



December 16, 2011

Mr. Bruce H. Wolfe
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street Suite 1400
Oakland, California 94612

Subject: Formal Amendment to the City of Richmond's Annual Stormwater Report

Dear Mr. Wolfe,

The City's of Richmond's 2010-2011 Annual Report needs to be amended to clearly state that the City of Richmond reports multiple violations of potential discharge on a site as one violation. It was a misunderstanding that the information requested in C.4.c.iii was to state the reporting method in potential discharge only. It was the City of Richmond's intention to record potential discharges violations as one violation per inspection, and actual discharge violations as one per storm drain affected. This was the instruction in the power point presentation by water board staff for expectations on the 2010-2011 Annual Report for C.4.

The following attachments are included:

- page 4-2 of the FY 2010-2011 Annual Report for the City of Richmond corrected to indicate the Permittee reports multiple violations on a site as one violation
- October 14, 2010 representation and authorization letter in which the Richmond City Manager has designated Lynne Scarpa to represent the City of Richmond with regard to required submittals to regulatory agencies in connection with municipal stormwater NPDES permit compliance.

Should you or your staff have any questions please contact me at (510) 307-8135 or send an e-mail to lynne_scarpa@ci.richmond.ca.us.

A handwritten signature in black ink that reads "Lynne Scarpa".

Lynne Scarpa
Environmental Manager, stormwater program

Attachment A: Amended pg 4-2 FY 2010-2011 Annual Report for the City of Richmond
Attachment B: October 14, 2010 representation and authorization letter

Cc: Tom Dalziel, Contra Costa Clean Water Program

C.4.c.iii.(1) ► Facility Inspections		
Fill out the following table or attach a summary of the following information. Indicate your violation reporting methodology below.		
<input checked="" type="checkbox"/>	Permittee reports multiple violations on a site as one violation.	
<input type="checkbox"/>	Permittee reports the total number of discrete violations on each site.	
	Number	Percent
Number of businesses inspected (if known)	89	
Total number of inspections conducted	93	
Number of violations (excluding verbal warnings and warning notices)	0	
Sites inspected in violation	0	N/A
Violations ³⁷ resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	0	100
<p>Comments:</p> <p>For the purposes of this section potential pollution observations that were given a warning notice (Level 1) were not included in number of violations. In the Enforcement Response Plan, an inspector can give issue a warning notice with corrective action to the next rain event or 10 business days (or longer if construction or permits are required) to correct potential pollution. If the inspector observes a warning notice is not sufficient, or if the action required in the warning notice is not achieved, then a notice of violation (NOV) with need to abate is issued. An NOV is recorded as a violation.</p> <p>All required actions and recommended actions are recorder on the inspection form. Recommended actions are equivalent to verbal warnings. Required actions are issued a warning notice, NOV, or citation. Citations are issued at level 2, recorded as violations, and are issued when and actual discharge occurred or an NOV is not corrected within the timeframe stated.</p>		

C.4.c.iii.(2) ► Frequency and Types/Categories of Violations Observed	
Fill out the following table or attach a summary of the following information.	
Type/Category of Violations Observed	Number of Violations
Actual discharge (e.g. active non-stormwater discharge or clear evidence of a recent discharge)	0
Potential discharge and other	0
<p>Comments:</p> <p>No violations were observed.</p>	

³⁷ Total number of violations equals the number of initial enforcement actions (i.e. one violation issued for several problems during an inspection at a site). It does not equal the total number of enforcement actions because one violation issued at a site may have a second enforcement action for the same violation at the next inspection if it is not corrected.

CITY MANAGER'S OFFICE



October 14, 2010

Thomas Dalziel
Interim Program Manager
Contra Costa Clean Water Program
255 Glacier Drive
Martinez, CA 94553

Re: Management Committee Representation and Authorizations

Dear Mr. Dalziel:

The following persons are designated to represent City of Richmond on the Contra Costa Clean Water Program Management Committee. As such, they are my duly authorized representatives with regard to required submittals to regulatory agencies in connection with municipal stormwater NPDES permit compliance.

The following persons are specifically authorized to:

1. Execute the following statement to be attached to submittals made on behalf of the City of Richmond

"I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

2. Following their own review of a group submittal to be made collectively with other member agencies, direct the staff of the Contra Costa Clean Water Program to execute a similar statement to be attached to that submittal on behalf of the City of Richmond as one of the Program's member agencies.
3. Following their own review of a group submittal to be made collectively with other member agencies, direct the staff of the Contra Costa Clean Water Program to direct, in turn, the Board of the Bay Area Stormwater Management Agencies Association to execute a similar statement to be attached to that submittal made on behalf of City of Richmond as one of many agencies region-wide.

You may inform staff of the California Water Boards and other regulatory agencies of this authorization.

Duly authorized representatives:

Lynne Scarpa, Environmental Manager – Stormwater Program

Chad Davisson, Wastewater Project Manager

Very truly,

A handwritten signature in black ink, appearing to read "Bill Lindsay", with a stylized flourish extending to the right.

Bill Lindsay
City Manager