

Memorandum

City of Salinas

Date: April 1, 2016
To: Michael Godwin PG
From: Gary E. Petersen, Director of Public Works
CC: Walter Grant P.E., Heidi Niggemeyer

SUBJECT: Summary of Actions Taken to Address EPA Audit Findings

Below is a summary of the actions we are taking to resolve the EPA audit findings in the areas of IDDE (H), Commercial/Industrial Facilities (F), and Construction Site Management (K).

In addition to these responses a complete gap analysis of all permit requirements has been performed by the new SW Program Coordinator to identify deficiencies that need to be addressed.

Illicit Discharge Detection & Elimination:

- The Illicit Discharge Guidance Manual is being revised to be a user-friendly SOP
- A new Enforcement Response Plan has been developed and implemented for consistent enforcement throughout the SW program
- The illicit discharge report form has been revised to include all required information
- A log has been created to log all illicit discharge calls; this log is kept at the front desk at the public Works Yard
- Our GIS-based data collection and reporting system have been modified to facilitate better access to inspection reports (for review by the Stormwater Coordinator) and facilitate required reporting
- City-wide training on SW Awareness and IDDE has been implemented to ensure everyone is familiar with our program requirements, what an illicit discharge is and what to do in the case of one
- A new Dry-weather screening program has been developed as well as new procedures to document screening results
- The Fire Department will receive training on our NPDES permit requirements for IDDE/spill response to ensure communication of information occurs

Commercial/Industrial Facilities:

- A backup plan has been put into place should MRWPCA no longer be able to support our Business/industrial inspections; a consultant trained in the IGP requirements with industrial inspection experience has been identified to perform those services
- The City has a contract in place with MRWPCA; an MOU between MRWPCA and the City is being developed to better define contractor and City staff responsibilities
- A procedure has been developed for performance of commercial/industrial inspections; this procedure will include information on how to prioritize facilities
- Our Information Management System has been revised to include all permit-required information and facilitate reporting
- The Stormwater Program Coordinator now assess the commercial/industrial stormwater program to ensure procedures, training, and facility information is current; the Coordinator will also track inspections to ensure 20% are being completed each year.

- An annual kickoff meeting is being held at the beginning of each permit year between City staff (including the SW Coordinator) and MRWPCA to confirm roles & responsibilities and prioritize facilities to be inspected
- A consultant now reviews the commercial/industrial inventory annually to ensure all facility information is current, all EPCRA facilities and facilities in close proximity to 303(d) waterbodies (within the City limits) are included in the inventory, and all applicable industrial facilities (per SIC code) are enrolled in the IGP

Construction Site Management:

- New construction site inspection procedures, inspection forms, Erosion & Sediment Control checklists, High Priority criteria checklists, and an enforcement response plan have been developed and implemented
- All active construction projects are being re-evaluated to determine their “High Priority” status
- All sites are now inspected according to the permit-required frequencies; a trigger mechanism is being developed to ensure all sites are inspected at their required frequencies
- Rain forecasts are being tracked on a daily basis
- The City received permission from the CCWB staff to allow building inspectors to inspect construction sites that are not High Priority or do not have post-construction BMPs; certification is being explored for all site inspectors that do not have the credentials for QSD certification
- All construction site inspectors are being trained 4/29/16 by a certified QSD on the new procedures, inspection forms, and use of Construction BMP Handbooks already available to the public (CASQA, CalTrans, etc); these are the only documents/manuals that will be utilized by our inspectors. Contract QSDs are being retained to supplement staffing for larger CIP projects for Permit related inspections. In-house QSDs are being used as staffing allows.
- A document approval process has been developed to ensure only *approved* documents are used in the stormwater program
- When inspecting sites with SWPPPs, the City QSD inspector now inspects the site’s SWPPP documentation to ensure site inspections are being conducted, REAPs are in place, and monitoring is being performed if required
- It’s been determined that the present TrakIt system is not robust enough to accommodate the collection/storage of all permit required information. Therefore a new Information Management System is currently being implemented to ensure all permit-required information is collected and queries can be made for easier access and reporting purposes (i.e. determination of % of sites ready for a ½’ rain event