WHITEWATER RIVER REGION STORMWATER MANAGEMENT PLAN

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TABLE OF CONTENTS

List of Tables

List of Figures

Appendices

1.0 PROGRAM MANAGEMENT

1.1 PURPOSE

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

1.2 REGULATORY FRAMEWORK

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

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

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

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

Region (Regional Board). The Regional Board issued the first-term MS4 Permit for the Whitewater River Region (Order No. 96-015) in May 1996. In compliance with the first-term MS4 Permit, the Permittees prepared and implemented the initial SWMP and submitted an application for renewal of their area-wide MS4 Permit in December 2000. The Regional Board adopted the 2001 MS4 Permit (Order No. 01-077) in September 2001. In March 2006 the Permittees submitted a Report of Waste Discharge (ROWD) as an application for renewal of the MS4 Permit that expired on September 5, 2006. Until the Regional Board adopts the third-term MS4 Permit, the Permittees will continue to operate under the 2001 MS4 Permit and implement the programs described in the 2001 SWMP.

The second-term MS4 Permit required the Permittees to implement the 2001 SWMP that was submitted to the Regional Board as part of the December 2000 ROWD. The Best Management Practices (BMPs) and a phased implementation schedule were provided in Attachment B to the second-term MS4 Permit. This 2006 SWMP describes the stormwater management program that will be implemented during the third-term MS4 Permit. Programmatic improvements have been incorporated into the 2006 SWMP based on the Permittees' experience in implementing the 2001 SWMP, findings of the monitoring program, enhancements to the NPDES MS4 compliance programs in the Santa Ana River and Santa Margarita River regions of Riverside County, and implementation of statewide water quality policies. Components of the 2001 SWMP that have proven most effective have been carried forward and incorporated into the proposed program for the third-term MS4 Permit. Taking into account the unique nature of the Coachella Valley's desert environment, this 2006 SWMP continues to emphasize source control measures and strong public education/outreach efforts as being the most effective way to manage urban runoff in this highly arid region. A copy of the Third-term MS4 Permit, scheduled for adoption in September 2006, is provided in Appendix B.

1.3 ORGANIZATION

The third-term MS4 Permit continues to identify the District and the County as Principal Permittees and the CVWD and the cities are identified as Co-Permittees. Collectively, the entire group is referred to as the Permittees. Under this organizational framework the Principal Permittees are responsible for coordinating collective Permittee activities, including report preparation and submittals to the Regional Board.

The Permittees have established the Desert Task Force to facilitate coordination of program development and implementation policy and funding issues. Each Permittee is required to formally designate representatives to the Desert Task Force and require regular attendance and participation in subcommittees. The Task Force generally meets monthly to disseminate information, discuss issues, and coordinate Permittee actions to implement the SWMP and facilitate MS4 Permit compliance. The Desert Task Force meets as needed to coordinate activities required to implement this 2006 SWMP.

To underpin the working framework among multiple agencies, the Permittees updated the Implementation Agreement in 2003, a copy of which is provided in Appendix C. The Implementation Agreement reinforces the roles and responsibilities of each Permittee established by the MS4 Permit. Specific provisions of the Implementation Agreement included cost sharing for public education activities and water quality monitoring. The Implementation Agreement expires coincident with expiration of the second-term MS4 Permit. The Permittees are committed to entering into a similar implementation agreement soon after the third-term MS4 Permit is adopted.

This 2006 SWMP is organized into the following program elements:

- **Section 2, Elimination of Illicit Connections and Illegal Discharges (IC/ID)** – This program involves screening, detection, and elimination of improper discharges to the MS4. This program is implemented at both the area-wide and individual Permittee levels. The SWMP has been enhanced to provide for more formalized inspections of the MS4. The State Water Resources Control Board (SWRCB) is working with stakeholders to develop waste discharge requirements (WDRs) for operators of sanitary sewage collection systems. It is anticipated that the WDRs will be adopted by the SWRCB in 2006. The objective of these WDRs, which are being adopted pursuant to SWRCB Resolution No. 2004-0080, is to develop a consistent approach for reducing sanitary sewer overflows (SSOs) throughout California. The SWMP acknowledges that the Permittees will support the implementation of the compliance programs developed by the sanitary sewer system operators in response to the WDRs. In addition, descriptions of existing oversight programs for portable toilets and individual septic systems have been incorporated into the Whitewater River Region program.
- **Section 3, Commercial/Industrial Program** – The Commercial/Industrial program area is implemented primarily through area-wide outreach, education, and facility visits. The program continues to include technical training for Permittee staff regarding BMPs and stormwater management at industrial and commercial sites.
- **Section 4, Development Planning and Construction Activities** – Development Planning program requirements continue to focus on integrating stormwater management measures into current development review processes within the Permittees' Planning and Public Works Departments. The Construction program is closely linked to New Development/Redevelopment and will continue existing efforts for projects under the jurisdiction of the Permittees.
- **Section 5, Municipal Agency Activities** – This program area is targeted at Permittee operations and activities, including various departments within the Permittee's Public Works frameworks. Employee training activities are a key aspect of stormwater management at the Permittee level.
- **Section 6, Public Education Program** – Public education is lead by the area-wide StormWater/CleanWater Protection Program (SW/CWPP). This media campaign takes advantage of countywide resources to develop and increase public awareness of urban runoff issues on a regional scale in both English and Spanish. The enhancements to the SW/CWPP that have been implemented by the District have been reflected in this 2006 SWMP. These enhancements include significant revisions to the SW/CWPP to educate the general public regarding residential activities such as vehicle washing and maintenance, landscaping, home maintenance, pet ownership, and illegal dumping. The SW/CWPP also includes the use of public awareness surveys to gauge the effectiveness of the SW/CWPP, the use of new advertisements, promotional materials, brochures and other media to increase stormwater awareness and updates to the web site, 1-800 line and other outreach channels.
- **Section 7, Monitoring Program** – Water quality sampling and analysis are conducted throughout the Whitewater River Region to characterize runoff and establish a baseline set of water quality conditions.

Comment [BC1]: Should we emphasize bilingual efforts of the Public Education Program or implementation of such if not presently done.

- **Section 8, Program Reporting, Evaluation, and Revision** – The Permittees prepare Annual Reports regarding program implementation for submittal to the Regional Board. The Permittees also evaluate the effectiveness of the program elements to identify revisions to the program that will subsequently be reflected in an updated SWMP.

To facilitate implementation of the compliance program, the following categories of BMPs are identified in the SWMP:

BMP Category	Category Description
Operation and Maintenance BMPs	BMPs related to operation and maintenance of the MS4
Education	Specific educational activities
Source Control BMPs	Stormwater management activities
Regulatory BMPs	BMPs that comply with requirements specified in the MS4 Permit

1.4 PERMIT AREA

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

- California and federal facilities,
- Utilities and special districts, and
- Native American tribal lands.

These areas are not included in the Whitewater River Region. In addition, other point and non-point source discharges otherwise permitted by or under the jurisdiction of the Regional Board may affect water quality in the Whitewater River watershed. Although areas of the Whitewater River watershed that are not currently urbanized are not included in the Whitewater River Region, the Permittees will apply the New Development/Significant Redevelopment and Construction program requirements described in Section 4 of this SWMP to projects outside of the Whitewater River Region, but within the Whitewater River watershed within Riverside County.

The area of Riverside County in the Whitewater River Region, and under the jurisdiction of the Regional Board, is approximately 350 square miles, which is less than 5 percent of the 7,300 square miles within Riverside County. Thirteen of the 24 municipalities within Riverside County are under the jurisdiction of the Regional Board.

1.5 AREA-WIDE PROGRAMS

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

1.5.1 Hazardous Materials Spill Response

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

1.5.2 Commercial/Industrial Compliance Assistance Program

The Commercial/Industrial Compliance Assistance Program (CAP) was developed to support elements of the SWMP and to fulfill requirements associated with Riverside County's two other MS4 permits. The CAP consists of contract services provided by Riverside County's Department of Environmental Health to utilize the current inspection programs of commercial and industrial facilities to facilitate MS4 Permit compliance. The CAP involves focused outreach to approximately 5,000 food service facilities through annual visits and to over 1,800 hazardous materials and industrial facilities in Riverside County approximately once every two years.

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

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

1.5.4 Public Education Program

The SW/CWPP is a broad-based education and outreach program that communicates the importance of stormwater management and pollution prevention to the general public and to targeted commercial and industrial sources through the use of various media. The goal of the program is to perform outreach to citizens by presenting clear and consistent messages that explain the connections between every day activities and their impact on water quality.

1.6 LEGAL AUTHORITY

The Permittees are required to establish adequate legal authority to implement the provisions of the MS4 Permit in accordance with federal regulations at 40 CFR 122.26. The Permittees have established this legal authority and will revise their authorities as needed to implement the third-term MS4 Permit. The District and CVWD rely on the principle of "combined legal authority" as outlined in the USEPA Part 2 Permit Application Guidance. Legal authority is then maintained and exercised by the Permittees with jurisdiction for the MS4.

1.7 ENFORCEMENT AND COMPLIANCE STRATEGY

An Enforcement/Compliance Strategy for ensuring that construction sites, commercial establishments, and industrial facilities operate in compliance with the local stormwater and urban runoff ordinances and local erosion control ordinances was developed jointly by the Phase I MS4 Permittees in the Santa Ana and Santa Margarita River Regions. That Enforcement/Compliance Strategy has been incorporated into

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

1.7.1 Prioritize Violations

The local stormwater and erosion control ordinances cover a wide range of prohibited activities with varying magnitudes of potential impact on the beneficial uses of receiving waters. For example, discharges of either hazardous materials (e.g., solvents and pesticides) or non-hazardous materials (e.g., food wastes, trash, and debris) into the MS4 are violations of stormwater ordinances subject to enforcement. Similarly, an accidental spill into a catch basin inlet and an intentional discharge from an illicit connection are both violations. Prioritizing violations is important in focusing local resources on those violations that may have the greatest potential impact on receiving water quality.

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

Table 2 has been developed to facilitate some level of consistency in enforcement actions by the Permittees across the Whitewater River Region and throughout the County. Table 2 categorizes the severity of violations based on the factors and/or circumstances associated with a violation, and also describes the criteria chosen to characterize the severity of a violation as “high”, “medium”, or “low.” For example, using Table 2, the accidental dumping of 20 gallons of trash several hundred yards away from an ephemeral stream would be considered a “low” priority violation. However, the intentional discharge of 2,000 gallons of pesticide directly into aquatic wildlife habitat would be a “high” priority violation.

However, violations may not clearly fall into any single severity priority level described in Table 2. It is more likely that a violation would be characterized by factors representing more than one of the priority levels described in Table 2. In this case, a subjective evaluation of the violation would be required to select the priority level most representative of the characteristics and circumstances surrounding the violation.

Table 1. Prioritization Factors for Violations

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

Table 2. Severity of Violations

Factors Affecting the Severity of Violations	Severity Priority Level		
	High	Medium	Low
Pollutant Characteristics	Hazardous Materials (e.g., pesticides and solvents)	Metals, Nutrients, Sediment, other Non-Hazardous Materials	Trash and Debris
Sensitivity of Receiving Waters	Drinking Water Source, Wildlife Refuge	Recreational reservoir, riparian habitat	Dry, ephemeral stream
Proximity of Receiving Waters	Adjacent	Several hundred feet away	Several hundred yards away
Discharge Magnitude	1000's Gallons	100's Gallons	10's Gallons
Responsiveness of Discharger	No action to contain or mitigate discharge	Reactive to control discharge when requested (i.e., cooperative)	Implements spill control plan at own initiative or shows good faith effort to respond
Intent of Violation	Intentional	Discharge due to lack of controls or negligence	Implemented and maintained controls that failed (i.e., accident)
Frequency of Violation	Continuous	Intermittent	Isolated incident
Previous History of Discharger	Enforcement and cleanup historically resisted and more than one previous violation	Enforcement and cleanup performed when threatened and one or less previous violations	Enforcement and cleanup performed when requested and no previous violations

1.7.2 Enforcement and Compliance Responses

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

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

1.7.2.1 Administrative Remedies

Notice of Noncompliance. The Notice of Noncompliance constitutes a basic request that the property owner or facility operator rectify the condition causing or threatening to cause noncompliance with the stormwater or erosion control ordinance. The Notice of Noncompliance is generally issued when one or more of the following circumstances exist:

- The violation or threat is not significant and has been short in duration,
- The responsible party is cooperative and has indicated a willingness to remedy the conditions,

- The violation or threat is an isolated incident, and
- The violation or threat does not affect and will not harm human health or the environment.

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

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

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

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

Prior to issuance of any Administrative Compliance Order, Cease and Desist Order or commencement of other civil or criminal enforcement action against any person, the Permittee should deliver to the person a written Notice of Noncompliance, which states the act or acts constituting the violation and directs that the violation be corrected. The Notice of Noncompliance should provide the person with a reasonable time period to correct the violation before further proceedings are brought against the person. However, a Notice of Noncompliance should not be the first enforcement method used if egregious or unusual circumstances indicate that a stronger enforcement method is appropriate.

1.7.2.2 Criminal Enforcement

Misdemeanors. Criminal enforcement is appropriate when evidence of noncompliance indicates that the violator of the Ordinance has acted willfully with intent to cause, allow continuing or concealing a discharge in violation of the Ordinance.

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

- The duration of the violation or threatened violation.

- The compliance history of the person, business or entity.
- The effort made to comply with an established compliance schedule.
- The existence of prior enforcement actions.
- The actual harm to human health or the environment from the violation.

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

- The name and address of the violator,
- The provisions of the Ordinance violated,
- The time and place of required appearance before a magistrate.

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

1.7.2.3 Referral to Environmental Crimes Strike Force

The Riverside County Environmental Crimes Strike Force is a committee designed to pursue enforcement of serious environmental crimes. Referral of a case to the Environmental Crimes Strike Force would occur after repeated attempts at obtaining compliance have failed.

1.7.2.4 Appropriate Enforcement/Compliance Responses

Permittees will emphasize and encourage voluntary compliance with stormwater and erosion control ordinances to the maximum extent practicable. Table 3 lists appropriate enforcement responses that correspond to the severity priority level of a violation as determined from Table 2. Permittees and the Regional Board will work cooperatively in implementing enforcement/compliance responses according to Table 3 unless there is justification for implementing alternate actions. In general, the Regional Board will take the lead in initiating enforcement actions related to high-priority incidents and the Permittees will take the lead in initiating enforcement actions related to medium and low-priority incidents. Finally, the Regional Board will take all enforcement actions related to compliance with the NPDES General Permits/Waste Discharge Requirements issued by the SWRCB.

Table 3. Enforcement Responses for Violations Where Overlapping Authority Exists

Incident Severity Priority Level	Appropriate Enforcement Responses[1]	Lead Enforcement Agency	
		Permittee	Regional Board Support
High	Referral to Environmental Crimes Strike Force	3	3
	Citation	3	3
	Infraction	3	3
	Misdemeanor	3	3
Medium	Infraction	3	3
	Misdemeanor	3	3
	Stop work order or cease and desist order	3	
	Administrative compliance order	3	
	Notice of non-compliance	3	
Low	Administrative compliance order	3	
	Notice of non-compliance	3	
	Written warning	3	
	Verbal warning	3	
	Education and information	3	

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

1.7.2.5 Coordination of Enforcement/Compliance Activities with Other Permittees

Coordination with other Permittees and government agencies, including the Regional Board, is essential for successful implementation of an enforcement/compliance program. A single Permittee does not control the entire MS4, nor does any single Permittee have authority to take enforcement action for violations occurring outside of its jurisdiction. Further, other governmental agencies may have additional enforcement authorities that are appropriate to the situation. Each Permittee will coordinate its enforcement activities, as practicable, with the appropriate Permittees and agencies in accordance with the following guidelines:

- Enforcement will be coordinated when multiple agencies have jurisdiction and an agency has not been able to obtain compliance by the discharger.
- Unless otherwise agreed to in writing, the lead enforcement agency role will be assigned on the basis of the origin of the discharge.
- The Regional Board will be the lead enforcement agency for higher priority discharges.
- Investigation and other relevant information will be shared among the participating agencies in a timely fashion.

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

- Coordinating activities and assigning responsibilities (e.g., investigations, site visits, etc.) among participating agencies;

- Maintaining communication and information exchange among participating agencies; and
- Ensuring that follow-up actions are implemented.

Enforcement Activities Directory. A list of contact names identifying who should be contacted to coordinate enforcement activities for each Permittee, as well as the Regional Board and other potentially interested agencies will be developed as part of the Enforcement/Compliance strategy. This list will be maintained and distributed to the Permittees and others as appropriate by the District to facilitate coordination of enforcement activities.

1.7.2.6 Coordination with the Regional Board

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

1.7.2.7 Coordination with Other Agencies

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

1.7.3 Recordkeeping and Reporting

1.7.3.1 Minimum Guidelines for Recordkeeping

Information that should be retained regarding the Enforcement/Compliance Strategy includes the following materials:

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

- Copies of notifications of potential non-compliance.

1.7.3.2 Annual Summary of Enforcement Actions

Each Permittee will complete an annual summary of enforcement actions to document implementation of the Enforcement/Compliance Strategy, which will be included in the Annual Report. The summary will document the responsible party, address, type of facility, description of violation, date of initial violation, and enforcement/compliance actions implemented for violations identified by a Permittee.

1.8 FISCAL ANALYSIS

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

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

1.8.1 Whitewater River Watershed Benefit Assessment Area

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

1.8.2 County Service Area 152

The County of Riverside formed County Service Area (CSA) 152 in 1991 to provide funding for MS4 Permit compliance activities. The County developed a modified assessment methodology that was activated in FY-1995-96 and began using the Transportation and Land Management Agency's Geographic Information System to perform the assessment calculations. The cities of Banning, Cathedral City, Coachella, Desert Hot Springs, Indio, La Quinta, Palm Desert, Palm Springs, and Rancho Mirage are annexed into CSA 152. These cities determine their individual assessment rates and decide the method of allocating funds among their respective stormwater management programs.

1.8.3 General Fund

As described above, the cities of Banning, Cathedral City, Coachella, Indio, and Palm Desert are included in CSA 152. However, each city currently imposes a $0.00 assessment annually. These cities, along with the County, City of Indian Wells and CVWD rely on general or "ad valorem" tax revenues to finance their respective stormwater management programs. The Permittees intend to continue to use these existing funding sources to implement the SWMP during the third-term MS4 Permit.

2.0 ELIMINATION OF ILLICIT CONNECTIONS AND ILLEGAL DISCHARGES

This program element is designed to detect and eliminate improper discharges to the MS4. Three types of releases, generally referred to as "improper discharges" to the MS4 are addressed under this IC/ID program:

- Illicit discharge: An illicit discharge is any discharge that is not composed entirely of storm water except discharges pursuant to a NPDES Permit and other exempt discharges such as fire fighting flows and others. Illicit discharges can be considered any non-storm water discharges, which enter or have the potential to enter the storm drain system through illicit connections or illegal dumping.
- Illicit connection: An illicit connection is a direct physical connection to a storm drain, which allows prohibited discharges to enter the MS4. Examples include sanitary sewer connections, industrial process waters, and floor drains.
- Illegal dumping: Illegal dumping is the intermittent discharge of pollutants into the MS4 through either legal connections, such as catch basins, or by direct dumping into creeks, streams, and channels. This could include the disposal of used oil, paint, and wash water. In addition, illegal dumping includes the illegal disposal of pollutant material in the drainage channels, creeks, and streams throughout the Whitewater River Region such that stormwater can eventually mobilize it and carry it to other portions of the MS4 and to Receiving Waters.

The IC/ID program element addresses:

- Discharge limitations
- Current activities focusing on BMP implementation
- BMPs to manage stormwater/urban runoff and non-stormwater discharges
- Training for Permittee staff in IC/ID BMPs
- Evaluation & Assessment of BMPs

2.1 DISCHARGE LIMITATIONS

The following Discharge Limitations are implemented by the Permittees:

1. The Permittees prohibit illicit connections and illegal discharges from entering the MS4 and require controls to reduce the discharge of potential pollutants to the MEP.
2. The discharge of stormwater from the Permittee's MS4 to waters of the United States containing pollutants which have not been reduced to the MEP is prohibited.
3. The Permittees need not prohibit the following discharges unless identified by the Permittees or the Regional Board as a significant source of pollutants to the receiving waters.
   a. Discharges composed entirely of stormwater;
   b. Discharges covered by NPDES permits or written clearances issued by the Regional Board or SWRCB;

c. Potable water line flushing and other potable water sources;

d. Passive footing drains;

e. Water from crawl space pumps;

f. Dechlorinated swimming pool discharges;

g. Non-commercial vehicle washing;

h. Diverted stream flows;

i. Rising ground waters and natural springs;

j. Ground water infiltration as defined in 40 CFR 35.2005(20) and uncontaminated pumped groundwater;

k. Flows from riparian habitats and wetlands;

l. Street wash water and runoff from fire fighting;

m. Waters not otherwise containing wastes as defined in California Water Code Section 13050 (d); and

n. Other types of discharges identified and recommended by the Permittees and approved by the Regional Board.

4. A discharge may include stormwater and other types of discharges as indicated above.

5. If it is determined by the Permittees that any of these discharges cause or contribute to violations of water quality standards or are significant contributors of pollutants to waters of the United States, the Permittees shall prohibit these discharges from entering the MS4.

6. Non-stormwater discharges from Permittees' activities into waters of the U.S. are prohibited unless the non-stormwater discharges are permitted by an NPDES permit or are included in Item 3, above. If permitting or immediate elimination of the non-stormwater discharges is impractical, the Permittees will submit to the Regional Board a proposed plan to address the non-stormwater discharges.

2.2 SURVEILLANCE AND SOURCE IDENTIFICATION

2.2.1 Field MS4 Surveillance

Field surveillance of the MS4 consists of:

- Source identification
- Routine field inspection of the MS4

The Permittees report new outfall locations, additions or modifications to major structural controls, and additions to the list of industrial operations covered under the Waste Discharges Requirements for Discharges Associated with Industrial Activities[1] (General Permit-Industrial) in the Annual Reports. The Annual Reports also included a list of commercial establishments and industrial facilities as documented by the County Hazardous Materials Management Program. These source identification efforts are further described in Section 3.

[1] SWRCB Order No. 97-03-DWQ; NPDES No. CAS000001

During the third-term MS4 Permit the Permittees will:

- Continue to implement the IC/ID MS4 field inspection schedule established within the Permittees respective jurisdictions. A target list of industries that are known to be contributing substantial pollutant loads to the MS4 is maintained as part of the Compliance Assistance Program described in Section 3.1.
- Document field inspections during the performance of existing field activities, including recording and forwarding IC/ID observations to appropriate jurisdictions.
- Pollutants in runoff from landfills and SARA Title III facilities will continue to be monitored in compliance with existing Regional Board WDRs. This will also be used to assess compliance with the storm water requirements. Data compiled and provided to the Regional Board in compliance with the WDRs will be incorporated into the storm water compliance reports by reference.

Field inspections of the MS4 are performed by the Permittees. Co-Permittee code enforcement staff routinely patrol and inspect the MS4 and report IC/ID incidents. Several Co-Permittees have instructed staff, including building inspectors, fire department, and community service staff to report IC/ID incidents while in the field performing their specific duties. Inspections of catch basins are performed by public works staff either as part of routine maintenance, or on a periodic (semi-annual/annual) basis. The District and CVWD perform field inspections of their respective elements of the MS4 as part of ongoing facility maintenance programs.

Routine industrial/commercial facility inspections and outreach are addressed through the CAP described in Section 3.1.

2.2.2 Swimming Pool Discharges

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

- Several cities issue permits for swimming pool drainage that require the discharger to stop chlorinating the pool for three to seven days, and to test the dechlorinated water for confirmation of an acceptable level of chlorine residual in the water prior to discharge.
- All Permittee cities have adequate legal authority to halt an IC/ID incident that results in the improper disposal of swimming pool discharges.

2.2.3 Reporting

The purpose of standardized reporting is to formalize the procedures followed for incident documentation and follow up. The Permittees have developed a program for reporting and documenting illegal discharges, spills, and dumping. The Permittees have used internal log forms to document reports of IC/ID. The log forms are also used by staff to record observations in the field of improper discharge. Incidents involving hazardous materials are documented using a standard California Hazardous Material Incident Report form. Since IC/ID is usually reported to code enforcement, public works, or fire department staff, a case number is assigned to the reported incident.

2.2.4 Incident Response, Investigation, and Clean up

The purpose of this activity is to address the procedures followed for incident response, investigation, and cleanup. The Co-Permittee public works or code enforcement staff respond to notification of illegal discharges by taking phone calls, assessing the magnitude of the discharge, and either initiating direct follow-up or referring the call to County HAZMAT (if a significant quantity of hazardous materials is reported). Over the third-term MS4 Permit, the Permittees will continue to support the HAZMAT crews responding to IC/ID incidents.

Permittees meet the following minimum guidelines when responding to reports of illicit connections or illegal discharges:

- If the reported incident is outside of a Permittee's jurisdiction, referral to the appropriate agency and/or the Regional Board will be made;
- Permittees will respond to reports of illicit connections or illegal discharges within their jurisdiction;
- Inspections performed in response to a report will be documented appropriately; and
- When appropriate, samples of illegal discharges will be collected.

A toll-free "hotline" (1-800-506-2555) has been established in conjunction with the SW/CWPP to specifically receive public complaint calls regarding improper discharges. The hotline staff is trained to notify the appropriate responders of any hazardous or non-hazardous material release to the MS4 such as oil, paint, or other suspicious discharges.

2.2.5 Sanitary Waste Management

The SWRCB is working with stakeholders to develop WDRs for operators of sanitary sewage collection systems. It is anticipated that the WDRs will be adopted by the SWRCB in 2006 and will require the collection system owner or operator to develop and implement a facility-specific Sewer System Management Plan (SSMP). The objective of these WDRs, which are being adopted pursuant to SWRCB Resolution No. 2004-0080, is to develop a consistent approach for reducing sanitary sewer overflows (SSOs) throughout California. The Permittees will support the implementation of the SSMPs developed in response to the WDRs.

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

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

In cooperation with the County Health Department, the Permittees have identified procedures to control septic system failures to prevent impacts on Urban Runoff quality and continue to follow procedures established by the State Health Department to address such failures. The County also implements regulations adopted by the SWRCB pursuant to California Water Code Section 13290-13291.7 through a memorandum of understanding with the Regional Board. The design review of septic systems is performed by MOUs with the Regional Boards. Statewide standards for construction are being developed by the SWRCB, in conjunction with other stakeholders, under the provisions of AB 885 of 2000. It is expected that the final regulations implementing AB885 will include provisions for ongoing, regular monitoring of some or all septic systems.

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

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

2.3 TRAINING

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

In the past, training of new County employees on procedures established for the reporting and abatement of illegal dumping was conducted on an as-needed basis. For the Co-Permittees, a variety of training methods including video presentations, formal staff meetings, informal briefings by code enforcement staff, and fire department “First Responder Courses” have been used to educate personnel on urban runoff issues. The SW/CWPP has developed formal municipal employee training workshops. The workshops are devoted to address both stormwater and non-stormwater issues for IC/ID, materials storage and many other functional BMP areas, such as maintenance and public works construction activities. The workshops are generally offered at least twice a year, in the spring and in the fall.

During the third-term MS4 Permit:

- NPDES coordinators will document their respective staff training activities and forward the information to the District annually for inclusion in the Annual Report. The documentation will include pertinent information such as, but not limited to, the number of staff in attendance and the type of training received.
- NPDES coordinators will attend at least one training session annually at any of the existing training forums available in the local area.

- NPDES coordinators will continue to use existing Permittee forums to hold briefings for appropriate staff on commercial/industrial stormwater issues.
- Co-Permittees will attend training workshops developed by the SW/CWPP.
- Co-Permittees will use video presentations available from the SW/CWPP for internal staff training.

Training for the IC/ID program may be conducted in conjunction with training for other portions of the municipal stormwater program discussed in Section 3 Commercial/Industrial; Section 4 Development Planning and Construction Activities; Section 5 Permittee Facilities and Activities; and Section 6 Public Education and Outreach Program.

2.4 EVALUATION/ASSESSMENT

Evaluation and assessment of BMP performance and Permittee compliance will be accomplished primarily through reporting and documentation. The proposed evaluation and assessment requirements for the IC/ID program are:

- Number of Permittee employees trained, by department or function
- Compliance with established procedures, such as use of standardized IC/ID reporting form
- Collect information on IC/ID reports:
  - Number of reports received
  - Number of cases investigated/responded to
  - Source of IC/ID
  - Final outcome of case (e.g., spill/connection was terminated and cleaned up, source owner/operator educational visit, warning letter, referral to enforcement agency)
- Number of enforcement actions issued/taken (e.g., notice of non-compliance, notice of violation and order to comply, referral to District Attorney for prosecution)

3.0 COMMERCIAL/INDUSTRIAL PROGRAM

The purpose of this program area is to conduct source identification and outreach to reduce discharge of pollutants from both commercial businesses and industrial operations.

3.1 INSPECTION AND SOURCE IDENTIFICATION

The Permittees coordinated with the County Health Department, local fire departments, and the Regional Board, as necessary, to develop a targeted list of industries, which are known to be contributing substantial pollutant loads to the storm drain system. The Permittees further worked with the DEH to develop the regional CAP to enhance outreach to those facilities and to assist Permittees with identification of potential IC/IDs.

Regionally, the DEH implements the CAP as an extension of its oversight and inspection of industrial and commercial sources for other regulatory programs. The surveys performed as part of the CAP are generally conducted at frequencies required by other regulatory programs. However, lower priority threats to water quality, such as restaurants, may be surveyed at lesser frequencies.

In April 2004, the District and the DEH executed an agreement that provides continued support for the area-wide CAP. The CAP involves a detailed storm water compliance survey for facilities that must secure a hazardous materials permit for storing, handling or generating such materials and for retail food facilities. Many types of industrial and commercial establishments are inspected by the DEH Hazardous Materials Management staff including those that conduct automobile mechanical repair, maintenance, fueling, or cleaning operations, automobile or other vehicle body repair or painting operations, and painting or coating operations. In Western Riverside County there are approximately 5,500 facilities having a hazardous materials permit of which approximately 2,300 are inspected annually by the DEH. All hazardous material permit facilities are surveyed for NPDES compliance at least twice during the MS4 Permit term. There are also approximately 6,750 retail food facilities, all of which are formally surveyed for NPDES compliance at least once every five years.

During the CAP surveys of the hazardous materials permit facilities the following BMPs are verified:

- Hazardous waste/materials storage areas are clean, no signs of leakage, and protected from rainfall and runoff;
- Trash bin areas are clean, the bin lids are closed, the bins are not filled with liquid, and no signs of leakage from the trash bins;
- Aboveground tanks have been properly maintained including no signs of leakage, and secondary containment in good condition;
- Onsite storm drain inlets are protected from inappropriate non-stormwater discharges;
- Oil/water separators are connected to sanitary sewer;
- Wash water from wash pads (steam cleaning or high pressure cleaning) is directed to the sanitary sewer and does not discharge to the MS4;
- Mop bucket wash water is discharged to sanitary sewer via clarifier;
- Parking lot areas are free of trash, debris, and fluids other than water; and

- Facility has coverage under the General Permit-Industrial, if appropriate.

These specific topics are addressed in questions 1-10 of the "Hazardous Waste/Hazardous Materials Facility Storm Water Compliance Survey" form included in Appendix D.

During the CAP restaurant surveys the following minimum BMPs are verified:

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

These specific topics are addressed in questions 1-8 of the "Food Facility Storm Water Compliance Survey" form included in Appendix E.

General Permit-Industrial Coordination

Many manufacturing and industrial operations are subject to the requirements of the General Permit-Industrial. The Permittees will continue to use the CAP surveys to identify facilities lacking General Permit-Industrial coverage within their respective jurisdictions. The Permittees also require proof of compliance with the General Permit-Industrial prior to issuance of a business license or a certificate of occupancy for new industrial facilities.

The CAP includes educational outreach to the facilities and completion of a storm water compliance survey. In conducting a facility survey, if it appears that the facility may be required to have coverage under the General Permit-Industrial and the facility operator indicated that a Stormwater Pollution Prevention Plan (SWPPP) is not onsite, the inspector provides the facility operator with an informational sheet on the requirements of the General Permit-Industrial and makes a notes on the compliance survey that the SWPPP was not available onsite. The implementation schedule for CAP surveys will continue to be prioritized to address targeted industrial facilities.

A brochure entitled "Did you know…your facility may need a Storm Water Permit?" provides information on how to submit a Notice of Intent (NOI) for industrial facilities and lists certain manufacturing operations that may require coverage under the General Permit-Industrial issued by the SWRCB. This brochure is being circulated via the permit counter of each Co-Permittee and through CAP surveys.

The Co-Permittees will continue to provide the Public Education Coordinator with the name, address, and telephone number of mobile cleaning services within their respective jurisdictions using available information sources including business license databases or telephone directories, etc., to conduct outreach.

3.1.1 Oil & Grease Evaluation for Additional Controls

The Permittees have evaluated the need for additional controls for oil and grease and concluded that such controls are not needed. This conclusion was based on the following factors:

- In general, low levels of oil and grease have been consistently reported in the Whitewater River Region monitoring program and they are not contributing to water quality impairment.
- The Permittees have developed a comprehensive strategy to address oil and grease that involves focused outreach, adequate legal authority, and source control BMPs.
- Treatment controls for oil and grease are still not proven to be highly effective in controlling the relatively low concentrations typically found in Urban Runoff.
- The Permittees are monitoring research efforts for various BMPs programs statewide.

3.2 TRAINING

Staff that conduct CAP surveys receive annual training regarding the following topics:

- Selection, implementation, and maintenance of appropriate or minimum BMPs for industrial or commercial facilities,
- The General Permit-Industrial and NOI requirements,
- The local jurisdiction's Storm Water Ordinance and other local jurisdiction resolutions and codes related to protection of water quality,
- The local jurisdiction's enforcement and compliance strategy/policy for industrial commercial facilities
- The MS4 Permit and the SWMP, and
- How to provide guidance to facility operators on proper selection, implementation and maintenance of industrial/commercial BMPs.

3.3 EVALUATION/ASSESSMENT

Evaluation and assessment for the Commercial/Industrial program performance and Permittee compliance is accomplished primarily through the following reporting and documentation activities:

- Number of commercial and industrial facilities in the source database, by type:
  - Restaurant
  - Automotive Service
  - Industrial
  - Mobile Cleaning Business
- Number of commercial and industrial facilities visited:
  - Implement BMPs
  - Maintain a SWPPP (if required by the General Permit-Industrial)

4.0 DEVELOPMENT PLANNING AND CONSTRUCTION ACTIVITIES

4.1 CURRENT ACTIVITIES AND SOURCE IDENTIFICATION

4.1.1 Development Planning

The Development Planning program element is directed at reducing pollutant discharges from all types of land uses, including residential, commercial, and industrial. This is accomplished by incorporating applicable structural and non-structural BMPs into New Development projects and Significant Redevelopment projects during the development planning process. *New development* is considered construction on a previously undisturbed parcel. A *redevelopment* project is any project where major modifications to an existing site or structure requiring a permit issued by a Co-Permittee are undertaken. Routine maintenance, interior remodeling, re-roofing, and parking lot maintenance are not included. A redevelopment project is not to be confused with the projects undertaken by a Redevelopment Agency.

New Development Guidelines (Supplement "A") were developed by the Permittees with participation from several business and industrial groups and collaboration with the San Diego and Santa Ana Regional Boards. A *New Development Guidelines* video was also produced and made available to the public. Supplement "A" comprises the single largest component of the Development Planning program element. Supplement "A" is presented as Appendix F.

Supplement "A" contains planning review procedures to address stormwater management measures during the planning, construction, and completion phases of a development project. The development planning review process contained in Section 3.0 of Supplement "A" is summarized as:

a. Present procedures for approval of grading, building, and similar permits will be modified to include BMPs listed in Supplement "A" (Tables 1 and 2).

b. Permittees will make Supplement "A" available to applicants as early in the development permitting process as possible.

c. Permittees will develop implementation procedures for the New Development BMP guidelines, including training and education for employees who will implement Supplement "A".

d. Implementing staff will notify the applicant at the earliest possible opportunity if there is a known water quality problem that might affect the proposed development.

4.1.2 Construction Activities

For private sector construction projects that require coverage under the General Permit for Stormwater Discharges Associated with Construction Activity[2] or the General Permit for Stormwater Discharges Associated with Construction Activity from Small Linear Underground/Overhead Projects[3] (General Permits-Construction), the Permittees verify that applicants have filed a NOI prior to the issuance of a grading permit.

Construction related activities conducted at project sites such as storage and handling of materials, fueling, equipment maintenance, etc. present opportunities for introducing potential pollutants into the

[2] SWRCB Order No. 99-08-DWQ; NPDES General Permit No. CAS000002.

[3] SWRCB Order No. 2003-0007-DWQ; NPDES General Permit No. CAS000005.

MS4. Therefore, the Permittees will continue to implement the following procedures related to construction activities:

- Reporting Permittee public works construction projects to the Regional Board that would otherwise necessitate coverage under the General Permits-Construction
- Preparing SWPPPs for Permittee public works projects that would otherwise necessitate coverage under the General Permits-Construction
- Inspecting Permittee public works construction sites
- Verifying NOI submittal for non-public works (private sector) construction projects that require coverage under the General Permits-Construction prior to the issuance of grading permits.

During the third-term MS4 Permit:

1. The Permittees will continue to require proof of coverage under the General Permits-Construction by private sector construction projects disturbing 1 acre or more.
2. The Permittees will continue to implement the compliance procedures for public works construction projects.

4.2 TRAINING

To support effective stormwater and non-stormwater pollution prevention the Permittees have developed and provide informational and appropriate training sessions to staff conducting construction site inspections. Training outlined in Section 2.3 will include construction related stormwater and non-stormwater issues. Development planning and construction training modules will contain a construction stormwater orientation for plan check staff and field inspectors. Topics will cover:

- MS4 Permit requirements
- General Permits-Construction requirements
- SWPPP preparation (for Permittee projects)
- Site inspection criteria and priorities

4.3 EVALUATION/ASSESSMENT

Evaluation and assessment of BMP performance and Permittee compliance will continue to be accomplished primarily through reporting and documentation. The following evaluation and assessment measures are used to evaluate the Development Planning and Construction Activities Program:

- Confirm that existing ordinances adequately address MS4 Permit requirements.
- Each Permittee to confirm compliance of New Development and Redevelopment projects with Supplement “A”.
- List priorities and develop implementation schedule for Construction inspections. Conduct Construction inspections within existing building/grading inspection framework based on priorities.

5.0 PERMITTEE FACILITIES AND ACTIVITIES

5.1 PERMITTEE CONSTRUCTION ACTIVITIES

As provided by the third-term MS4 Permit, the Permittees notify the Regional Board of their public works construction projects that would normally require coverage under the General Permits-Construction, as applicable. The dates and location of the construction project, the party responsible for the project and the telephone number of the responsible party is included in this notification, which is provided prior to the start of construction. The Permittees are not required to submit a NOI to the SWRCB coverage under the General Permits-Construction coverage. The Permittees develop and implement Construction SWPPPs consistent with the requirements of the General Permits-Constructions for construction activities that exceed one acre of disturbed soil. Public works construction monitoring includes site inspections before anticipated storm events and after actual storm events to verify SWPPP implementation. A Notice of Termination is submitted to the Regional Board within 30 days of the completion of each Permittee construction project.

Emergency public works projects required to protect public health and safety are not required to prepare a SWPPP, nor are they required to file a NOI or provide advance notice to the Executive Officer of planned changes that may result in non-compliance with the Construction Activity Permits.

5.2 OPERATION AND MAINTENANCE OF PERMITTEE FACILITIES

5.2.1 Sewage Systems

The SWRCB is working with stakeholders to develop WDRs for operators of sanitary sewage collection systems. It is anticipated that the WDRs will be adopted by the SWRCB in 2006 and will require the collection system owner or operator to develop and implement a facility-specific SSMP. The objective of these WDRs, which are being adopted pursuant to SWRCB Resolution No. 2004-0080, is to develop a consistent approach for reducing SSOs throughout California. The Permittees will support the implementation of the SSMPs developed in response to the WDRs.

5.2.2 MS4 Maintenance

The Permittees developed maintenance schedules for the structural control and treatment control BMPs and the MS4, are implementing those maintenance schedules and report on the BMP and MS4 maintenance activities annually. These maintenance schedules address clean-out schedules and frequencies for the Permittees catch basins, open channels, debris basins, and retention/detention basins. Wastes and materials removed are disposed of per applicable laws and appropriate BMPs are implemented to minimize impacts to the Receiving Waters to the MEP.

5.2.3 Other Municipal Facilities and Activities

The Permittees have identified BMPs for municipal activities including street sweeping, catch basin cleaning, maintenance yards, vehicle and equipment maintenance areas, waste transfer stations, corporation and storage yards, parks and recreational facilities, landscape and swimming pool maintenance activities, MS4 maintenance activities, and the application of pesticides.

As part of the development of the Municipal Facilities Strategy, the Permittees identified the types of municipal facilities they operate. During this process, the types of Permittee facilities and the activities conducted at those facilities were identified as having the potential to contribute pollutants to Urban Runoff as shown in Table 4. Permittee facilities such as wastewater treatment plants, airports, and landfills have coverage under the General Permit-Industrial or under an individual NPDES permit.

Identification of the potential pollutants at each Permittee's facilities was necessary in order to select appropriate candidate BMPs to reduce pollutants in Urban Runoff to the MEP. In addition, the Permittees were surveyed to identify the potential pollutants of concern typically associated with the activities performed at or based from the identified facilities of concern. Table 5 identifies pollutants of concern that may be associated with activities conducted at or based from Permittees' municipal facilities.

During the development of the facility specific strategies, the Permittees identified existing non-storm water discharges and characterized the discharges with respect to frequency, volume, flow, and duration. The Permittees eliminated or permitted such discharges. A template facility Pollution Prevention Plan for Permittee facilities, including an annual inspection form is provided in Appendix G. Facility-specific Pollution Prevention Plans are maintained and updated by the Permittees annually. Re-inspections and corrective actions are taken where deficiencies are found. The inspection reports, and documentation of resulting corrective actions, are kept for five years and are incorporated into the Pollution Prevention Plans.

Based on the facilities, associated activities and the pollutants of concern identified, a list of potential source control BMPs was developed by the Permittees. This list utilizes the BMP designations used in the 2003 California Stormwater Best Management Practice Handbooks[4] (Industrial and Municipal Handbooks). The list of potential source control BMPs includes:

Industrial Handbook References

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

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

- SC-43 Parking/Storage Area Maintenance
- SC-44 Drainage System Maintenance

Municipal Handbook References

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

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

5.3 FIRE FIGHTING BMPS

In coordination with the Riverside County Fire Agencies, the Permittees developed a list of appropriate BMPs to be implemented to reduce pollutants from fire training activities, fire hydrant/sprinkler testing or

flushing and BMPs feasible for emergency fire fighting flows. These fire fighting BMPs and the strategy for providing training and updating the list of BMPs are described in Appendix H.

5.4 TRAINING FOR MUNICIPAL MAINTENANCE EMPLOYEES

Staff involved in implementing a Permittee's municipal maintenance program receive annual training on the following topics:

- Requirements of the local storm water ordinances;
- Requirements of the third-term MS4 Permit and SWMP;
- Model Maintenance Procedures as described in Section 5.3.2 of the SWMP;
- Fertilizer and Pesticide Management
- Municipal Facilities Pollution Prevention Plan
- Other applicable pollution control measures.

In addition, staff responsible for restricted use pesticide application are trained and certified under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) requirements and the California Food and Agriculture Code. Training is provided twice a year for Permittee maintenance staff. Permittee staff may also attend training sponsored by third parties (for example, California Stormwater Quality Association) in lieu of Permittee-sponsored training. The Permittees individually maintain a log of trained staff and report training in the Annual Reports.

Table 4. Permittee Facilities and Activities

Type of Municipal Facility	Activities of Concern Conducted
Corporate Yards[1]	Loading, unloading, handling, and storage of animal wastes, anti-freeze, asphalt, batteries, chemicals, concrete, diesel wastes, emulsions, fertilizer, fuel, green wastes, hazardous materials, new and used oil, paint products, pesticides, scrap metal, solvents, trash and debris, and wash water
	Filling of aboveground and underground storage tanks (ASTs and USTs) with fuels
	Dispensing of fuels to vehicles, equipment, and portable fuel containers
	Vehicle and equipment parking and storage
	Vehicle, equipment, and material washing and steam cleaning
	Leak and spill cleanup
	Landscape, garden, and general maintenance and cleaning
Warehouses	Loading, unloading, handling, and storage of materials
	Landscape, garden, and general maintenance and cleaning
Fire and Police Stations	Loading, unloading, handling, and storage of antifreeze, chemicals, new and used oil, scrap metal, and trash and debris
	Filling of ASTs and USTs with fuels
	Dispensing fuel
	Vehicle and equipment maintenance
	Vehicle and equipment parking and storage
	Vehicle washing and steam cleaning
	Leak and spill cleanup
	Landscape, garden and general maintenance and cleaning
Hazardous Materials Storage Facilities[2]	Loading, unloading, handling, and storage of potentially hazardous materials
	Leak and spill cleanup
Animal Shelters	Loading, unloading, handling, and storage of animal wastes for off-site recycling, chemicals, and fuel
	Vehicle, equipment, and material washing
	Leak and spill cleanup
	Landscape, garden, and general maintenance and cleaning
Swimming Pools	Storage and use of chemicals, including chlorine
	Filter maintenance and backwashing
	Landscape, garden, and general maintenance and cleaning
Water Treatment Facilities	Loading, unloading, handling, and storage of materials
	Filling of ASTs and USTs with fuels
	Vehicle washing and steam cleaning
	Leak and spill cleanup
	Landscape, garden, and general maintenance and cleaning

1 Corporation yards include equipment, transit maintenance, public works, fleet maintenance, civic centers, and parks and recreation equipment yards.

2 Includes household hazardous waste collection facilities

Table 5. Potential Pollutants of Concern

Potential Pollutants	Material Loading, Unloading, Handling, or Storage	Filling of ASTs & USTs	Dispensing Fuel	Vehicle & Equipment Maintenance	Vehicle & Equipment Parking and Storage	Vehicle & Equipment Material Washing & Steam Cleaning	Leak & Spill Cleanup	Landscape, Garden, and General Maintenance & Cleaning
Animal Wastes	3							
Anti-freeze	3			3	3		3	
Asphalt	3							
Acid	3			3				
Chemicals	3			3	3		3	
Concrete	3						3	
Diesel Wastes	3			3			3	
Emulsions	3						3	
Fertilizer	3						3	
Fuel		3	3	3			3	
Green Wastes	3							3
Hazardous Materials	3			3	3		3	3
Herbicides	3						3	3
New/Used Oil	3			3			3	
Oil and Grease Spills	3			3	3	3	3	
Paint Products	3						3	3
Pesticides	3						3	3
Scrap Metal	3			3				
Solvents	3			3			3	
Trash and Debris	3							3
Wash Waters						3		

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

Activities	BMP References From Industrial Handbook																BMP References From Municipal Handbook																				
	SC-10	SC-11	SC-20	SC-21	SC-22	SC-30	SC-31	SC-32	SC-33	SC-34	SC-35	SC-40	SC-41	SC-42	SC-43	SC-44	SC-10	SC-11	SC-20	SC-21	SC-22	SC-30	SC-31	SC-32	SC-33	SC-34	SC-41	SC-43	SC-60	SC-61	SC-70	SC-71	SC-72	SC-73	SC-74	SC-75	SC-76
Material Loading/Unloading/Handling/ Storage						3	3	3	3									3				3	3		3												
Waste Handling and Disposal	3							3		3							3									3			3							3	
Filling of ASTs/USTs			3															3	3																		
Dispensing Fuel			3															3	3																		
Vehicle/Equipment Maintenance/Repair					3						3							3			3			3													
Vehicle/Equipment Parking and Storage																																					
Vehicle and Equipment Cleaning	3			3				3			3						3			3										3							
Leak and Spill Cleanup	3	3					3	3									3	3											3								
Construction														3																							
Landscaping, Garden, and General Maintenance and Cleaning	3										3	3	3	3	3	3	3										3	3	3	3	3	3	3	3		3

5.5 EVALUATION / ASSESSMENT

Evaluation and assessment of the Permittee Facilities and Activities BMP performance and Permittee compliance will be accomplished primarily through the following reporting and documentation activities:

- Document and maintain training logs of staff training and certification activities.
- Document the number of new outfalls and structural controls added to Permittees' MS4s.
- Document the number of new industries within Permittees' jurisdictions that may contribute non-stormwater runoff to the MS4.

6.0 PUBLIC EDUCATION AND OUTREACH PROGRAM

6.1 INTRODUCTION

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

To leverage finite resources, the public education program has frequently partnered with various entities (Riverside County's Waste Management Department, Air Quality Management District; Western Riverside Council of Governments, Orange County Department of Public Works, Los Angeles County Department of Public Works, Riverside Corona Resource Conservation District, Mission Resource Conservation District, County Environmental Health, and various water agencies throughout Riverside County, etc.) to promote conservation, pollution prevention and environmental awareness. The education program also expands outreach opportunities by collaborating with entities such as Riverside County's Agricultural Commissioner for promoting the proper use of pesticides and herbicides to specific target groups such as pesticide applicators and home gardeners.

The public education and outreach program developed an Internet website that provides information to residents and businesses about the problem of storm water pollution and offers simple stormwater pollution prevention activities. The website also provides materials order form for all educational materials. The website also has a tracking mechanism for the number of queries. The website address is http://www.floodcontrol.co.riverside.ca.us.

6.2 MS4 PERMIT REQUIREMENTS

The District continues to expand implementation of public information activities, and other appropriate outreach activities to facilitate the development and implementation of the Whitewater River Region SWMP. In general, the public education and outreach program meets the following goals:

- Incorporation of Public Involvement in the program development and implementation process.
- To continue to participate in joint outreach efforts to ensure that a consistent and effective message on stormwater/urban runoff pollution prevention is brought to the public.
- To establish a Public Education Committee to oversee and guide the implementation of the public education program.
- Expand the existing public education and outreach program to include a concentrated, business-specific element. This education program must include information to encourage commercial facility owners and/or operators to comply with the local jurisdiction's storm water ordinance and, where applicable, the General Permit-Industrial or other NPDES permit/Waste Discharge Requirements issued by the SWRCB or Regional Board.
- To target residents, including businesses, commercial, and industrial establishments.

- To measurably increase the awareness of stormwater/urban runoff issues.
- To develop targeted BMP guidance for specific pollutants and residential and business activities, including identification of actions to prevent sewage spills.
- To promote the 1-800 hotline for reporting clogged storm drains, faded or missing catch basin decals or markers, illegal dumping from residential, industrial, construction and commercial sites into public streets, the MS4 and water bodies, and providing general Urban Runoff and BMP information.

6.3 OBJECTIVES

The public education and outreach program element has established the following guiding objectives.

Outreach Objectives:

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

Pollution prevention based education BMPs are a major focus of the outreach program. The outreach program includes three categories: Public Behavior, Business Activity, and Potential Pollutants. Table 7 identifies typical audience and outreach programs for the three categories of the outreach program.

Table 7. Public Education and Outreach Methods

Category	Audience	Potential Outreach Methods
Public Behavior	Residents; General Public	• Pamphlets • Brochures • Billboards • Utility Bill Inserts • Direct Mail • Newspaper Inserts • Advertisements • Community Events • Surveys • Community Presentations
	Students	• Classroom Presentations • DVD's • Workbook Materials Children's Workshops • Contests
	Home Gardeners	• Focused Brochures • Posters • Workshops • Inserts
Business Activity	Commercial; Industrial	• Brochures • Posters • Site Inspections
	Mobile Operators (auto maintenance; vehicle washing; mobile carpet, drape and furniture cleaning; mobile steam cleaning)	• Brochures • Information at Public Permit Counters • Site Inspections (base of operations)
	Groundskeepers, landscape installation, nurseries, greenhouses	• Focused Brochures • Posters • Workshops • Newspaper Inserts • Site Inspections (base of operations)
	Architects; Developers	• Focused Brochures • Information at Public Permit Counters • WQMP and Supplement A Compliance reviews
	General Contractors; Construction Contractors	• Focused Brochures • Information at Public Permit Counters • New Development Guidelines • Site Inspections
Potential Pollutants	Users or Generators of fertilizers, pesticides, chemicals, and other pollutants	• Pamphlets • Brochures • TV/Cable • Utility Bill Inserts • Newspaper Inserts • Advertisements • Community Events • Community Presentations • Surveys • Licensing

Program Management Objectives:

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

Program management objectives serve as a management strategy for public education program implementation and development. These objectives are achieved through techniques such as local coordination meetings, participation in regional organizational efforts, advertising and outreach to adjacent programs. Table 8 identifies secondary objectives and typical techniques used to implement them.

Table 8. Public Management Methods

Category	Potential Outreach Methods
SWMP Education (Section 6.5.2.1)	• Management Steering Committee • Permittee Technical Committee • Personnel Training Programs • Coordination Meetings with other Departments/Agencies • Comments on CEQA Documents
Public Participation (Section 6.5.2.2)	• Information at Public Permit Counters • Public Workshops • Public Notifications • Notifying Interested Parties
Program Coordination (Section 6.5.2.3)	• Participation in California Association of Stormwater Quality Agencies • Participation in various Watershed Management Efforts • Direct contact with adjacent or overlapping program managers (Stormwater, Waste, others)
Adaptive Management (Section 6.5.2.4)	• Surveys of attendants of public fairs and events • Online web surveys • Review of monitoring data • Participation in surveys organized and coordinated by other local/state agencies • Staff Feedback • Incorporation of new state or federal guidelines or information

6.4 IMPLEMENTATION

6.4.1 Public Education Committee

The Desert Task Force provides oversight and guidance for the implementation of the public education program in the Whitewater River Region. The Public Education Coordinator works directly with the Desert Task Force on the development and implementation of public education programs in the Whitewater River Region.

6.4.2 Program Framework

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

6.4.2.1 Countywide Level

As Principal Permittee for the County's three MS4 permits, the District is the administrator for the Public Education program and is responsible for developing a consistent and effective message on stormwater/urban runoff pollution prevention throughout the County. This countywide element consists of developing a program image and core message, implementing countywide education programs, and coordinating countywide events and countywide interagency activities. The countywide program maintains a consistent look, theme and focus of the public education materials in each region. Countywide activities coordinated by the District include school education programs, distribution of public education materials to countywide inspection programs, participation in state organizations such as the CASQA, coordinating with and taking the lead to other county agencies on various advertising campaigns, developing a look and theme for all public education materials and operation of the County's 24-hour 1-800 stormwater pollution hotline.

6.4.2.2 Regional Level

The public education program is also tailored for each of the three regions in the County. This approach integrates elements of the countywide program while focusing on the specific geography and water quality issues of the area and allows the program to address the impacts of local activities on local water quality. As Principal Permittee for each of the County's three MS4 permits, the District incorporates

regional public education requirements established by each region's MS4 permit. The District also works with each region's Permittees to incorporate other regional public educational needs into that region's public education activities. Regional public education needs are established through formal and informal public education committees who discuss public education requirements and funding requirements each year. Regional public education programs may include participation in large community fairs, customized public education materials to address regional water quality issues, and participation in other local agencies regional public education efforts.

6.4.2.3 Local Level

Outside of the countywide and regional public education activities undertaken by the District on behalf of the Permittees, each Permittee may also undertake individual public education activities to address specific local needs or MS4 Permit requirements. These local activities may include distribution of public education information during construction site/business inspections; distribution of public education materials at front counters, local fairs and other community activities; and/or development of specific public education programs/materials to address specific needs.

6.5 PROGRAM COMPONENTS

The following subsections identify specific programs currently implemented by the Permittees to address program objectives. These programs are adaptively managed by the Permittees to meet the changing needs of the overall MS4 program based on changing regulations, water quality conditions, and feedback surveys.

6.5.1 Outreach Objectives

6.5.1.1 Public Behavior Education Program

The following programs are currently being implemented to foster broad public awareness of water pollution concerns; increase public acceptance of pollution prevention activities to curtail everyday human behaviors that contribute to water quality problems; and to promote stewardship of local water resources:

- **School Education Outreach**. Outreach to schoolchildren is the core to developing an environmental ethic in the next generation that can help prevent stormwater pollution. The objective of this element of the public education program is implementation of a coordinated and comprehensive program that combines multiple elements – classroom or assembly presentations, teacher workshops and field events, and has the greatest potential to leave a lasting impression on school children. The program is implemented through contracts with the Riverside-Corona Resource Conservation District and the Mission Resource Conservation District. The program focuses on K through 6th grade. Flyers on how to conduct an environmentally friendly car wash are passed out to secondary schools and secondary school level student organizations.
- **Brochures**. Brochures regarding illegal dumping, disposal of household hazardous waste and antifreeze, batteries, oil and paint disposal information, lawn and garden maintenance brochures, car washing, fertilizer, pesticide and household chemical use, and pet care brochure.
- **Outreach Materials**. Various materials including dust pans, pens, pencils, etc., are provided free of charge to the public at community events to promote pollution prevention activities.

- **1-800 Hot Line**. The District operates a countywide 1-800 hotline number to encourage the public to report clogged storm drains, and illegal dumping from residential, industrial, construction and commercial sites into public streets, MS4 facilities and water bodies. This hotline is capable of receiving reports in both English and Spanish 24 hours/day seven days per week.
- **Website**. The District operates a website that provides information on how to report illegal dumping, clogged storm drains and lack of curb markers, as well as provides information on upcoming activities, opportunities for public participation in program development, and general information about Urban Runoff pollution prevention techniques. It also provides information for kids and teachers as well as an online media library and materials order form.
- **Mailing Inserts**. The District currently distributes various public education materials as mailing inserts. Public education materials have been distributed through mailings from the DEH, County Mail, County Auditor and Controller, County Libraries, County Fleet, County Transportation and Land Management, County Safety and County Agriculture, etc.
- **Media Outreach**. The District is evaluating the beneficial use of billboard campaigns to communicate pollution prevention concepts and information to the public.
- **Partnerships**. The District partners with several agencies:
  - Animal Care Services. The County Community Health Services and the Riverside Pet Adoption Center provide independent and various pet owner services. County Community Health offers patrol services to contracted cities and unincorporated areas of the County. Both agencies routinely distribute education materials that provide guidelines for pet care activities throughout Riverside County.
  - Riverside County Waste Management and County Environmental Health. Riverside County Waste Management (RCWMD) manages the recycling and composting programs and utilizes a variety of educational materials to recommend alternatives for reducing, reusing and the recycling of unwanted hazardous products, food wastes, paper and aluminum. There has also been close coordination with RCWMD and County Environmental Health to ensure that the District promotes the proper disposal of unwanted waste in most forms of media print, as well as at outreach events. For example, the Permittees, via landfill waste tipping fees, contribute funds towards the operation and maintenance of several Antifreeze, Battery, Oil and Paint (ABOP) and HHW Recycling centers, both fixed and mobile, throughout the County. In further support of this activity, the DEH and County Waste Management coordinate on the development of several outreach materials that identify the times and locations of HHW/ABOP recycling activities. These materials include a free environmental calendar that is passed out at public events, two page fliers that are mailed to residents via the Penny Saver and made available at public access offices, as well as a brochure regarding HHW/ABOP disposal that describes how and where to properly dispose of HHW/ABOP items.
  - Public Outreach Events. Participation in several public outreach events including the Tamale Festival, Date Festival and Clean Water Festival.

6.5.1.2 Business Specific Education Program

The business education program consists of the development and distribution of formal BMP guidance for certain potentially polluting business activities including mobile detailing, automotive service center and restaurant cleaning operations; and outreach to business associations. The business specific public education program also attempts to educate businesses regarding the General Permit-Industrial. The business specific education efforts currently include:

- **Food Services Inspection Program**. This program focuses on the inspection of retail and wholesale food facilities. The District has collaborated with DEH to ensure that storm water issues are discussed during food services inspections. The Registered Environmental Health Specialists (REHS) inspect over 6,700 food establishments throughout Riverside County. During these inspections food establishments are provided brochures such as entitled "What you should know for…The Food Service Industry" and the poster entitled "Good Cleaning Practices for the Food & Restaurant Industry." The materials provide food service employees, managers and owners with the best management practices that businesses should employ while performing various maintenance activities. In addition, inspectors discuss common pollution prevention activities that food services facilities can undertake to prevent storm water pollution. The inspectors generally review appropriate methods for cleaning of dumpster and grease bin areas; replacement of leaking or dirty dumpsters; reducing liquid waste in trash and double bagging trash to prevent leaks; encouraging dry sweeping and using dry methods for spill clean up; disposing of wash water to the sanitary sewer rather than the MS4; stopping spills at their source; and proper maintenance of outdoor grease interceptors.
- **Industrial Business Inspection Program**. The District has partnered with the DEH Hazardous Materials Management Division (HMMD) to ensure that stormwater issues are discussed during HMMD's Conditional Use Permit inspections of Riverside County businesses. HMMD implements the Hazardous Waste Inspection Program throughout Riverside County. Specialists in this program inspect 2,300 facilities that generate hazardous waste, evaluate hazardous waste generating industries, investigate reports illegal hazardous waste disposal, and respond to emergency spills of hazardous chemicals. During inspections, specialists routinely distribute appropriate storm water pollution prevention brochures, such as "What you should know for…Automotive Maintenance & Car Care" with a supporting poster entitled, "Keep Your Shop in Tune" to business owners. They also distribute brochures regarding the requirements of the General Permit-Industrial. In addition, Inspectors discuss common pollution prevention activities that facilities can undertake to prevent storm water pollution. Common activities discussed include proper disposal of automotive fluids; working on transmissions, engines, and miscellaneous repairs; preventing and cleaning up leaks and spills/dry method clean up; control of wastewater discharges; vehicle fueling and battery removal and storage; solvent and grease management; metal grinding and finishing; storing and disposal of waste; outdoor parking and wash water management during outdoor cleaning; and steam cleaning practices.
- **Construction Inspection Program**. Each Permittee inspects construction projects within its jurisdiction to ensure compliance with their local ordinances and to ensure that sites are covered under the General Permits-Construction, as applicable. During these inspections, the inspectors discuss appropriate methods to prevent pollutants from being mobilized at construction sites.

- **SWMP Section 4 Review**. The Permittees review development projects within their regions for compliance with *New Development Guidelines* (Supplement "A"). During this review, the Permittees discuss appropriate BMPs with developers and engineers to ensure their developments incorporate reasonable site design, source control, and treatment control BMPs.
- **Brochures**. Outdoor Cleaning Activities, General Stormwater Protection Information, General Construction and Site Supervision, Automotive Maintenance and Car Care, Outdoor Cleaning Activities, You Know… Your Facility May Need a Stormwater Permit and Food Service Industry.
- **BMP Posters**. Posters to address activities associated with the automotive repair industry, and the food/restaurant industry that may pose a threat to water quality and recommends BMPs that can be implemented to reduce the impact on the environment.
- **Website**. The District is working on a website that will provide downloadable Page Display Format (PDF) versions of brochures and posters, as well as additional information that businesses and developers can use to ensure that they are implementing appropriate BMPs at their sites. An online media library and materials order form is also available.
- **Media Outreach**. The District has included direct outreach to businesses through advertising in business trades and booth presence at various business specific symposiums. The District is also considering a billboard campaign to deliver pollution prevention messages to appropriate businesses.
- **Community Events**. Information and materials may be delivered to business people during trade shows, trade meetings, or other appropriate community events.

6.5.1.3 Potential Pollutants Education Program

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

- **Partnerships**. The District partners with several agencies:
  - Riverside County Waste Management Department,
  - Air Quality Management District,
  - Coachella Valley Water District,
  - Natural Science Collaborative and
  - Groundwater Task Force.

Each agency is interested to ensure the proper disposal of unwanted waste and emissions in most forms of media print, as well as at outreach events.

- **Public Outreach Events.** Participation in several public outreach events including the Water Festival, Tamale and Date Festivals.
- **Brochures**. Brochures regarding illegal dumping, disposal of household hazardous waste and antifreeze, batteries, oil and paint disposal information, lawn and garden maintenance brochures,

car washing, fertilizer, pesticide and household chemical use, pet care brochure, and home garden care guide.

- **Outreach Materials**. Various materials including shop cloths, and, dustpans, etc., are provided free of charge to the public at community events to promote pollution prevention activities.
- **1-800 Hot Line**. The District operates a countywide 1-800 hotline that local residents can use to report illegal dumping, clogged storm drains, obtain information on public education outreach programs and obtain schedules for household hazardous waste locations and dates.
- **Website**. The District operates a website that provides information on how to report illegal dumping, clogged storm drains and lack of curb markers, as well as provides information on upcoming activities, opportunities for public participation in program development, and general information about urban runoff pollution prevention techniques. It also provides information for kids and teachers as well as an online media library and materials order form.
- **Mailing Inserts**. The District currently distributes various public education materials as mailing inserts. Public education materials have been distributed through mailings from the DEH and Waste Management and several Permittee communities.
- **Media Outreach**. The Permittees are looking at billboard campaigns to deliver pollution prevention concepts and information to a broader range of the public.

6.5.2 Management Objectives

In order for the SWMP to be an effective planning tool for reducing pollutants in Urban Runoff, it is essential to involve the general public in the development of compliance documents, to train Permittee staff on the purpose, requirements and implementation of the programs outlined in the SWMP, to ensure that a consistent and cost effective message is brought to the public by coordinating with other regional education programs, and to ensure that the public education message is adaptively managed to ensure that it keeps up with the most recent regulatory requirements, watershed information, and changing MS4 program needs and objectives.

6.5.2.1 SWMP Education

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

- **Desert Task Force –** Each month the District chairs a meeting for the representatives of the Whitewater River Region Permittees. These meetings are open to the public. Members of regulatory agencies and other local government and state agencies are invited to attend, particularly when issues affecting their operations are addressed. These meetings are used to discuss progress on SWMP development, upcoming activities, changes to the regulatory framework, and to present information on available latest BMP technologies. Special presentations are also occasionally made by other NPDES permit holders to discuss their programs and how they inter-relate with our programs.

- **Permittee Staff Training Programs –** The District provides staff training at least twice a year for the Permittee groups that the following four broad categories of activities: construction inspection, new development review, municipal activities, and industrial/commercial business inspections. These training programs provide a broad overview of the NPDES regulatory framework, discuss other state permits that impact District activities, discuss SWMP and local ordinance requirements, and BMPs to be deployed during those activities. These programs are coordinated with Regional Board staff. The District continues to review the adequacy of the existing staff training programs and continue to develop and improve them. The Permittees are also seeking to work with neighboring MS4 programs to cooperate in the development of staff training materials.
- **Coordination Meetings with other Agencies/Departments –** As needed, the District coordinates with other local governments and state agencies to discuss the requirements of the SWMP and the MS4 programs. These meetings are used to coordinate agency activities.
- **Comment on CEQA Documents –** Each Permittee reviews CEQA documents for public and private projects in their jurisdictions. The CEQA review includes specific questions regarding water quality and compliance with the SWMP and local ordinances. These questions help to ensure that other public and private entities are aware of water quality requirements.

6.5.2.2 Public Participation

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

- **Open Meetings** – The District currently holds Desert Task Force meetings regarding the ongoing development of the SWMP and related water quality regulatory programs. These meetings are open to the public and they may provide comment on any activity that the District is undertaking in support of the SWMP.
- **Public Notice** – The District and the Permittees use public notices, posted on their websites and in local newspapers, to notify the public of the upcoming development of compliance programs, or of the release of draft compliance documents. These notices identify the period in which public comment will be accepted, where public comments may be submitted, and where copies of draft documents or supporting information may be located.
- **Public Workshop** – The District may use formal or informal public workshops to facilitate an interactive discussion on draft compliance documents. These public workshops are usually publicly noticed at least two weeks prior to their date and are usually held in conjunction with publicly noticed comment periods.

- **Community Meetings** – The District may use Community Meetings, such as city council meetings, Board of Supervisors meetings or others, to solicit comments from the public and other agency staff.

6.5.2.3 Program Coordination

A key factor in planning a cost effective and well-organized public education program is coordinating with existing, related programs at the local, state and national level. Such programs include Urban Runoff pollution programs being developed in counties adjacent to Riverside County and throughout California; environmental education programs at the community level offered through other local agencies, environmental organizations, or schools; and county-wide or municipal efforts to promote ride-sharing, recycling, water conservation, and proper household hazardous waste disposal. These programs are coordinated to deliver a consistent message regarding stormwater/urban runoff to the public.

The District currently coordinate activities with several agencies and entities including the San Bernardino County MS4 Program; San Diego County MS4 Program; Orange County MS4 Program; CASQA; RCRCD, and Mission Resource Conservation District; DEH, County Agriculture, Building Industry Association, RCWMD, County Economic Development Agency, County Auditor-Controllers Office, the Regional Water Quality Control Boards, Air Quality Management District and Caltrans, to name a few.

6.5.2.4 Adaptive Management

The success of the public education and outreach program will depend on its ability to assess its effectiveness and adapt to changing water quality issues within each region of Riverside County. At least twice annually, the Public Education Committee, convened as an individual sub-committee or as part of a budget committee, meets to discuss the effectiveness of the county-wide and regional public education programs, to discuss countywide and regional needs, and to discuss necessary changes to the public education program to ensure that it adapts to those needs.

The following tools may be used by the District to assess the effectiveness of the public education program or to determine changing needs:

- **Monitoring Data** – The District is collecting storm water monitoring data from each region of Riverside County. This data is analyzed for trends in pollutant loading and to see if pollutant problems can be tied to particular activities or land uses. This data may be used to modify the public education program to address potential pollutant problems or activity problems within specific regions or countywide.
- **Public Surveys** – The District either conduct surveys or may coordinate with surveys conducted by other agencies, to help assess the effectiveness of Permittee public education outreach activities. The District has been conducting a stormwater survey of attendants of various community fairs for the past three years. The District also recently coordinated with the Lake Elsinore/San Jacinto Watershed Council on a phone survey of residents of the San Jacinto watershed regarding water quality concerns. Results from these surveys will be used to adaptively manage the Permittees public education program. In addition, the Permittees Public Education subcommittee is conducting a review of the adequacy of our existing survey program and may make recommendations to modify the survey format or scope to better assess public education program effectiveness. Expansion and/or modification of the public survey program

may include analysis of results from construction inspection and industrial/commercial inspection forms. The District may also develop or coordinate with other agencies on other surveys, such as phone surveys or web based surveys in lieu of, or addition to, existing surveys in order to assess effectiveness.

- **Staff Feedback** – The District may modify the public education program based on Permittee feedback or knowledge of water quality issues affecting Riverside County or specific regions of Riverside County.
- **Incorporation of New State or Federal Guidelines** – The District may modify the public education program to address changes to the regulatory framework or regulatory requirements for specific SWMP related programs or activities.

6.6 RESIDENTIAL EDUCATION AND OUTREACH

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

6.6.1 Vehicle Washing and Maintenance

Vehicle washing and maintenance activities present opportunities for materials such as soap, motor oil, radiator fluid, etc. to enter the MS4. The "Only Rain Down the Storm Drain" Public Education Program works cooperatively with the County's local motor oil recycling programs to distribute informational materials that address the importance of proper disposal of used motor oil. In addition, the "Only Rain Down the Storm Drain" Public Education Program provides information on vehicle washing and maintenance related pollution prevention and control activities through distribution of brochures, utility inserts and flyer advertisements, presentations to student and adult audiences, etc.

The "Only Rain Down the Storm Drain" Public Education Program informs the general public of pollution prevention and control methods related to vehicle washing and maintenance. The County implements motor oil recycling programs to encourage the proper disposal of used motor oil. In addition, the District maintains a contract with the RCRCD to offer a "Car Wash Challenge" program for high schools. The Public Education Program provides education to the general public on the impacts of the following activities on receiving waters:

- littering and other improper disposal,
- dumping pollutants into the MS4, and
- leakage or dumping of gasoline, oil and grease, antifreeze and hydraulic fluid from vehicles into the streets.

6.6.2 Landscaping

Landscaping related activities such as mowing, fertilizing, weed control, etc. are potential sources of Urban Runoff pollution. The improper handling of grass clippings, chemical fertilizers and pesticides may introduce pollutants into the MS4 and jeopardize the quality of the Receiving Waters.

The "Only Rain Down the Storm Drain" Public Education Program has developed a home garden care brochure to inform residents of the adverse effects of stormwater pollution and to offer environmentally safe alternatives such as Integrated Pest Management, Companion Planting, Soil Solarization and

Composting. The brochures are distributed to the general public via local nurseries, garden workshops conducted by the RCRCD, the Agricultural Commissioner and UC Riverside Cooperative Extension. Other environmental educational tools such as video, flyer inserts, etc. were also developed to help increase public awareness in stormwater pollution prevention.

The "Only Rain Down the Storm Drain" Public Education Program will expand the home gardening workshops to include fairs and special events to educate the general public on the importance to reduce/eliminate the use of pesticides and fertilizers, to handle landscape wastes properly, and to avoid excessive irrigation. As part of the public education program, the RCRCD will continue to offer and conduct landscape training for contractors and groundskeepers through the University of California Cooperative Extension Workshops. The "Only Rain Down the Storm Drain" Public Education Program will be placing display units with information on stormwater pollution, household hazardous waste, less toxic home gardening alternative products, etc. at public outreach events. The Public Education Program will continue to implement the following activities to promote landscaping activities that are protective of receiving waters:

- Educate/inform the general public on the proper application and management of pesticides, fertilizers and herbicides, as well as the proper management of irrigation systems to prevent runoff drainage to the MS4. Where appropriate, coordinate with the Soil Conservation Service, Resource Conservation Districts and UC Cooperative Extension.
- Educate/inform the general public on the impacts of dumping pollutants into the MS4.
- Support the efforts of the County HHW Program that provides a convenient means to properly dispose of oil, antifreeze, pesticides, herbicides, paints, solvents, and other potentially harmful chemicals.

6.6.3 Home Maintenance

This category encompasses BMPs to facilitate the proper use and disposal of common household products such as insecticides, batteries, latex paints, varnishes, cleaners, etc. The "Only Rain Down the Storm Drain" Public Education Program has developed a brochure to educate residents on the importance of proper disposal of household hazardous wastes as well as offer less toxic alternatives to commonly used household products. The District and the Permittees also sponsor HHW Collection Events and ABOP Centers to encourage the proper disposal of household hazardous wastes.

The District addresses home maintenance related issues through the DEH HHW Collection Events and ABOP Centers. The public education efforts may include radio campaigns, utility bill inserts, newspaper inserts, brochures, presentations, etc. as methods to inform the general public of the proper disposal of household hazardous wastes and to offer less toxic alternative products. The Public Education Program will continue to implement the following activities to promote home maintenance activities that are protective of receiving waters:

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

6.6.4 Illegal Dumping

This education component addresses the array of residential activities that involve the improper disposal of waste materials into the MS4. Environmental educational tools that include brochures, video, public services announcements, etc. have been developed to inform the general public on the detrimental effects of stormwater pollution. Other activity includes the use of door hanger notices specifically developed for the residential setting to make residents aware of potential improper discharges from their properties or by someone in their neighborhood. In addition, an MS4 facility marking program has also been implemented to remind residents that no dumping is allowed. The Public Education Program will continue to implement the following activities to promote residential waste management activities that are protective of receiving waters:

- Educate/inform the general public on the impacts of littering and other improper disposal.
- Educate/inform the general public on the impacts of dumping pollutants into the MS4.
- Provide, collect, and maintain litter receptacles in strategic public areas and during public events.
- Develop a program, continue and/or expand an existing field program to detect and prevent dumping or routinely discharging pollutants into the MS4. This should involve re-evaluating, with regard to the MS4 Permit, previous decisions to allow certain relatively clean waters such as swimming pool water to be discharged to the MS4.

6.6.5 Pet Ownership

The importance of proper clean-up and disposal of pet waste has been addressed and emphasized throughout the “Only Rain Down the Storm Drain” Public Education Program campaign in various formats include educational brochures, two page flyers, and related promotionals, etc. The intent is to educate both adults and children on the adverse effects of improper disposal of pet waste and to cultivate awareness of responsible pet care to prevent Urban Runoff pollution and potential health hazard.

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

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

6.7 EVALUATION / ASSESSMENT

The primary performance targets for public education and outreach activities are the number of the audiences reached and their level of knowledge for stormwater pollution prevention. The evaluation and assessment of the Public Education Program is accomplished by collecting a list of data, categorized by the types of audiences and distribution media as follows.

- Number of educational materials distributed at community events

- Approximate attendance at community events
- Number of educational materials distributed at school presentations
- Attendance at school presentations
- Number of adult presentations provided
- Attendance at adult presentations
- Number of educational materials distributed at Permittee public counters
- Number of construction/development-focused workshops conducted
- Attendance at construction/development workshops
- Number of development staff training sessions conducted
- Attendance at development staff training sessions
- Local newspaper circulation estimates
- Total impressions from media outreach

The District uses the following targets to provide consistency among the Permittees' programs to gauge effort and assess future outreach:

- Document usage (call volume, type) of the 1-800 hotline.
- HHW Collection Program - track:
  - event dates and number of days per event;
  - type and amount of material collected; and
  - advertisement expenditures by type (newspaper, banners, flyers, etc.) for the Permittees' internal use.

7.0 MONITORING PROGRAM

7.1 INTRODUCTION

The overall goal of the water quality monitoring program for the Whitewater River Region is to characterize Urban Runoff discharges from the MS4. The District and the CVWD jointly implement the monitoring program. Each agency samples in its respective service area of the Whitewater River Region. Monitoring in the Whitewater River Region is coordinated with required surface water quality sampling activities in two other MS4 Permit areas of Riverside County.

The current water quality monitoring program was established when the Regional Board adopted Monitoring and Reporting Program No. 96-015 with the first-term MS4 Permit in 1996. From the 1995-96 wet season until the present, the program has included monitoring wet and dry weather runoff, sampling receiving water quality, and collecting soil samples from a detention basin.

7.2 CHARACTERIZATION ACCOMPLISHMENTS

Specific monitoring objectives set during the initial Permit term were designed to:

- Assess the influence of land use on water quality
- Detect illegal discharges and illicit connections
- Assess the effectiveness of water quality controls
- Identify problem areas and/or trends
- Identify pollutants of concern
- Identify baseline conditions
- Establish and maintain a water quality database

7.2.1 Data Management

The District uses a proprietary integrated hydrology/water quality data management system known as Hydstra[5]. The Hydstra system supports the export of water quality and hydrologic data to a variety of commonly used electronic formats. The District's monitoring database contains more than 30,000 discrete samples, including analysis results for over 100 chemical constituents for most samples.

7.2.2 Source Identification

The monitoring program includes dry weather sampling to characterize non-stormwater runoff throughout the watershed and to support efforts to identify and eliminate illicit connections and illegal discharges to the MS4. Sampling is directed to sources that may identify pollutants when visual observations or citizen complaints are made regarding a potential improper discharge.

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

7.2.3 MS4 Characterization

The District has developed a system of MS4 maps to show District facilities using a Geographic Information System (GIS) application. The GIS application format includes the MS4 network depicted over aerial photographs of the watershed within the District's service area. Primary features are shown such as the Whitewater River and Tahquiz Creek.

7.2.4 Water Quality Monitoring

The monitoring program was implemented throughout the first-term MS4 Permit in accordance with the Monitoring and Reporting Program 96-015. Water quality monitoring focused on characterizing dry and wet weather runoff, sediment, and receiving water quality. Throughout the first-term MS4 Permit, 16 sites were identified as potential locations for water quality sampling, eight for outfalls, and eight for receiving waters. One detention basin was selected for sediment quality sampling. The candidate sites and the detention basin are listed below in Table 9. Sampling sites and watershed boundaries are shown on the Figure 2.

Table 9. Whitewater River Watershed Sampling Sites

ID	Site Name	Receiving Water	Type	Year Sampled									
				95-96	96-97	97-98	98-99	99-00	00-01	01-02	02-03	03-04	04-05
407	Palm Springs Lane 27, Sunrise SD	Tahquitz Wash	Outfall – Background	X	X	X	X	X	X	X	X	X	X
782	Ramsey Street Storm Drain	San Gorgonio River	Outfall	X	X	X	X	X	X	X	X	X	X
785	Avenue 52 Storm Drain	Whitewater River	Outfall					X		X	X	X	
798	Whitewater River at I-10	Whitewater River	Rec Water	X									
799	Whitewater River at Sinatra Drive	Whitewater River	Rec Water			X							
802	Farrel Basin	Chino Canyon Wash	Outfall		X	X	X	X		X	X		
810	Chino Canyon Wash at Hwy 111	Whitewater River	Rec Water		X	X				X			
811	Date Palm Dr Storm Drain	Whitewater River	Outfall		X				X			X	X
812	Tahquitz Canyon Wash at Hwy 111	Whitewater River	Rec Water		X	X	X			X			
813	Whitewater River above Aqueduct	Whitewater River	Rec Water		X	X	X	X			X	X	X
814	Whitewater River at Avenue 72	Salton Sea	Rec Water		X	X	X	X	X	X	X	X	X
817	Portola Avenue Storm Drain, Indio	Whitewater River	Outfall		X	X				X			
819	Monroe St Storm Drain, Indio	Whitewater River	Outfall				X				X		

Dry and wet weather outfall flows were monitored at three sites during two rainfall events each fiscal year (July 1 to June 30) for constituents listed in the Permit as "Category A" constituents. One of the three sites was also evaluated for a suite of constituents shown in the Permit as "Category B" constituents. Additionally, two sites were sampled for fecal coliform, once a year during dry weather, and twice a year for wet weather flows.

Due to the scarcity of rainfall throughout the watershed and the ephemeral nature of receiving waters, samples were taken at sites that offered the best opportunity to manually sample runoff and receiving water flows. That is, sites were selected for monitoring where stormwater flows occurred.

Receiving Water stations were sampled during dry weather at two sites, one located in the upper area of the basin and one in the lower portion of the basin. The upper and lower basin sites were selected on the basis of being representative of receiving water flow upstream and downstream of the Whitewater River Region. The first-term MS4 Permit Monitoring and Reporting Program also required Receiving Water sampling upstream and downstream of outfalls during wet weather events once per year for "Category B" constituents. However, this requirement was removed following discussions between the Permittees and Regional Board staff.

7.3 PROGRAM IMPLEMENTATION

The Permittees will collaborate with Regional Board staff prior to the adoption of a revised MS4 Permit in developing revisions to the Whitewater River Region monitoring program. The Permittees seek to coordinate their monitoring activities with those conducted by the Salton Sea Restoration Program, Coachella Valley Water District and other entities. Therefore, the Permittees have not included a revised monitoring program as an element of the ROWD or the updated Whitewater River Region SWMP.

The major objectives of the revisions to the Whitewater River Region monitoring program will be:

- Objective 1: Develop and support an effective Urban Runoff management program;
- Objective 2: Identify those Receiving Waters which, without additional action to control Pollution from Urban Runoff, cannot reasonably be expected to achieve or maintain applicable Water Quality Standards;
- Objective 3: Characterize Pollutants associated with Urban Runoff and assess the influence of Urban land uses on Receiving Water Quality; and
- Objective 4: Analyze and interpret the collected data to identify trends, if any, both to prevent impairments through the implementation of preventive BMPs and to track improvements based on the MS4 management program.

Based on these objectives, the proposed revisions to the monitoring program include:

- In lieu of dry-weather sampling, review and refine the IC/ID program to encourage identification and elimination of sources of illicit dry-weather flows.
- Remove analysis of constituents that have not been identified in discharges.
- Review the monitoring program requirements to eliminate duplication of parameters that are being analyzed using multiple methods with different detection limits.

- Recommend that certain monitoring stations be removed or relocated to better characterize urban runoff within the Permit Area.
- Revising the Annual Report format to be consistent with other regions.

7.4 PERFORMANCE GOALS AND OBJECTIVES

Performance Goals and Objectives for the proposed monitoring program will be established as part of the collaboration between the Permittees and the Regional Board staff. Proposed Goals and Objectives are identified in Section 7.3.

8.0 PROGRAM REPORTING, EVALUATION, AND REVISION

8.1 ANNUAL REPORTING

Each year the Permittees prepare an Annual Report summarizing the implementation of the programs described in the SWMP for submittal to the Regional Board. To support preparation of the Annual Reports, the Permittees submit to the District documentation of their implementation of the Whitewater River Region SWMP compliance programs utilizing standardized reporting forms. Copies of these standardized reporting forms are included in Appendix I. The reporting forms will be amended by the Permittees as needed to facilitate changes in compliance programs or more accurate reporting of compliance programs.

8.2 PROGRAM EVALUATION

The Permittees will regularly assess the component programs of the SWMP to identify improvements that will promote the reduction of pollutants in Urban Runoff to the MEP while also supporting the responsible management and allocation of the public resources available to implement the SWMP.

The short-term strategy for assessing the effectiveness of the SWMP will focus on quantitative, but indirect methods (that is, not directly based on the quality of Urban Runoff or Receiving Water quality) of assessment. The Permittees will track and report the following data that are believed to have a positive influence on Urban Runoff and Receiving Water quality:

- The total number of industrial and commercial facility inspections for stormwater compliance (Permittees).
- The number of illicit connections detected and eliminated. (Permittees)
- The number of Permittee staff receiving training for activities related to SWMP implementation. (Regional and Permittees)
- The number of stormwater/urban runoff complaints received through hotlines. (Regional and Permittees)
- Industrial/Commercial outreach events conducted. (Regional and Permittees);
- The quantity of household hazardous waste material collected through the HHW Collection and ABOP Programs. (Regional and Permittees);
- Public education materials distributed and/or made available to the public (Regional and Co-Permittees)
- Public education events conducted. (Regional and Co-Permittees)
- Media impressions. (Regional)
- Classroom presentations. (Regional)

In addition to assessing the effectiveness of the various program elements, the Permittees will conduct an assessment of the effectiveness of their overall programs. The legal authority and program management elements of the Permittee programs will also be considered in this assessment. Major accomplishments and changes to be implemented in the subsequent year to improve the effectiveness of the program will be included in the evaluation.

The long-term strategy for assessing the effectiveness of the SWMP will focus on water quality data obtained. This is by necessity a long-term strategy since the first step will be to develop and understand baseline data, and then due to the inherent variability of Urban Runoff, years of monitoring data will be necessary to identify statistically significant trends or conclusions. Additionally, because there are numerous program elements being implemented concurrently and because other environmental regulation indirectly impacts the quality of Urban Runoff, the ability to identify cause-and-effect relationships between a specific program element and/or BMP and improvement in the quality of Urban Runoff is complicated, if not infeasible.

8.3 SWMP REVISIONS

As part of the annual reporting process for the Whitewater River Region, the Permittees review the SWMP to identify the need, if any, for revisions. The Annual Report will include the findings of these reviews. The revised SWMP will be submitted with the next ROWD. Upon approval by the Executive Officer, the Permittees will implement the revised SMWP in accordance with the schedule included as part of the ROWD.

APPENDIX A

Glossary of Terms, Abbreviations and Acronyms

APPENDIX B

2006 MS4 Permit

APPENDIX C

Implementation Agreement

APPENDIX D

Hazardous Waste/Hazardous Materials Facility Storm Water Compliance Survey

APPENDIX E

Food Facility Storm Water Compliance Survey

APPENDIX F

New Development Guidelines (Supplement "A")

APPENDIX G

Facility Pollution Prevention Plan Template

APPENDIX H

Fire Fighting BMPs

APPENDIX I

Standardized Reporting Forms