

DRAFT Core Permit Requirements – Table of Objectives, Elements, and Issues

Minimum Control Measure – Industrial/Commercial Storm Water Sources

Primary Objectives:	<ul style="list-style-type: none"> Identify and track industrial/commercial facilities which may be critical sources of storm water pollution to the MS4. Educate and raise storm water awareness of industrial/commercial facility employees to ultimately change behaviors that will reduce pollutant discharges to the MS4. Ensure the implementation of BMPs at industrial/commercial facilities to reduce the contribution of pollutants to storm water from industrial/commercial activities and materials storage. Increase the detection of illicit discharges and connections to the MS4 from industrial/commercial facilities. Minimize the occurrence of illicit discharges and connections to the MS4 from industrial/commercial facilities.
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Legal Authorities:	<ul style="list-style-type: none"> Requirements regarding proposed management program, covering minimum control measures to be included (40 CFR §122.26(d)(2)(iv)(A) and (C)) Regulations addressing illicit discharges and improper disposal (40 CFR §122.26(d)(2)(iv)(B))
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Category	Description of Requirement	Origin of Requirement	Notes
General	Ensure implementation of pollutant reduction and control measures at industrial and commercial facilities, with the objective of reducing pollutants in storm water.	Draft April 2011 LA County and Ventura County MS4 Permits	
Track	Maintain an updated watershed-based inventory or database of all industrial and commercial facilities within the jurisdiction that are critical sources of storm water pollution. Incorporate this information into GIS.	Draft April 2011 LA County and Ventura County MS4 Permits	
Track	This permit requirement lists the specific information which must be included in the inventory or database of critical sources.	Draft April 2011 LA County and Ventura County MS4 Permits	
Track	Update the inventory or database of critical sources at least annually.	Draft April 2011 LA County and Ventura County MS4 Permits	
Inspect	Inspect all commercial facilities identified by the Permit twice during the 5-year term of the Order, with the first mandatory compliance inspection within 2 years after Order adoption date. This permit requirement includes subsections that detail inspection and BMP requirements for different types of facilities, such as, (1)	Ventura County MS4 Permit	

	restaurants, (2) automotive service facilities, (3) retail gasoline outlets and automobile dealerships, and (4) commercial nurseries and nursery centers.		
Inspect	Conduct compliance inspections at industrial facilities identified by the Permit. Initial inspection must be within 2 years after Order adoption date. Conduct follow-up inspections at 20 percent of no-exposure facilities each year after the initial inspections are complete.	Ventura County MS4 Permit	
Inspect	During each inspection, confirm that each operator has a current WDID number, has a No Exposure Certification, if applicable, and is effectively implementing BMPs for the reduction of pollutants in storm water discharges from the facility or maintaining a condition of no exposure of industrial activities to storm water, if applicable.	Ventura County MS4 Permit	
Ensure Compliance	Ensure BMP implementation of the source control BMPs identified in the <i>CASQA Industrial and Commercial BMP Handbook</i> .	Ventura County MS4 Permit	
Ensure Compliance	Ensure implementation of additional pollutant-specific controls for critical sources that discharge to MS4s that directly discharge to ESAs or to CWA § 303(d) listed impaired waterbodies.	Ventura County MS4 Permit	
Ensure Compliance	Implement a progressive enforcement policy to ensure that facilities are brought into compliance with all storm water requirements within a reasonable time period, as specified in the Permit.	Draft April 2011 LA County and Ventura County MS4 Permits	
Interagency Coordination	A Permittee may refer a violation(s) of its municipal storm water ordinances and California Water Code § 13260 by Industrial and Commercial facilities to the Regional Water Board provided that the Permittee has conducted and documented at least two follow-up inspections and two warning letters or notices of violation.	Draft April 2011 LA County and Ventura County MS4 Permits	
Interagency Coordination	For facilities in violation of municipal storm water ordinances and subject to the Industrial Activities Storm Water General Permit (IASGP), Permittees may escalate referral of such violations to the Regional Water Board (promptly via telephone or electronically) after one inspection and one written notice of violation.	Draft April 2011 LA County and Ventura County MS4 Permits	
Interagency Coordination	Initiate, within one business day of complaint transmittal by the Regional Water Board, investigation of complaints (other than non-storm water discharges to the MS4) from facilities.	Draft April 2011 LA County and Ventura County MS4 Permits	
Interagency Coordination	Provide assistance to the Regional Water Board for enforcement actions, as directed by the Regional Water Board Executive Officer.	Draft April 2011 LA County and Ventura	

		County MS4 Permits	
Interagency Coordination	Participate in an enforcement task force with the Regional Water Board and other public agencies.	Draft April 2011 LA County and Ventura County MS4 Permits	

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Minimum Control Measure – Development Construction Program

Primary Objectives:	<ul style="list-style-type: none"> • Prevent illicit construction-related discharges of pollutants into the MS4. • Ensure that structural and non-structural BMPs are implemented and maintained. • Reduce discharge of pollutants from construction sites to the MEP. • Minimize the potential for sediment discharges from construction activities to impact sensitive receiving waterbodies. • Minimize soil compaction during construction activities to preserve the highest potential for infiltration of post-construction storm water.
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Legal Authority:	<ul style="list-style-type: none"> • Requirements regarding proposed management program, covering minimum control measures to be included (40 CFR §122.26(d)(2)(iv)(D)) • Regulations addressing illicit discharges and improper disposal (40 CFR §122.26(d)(2)(iv)(B))
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Category	Description of Requirement	Origin of Requirement	Notes
Purpose	Each Permittee shall implement a construction program that prevents illicit construction-related discharges of pollutants into the MS4, implements and maintains structural and non-structural BMPs to reduce pollutants in storm water runoff from construction sites, reduces construction site discharges of pollutants from the MS4 to the MEP, and prevents construction site discharges from the MS4 from causing or contributing to a violation of water quality standards.	Ventura County MS4 Permit	
Applicability	Applies to all activities involving soil disturbance with the exception of agricultural activities. Activities covered by this permit include but are not limited to grading, vegetation clearing, soil compaction, paving, re-paving and linear underground/overhead projects (LUPs).	Contractor, with language from the State Water Board Construction General Permit (CGP)	
Inventory/Electronic Tracking System	Each Permittee shall use an electronic system to inventory grading permits, encroachment permits, demolition permits, building permits, or construction permits (and any other municipal authorization to move soil and/ or construct or destruct that involves land disturbance) issued by the Permittee. To satisfy this	Venura County MS4 Permit SWRCB’s Draft Small MS4s General Permit	

Category	Description of Requirement	Origin of Requirement	Notes
	<p>requirement, the use of a database or GIS system is encouraged, but not required.</p> <p>The tracking system shall contain the following information:</p> <ul style="list-style-type: none"> (a) Relevant contact information for each project (e.g., name, address, phone, email, etc. for the owner and contractor), (b) The basic site information including location, status, size of the project and area of disturbance, (c) The proximity all water bodies, water bodies listed as impaired by sediment-related pollutants, and water bodies for which a sediment-related TMDL has been adopted and approved by USEPA, (d) Significant threat to water quality status, based on consideration of factors listed in Appendix 1 to the State Water Board’s Constructin General Permit (CGP), (e) Current construction phase. (f) The required inspection frequency, (g) The project start and anticipated completion dates, (h) Whether the project has coverage under the State Water Board’s CGP, (i) The date the Permittee approved the erosion and sediment control plan (j) Post-Construction Structural BMPs subject to Operation and Maintenance Requirements. 	<p>Contractor recommends the addition of Post-Construction BMPs to the tracking system for continuity between Construction and Post-Construction Phases.</p>	
<p>Plan Review and Approval Procedures</p>	<p>Prior to issuance of a grading or building permit, the operator shall submit the Erosion and Sediment Control Plan (ESCP)prior to the disturbance of land for the Permittee’s review and written approval. The construction site operator shall be prohibited from commencing construction activity prior to receipt of written approval.</p>	<p>SWRCB’s Draft Small MS4s General Permit</p>	
<p>Criteria for Review</p>	<p>The ESCP must include the elements of a Storm Water Pollution Prevention Plan (SWPPP). Controls must be consistent with the applicable California Stormwater Quality Association (CASQA) Best Management Practices Handbooks (or Caltrans Handbooks for public transportation related construction projects) and tailored to the risks posed by the project. Projects are ranked from Low Risk</p>	<p>Ventura County MS4 Permit</p> <p>SWRCB’s Draft Small MS4s General Permit and the CGP</p>	

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	<p>(Risk 1) to High Risk (Risk 3). Project risks are calculated based on the potential for erosion from the site and the sensitivity of the receiving waterbody. Receiving waterbodies that are listed on the Clean Water Act (CWA)Section 303(d) list for sediment or siltation are considered high risk. Likewise, waterbodies with designated beneficial uses of SPWN, COLD, and MIGRATORY are also considered to be high risk. The combined (sediment/receiving water) site risk may be calculated using the methods provided in Attachment 1 of the StateWater Board’s CGP.</p> <p>Applicable BMP controls for projects of different sizes are referenced in Tables VI.C.10-A, B, and C of this order.</p> <p>Applicable BMPs for enhanced requirements for high-risk sites are referenced in Table VI.C.10-D. of this order.</p> <p>Applicable BMPs for paving projects are described in Table VI.C.10-E. of this order.</p>		
<p>Required Elements of the ESCP/SWPPP</p>	<p>At a minimum, the ESCP/SWPPP must address the following elements:</p> <ul style="list-style-type: none"> • Scheduling--soil disturbance activities shall be scheduled for completion during the dry weather season to the extent feasible, • Methods to minimize the footprint of the disturbed area and to prevent soil compaction outside of the disturbed area, • Methods used to protect native vegetation and trees, • Sediment/Erosion Control, • Controls to prevent tracking on and off the site, • Non-storm water controls (e.g., vehicle washing, dewatering, etc.), • Materials Management (delivery and storage), • Spill Prevention and Control • Waste Management (e.g., concrete washout/waste 	<p>Ventura County MS4 Permit</p> <p>SWRCB’s Draft Small MS4s General Permit and CGP</p> <p>Contractor recommends limitations on soil disturbance during wet weather, miminizing footprint of the disturbed area and protection of native vegetation and trees.</p>	

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	management; sanitary waste management), <ul style="list-style-type: none"> • Rain Event Action Plan (REAP) when soil disturbance activities will be conducted during the wet-weather season. 		
Rationale for Selection and Design of BMPs	The ESCP/SWPPP must include the rationale for the selection and design of the proposed BMPs including quantifying the expected soil loss from different BMPs.	Ventura County MS4 Permit and the SWRCB's Draft Small MS4s General Permit	
Certification	(A) Each Permittee shall require that for projects disturbing 1 acre or more, the ESCP/SWPPP is developed and certified by a <i>Qualified SWPPP Developer (QSD)</i> . (B) <i>Each Permittee shall require that all structural BMPs be designed by a California licensed engineer.</i> (C) Each Permittee shall require that for all projects, the landowner or the landowner's agent sign a statement on the Local ESCP/SWPPP to the effect: <i>"I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am aware that submitting false and/or inaccurate information, failing to update the Local SWPPP to reflect current conditions, or failing to properly and/or adequately implement the ESCP/ SWPPP may result in revocation of grading and/or other permits or other sanctions provided by law."</i>	State Water Board CGP Ventura County MS4 Permit	
Confirming Coverage under Other Permits	Prior to issuing a grading or building permit, the Permittee shall verify that the construction site operators have existing coverage under applicable permits, including, but not limited to the State Water Board's CGP, State Water Board 401 Water Quality Certification, U.S. Army Corp 404 permit, and California Department	SWRCB's Draft Small MS4s General Permit	

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	of Fish and Game 1600 Agreement.		
ESCP/SWPPP Plan Review Checklist	The Permittee shall develop a checklist to be used to conduct and document review of each ESCP/SWPPP.	SWRCB's Draft Small MS4s General Permit	
Inspection Authority	the Permittee shall use legal authority to implement procedures for inspecting public and private projects and conducting enforcement if necessary.	SWRCB's Draft Small MS4s General Permit	
Inspection Frequency	<p>The Permittee shall inspect all phases of construction as follows:</p> <p>(1) Prior to Land Disturbance: Prior to allowing an operator to commence land disturbance, the Permittee shall perform an inspection to ensure all necessary erosion and sediment structural and non-structural BMP materials and procedures are available per the erosion and sediment control plan.</p> <p>(2) Grading and Land Development: During grading and land development activities, conduct inspections in accordance with the frequencies specified in Section VI.C.10-F of this Order.</p> <p>(3) Streets and Utilities: During street and utilities activities, conduct inspections in accordance with the frequencies specified in Table VI.C.10-F of this Order.</p> <p>(4) Vertical Construction: During vertical construction activities, conduct inspections in accordance with the frequencies specified in Table VI.C.10- F of this Order.</p> <p>(5) Final Landscaping and Site Stabilization: At the conclusion of the project, the Permittee shall inspect 10% of all projects to ensure that all graded areas have reached final stabilization and that all trash, debris, and construction materials, and temporary erosion and sediment BMPs are removed.</p>	SWRCB's Draft Small MS4s General Permit	
Inspection Procedures	<p>The Permittee shall develop, implement, and revise as necessary, standard operating procedures that identify the inspection and enforcement procedures the Permittee will follow.</p> <p>Inspections of construction sites, and the standard operating procedures, shall include, but are not limited to:</p> <p>(1) Verification of active coverage under the State Water Board's CGP for projects disturbing 1 acre or more, or are part of a</p>	<p>SWRCB's Draft Small MS4s General Permit</p> <p>Contractor recommends sampling and analysis of storm</p>	

Category	Description of Requirement	Origin of Requirement	Notes
	<p>planned development that will disturb 1 acre or more.</p> <p>(2) Review of the applicable ESCP/SWPPP and inspection of the construction site to determine whether all BMPs have been selected, installed, implemented, and maintained according to the approved plan.</p> <p>(3) Assessment of the appropriateness of the planned BMPs and their effectiveness.</p> <p>(4) Visual observation and record keeping of non-storm water discharges, potential illicit connections, and potential discharge of pollutants in storm water runoff.</p> <p>(6) Sampling and analysis of storm water runoff discharges from the property when visual observation indicates turbidity in the storm water discharge.</p> <p>(7) Development of a written or electronic inspection report generated from an inspection checklist used in the field</p> <p>(8) Tracking of the number of inspections for the inventoried construction sites throughout the reporting period to verify that the sites are inspected at the minimum frequencies required in Table VI.C.10-F of this Order.</p>	<p>water discharge from the property when visual observation indicates turbidity.</p>	
<p>Enforcement Procedures</p>	<p>(1) Take all necessary follow-up actions (e.g., re-inspection, enforcement) to ensure compliance in accordance with the Permittee’s Legal Authority and Enforcement Response Plan. At a minimum, follow-up inspections shall be conducted within 2 weeks after for inspected sites that have not adequately implemented their ESCP/SWPPP.</p> <p>(2) The Permittee shall track and report these follow-up inspections and enforcement actions.</p> <p>(3) Each Permittee shall take additional enforcement actions to achieve compliance as specified in municipal codes, if compliance with municipal codes, ordinances, or permits has not been attained.</p> <p>(4) Each Permittee can refer sites to the Regional Water Board for joint enforcement actions for violation of municipal storm water ordinances and the CGP, after conducting a minimum of 2 site inspections and issuing a minimum of two written notices to the operator regarding the violation (copied to the</p>	<p>Ventura County MS4 Permit</p>	

Category	Description of Requirement	Origin of Requirement	Notes
Certificate of Occupancy	<p>Regional Water Board).</p> <p>Prior to approving and/ or signing off for occupancy and issuing the Certificate of Occupancy for all construction projects subject to post-construction controls, each Permittee shall inspect the constructed site design, source control and treatment control BMPs to verify that they have been constructed in compliance with all specifications, plans, permits, ordinances, and this Order.</p>	Ventura County MS4 Permit	
Training of Permittee Staff	<p>Task Description – The Permittee shall ensure that all staff whose primary job duties are related to implementing the construction storm water program are adequately trained.</p> <p>Implementation Level – The Permittee may conduct in-house training or contract with consultants. Training shall be provided to the following staff positions of the MS4:</p> <p>(a) Plan Reviewers and Permitting Staff - Ensure staff and consultants are trained as qualified individuals, knowledgeable in the technical review of local erosion and sediment control plans and the key objectives of the State Water Board Qualified SWPPP Developer (QSD) program. Permittees may provide internal training to staff or require staff to obtain QSD certification.</p> <p>(b) Erosion Sediment Control/Storm Water Inspectors - The Permittee shall ensure that its inspectors are knowledgeable in inspection procedures consistent with the State Water Board sponsored program <i>QSD</i> or a Qualified SWPPP Practitioner (QSP) or ensure that a designated person on staff who has been trained in the key objectives of the QSD/QSP programs supervise inspection operations . Permittees may provide internal training to staff or require staff to obtain QSD/QSP certification.</p> <p>(c) Third-Party Plan Reviewers, Permitting Staff, and Inspectors - If the Permittee utilizes outside parties to conduct inspections and/or review plans, the Permittee shall ensure these staff are trained per the requirements listed above.</p>	SWRCB’s Draft Small MS4s General Permit and collaboration between the Regional Water Board staff and the contractor.	
Education Outreach to Development Community	<p>The Permittee shall develop and distribute educational materials to construction site operators. The Permittee shall do the following:</p> <p>(a) Each year, provide information on training opportunities for</p>	SWRCB’s Draft Small MS4s General Permit	

Category	Description of Requirement	Origin of Requirement	Notes
	<p>construction operators on BMP selection, installation, implementation, and maintenance as well as overall program compliance</p> <p>(b) Develop or utilize existing outreach tools (i.e. brochures, posters, etc.) aimed at educating construction operators on appropriate selection, installation, implementation, and maintenance of storm water BMPs, as well as overall program compliance.</p> <p>(c) Distribute appropriate outreach materials to all construction operators who will be disturbing land within the MS4 boundary. The Permittee's contact information and website shall be included in these materials.</p> <p>(d) Update the existing website to include information on appropriate selection, installation, implementation, and maintenance of BMPs, as well as overall program compliance.</p>		

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Table VI.C.10-A. Minimum Set of BMPs for All Construction Sites

Minimum Set of BMPs for All Construction Sites	CASQA Handbook	Caltrans Handbook ¹
Erosion Controls		
Scheduling	EC-1	SS-1
Preservation of Existing Vegetation	EC-2	SS-2
Sediment Controls		
Silt Fence	SE-1	SC-1
Sand Bag Barrier	SE-8	SC-8
Stabilized Construction Site Entrance/Exit	TC-1	TC-1
Non-Storm Water Management		
Water Conservation Practices	NS-1	NS-1
Dewatering Operations	NS-2	NS-2
Waste Management		
Material Delivery and Storage	WM-1	WM-1
Stockpile Management	WM-3	WM-2
Spill Prevention and Control	WM-4	WM-4
Solid Waste Management	WM-5	WM-5
Concrete Waste Management	WM-8	WM-8
Sanitary/Septic Waste Management	WM-9	WM-9

¹ Applies to public roadway projects.

Table VI.C.10-B. Additional BMPs Applicable to Construction Sites Disturbing 1 Acre or More but Less Than 5 Acres

BMPs	CASQA Handbook	Caltrans Handbook ¹
Erosion Controls		
Hydraulic Mulch	EC-3	SS-3
Hydroseeding	EC-4	SS-4
Soil Binders	EC-5	SS-5
Straw Mulch	EC-6	SS-6
Geotextiles and Mats	EC-7	SS-7
Wood Mulching	EC-8	SS-8
Sediment Controls		
Fiber Rolls	SE-5	SC-5
Gravel Bag Berm	SE-6	SC-6
Street Sweeping and/ or Vacuum	SE-7	SC-7
Storm Drain Inlet Protection	SE-10	SC-10
Additional Controls		
Wind Erosion Controls	WE-1	WE-1
Stabilized Construction Entrance/ Exit	TC-1	TC-1
Stabilized Construction Roadway	TC-2	TC-2
Entrance/ Exit Tire Wash	TC-3	TC-3
Non-Storm Water Management		
Vehicle and Equipment Washing	NS-8	NS-8
Vehicle and Equipment Fueling	NS-9	NS-9

¹ Applies to public roadway projects.

Table VI.C.10-C. Additional BMPs Applicable to Construction Sites Disturbing 5 Acres or More

BMPs	CASQA Handbook	Caltrans Handbook¹
Sediment Controls		
Scheduling	EC-1	SS-1
Check Dam	SE-4	SC-4
Tracking Control BMPs		
Stabilized Construction Entrance/ Exit	TR-1	TC-1
Non-Storm Water Management		
Vehicle and Equipment Maintenance	NS-10	NS-10
Waste Management		
Material Delivery and Storage	WM-1	WM-1
Spill Prevention and Control	WM-4	WM-4

¹ Applies to public roadway projects.

Table VI.C.10-D. Additional Enhanced BMPs for High Risk Projects

BMPs	CASQA Handbook	Caltrans Handbook¹
Erosion Controls		
Hydraulic Mulch	EC-3	SS-3
Hydroseeding	EC-4	SS-4
Soil Binders	EC-5	SS-5
Straw Mulch	EC-6	SS-6
Geotextiles and Mats	EC-7	SS-7
Wood Mulching	EC-8	SS-8
Slope Drains	EC-11	SS-11
Sediment Controls		
Silt Fence	SE-1	SC-1
Fiber Rolls	SE-5	SC-5
Sediment Basin	SE-2	SC-2
Check Dam	SE-4	SC-4
Gravel Bag Berm	SE-6	SC-6
Street Sweeping and/or Vacuum	SE-7	SC-7
Sand Bag Barrier	SE-8	SC-8
Storm Drain Inlet Protection	SE-10	SC-10
Additional Controls		
Wind Erosion Controls	WE-1	WE-1
Stabilized Construction Entrance/Exit	TC-1	TC-1
Stabilized Construction Roadway	TC-2	TC-2
Entrance/Exit Tire Wash	TC-3	TC-3
Advanced Treatment Systems ¹		
Non-Storm Water Management		
Water Conservation Practices	NS-1	NS-1
Dewatering Operations (Groundwater dewatering only under NPDES Permit No. CAG994004)	NS-2	NS-2
Vehicle and Equipment Washing	NS-8	NS-8
Vehicle and Equipment Fueling	NS-9	NS-9
Vehicle and Equipment Maintenance	NS-10	NS-10
Waste Management		
Material Delivery and Storage	WM-1	WM-1
Stockpile Management	WM-3	WM-2
Spill Prevention and Control	WM-4	WM-4
Solid Waste Management	WM-5	WM-5

¹ Applies to public roadway projects.

Table VI.C.10-E-Minimum Required BMPs for Roadway Paving or Repair Operation (For Private or Public Projects)

1.	Restrict paving and repaving activity to exclude periods of rainfall or predicted rainfall unless required by emergency conditions.
2.	Install gravel bags and filter fabric or other equivalent inlet protection at all susceptible storm drain inlets and at manholes to prevent spills of paving products and tack coat.
3.	Prevent the discharge of release agents including soybean oil, other oils, or diesel to the storm water drainage system or receiving waters.
4.	Minimize non storm water runoff from water use for the roller and for evaporative cooling of the asphalt.
5.	Clean equipment over absorbent pads, drip pans, plastic sheeting or other material to capture all spillage and dispose of properly.
6.	Collect liquid waste in a container, with a secure lid, for transport to a maintenance facility to be reused, recycled or disposed of properly.
7.	Collect solid waste by vacuuming or sweeping and securing in an appropriate container for transport to a maintenance facility to be reused, recycled or disposed of properly.
8.	Cover the "cold-mix" asphalt (i.e., pre-mixed aggregate and asphalt binder) with protective sheeting during a rainstorm.
9.	Cover loads with tarp before haul-off to a storage site, and do not overload trucks.
10.	Minimize airborne dust by using water spray or other approved dust suppressant during grinding.
11.	Avoid stockpiling soil, sand, sediment, asphalt material and asphalt grindings materials or rubble in or near storm water drainage system or receiving waters.
12.	Protect stockpiles with a cover or sediment barriers during a rain.

Table IV.C.10-F. Inspection Frequencies

Site Risks	Inspection Frequency
a. All sites one (1) acre or larger that discharge to a tributary listed by the state as an impaired water for sediment or turbidity under the CWA § 303(d)	1) when two or more consecutive days with greater than 50% chance of rainfall are predicted by NOAA ¹ and 2) within 48 hours of a ½-inch rain event and at least once every two weeks
b. Other sites one (1) acre or more determined to be a significant threat to water quality.	At least monthly
c. All other construction sites with one (1) acre or more of soil disturbance not meeting the criteria above	As needed based on the evaluation of the factors that are a threat to water quality
d. Construction sites less than one (1) acre in size	As needed based on the evaluation of the factors that have not adequately implemented
A follow-up inspection shall take place within two weeks for inspected sites that have not adequately implemented the ESCP/SWPPP.	
*In evaluating the threat to water quality, the following factors shall be considered: soil erosion potential; site slope; project size and type; sensitivity of receiving water bodies; proximity to receiving water bodies; non-storm water discharges; past record of non-compliance by the operators of the construction site; and any water quality issues relevant to the particular MS4.	

¹ www.srh.noaa.gov/forecast

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Minimum Control Measure – Illicit Connections and Illicit Discharges Detection and Elimination Program (IC/ID)

Primary Objectives:	<ul style="list-style-type: none"> • Gain an understanding of the MS4 and possible sources of pollution to the MS4 through mapping activities and to provide a tool to track or trace illicit discharges. • Minimize the occurrence of illicit discharges and connections to the MS4. • Increase the detection of illicit discharges and connections to the MS4 which do occur and eliminate them as needed. • Document sufficient information to demonstrate the effectiveness of the IC/ID program.
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Regulatory Authority:	<ul style="list-style-type: none"> • Regulations addressing illicit discharges and improper disposal (40 CFR §122.26(d)(2)(iv)(B))
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Category	Description of Requirement	Origin of Requirement	Notes
General	Continue to implement an IC/ID Program to detect, investigate, and eliminate IC/IDs to the storm drain system.	Draft April 2011 LA County and Ventura County MS4 Permits	
General	Ensure that the Permittee has adequate legal authority to prohibit IC/IDs to the storm drain system and enable enforcement capabilities to eliminate the source of IC/IDs.	Draft April 2011 LA County and Ventura County MS4 Permits	
General	<p>The IC/ID Program must consist of at least the following major components:</p> <ol style="list-style-type: none"> (1) An up-to-date storm sewer system map (see Part X) (2) Procedures for identifying priority areas within the MS4 likely to have IC/IDs, and a list of all such areas identified in the system (see Part X) (3) Procedures for field screening to detect IC/IDs (see part X) (4) Procedures for conducting source investigations for IC/IDs (see Part X) (5) Procedures for eliminating the source of IC/IDs (see Part X) (6) Spill response plan (see Part X) (7) IC/ID education and training for Permittee staff (see Part X) 	Draft April 2011 LA County and Ventura County MS4 Permits and SWRCB’s Draft Small MS4s General Permit and EPA Permit Improvement Guide	

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Mapping	<p>Develop and maintain an up-to-date, accurate map of the MS4. If possible, the map should be maintained in GIS. The map must include at least, the following:</p> <ol style="list-style-type: none"> (1) MS4 outfalls (2) Drainage areas contributing to those outfalls (3) The location and length of underground storm drain pipes 18 inches and greater in diameter (4) The location and length of open stormwater channels (5) Priority areas (6) Receiving waters (7) Field screening stations (8) Dry weather diversions 	Draft April 2011 LA County and Ventura County MS4 Permits and SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Priority Areas	Identify priority areas in the MS4 and include them on the MS4 map. The Permit defines specific types of areas which must be identified as priority areas and requires that at least 20 percent of the system be identified as a priority area. The list of priority areas must be evaluated yearly to determine whether areas should be added or removed from the list.	Draft April 2011 LA County and Ventura County MS4 Permits and SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Field Screening	Develop and implement a Dry Weather Field Screening and Analytical Monitoring Program to detect and eliminate IC/IDs.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Field Screening	Document how the Dry Weather Field Screening and Analytical Monitoring Program will be implemented with written procedures. Procedures must be updated to reflect current program.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Field Screening	Identify a minimum of [specify number] stations within the priority areas it identified in Part X at which field observations, field screening monitoring and analytical monitoring will take place. This list should be updated annually in concert with the evaluation of priority areas.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Field Screening	Conduct dry weather field observations and field screening	SWRCB's Draft Small	

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	monitoring at each station identified above at least once per year.	MS4s General Permit and EPA Permit Improvement Guide	
Field Screening	Field Observations - Visually observe each identified station and document the observations in either hardcopy and/or electronic format.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Field Screening	Field Screening Monitoring Requirements - Conduct a field screening analysis for the following constituents: XX, XX, XX, XX, and XX. Samples must be collected and analyzed consistent with the procedures required by 40 CFR Part 136	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Field Screening	Conduct sampling of flow or ponded runoff if observed at a field screening station and there has been at least seventy-two (72) hours of dry weather prior to the observation.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Field Screening	Conduct an annual evaluation of the Dry Weather Field Screening and Analytical Monitoring Program to determine whether changes or updates are needed. Make changes as necessary.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Illicit Discharge Investigation & Elimination	Develop written procedures for conducting investigations to identify the source of all illicit discharges, including procedures to eliminate the discharge once the source is located.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Illicit Discharge Investigation & Elimination	Conduct an investigation(s) to identify and locate the source of any continuous or intermittent non-stormwater discharge within 48 hours of becoming aware of the illicit discharge. Part VI.C.12.e.iii specifies conditions which must be met for conducting the investigations.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Illicit Discharge Investigation & Elimination	Corrective Action to Eliminate Illicit Discharges – Once the source of the illicit discharge has been determined, the Permittee must immediately notify the responsible party of the problem, and require the responsible party to conduct all necessary corrective actions to eliminate the non-stormwater discharge within 48 hours of notification. The Permittee must formally verify and document	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	

Category	Description of Requirement	Origin of Requirement	Notes
	that the illicit discharge has been eliminated.		
Illicit Connection Investigation & Elimination	Conduct screening for illicit connections to the MS4. The Permit outlines an implementation schedule for this activity.	Ventura County MS4 Permit	
Illicit Connection Investigation & Elimination	Maintain a list containing all connections under investigation for possible illicit connection and their current status.	Ventura County MS4 Permit	
Illicit Connection Investigation & Elimination	Upon discovery or upon receiving a report of a suspected illicit connection, complete an investigation within 21 days.	Ventura County MS4 Permit	
Illicit Connection Investigation & Elimination	Upon confirmation of an illicit storm drain connection, ensure that the connection is eliminated within 180 days of completion of the investigation, using its formal enforcement authority, if necessary, to eliminate the illicit connection.	Ventura County MS4 Permit	
Illicit Connection Investigation & Elimination	Formal records must be maintained for all illicit connection investigations and the formal enforcement taken to eliminate illicit connections.	Ventura County MS4 Permit	
Public Reporting	Promote, publicize, and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into	Ventura County MS4 Permit and	

Category	Description of Requirement	Origin of Requirement	Notes
	or from MS4s through a central contact point, including phone numbers and an internet site for complaints and spill reporting.	collaboration between contractor and Regional Board	
Public Reporting	Develop and maintain written procedures that document how complaint calls are received, documented, and tracked to ensure that all complaints are adequately addressed. Evaluate procedures annually and make changes as necessary.	EPA Permit Improvement Guide	
Public Reporting	Maintain documentation of the complaint calls and record the location of the reported spill or IC/ ID and the actions undertaken in response to all IC/ID complaints.	Draft April 2011 LA County and Ventura County MS4 Permits and EPA Permit Improvement Guide	
Spill Response	Develop a written spill/dumping response procedure, and a flow chart or phone tree, or similar list for internal use, that shows the procedures for responding to public notices of illicit discharges, the various responsible agencies and their contacts, and who would be involved in illicit discharge incidence response, even if it is a different entity other than the Permittee.	EPA Permit Improvement Guide	
Education & Training	Continue to implement a training program regarding the identification of IC/IDs for all municipal field staff and contractors, who, as part of their normal job responsibilities (e.g., street sweeping, storm drain maintenance, collection system maintenance, road maintenance), may come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system. Training program documents must be available for review by the permitting authority.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Education & Training	Training program should address, at a minimum, the following: (1) IC/ID identification, (2) investigation, (3) elimination, (4) cleanup, (5) reporting, and (6) documentation.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	
Education & Training	Create a list of applicable staff which require IC/ID training and ensure that training is provided at least annually. Maintain documentation of the training activities.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	

Category	Description of Requirement	Origin of Requirement	Notes
Education & Training	New Permittee staff members must be provided with IC/ID training within six months of starting employment.	SWRCB's Draft Small MS4s General Permit and EPA Permit Improvement Guide	

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DRAFT Core Permit Requirements – Table of Objectives, Elements, and Issues

Minimum Control Measure – Public Agency Activities Program

Primary Objectives:	<ul style="list-style-type: none"> Minimize storm water pollution impacts from permittee owned or operated facilities and activities. Develop, deploy, and ensure ongoing operation and maintenance of BMPs for facilities, activities, and staff. Train public employees on the need for, use, and maintenance of BMPs.
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Legal Authority:	<ul style="list-style-type: none"> Requirements regarding proposed management program, covering minimum control measures to be included (40 CFR §122.26(d)(2)(iv)) Regulations addressing structural and source control measures to reduce pollutants from runoff (40 CFR §122.26(d)(2)(i)(A)(1),(3),(5),and(6)) Regulations addressing illicit discharges and improper disposal (40 CFR §122.26(d)(2)(iv)(B))
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Category	Description of Requirement	Origin of Requirement	Notes
General	Implement a Public Agency Activities Program to minimize storm water pollution impacts from Permittee-owned or operated facilities and activities.	Ventura County MS4 Permit	
Public Construction Activities Management	Implement and comply with the Planning and Land Development Program requirements in Part X of this Order.	Ventura County MS4 Permit	
Public Construction Activities Management	Implement and comply with the appropriate Development Construction Program requirements in Part X of this Order.	Ventura County MS4 Permit	
Public Construction Activities Management	Projects that disturb less than one acre of soil shall require the development and implementation of a Storm Water Pollution Control Plan (SWPCP).	Ventura County MS4 Permit	
Public Construction Activities Management	Obtain separate coverage under the CASGP or Small LUP General Permit for all Permittee-owned or operated construction sites that require coverage.	Ventura County MS4 Permit	
Public Facility Inventory	Maintain an updated watershed-based inventory and map of all Permittee-owned or operated facilities within its jurisdiction that are potential sources of storm water pollution. The incorporation of facility information into a Geographical Information System (GIS) is required.	SWRCB’s Draft Small MS4s General Permit and EPA Permit Improvement Guide	

Category	Description of Requirement	Origin of Requirement	Notes
Public Facility Inventory	Include the following minimum fields of information for each Permittee-owned or operated facility in its watershed-based inventory and map.	Ventura County MS4 Permit	
Public Facility Inventory	Update its inventory and map at least annually.	Ventura County MS4 Permit	
Public Agency Facility and Activity Management	Obtain separate coverage under the IASGP for all Permittee-owned or operated facilities where industrial activities are conducted that require coverage under the IASGP.	Ventura County MS4 Permit	
Public Agency Facility and Activity Management	Implement and maintain the general and activity specific BMPs listed in Table X (BMPs for Public Agency Facilities and Activities) when such activities occur at Permittee-owned or operated facilities and field activities or that have the potential to discharge pollutants in storm water.	Ventura County MS4 Permit	
Public Agency Facility and Activity Management	Any contractors hired by the Permittee to conduct Public Agency Activities (e.g., municipal maintenance) shall be contractually required to implement and maintain the general and activity specific BMPs listed in Table X (BMPs for Public Agency Facilities and Activities). Conduct oversight of contractor activities to ensure these BMPs are implemented and maintained.	Ventura County MS4 Permit and EPA Permit Improvement Guide (for inclusion of contractors)	
Vehicle and Equipment Washing	Implement and maintain the activity specific BMPs listed in Table X (BMPs for Public Agency Facilities and Activities) for all vehicle and equipment washing.	Ventura County MS4 Permit	
Vehicle and Equipment Washing	Eliminate all existing discharges of wash waters from vehicle and equipment washing.	Ventura County MS4 Permit	
Vehicle and Equipment Washing	Ensure that any municipal facilities constructed, redeveloped, or replaced shall prohibit discharges to the MS4 for all vehicle and equipment wash areas.	Ventura County MS4 Permit	
Landscape, Park, and Recreational Facilities Management	Implement and maintain the activity specific BMPs listed in Table x (BMPs for Public Agency Facilities and Activities) for all landscape, park, and recreational facilities and activities.	Ventura County MS4 Permit	
Landscape, Park, and Recreational Facilities Management	Implement Integrated Pest Management (IPM) Program.	Ventura County MS4 Permit	

Category	Description of Requirement	Origin of Requirement	Notes
Landscape, Park, and Recreational Facilities Management	Implement additional the following requirements: 1. Comply with the provisions and the monitoring requirements for application of aquatic pesticides to surface waters (WQ Order No. 2004-0008-DWQ) (Vector Control) and Order No. 2004-0009-DWQ (Weed Control). 2. Consistency with the State Board’s guidelines and monitoring requirements for application of aquatic pesticides to surface waters (WQ Order No. 2001-12 DWQ). 3. Use a standardized protocol for the routine and non-routine application of pesticides and fertilizers. 4. Ensure there is no application of pesticides or fertilizers immediately prior to, during, or immediately after a rain event, or when water is flowing off the area where the application is to occur. 5. Ensure that no banned or unregistered pesticides are stored or applied. 6. Ensure that all staff applying pesticides are certified in the appropriate category by the California Department of Pesticide Regulation, or are under the direct supervision of a pesticide applicator certified in the appropriate category. 7. Implement procedures to encourage the retention and planting of native vegetation to reduce water, pesticide and fertilizer needs 8. Store pesticides and fertilizers indoors or under cover on paved surfaces, or use secondary containment.	Ventura County MS4 Permit and Inclusion of Aquatic Pesticide Orders and Guidance	
Storm Drain Operation and Maintenance (General)	1. Implement and maintain the activity specific BMPs listed in Table X (BMPs for Public Agency Facilities and Activities) for storm drain operation and maintenance. 2. Ensure that all material removed from the storm drain system does not reenter the system. Solid material shall be dewatered in a contained area and liquid material shall be disposed in accordance with approved measures.	Ventura County MS4 Permit and EPA Permit Improvement Guide for Item 2	

Category	Description of Requirement	Origin of Requirement	Notes
<p>Storm Drain Operation and Maintenance (Catch Basin Prioritization)</p>	<p>Designate catch basin inlets within its jurisdiction as one of the following: <u>Priority A</u>: Catch basins that are designated as consistently generating the highest volumes of trash and/or debris. <u>Priority B</u>: Catch basins that are designated as consistently generating moderate volumes of trash and/or debris. <u>Priority C</u>: Catch basins that are designated as generating low volumes of trash and/or debris.</p> <p>Submit a map or list of Catch Basins with their GPS coordinates and their priority designations. The map or list shall contain the rationale or data to support designations.</p>	<p>Ventura County MS4 Permit</p>	
<p>Storm Drain Operation and Maintenance (Catch Basin Inspection and Cleaning)</p>	<p>In areas that are not subject to a trash TMDL, inspect catch basins according to the following schedule: <u>Priority A</u>: A minimum of 3 times during the wet season (October 1 through April 15) and once during the dry season every year. <u>Priority B</u>: A minimum of once during the wet season and once during the dry season every year. <u>Priority C</u>: A minimum of once per year.</p> <p>Catch basins shall be cleaned as necessary on the basis of inspections. At a minimum, ensure that any catch basin that is determined to be at least 25% full of trash shall be cleaned out. Maintain inspection and cleaning records for Regional Water Board review.</p>	<p>Ventura County MS4 Permit</p>	
<p>Storm Drain Operation and Maintenance (Catch Basin Inspection and Cleaning)</p>	<p>In areas that are subject to a trash TMDL, continue to implement the requirements listed below until trash TMDL implementation measures are adopted. Thereafter, implement programs in conformance with the TMDL implementation schedule, which shall include an effective combination of measures such as street sweeping, catch basin cleaning, installation of treatment devices and trash receptacles, or other BMPs. Default requirements include:</p>	<p>Ventura County MS4 Permit</p>	

Category	Description of Requirement	Origin of Requirement	Notes
	<ol style="list-style-type: none"> 1. Inspection and cleaning of all catch basins a minimum of 3 times during the wet season (October 1 through April 15) and once during the dry season every year; 2. For any catch basin that is found to be $\geq 40\%$ full of trash and/or debris during an inspection; the inspection and cleaning frequency shall be increased to 4 times during the wet season and once during the dry season every year; 3. Record keeping of catch basins cleaned, demonstrating that all required catch basin cleaning has been conducted; and 4. Recording of the overall quantity of catch basin waste collected. 		
Storm Drain Operation and Maintenance (Trash Management at Public Events)	<p>Require the following measures for any event in the public right of way or wherever it is foreseeable that substantial quantities of trash and litter may be generated, including events located in areas that are subject to a trash TMDL:</p> <ol style="list-style-type: none"> 1. Proper management of trash and litter generated; <u>and</u> 2. Arrangement for temporary screens to be placed on catch basins; <u>or</u> 3. Provide clean out of catch basins, trash receptacles, and grounds in the event area within 24 hours subsequent to the event. 	Ventura County MS4 Permit	
Storm Drain Operation and Maintenance (Trash Receptacles)	<ol style="list-style-type: none"> 1. Install trash receptacles, or equivalent trash capturing devices in areas that are subject to a trash TMDL, and all other areas subject to high trash generation within its jurisdiction. 2. Ensure that all trash receptacles are cleaned out and maintained as necessary to prevent trash overflow. 	Ventura County MS4 Permit	
Storm Drain Operation and Maintenance (Catch Basin Labels)	<ol style="list-style-type: none"> 1. Inspect the legibility of the stencil or label nearest each inlet prior to the wet season every year. 2. Record all catch basins with illegible stencils and re-stencil or re-label within 15 days of inspection. 	Ventura County MS4 Permit	
Storm Drain Operation and Maintenance (Additional Trash	Install trash excluders, or equivalent devices on or in catch basins or outfalls to prevent the discharge of trash to the storm drain system or receiving water in areas defined as Priority A or B. Criteria and	Ventura County MS4 Permit	

Category	Description of Requirement	Origin of Requirement	Notes
Management)	corresponding exceptions for flooding and alternatives BMPs are included.		
Storm Drain Operation and Maintenance (Storm Drain Maintenance)	Implement a program for Storm Drain Maintenance includes the following: <ol style="list-style-type: none"> 1. Visual monitoring of Permittee-owned open channels and other drainage structures for debris at least annually. 2. Remove trash and debris from open channel storm drains a minimum of once per year before the wet season. 3. Eliminate the discharge of contaminants during MS4 maintenance and clean outs. 4. Quantify the amount of materials removed using techniques appropriate for quantifying solid waste and ensure the materials are properly disposed of. 	Ventura County MS4 Permit	
Storm Drain Operation and Maintenance (Spill Response)	Each Permittee which owns and /or operates a sanitary sewer system that requires coverage under the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (Order No. 2006-0003-DWQ), shall comply with the provisions and the monitoring requirements associated with this Order.	Ventura County MS4 Permit	
Storm Drain Operation and Maintenance (Permittee Owned Treatment Control BMPs)	<ol style="list-style-type: none"> 1. Implement an inspection and maintenance program for all Permittee owned treatment control BMPs, including post-construction treatment control BMPs. 2. Ensure proper operation of all treatment control BMPs and maintain them as necessary for proper operation, including all post-construction treatment control BMPs. 3. Implement BMPs for all residual water produced by a treatment control BMP and not being internal to the BMP performance. 	Ventura County MS4 Permit	
Streets, Roads, and Parking Facilities Maintenance (Prioritization)	Designate streets and/or street segments within its jurisdiction as one of the following: <u>Priority A:</u> Streets and/or street segments that are designated as consistently generating the highest volumes of trash and/or debris. <u>Priority B:</u> Streets and/or street segments that are designated as consistently generating moderate volumes of trash and/or debris. <u>Priority C:</u> Streets and/or street segments that are designated as	Ventura County MS4 Permit	

Category	Description of Requirement	Origin of Requirement	Notes
	generating low volumes of trash and/or debris.		
Streets, Roads, and Parking Facilities Maintenance (Street Sweeping)	Perform street sweeping of curbed streets according to the following schedule: <u>Priority A</u> : Streets and/or street segments that are designated as Priority A shall be swept at least two times per month. <u>Priority B</u> : Streets and/or street segments that are designated as Priority B shall be swept at least once per month. <u>Priority C</u> : Streets and/or street segments that are designated as Priority C shall be swept as necessary but in no case less than once per year.	Ventura County MS4 Permit	
Streets, Roads, and Parking Facilities Maintenance (Road Reconstruction)	Require that for any project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing roadbed surfaces, that the BMPs in X (BMPs for Public Agency Facilities and Activities) and as specified in Part X (Development Construction Program) be implemented for each project.	Ventura County MS4 Permit	
Streets, Roads, and Parking Facilities Maintenance (Parking Facilities Maintenance)	Permittee-owned parking lots exposed to storm water shall be kept clear of debris and excessive oil buildup and cleaned using street sweeping equipment no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. In no case shall a Permittee-owned parking lot be cleaned less than once a month.	Ventura County MS4 Permit	
Emergency Procedures	Each Permittee may conduct repairs of essential public service systems and infrastructure in emergency situations with a self-waiver of the provisions of this Order as follows: 1. Providing an explanation of the circumstances, and the measures that were implemented to reduce the threat to water quality, no later than 30 business days after the situation of emergency has passed. 2. Minor repairs of essential public service systems and infrastructure in emergency situations (that can be completed in less than one day) are not subject to the notification provisions.	Ventura County MS4 Permit	
Municipal Employee and Contractor Training	Train all of their employees and contractors in targeted positions on the requirements of the overall storm water management program	Ventura County MS4 Permit	

Category	Description of Requirement	Origin of Requirement	Notes
	to: 1. Promote a clear understanding of the potential for activities to pollute storm water. 2. Identify opportunities to require, implement, and maintain appropriate BMPs in their line of work.		
Municipal Employee and Contractor Training	Annually train all of their employees and contractors who use or have the potential to use pesticides or fertilizers to address: 1. The potential for pesticide-related surface water toxicity. 2. Proper use, handling, and disposal of pesticides. 3. Least toxic methods of pest prevention and control, including IPM. 4. Reduction of pesticide use.	Ventura County MS4 Permit	

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DRAFT Core Permit Requirements – Table of Objectives, Elements, and Issues

Minimum Control Measure – Planning and Land Development Program

Primary Objectives:	<ul style="list-style-type: none"> • Lessen the impacts of development and significant re-development projects on water quality and hydrology by designing projects to minimize the impervious area footprint and employing Low Impact Development (LID) design principles to mimic pre-development water balance through infiltration, evapotranspiration and re-use. • Minimize pollutant loadings through the use of properly designed, technically appropriate BMPs (including source control BMPs), LID strategies, and treatment control BMPs. • Minimize the adverse impacts from storm water runoff on the biological integrity of natural drainage systems and the beneficial uses of waterbodies in accordance with requirements under CEQA (Cal. Pub. Resources Code § 21100). • Lessen the water quality impacts of development by using smart growth practices such as compact development, directing development towards existing communities via infill or redevelopment, safeguarding of environmentally sensitive areas, mixing of land uses (e.g., homes, offices, and shops), transit accessibility, and better pedestrian and bicycle amenities.
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Legal Authority:	<ul style="list-style-type: none"> • Requirements regarding proposed management program, covering minimum control measures to be included (40 CFR §122.26(d)(2)(iv)) • Regulations addressing post-construction controls for new development and significant re-development (40 CFR §122.26(d)(2)(iv)(A)(2)) • Regulations addressing illicit discharges and improper disposal (40 CFR §122.26(d)(2)(iv)(B)) • Regulations addressing discharges by implementing and maintaining structural and non-structural best management practices to reduce pollutants in storm water runoff (40 CFR §122.26(d)(2)(iv)(D))
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Category	Description of Requirement	Origin of Requirement	Notes
Purpose	<ul style="list-style-type: none"> • Lessen the impact of new development and significant re-development on pollutant loading to receiving waterbodies. • Minimize the hydromodification impacts on natural drainage systems. • Provide criteria to ensure the effective design, operation and maintenance of LID and hydromodification control BMPs. 	Ventura County MS4 Permit with modifications based on collaboration between the contractor, Regional Board staff and EPA.	
Applicability	Define new development and re-development projects that are subject to the requirements of Part X.	Ventura County MS4 Permit	
Performance Criteria	Except as provided for under Part X or X, new development and re-development projects must retain on-site the storm water runoff	Collaboration between the contractor,	

	<p>volume resulting from the 85th percentile, 24-hour storm or the 0.75 inch 24-hour storm, whichever is greater.</p> <p>If it is not technically feasible to retain on-site the entire storm water runoff volume, the project must be designed and operated to biofiltrate 1.5 times the storm water runoff volume that cannot be retained on-site.</p> <p><u>Note:</u> The draft permit language does not restrict the percent effective impervious area (EIA). The draft permit encourages designs that minimize impervious surfaces because the storm water runoff volume is related to the amount of impervious surface.</p>	<p>Regional Board staff and EPA. The 85th percentile, 24-hour storm is the design storm used in recently-issued California MS4 permits.* A minimum requirement based on the 0.75 inch 24-hour storm is required in this permit to prevent backsliding from the previous permit.</p> <p>*The following permits include requirements to retain on-site the runoff volume from the 85th percentile design storm:</p> <ul style="list-style-type: none"> • San Bernardino County MS4 Permit (Order No. R8-2010-0036) • Riverside County in San Diego Region (Order No. R9-2010-0016). 	
<p>Performance Criteria for Infiltration</p>	<p>The Infiltration rate of soils decrease as the moisture content increases-- to the point of saturation. When calculating the infiltration rates of underlying soils, the Permittees will account for the infiltration loss considering the impact of increasing soil moisture using Horton’s Equation or other means approved by the Executive Officer of the Los Angeles Regional Water Quality Control Board. Alternatively, the Permittee may assume that the soil is</p>	<p>Horton’s Equation is referenced in the Energy Independence and Security Act (EISA) Technical Guidance Manual.</p> <p>The State Water</p>	

	<p>saturated and the minimum infiltration rate applies.</p>	<p>Resources Control Board developed a Post-Construction Water Balance Calculator spreadsheet for estimating the performance of LID elements. The calculator input assumes wet soil conditions and the minimum infiltration rate for the specified soil classification.</p>	
<p>Design Criteria for Biofiltration</p>	<p>Bio-filtration BMPs shall be designed to accommodate the design flow at a surface loading rate no greater than 5 inches per hour and shall have a total volume, including pore spaces and pre-filter, detention volume, no less than the runoff volume generated by the design storm depth times 0.75.</p> <p>[Note: These design criteria are under review based on more recent information.]</p>	<p>Collaboration with the contractor, Regional Board staff and EPA.</p> <p>Similar to provisions in the San Diego Regional Board MS4 Permit for South Orange County (Order No. R9-2009-002).</p>	
<p>Performance Criteria for Harvest and Re-use</p>	<p>If rainwater harvested for use in irrigation is to be credited toward the total volume of storm water runoff retained on-site, the Permittees must require that the project applicant to conduct a conservative (assuming reasonable worst-case scenarios) assessment of water demand during the wet season. This volume will be referred to as the “reliable” estimate of irrigation demand. The portion of water to be credited as retained on-site for re-use in irrigation may not exceed the reliable estimated irrigation demand during the wet season.</p>	<p>Collaboration with the contractor, Regional Board staff and EPA.</p>	
<p>Alternative Compliance for Technical Infeasibility</p>	<p>Technical site constraints may preclude the use of infiltration LID measures and limit the ability to meet the Integrated Water Quality/Flow Reduction/Resources Management Criteria in Part X.</p> <p>The Permittees may allow projects that are unable to meet the</p>	<p>Ventura County MS4 Permit</p>	

	<p>Integrated Water Quality/Flow Reduction/Resources Management Criteria in Part X to comply with this Order through the alternative compliance measures described in this section to encourage smart growth and infill development of existing urban centers where on-site compliance with post-construction requirements may be technically infeasible.</p>		
<p>Technical Infeasibility</p>	<p>Technical infeasibility may result from conditions including the following:</p> <ol style="list-style-type: none"> (1) Locations where seasonal high groundwater is within <u>5 to 10</u> feet of the surface (2) Locations within 100 feet of a groundwater well used for drinking water (3) Brownfield development sites or other locations where pollutant mobilization is a documented concern (4) Locations with potential geotechnical hazards (5) Smart growth and infill or redevelopment locations where the density and/ or nature of the project would create significant difficulty for compliance with the on-site volume retention requirement. 	<p>Ventura County MS4 Permit with modifications to be consistent with municipal LID manuals. References to a Technical Guidance Manual have been deleted. The draft permit does not require the Permittees to develop a Technical Guidance Manual.</p>	
<p>Alternative Compliance Measures</p>	<p>When a Permittee finds that the project applicant has demonstrated technical infeasibility, after confirming that the project design minimizes the impervious area to the extent allowed by local zoning regulations and the project design incorporates all applicable LID BMPs including green roofs and rainfall harvest and re-use, and considering recommended protective buffers for riparian areas and environmentally sensitive areas, the Permittee shall require the applicant to provide off-site mitigation.</p> <p>The required off-site mitigation volume will be equal to 1.5 times the storm water volume runoff that cannot be retained on-site. The project applicant must perform off-site mitigation or provide sufficient funding for public or private off-site mitigation to achieve equivalent mitigation storm water volume reduction through infiltration, reuse, and/or evapotranspiration.</p> <p>The Permittees must develop a prioritized list of off-site mitigation projects, and when feasible, the mitigation must be directed to the highest priority mitigation project within the same drainage area as,</p>	<p>Ventura County MS4 Permit and collaboration between the contractor, the Regional Board staff and EPA.</p>	

	<p>or the nearest downstream drainage from the proposed development or re-development.</p> <p>Off-site mitigation projects shall be completed as soon as possible, and at the latest, within 4 years of the certificate of occupancy for the first project that contributed funds toward the construction of the off-site mitigation project, unless a longer period is authorized by the Executive Officer of the Los Angeles Regional Water Quality Control Board.</p>		
Water Quality Mitigation Criteria	<p>Applies when the project applicant has successfully demonstrated technical infeasibility to retain on-site the required storm water runoff volume. In addition to providing off-site mitigation, the project applicant must provide for effective treatment of the runoff from the project site.</p> <p>In addition to the requirements for controlling pollutant discharges as described above, the Permittee will ensure that the new development or re-development project will not cause the Permittee to exceed applicable wasteload allocations (WLAs) or fail to comply with Total Maximum Daily Load (TMDL) implementation plan requirements.</p>	Ventura County MS4 Permit and collaboration between the contractor, the Regional Board and EPA.	
Hydromodification	<p>Applies to natural drainage systems (to be defined). The goal of the hydromodification provisions is to preserve pre-development hydrology. The draft permit will provide Interim hydromodification requirements. Final hydromodification requirements will be developed by the Permittees based on pending studies to be approved by the SWRCB.</p>	Ventura County MS4 Permit and collaboration with the contractor, Regional Board staff and EPA.	
Hydromodification Projects Disturbing Less than 50 Acres	<ul style="list-style-type: none"> The project is designed to retain on-site, through infiltration, evapotranspiration, and/or harvest and reuse, the stormwater volume from the runoff of the 95th percentile, 24-hour storm, or The runoff flow rate, volume, velocity, and duration for the post-development condition do not exceed the pre-development condition for the 2-year, 24-hour rainfall event. 	<ul style="list-style-type: none"> Federal Energy Independence and Security Act (EISA), Technical Guidance Document¹ Other recently issued California 	

¹ U.S. Environmental Protection Agency. December 9, 2009. *Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act* < <http://www.epa.gov/owow/NPS/lid/section438/>>. Accessed October 20, 2011.

	<p>This condition may be substantiated by simple screening models or</p> <ul style="list-style-type: none"> The Erosion Potential (Ep) in the receiving water channel will approximate 1, as determined by a Hydromodification Analysis Study and the equation presented in Attachment X. <p>Note: These requirements are intended to offer less expensive options than the requirements for larger projects.</p>	<p>MS4 permits. These requirements are similar to provisions in the Orange County MS4 permit (Order No. R8-2009-0030) and the Riverside County MS4 Permit (Order No. R9-2010-0016).</p> <ul style="list-style-type: none"> The Erosion Potential method is from the Ventura County MS4 Permit. 	
Hydromodification Projects Disturbing 50 Acres or More	<ul style="list-style-type: none"> The project infiltrates on-site at least the runoff from a 2-year, 24-hour storm event, or The runoff flow rate, volume, velocity, and duration for the post-development condition does not exceed the pre-development condition for the 2-year, 24-hour rainfall events. These conditions must be substantiated by hydrologic modeling acceptable to the Permittee, or The Erosion Potential (Ep) in the receiving water channel will approximate 1, as determined by a Hydromodification Analysis Study and the equation presented in Attachment X. 	<ul style="list-style-type: none"> Other recently issued California MS4 permits. These requirements are similar to provisions in the Orange County MS4 Permit (Order No. R8-2009-0030) and the Riverside County MS4 Permit (Order No. R9-2010-0016). The Erosion Potential method is from the Ventura County MS4 Permit. 	
Implementation	Maintenance Agreement and Transfer of Responsibility to operate and maintain post-development BMPs.	Ventura County MS4 Permit	
Maintenance Agreement	Prior to issuing approval for occupancy, the Permittee will require new development and redevelopment projects to provide a plan and financial assurance for continued operation and maintenance of LID practices, treatment control BMPs, and hydromodification control BMPs.	Ventura County MS4 Permit	

Tracking, Inspection and Enforcement of Post-Construction BMPs	Each Permittee will implement a tracking system and an inspection and enforcement program for new development and re-development post-construction storm water BMPs.	Ventura County MS4 Permit	
Alternative Post-Construction Storm Water Mitigation Programs	A Permittee or coalition of Permittees may apply to the Regional Water Board for approval of a Redevelopment Project Area Master Plan (RPAMP) for re-development within Re-development Project Areas, in consideration of exceptional site constraints that inhibit site-by-site or project-by-project implementation of post-construction requirements.	Ventura County MS4 Permit	
Developer Technical Guidelines	Note: The Draft Permit does not require the Permittees to develop a Technical Guidance Document. This section is to be used to provide general technical guidelines relating to site development, recommended riparian buffer widths, etc.	Collaboration between the contractor, the Regional Board staff and EPA.	

DRAFT

DRAFT Core Permit Requirements – Table of Objectives, Elements, and Issues

Minimum Control Measure – Public Information and Participation Program (PIPP)

Primary Objectives:	<ul style="list-style-type: none"> To measurably increase the knowledge of the target audience about the MS4, the adverse impacts of storm water pollution on receiving waters and potential solutions to mitigate the impacts. To measurably change the waste disposal and storm water pollution generation behavior of target audiences by developing and encouraging the implementation of appropriate solutions. To involve and engage socio-economic groups and ethnic communities in Los Angeles County to participate in mitigating the impacts of storm water pollution.
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Legal Authorities:	<ul style="list-style-type: none"> Requirements regarding proposed management program, covering minimum control measures to be included (40 CFR §122.26(d)(2)(iv)(A)(6)) Regulations addressing public information and participation programs (40 CFR §122.26(d)(2)(iv)(B)(6))
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Category	Description of Requirement	Origin of Requirement	Notes
General	<p>The Permittees shall implement a Public Information and Participation Program (PIPP) that includes, but is not limited to, the requirements listed in this part.</p> <p>The Permittees shall be responsible for developing and implementing the PIPP, and implementing specific PIPP requirements.</p>	Draft April 2011 LA County and Ventura County MS4 Permits	
Advisory Committee	<p>The Permittees shall consider developing an advisory committee to provide input and assistance in meeting the goals and objectives of the public education campaign.</p> <p>The advisory committee shall be consulted during the process of developing the PIPP campaign, and shall provide comments and advice during the process of preparing a Request For Proposal for a storm water public education contractor.</p> <p>The committee may participate as a part of a working group that</p>	Draft April 2011 LA County MS4 Permit	

Category	Description of Requirement	Origin of Requirement	Notes
	<p>evaluates contractor proposals and other tasks as appropriate.</p> <p>The committee shall be comprised of representatives of the environmental community, Permittees, Regional Water Board staff, and experts in the fields of public education and marketing.</p> <p>The committee shall meet at least once a year.</p>		
<p>Residential Program – No Dumping Message</p>	<p>Each Permittee shall label all storm drain inlets that they own with a legible “no dumping” message.</p> <p>Signs with prohibitive language discouraging illegal dumping shall be posted at designated public access points to creeks, other relevant waterbodies, and channels.</p> <p>Signage and storm drain messages shall be legible and maintained as necessary during the term of the permit.</p>	<p>Draft April 2011 LA County MS4 Permit</p>	
<p>Residential Program – Countywide Hotline</p>	<p>Permittees will develop and implement, or continue to implement, a watershed-wide reporting hotline to serve as the general public reporting contact for reporting illicit discharges/dumping, faded or lack of catch basin labels, and general storm water management information. Each Permittee may establish its own hotline if preferred.</p> <p>Permittees shall include this information, updated when necessary, in public information, and the government pages of the telephone book, as they are developed or published.</p> <p>The Permittees shall compile a list of the general public reporting contacts submitted by all Permittees and make this information available on the Permittee’s websites and upon request.</p>	<p>Draft April 2011 LA County MS4 Permit</p>	

Category	Description of Requirement	Origin of Requirement	Notes
	Each Permittee is responsible for providing current, updated information to the Principal Permittee.		
Outreach and Education	<p>The Permittees shall implement the following activities:</p> <ol style="list-style-type: none"> (1) Conduct a storm water pollution prevention advertising campaign (2) Conduct storm water pollution prevention public service announcements (3) Consider distributing storm water pollution prevention public education materials to potential pollutant contributing entities, such as automotive parts stores, home improvement centers / lumber yards / hardware stores, and pet shops / feed stores (4) Public education materials shall include the topics specified at Permit Part X (5) Consider working with existing local watershed groups or organizing watershed Citizen Advisory Groups/ Committees to develop effective methods to educate the public about storm water pollution (6) Organize events targeted to residents and population subgroups (7) Maintain the countywide storm water website (www.888CleanLA.com), which shall include educational material listed in Part X. 	Draft April 2011 LA County MS4 Permit and Ventura County MS4 Permit	
Outreach and Education	The Permittees shall develop a strategy to educate ethnic communities through culturally effective methods.	Draft April 2011 LA County MS4 Permit	
Outreach and Education	Requirement regarding quantity of storm water quality "impressions" on the general public - To be developed.	Draft April 2011 LA County MS4 Permit	
Outreach and Education	The Permittees shall provide schools within each School District in the county with materials, including, but not limited to, videos, live presentations, and other information necessary to educate a minimum of 50 percent of all school children (K-12) every 2 years	Draft April 2011 LA County MS4 Permit	

Category	Description of Requirement	Origin of Requirement	Notes
	on storm water pollution.		
Pollutant-specific Outreach	The Permittees shall coordinate to develop outreach programs that focus on the watershed-specific pollutants listed in Table 1.	Draft April 2011 LA County MS4 Permit	
Pollutant-specific Outreach	Each Permittee shall make outreach materials available to the general public and target audiences, such as schools, community groups, contractors and developers, and at appropriate public counters and events. Outreach material shall include information on pollutants of concern, sources, and source abatement measures.	Draft April 2011 LA County MS4 Permit	
Corporate Business Outreach	The Permittees shall consider working with other regional or statewide agencies and, associations such as the California Storm Water Quality Association (CASQA), to develop and implement a Corporate Outreach program to educate and inform corporate franchise operators and/or local facility managers about storm water regulations and BMPs.	Ventura County MS4 Permit	
Corporate Business Outreach	Once developed, the program shall consider targeting Retail Gasoline Outlets (RGO) franchisers, retail automotive parts franchisers, home improvement center franchisers and restaurant franchisers.	Ventura County MS4 Permit	
Business Assistance Program	The Permittees shall consider implementing a Business Assistance Program to provide technical information to small businesses to facilitate their efforts to reduce the discharge of pollutants in storm water. The Permit specifies required components of the program.	Draft April 2011 LA County and Ventura County MS4 Permits	