. Do the storm drain inlets appear to be properly maintained and/or cleaned?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5 Is there evidence of unauthorized non-storm water to the storm drain system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6 Are landscaped areas properly maintained and free of erosion?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7 Are parking areas properly maintained and free of debris and excessive oil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8 Is vehicle or equipment repair / maintenance / cleaning performed on site? Under cover? <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.a. Are vehicle or equipment repair/maintenance/cleaning BMP's being implemented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9 Is a mobile wash contractor used to clean exterior areas or vehicles?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.a. Are vehicle, equipment and exterior surface cleaning BMP's being implemented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10 Are the contents of waste receptacles (bins, drums, etc.) protected from contact with stormwater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11 On Site Water Quality Facility - Maintained as required, free of excess trash & debris, operational.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12 WQMP - on site (as applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13 Industrial Permit - SWPPP (as applicable) - Copy on site <input type="checkbox"/> // WDID # _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14 Other NPDES Permit (i.e. scrap metal) - SWPPP Copy on site <input type="checkbox"/> // WDID # _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Business License? Yes No	*Overall Rating: Good Average Needs Improvement // Facility Rating: Low Med High
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\*Overall Rating: Good: 0 Corrections, 0 Violations // Average: 1-2 Corrections, 0 Violations // Needs Improvement: 3 or more Corrections and/or 1+ Violations

**\*\*NOTICE OF VIOLATION** (see above) - Violation of LEMC 14.08 / Correction Due On or Before:

**COMMENTS:**

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In the event inappropriate material, waste handling or storage practices are observed, or there is evidence of past or present unauthorized, non-storm water discharges, a written enforcement order may be issued at the time of the initial inspection, a written enforcement order shall be issued at the time of the follow-up inspection, if the Facility is still not in compliance.

Signature of receiver \_\_\_\_\_ / \_\_\_\_\_ Print Name

**STAFF USE:** Cross Street: \_\_\_\_\_ Decimal Latitude/Longitude: \_\_\_\_\_  
SIC Code: \_\_\_\_\_ /Acres: \_\_\_\_\_ APN: \_\_\_\_\_