



September 12, 2013

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

Re: Response to City of Simi Valley Municipal Separate Storm Sewer System (MS4)  
Compliance Audit Report

Dear Ms. Johnson:

The City is pleased to respond to the Environmental Protection Agency's (EPA) July 22, 2013, Compliance Audit Report for the City of Simi Valley (City) Municipal Separate Storm Water Sewer System (MS4) Program (Program). On June 26, 2012, EPA Region 9 staff and its consultant, along with Los Angeles Regional Water Quality Control Board (Regional Board) staff began a compliance audit to assess the City's compliance with the requirements contained within the NPDES Storm Water Permit and Waste Discharge Requirements for the MS4s within Ventura County. During the audit, the EPA team:

- Met with City staff and visited field locations to review the City's MS4 Program.
- Reviewed the *Ventura County Stormwater Quality Management Program's 2010/11 Water Quality Monitoring Report* (Annual Report) produced by the Ventura County Watershed Protection District on behalf of the Ventura County MS4 Copermittees. (The Copermittees under the MS4 NPDES permit include the Watershed Protection District, the County of Ventura, and the Cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura, Santa Paula, Simi Valley, and Thousand Oaks.) Discharges from Copermittees', as well as the City's, MS4 are regulated under *Waste Discharge Requirements for Storm Water (Wet Weather) and Non-Storm Water (Dry Weather) Discharges from Small Municipal Separate Storm Sewer Systems within the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein*, NPDES Permit No. CAS004002, Order No. R4-2010-0108 (Permit), issued July 8, 2010.
- Reviewed the Calleguas Creek Total Maximum Daily Load (TMDL) Monitoring Program, and the Annual Reports produced under that program.

The following are responses to issues of critical importance to the City, identified by the EPA in the Compliance Audit Report. The responses generally provide clarifications on the City's current and proposed MS4 Program activities, and on reports provided to the EPA staff during the course of the audit. The structure of the following section provides three parts to each subject area of the audit:

1. The audit conclusion is shown in *italics (Section and subsection are bold italics)*.
2. The City's response is provided in plain text.
3. The City's requested further action by the EPA is shown as underlined.

### ***3.1 Industrial/Commercial Facilities Program***

#### ***3.11 Tracking Critical Sources***

*Potential Permit Violation: To comply with Permit requirements and increase the usefulness of the City's database of critical sources, the City must expand its database to include facility owner/operator name, and facility status with regards to storm water permit coverage under the IGP or other general/industrial NPDES storm water permit or any applicable waiver issued by the Regional or State Board pertaining to runoff discharges. [Part 4.D.I.1]*

The City's database, when audited, included contact (owner/operator) information and status of enrollment under the IGP as required in Part 4.D.I.1, and furthermore, the database has included this vital data since its inception, and continues to include this information. The City's Environmental Compliance Electronic Database was initially constructed in January 2007 and has been used essentially daily since to track facility inspections, permits, billing, violations, contacts, Stormwater Pollution Control Plans, sampling, etc.

The attached screenshots of the database show, in the circled areas, if the facility has filed a Notice of Intent, is under a General Industrial permit, and if they possess a WDID number. The second database screenshot shows the facility contact which could be the owner or operators for the facility in question. The database contains this information for each and every Critical Source as required.

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 View Filter Sort & Filter Records Find Window Text Formatting

Locate Discharger: **Malebar International**

**Discharger ID:** 2262      **Discharger Name:** Malebar International      **SIC Code:** 3799      **NAICS Code:** 336999  
**Facility Address:** 220 W Los Angeles Ave      **Principal Business Activity:** Hydraulic ground equipment for aircraft      **SIC Code:**      **NAICS Code:**      **SIC Code:**      **NAICS Code:**      **SIC Code:**      **NAICS Code:**  
**Classification:** Class II      **Stormwater Classification:** Industrial      **Critical Source:**       **SIC Code:**      **NAICS Code:**      **SIC Code:**      **NAICS Code:**  
**Assigned Inspector:** Richard Brewer      **Date Operations Began:**      **SIC Code:**      **NAICS Code:**      **SIC Code:**      **NAICS Code:**  
**Application Date:** 5/28/2013      **Area:** Area A      **Customer #:** 800006

General Info | Contacts | Plan Check | Fact Sheet | Permits | Pretreatment | Sampling 1170 | Stormwater | SW Checklist | SW Checklist 2013 | Water Con. | SWPCP | Billing | Rqmts | Violations | Notes | Pr

**SWPCP Date Requested:** 3/23/2004      **2nd SWPCP Request:**   
**SWPCP Date Approved:** 7/30/2004      **3rd SWPCP Request:**   
**SWPCP Fee Letter Sent:**      **Final SWPCP Request:**   
**SWPCP Fee Received:**      **SWPCP Packet Date:**      **Given By:**      **Follow Up Date:**      **Comments:** 7/14/08 - Exemption letter filed for NOI  
**SWPCP Reviewed/Updated:** 4/23/2013  
**Fee Waived:**

**SWPPP:** Yes      10/31/2011  
**Notice of Intent Filed:** N/A  
**No Exposure Certificate:** Yes  
**General Industrial Permit:** No  
**Waste Discharge ID Number (WDID):**

**Stormwater Treatment Device:**   
**Stormwater Treatment Device Cleaning Schedule:**      **Stormwater Treatment Device Specifications:**      **Maintenance Due Date:**

Record: 1 of 1      No Filter      Search

Record: 660 of 2642      No Filter      Search

Form View      Num Lock

Form Tools | Database | Environmental Compliance

File Home Create External Data Database Tools Datasheet

View Filter Sort & Filter Records Find Window Text Formatting

Locale Discharger: **Malabar International**

Discharger ID: 2262 Discharger Name: Malabar International SIC Code: 3759 NAICS Code: 335999

Facility Address: 220 W Los Angeles Ave Principal Business Activity: Hydraulic ground equipment for aircraft SIC Code: NAICS Code:

Classification: Class II Stormwater Classification: Industrial Critical Source:  SIC Code: NAICS Code:

Assigned Inspector: Richard Brewer Date Operations Began: SIC Code: NAICS Code:

Application Date: 5/28/2013 Area: Area A Customer #: 800006

General info | **Contacts** | Plan Check | Fact Sheet | Permits | Pretreatment | Sampling 1178 | Stormwater: SW Checklist | SW Checklist 2013 | Water Con | SWPCP | Billing | Rqmts | Violations | Notes | Pr

Fname	Lname	Title	Phone	Ext	Email	Primary	Other
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George	Espinosa	Maintenance				<input type="checkbox"/>	
Daniel	Garcia	Manufacturing Supv	(805) 581-0116			<input type="checkbox"/>	
Chris	Advent	Vice President	(805) 581-1200	324		<input type="checkbox"/>	
Paula	Hill		(805) 581-0116			<input type="checkbox"/>	

Record: 1 of 6

Form View Num Lock

**Requested Action:** Revise the Compliance Audit Report to omit the potential permit violation and to correct the conclusion to reflect that the City's database does include contact and permit status information.

### 3.2 TMDL Implementation

#### 3.2.2 Chlorpyrifos and Diazinon WLA Exceedances

*Potential Permit Violation: The City failed to implement BMPs sufficient to meet the numeric WLAs for chlorpyrifos and diazinon [Part 5.VI.6(b)(2)]*

As a Copermittee to the Ventura County Stormwater Quality Management Program, the City is obligated to comply with Part 5.1 of the MS4 NPDES Permit that requires compliance with WLAs and other TMDL requirements. In addition, the City also implements TMDL programs and projects as a signatory to the *Memorandum of Agreement for Implementation of the Calleguas Creek Watershed TMDL Total Maximum Daily Load Program*. Under the agreement, the parties thereto are implementing TMDL requirements in the Calleguas Creek Watershed, including the Toxicity, Chlorpyrifos, and Diazinon TMDL. To comply with this TMDL, water quality at the 07\_HITCH receiving water compliance monitoring location is monitored for the respective constituents. The City is required under Part 5.VI.6(a)(1) of the Permit to implement BMPs to achieve the MS4 WLAs shown in the following table:

#### **Toxicity, Chlorpyrifos and Diazinon TMDL MS4 Wasteload Allocations**

<b>Parameter</b>	<b>Wasteload Allocation</b>
Toxicity	1.0 TUc
Chlorpyrifos	0.014 µg/L
Diazinon	0.10 µg/L

The EPA reviewed the three most recent Calleguas Creek TMDL Monitoring Program Annual Reports (Year 1 – 2010, Year 2 – 2011, and Year 3 – 2012) and verified that the MS4 WLAs for chlorpyrifos and diazinon were exceeded at the 07\_HITCH compliance monitoring location nine times for chlorpyrifos and once for diazinon. The 07\_HITCH site is a compliance point for both urban and agricultural discharges. Although urban dischargers are to be in compliance with the final TMDL WLAs at this time, agricultural dischargers are not required to meet final allocations until 2016. While agricultural dischargers are compliant with the interim WLAs assigned under the TMDL, the agricultural load allocations are significantly higher than those tabulated, above.

As noted, the water quality at 07\_HITCH represents discharges from multiple sources, including agricultural dischargers. Therefore, the receiving water exceedances observed at the 07\_HITCH monitoring location may not be due to City influences, and may be the result of discharges from sources that have more time to come into compliance with the TMDL than the City.

The Calleguas Creek TMDL monitoring program was designed to evaluate sources potentially causing or contributing to exceedances observed at a receiving water monitoring location due to the fact that multiple sources with different allocations discharge upstream of receiving water compliance monitoring locations, such as 07\_HITCH. Concurrent samples from a representative MS4 outfall within the City are collected on the same day as the receiving water sample is collected. The City uses the MS4 outfall monitoring to evaluate whether the City's discharges are potentially causing or contributing to any observed exceedances at the receiving water monitoring station. Only a single chlorpyrifos exceedance was observed at the urban land use monitoring site, 07T\_DC\_H (Dry Canyon at Heywood St.), during the period where multiple chlorpyrifos exceedances were observed at the compliance monitoring location, 07\_HITCH, as shown in the following table:

**Summary of Chlorpyrifos and Diazinon Exceedances above WLAs**

<b>Parameter</b>	<b>Date</b>	<b>Compliance Monitoring Results (<math>\mu\text{g/L}</math>) at 07_HITCH</b>	<b>Notes</b>	<b>Land Use Monitoring Results (<math>\mu\text{g/L}</math>) at 07T DC H</b>
Chlorpyrifos	8/7/2008	0.0267	Event 1 – dry weather	ND
	12/15/2008	0.0288	Event 3 – dry weather	n/a*
	2/4/2009	0.0652	Event 5 – dry weather	ND
	2/7/2009	0.4419	Event5 – wet weather	ND
	12/7/2009	0.119	Event 14 – wet weather	ND
	1/20/2010	1.245	Event 16 – wet weather	ND
	12/19/2010	0.1142	Event 24 – wet weather	0.37
	2/1-2/2/2011	0.0393	Event 25 – dry weather	ND
	3/20/2011	1.227	Event 26 – wet weather	ND
Diazinon	1/20/2010	0.109	Event 16 – wet weather	ND

\* Water quality sample not analyzed during this event.

Additionally, the City has not observed detected concentrations of chlorpyrifos and diazinon in water quality samples collected from its major outfall monitoring location, MO-SIM, as shown in following table:

## Summary of Chlorpyrifos and Diazinon Concentrations at MO-SIM

Parameter	Date*	Monitoring Results ( $\mu\text{g/L}$ ) at MO-SIM	Notes
Chlorpyrifos	10/6/2010	ND	Event 2010/11-1 Wet
	10/30/2010	ND	Event 2010/11-2 Wet
	2/16/2011	ND	Event 2010/11-4 Wet
	4/27/2011	ND	Event 2010/11-5 Dry
Diazinon	10/6/2010	ND	Event 2010/11-1 Wet
	10/30/2010	ND	Event 2010/11-2 Wet
	2/16/2011	ND	Event 2010/11-4 Wet
	4/27/2011	ND	Event 2010/11-5 Dry

\* Major outfall monitoring at MO-SIM began in the 2010-11 monitoring year.

Although the City observed just one chlorpyrifos exceedance between 2008 and 2011, the City has ongoing and planned BMPs to address pesticide discharges. The potential permit violation recognizes that additional BMPs are planned, but the City did not clearly describe them or commit to their implementation in the report. This does not lead to the conclusion that the City does not fully intend to implement these BMPs, just whether they are described in annual report. Future reports will include this information.

The BMPs designed to prevent future discharges of diazinon and chlorpyrifos and address the Toxicity WLA exceedances are presented in more detail below and are discussed further in the next section. However, since 07\_HITCH receives discharges from multiple sources, and diazinon and chlorpyrifos are rarely observed in the City's outfalls, the City will continue to evaluate the need to implement additional BMPs based on evaluating both the receiving water and outfall data. The City will more clearly present this information in future reports.

### 3.2.3 Toxicity WLA Exceedances and TRE/TIE Process

*Program Deficiency: Based on the significant reductions in survival and reproduction observed at the City's Toxicity TMDL monitoring station (i.e. 07-HITCH) described in the Annual Report and summarized in Table 3 above, and the limited information provided in the City's annual reports specific to its response to these exceedances, the City was unable to demonstrate that it had taken appropriate action to eliminate the identified source of the toxicity. [Part 5.VI.6(b)(3)]*

EPA's review of toxicity data taken from the last three years of Calleguas Creek Watershed TMDL Monitoring Program Annual Reports (Year 1 – 2010, Year 2 – 2011, and Year 3 – 2012) revealed that of the four TIEs conducted over the three-year time period, each implicated compounds similar to OP pesticides as likely contributing to the observed toxicity.

As discussed above, the receiving water monitoring location receives discharges from multiple sources, including agricultural dischargers that are not yet required to be in compliance with the toxicity load allocation. However, recognizing that pesticides can be a source of toxicity in

receiving waters, the City continues to implement BMPs to reduce MS4 discharges of pesticides, described further below. The potential program deficiency recognizes that additional BMPs are planned, but the City did not clearly describe them or commit to their implementation in the report. This does not lead to the conclusion that the City does not fully intend to implement these BMPs, just whether they are described in the annual report. Future reports will include this information.

The City implements a Public Outreach and Education Program and Pesticide Collection Program to reduce pesticide levels in the MS4 discharge. The City collects approximately 110,000 lbs of hazardous waste from its residents on an annual basis through a bimonthly Household Hazardous Waste Program. Informational material on BMPs for gardeners (pest and weed control) and integrated pest management strategies (see enclosures) are also made available to those participating in the bimonthly events. The City enhanced its Public Outreach and Education Program and Pesticide Collection Program by upgrading the City's Stormwater webpage to include less toxic alternatives to pesticides (found on the City website located at <http://www.simivalley.org>). The City has enhanced its Public Outreach and Education Program and Pesticide Collection Program in recent years by including Watershed Protection Tips for Gardeners flyers in the Household Hazardous Waste event handouts and providing these flyers at City Outreach events. Several annual City outreach events include stormwater demonstrations using an Enviroscape (a display model) to illustrate how the overuse or misuse of pesticides and fertilizers affect the watershed followed by an accompanying discussion on reducing overuse of fertilizers and alternatives to traditional pesticides.

In addition, the City participates with other MS4 dischargers throughout California in working with the Department of Pesticide Regulations to better regulate pesticides to reduce the potential for pesticide runoff and toxicity in receiving waters. Through these efforts, the use of pyrethroid pesticides has been restricted to avoid potential future sources of toxicity in receiving waters.

The City plans to enhance its Public Outreach and Education Program and Pesticide Collection Program during the 2013/14 fiscal year by providing citizens a variety of handouts describing less toxic methods to control household and garden pests, as well as "green" methods to control weeds, composting, and use of native plants. The City has two Residential Landscape training classes scheduled in October 2013. The City plans to run a crawler on public television, an article/ad in a local newspaper on proper disposal of unwanted pesticides, and provide information on use of the City's Free Household Waste collection programs.

**Requested Action:** Revise the Compliance Audit Report to acknowledge that the City's MS4 outfall data indicates that the City is not regularly discharging diazinon and chlorpyrifos at levels that exceed the WLA and that the City has implemented BMPs to address pesticide discharges. Omit the potential permit violation and program deficiency, and revise them into recommendations to better report the evaluation conducted to determine if additional BMPs are necessary and clearly identify proposed additional BMPs to address diazinon, chlorpyrifos and toxicity WLA exceedances, if observed in the future.



### **3.3 Receiving Water Limitations – Calleguas Creek Mass Emission Station WQS Exceedances (2010/11 Monitoring Season)**

*Potential Permit Violation: The City failed to submit a report to the RWQCB Executive Officer describing the additional BMPs that will be implemented to prevent or reduce the discharge of E. coli, fecal coliform, and aluminum in its stormwater discharges to address exceedances of receiving water limitations. [Part 2.3(a)]*

The Program's Annual Report clearly identifies on pages 9-16 where outfalls can be considered to be causing or contributing to an exceedance of receiving water objectives. The Report also discusses the programs being implemented and planned for the future. The potential permit violation recognizes that additional BMPs are planned, but the City did not clearly describe them or commit to their implementation in the report. This does not lead to the conclusion that the City does not fully intend to implement these BMPs, just whether they are described in the annual report. Future reports will include this information.

#### E-Coli

Elevated concentrations of bacteria in stormwater runoff, similar to those measured in Ventura County, are common throughout the United States and pose a difficult challenge to municipal stormwater programs trying to reduce pathogen indicators in their stormwater discharges. However, the City has been actively engaged in implementing BMPs to address identified sources of bacteria.

At the time of the release of the 2010/11 Annual Report, the City implemented a Public Outreach and Education Program, along with an Illicit Discharges/Illicit Connections (ID/IC) Program to reduce bacteria levels in the MS4 discharge. Subsequent to the 2010/11 monitoring season and in response to the monitoring results, the City enhanced its Public Outreach and Education Program by increasing neighborhood sweeps for pet waste and increasing pet waste outreach at public events. In areas where the City has received complaints of pet waste and an investigation has shown there to be an issue with more than one resident, City staff have inspected the areas to distribute our Watershed Protection Tips for Pet Owners flyers (see enclosures) at each residence. The City also performs this procedure within horse property areas by distributing our Watershed Protection Tips for Horse Owners flyer (see enclosures). The City participates in several public outreach events throughout the year including Earth Day, the City's Living Green Expo, Street Fair, Moorpark College Multicultural and Earth Day, and Coastal Cleanup Day. At these events, the City provides demonstrations showing the effects of pet waste on the environment. Informational brochures are given out at all City events.

Additionally, the City has placed 73 trash and recycling receptacles on public streets to reduce the amount of trash making its way to the receiving water. The City has also installed trash excluders in 53 storm drain catch basins to further reduce the flow of trash, sediment, and debris to the receiving water.

In an effort to eliminate sanitary sewer overflows, the City routinely inspects its more than 500 miles of sewer lines and performs regular cleaning of those lines. In commercial areas where high concentrations of fats, oils, and grease are found in the sewers, grease traps are routinely inspected for compliance. City staff educates facility owners and employees on the proper disposal of waste that might lead to sanitary sewer overflows. In residential areas with above average grease and oil in the sewer lines, the City's Residential Grease Program flyer is distributed (see enclosures).

#### Fecal Coliform

Noting the limitations of BMP implementation, alone, the City in cooperation with the MS4 Copermittees, will initiate a bacteria source tracking study to identify the source(s) of fecal bacteria in the MS4 discharge beginning in autumn, 2013. The study is intended to identify the extent to which flows contain human fecal contamination. Human waste poses greater risk to human health than most other animal sources, and a high priority may be given for additional sampling and/or BMP implementation to drainages with detection of human markers. This study is part of the microbiology component of Southern California Coastal Water Research Project's (SCCWRP) 2013 Southern California Bight Regional Monitoring Program (Bight' 13) and is a collaborative effort between multiple storm water agencies.

Above and beyond that collaborative effort the Ventura Countywide Stormwater Quality Program will take additional samples at all major outfalls and analyze for the human marker (HF183) for three (3) storm events. HF183 marker results will indicate frequency of human contamination at sample locations. A quantitative assessment of the extent of human contamination or percentage of pathogen indicators related to human waste is not achievable with the science available at this time. To further investigate anthropogenic sources of pathogen indicators, the study will include an option to analyze archived samples for additional host-specific markers if desired at a later time (e.g., gull, dog, bird, cattle or horse).

It is believed that this effort will provide information regarding the primary sources of the pathogen indicators measured in stormwater runoff and allow the City to develop more targeted bacteria reduction strategies to reduce bacteria levels in the MS4 discharge over the coming years.

#### Aluminum

The City has implemented BMPs in response to the monitoring results and is committed to implementing additional actions that will address the discharge of aluminum to receiving waters as discussed below.

Aluminum is a ubiquitous natural element in the sediments throughout Ventura County's geology, and preventing sediment mobility comprises many BMPs implemented by the City. At the time of the release of the 2010/11 Annual Report, the City implemented sediment control activities in the forms of street sweeping, catch basin cleaning, debris basin maintenance, and installation of publicly owned BMPs to reduce the amount of sediment, and thus aluminum. The City also implemented BMPs to specifically reduce metals in stormwater runoff in the forms of industrial and commercial inspections, construction site inspections, and ID/IC elimination efforts.

Subsequent to the 2010/11 monitoring season and in response to the monitoring results, the City has enhanced its Construction Inspection Program as construction has begun to increase in the City with the slowly improving economy. City Inspectors attend quarterly countywide meetings where they gain additional knowledge of inspection practices. This increased knowledge allows them to complete more thorough inspections. Inspectors carefully inspect and monitor BMPs in use at the construction sites to ensure the BMPs are working properly and preventing sediment discharges. Additionally, the City has performed a file search and physical investigation and has been unable to discover any industrial activities contributing to the elevated aluminum in the stormwater monitoring.

The City and other MS4 Copermittees are also scheduled to begin a comprehensive aluminum assessment in Ventura River, Santa Clara River, and Calleguas Creek watersheds in autumn, 2013. This assessment will analyze historic and ongoing aluminum monitoring data to measure aluminum concentrations in receiving waters upstream of anthropogenic activities and impoundments. The analysis is intended to reveal the relative proportion of natural to anthropogenic aluminum discharges. In addition, the Program will prepare georeferenced maps showing geology and soil conditions to map natural aluminum sources. To support these maps, soil and geology databases from the California Spatial Information Library, Department of Water Resources, National Resource Conservation Service, and US Geological Survey will be assessed. A GIS layer will be prepared to help communicate and share this data. The data will be used by the City better specify BMPs that may be effective in reducing aluminum concentrations in the MS4 discharge. Furthermore, the study may assist in determining whether a regulatory solution (e.g., natural source exclusion, aluminum water effects ratio, high flow suspension) is necessary.

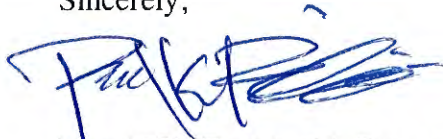
**Requested Action:** Revise the Audit Report to acknowledge the City has implemented BMPs to address these persistent exceedances of bacteria and aluminum. Omit the potential permit violation and revise it into a recommendation for a program improvement to more clearly identify proposed BMPs for future exceedances, if needed.

Though no violation, deficiency, or other action was cited, the Compliance Audit Report, on page 5, Section A.4, Poly-Tainer, Inc. facility Site Visit Report and Photograph Log, contains a summary of the inspection of the Poly-Tainer facility which included photos of "stray nurdles on the ground" at the site. City staff present during this site visit noted that there were approximately six nurdles contained in a planter at the time this photo was taken. None were seen in the parking lot, in the onsite stormdrain system and more importantly, none were seen leaving their site. After the audit, City staff performed subsequent unannounced visits to the facility, and found the nurdles in the planter were cleaned up. We request the report provide more details on the number of the nurdles found.

### Conclusions

The City appreciates the opportunity to respond to the results of the EPA Audit and to clarify the City's actions towards continued compliance with the NPDES MS4 Permit. The City will utilize the information provided in the Audit Report to continue to look for opportunities to improve the stormwater program. We hope the information in this letter has provided you with a better understanding of the City's program and that the requested changes outlined below will be considered prior to finalization of the Audit Report. We look forward to resolving the issues discussed above in the final audit report. Should you have any questions, please contact Joe Deakin, Assistant Director of Public Works, at (805) 583-6401.

Sincerely,



Ronald K. Fuchiwaki, Director  
Department of Public Works

cc (via email with enclosures):

Assistant Director of Public Works  
Greg Gholson, EPA  
Renee Purdy, LARWQCB  
Sam Unger, LARWQCB  
Ventura County Stormwater Copermittees