

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
REPORTING PROGRAM - No. CI 7388
FOR
ORDER 07-xxxx
NPDES PERMIT NO. CAS004002
WASTE DISCHARGE REQUIREMENTS
MUNICIPAL SEPARATE STORM SEWER SYSTEM DISCHARGES
WITHIN THE
VENTURA COUNTY WATERSHED PROTECTION DISTRICT,
COUNTY OF VENTURA AND THE INCORPORATED CITIES THEREIN.

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Reporting Program Requirements

The Principal Permittee shall submit by December 15th of each year beginning the year of 2007, an Annual Report to the Regional Water Board Executive Officer in the form of a one hard copy and three compact disks (CD) (or equivalent electronic format)

1. The Annual Report shall document the status of the General Storm Water Program, an integrated summary of the results of analyses from:
 - (a) The monitoring program described under Part 1-Monitoring Report; and
 - (b) The requirements described under Part 2- Program Report.
2. Plans shall be submitted to the Regional Water Board Executive Officer in the form of a hard copy and on a compact disk (CD), submit 1 hard copy and 3 CD copies.
3. Study Reports shall be submitted to the Regional Water Board Executive Officer in the form of a hard copy and on a CD, submit 1 hard copy and 3 CD copies.
4. Progress Reports shall be submitted to the Regional Water Board Executive Officer in the form of a hard copy and on a CD, submit 1 hard copy and 3 CD copies.

PART 1 - MONITORING REPORT

A. The following shall be included in the Annual Report:

1. Mass Emissions
 - (a) Assess the variability of storm water constituents from the results all monitored storms events.
 - (b) Rain totals and hydrographs for monitoring events in both narrative and graphic formats shall be included with the Annual Report.
 - (c) A summary of the years' mass emission station's monitoring results highlighting exceedences (POC) with corresponding sampling dates shall be included with the Annual Report.
2. Aquatic Toxicity Monitoring
 - (a) An analysis of the mass emission samples for aquatic toxicity to evaluate the extent and causes of toxicity in receiving waters.
 - (b) A report on the development, implementation, and results for each TRE Corrective Action Plan in the Annual Report, beginning the year following the identification of each pollutant or pollutant class causing toxicity.

- (c) Report on the development, implementation, and results for each TRE Corrective Action Plan, beginning the year following the identification of each pollutant or pollutant class causing toxicity.
- (d) All constituents (POCs) that caused toxicity or exceeded any applicable water quality objectives at the associated mass emission station the previous year shall be listed.
- (e) A summary of the years' mass emission station's monitoring results with corresponding sampling dates and ToxCalc output.

3. TMDL Compliance Monitoring

- (a) A summary of the years' monitoring results for each TMDL.
 - (i) Corresponding sampling dates and ToxCalc output (if applicable).
 - (ii) Outfall(s) name and ID number for both wet and dry weather.
 - (iii) Outfall(s) associated "no flow" or "flow observed" for dry weather.

B. The following shall be submitted to the Regional Water Board Executive Officer:

1. Aquatic Toxicity Monitoring
 - (a) A TRE Corrective Action Plan within 30 days after the source of toxicity and appropriate BMPs are identified.
2. TMDL Compliance Monitoring
 - (a) A report identifying the Southern California Municipal Storm Water Monitoring Coalition's (SMC) standardized toxicity testing protocol and compliance criteria, for consideration and approval.
3. Trash and Debris Study
 - (a) A trash and debris study final report, no later than 18 months from the study's start date.
4. Pyrethroid Insecticides Study
 - (a) Pyrethroid insecticides study final report, no later than 8 months after completion of the study.
5. Hydromodification Control Study
 - (a) Letter stating how the Principal Permittee is satisfying this requirement, no later than 2 months after deciding to either conduct or participate in special studies.
6. Low Impact Development
 - (a) Letter stating how the Principal Permittee is satisfying this requirement, no later than 2 months after deciding to either conduct or participate in special study.

7. Non-Compliance

- (a) When monitoring can not be performed to comply with the requirements of this Order due to circumstances beyond the Permittees control, then within 48 hours the following shall be submitted:
 - (1) Statement of situation.
 - (2) Explanation of circumstance(s) with documentation.
 - (3) Statement of corrective action for the future.

C. Submitted electronically to the Regional Water Board, the following shall be:

1. Mass Emissions

- (a) Monitoring results no later than 45 days from sample collection date.

2. Aquatic Toxicity Monitoring

- (a) Monitoring results no later than 45 days from sample collection date.

3. TMDL Compliance Monitoring

- (a) Monitoring results no later than 45 days from sample collection date.

4. Non-Compliance

- (a) When the Order 's monitoring requirements can not be performed due to circumstances beyond the Permittees control, then within 48 hours the following shall be submitted to the Regional Water Board Executive Officer:
 - (1) Statement of situation.
 - (2) Explanation of circumstance(s) with documentation.
 - (3) Statement of corrective action for the future.

5. Data transmitted shall be in the SMCs Standardized Data Transfer Formats (SDTFs) and all updates are to be adhered to.¹

- (a) Regional Water Board's Storm Water E-mail Address:
MS4stormwaterb4@waterboards.ca.gov

¹ The SMC developed a SDTFs for use by member agencies for electronic recording and transfer of storm water monitoring data. Southern California Coastal Water Research Project, Technical Report 421 (August, 2004).

PART 2 - PROGRAM REPORT

On an annual basis the Permittees shall complete an Annual Monitoring Program Report that responds adequately to the evaluative questions below which correspond to the Order.

DISCHARGE PROHIBITIONS

- (a) Have you effectively prohibited all non-storm discharges into the MS4 and watercourses?
- (b) If there are any exceptions in the municipal code, list the exceptions to the municipal code. In other words, which non-storm water discharges does your municipality allow? Under what conditions are they allowed (with BMPs)? List which BMPs are required prior to discharge.
- (c) Do you have a procedure to assure that any project within your jurisdiction which may undertake ground water dewatering obtain a permit from the Regional Water Board?
- (d) How many projects are permitted to dewater in your jurisdiction?
- (e) How many are permanent dewatering to continue after construction is completed?
- (f) Do you have a permitting/ permission system for the discharge of dechlorinated/ debrominated swimming pool discharges? Explain it.
- (g) If yes, how many swimming pools are drained with the agency's permit/ permission?
- (h) How do you ensure that discharge limits for chlorine, bromine, etc are not exceeded?
- (i) Do you allow the discharge of "salt water" swimming pool discharges? If yes
- (j) Do you have a permitting/ permission system for the discharge of "salt water" swimming pool discharges? Explain it.

RECEIVING WATER LIMITATIONS

1. At any time, has the discharge from the MS4 caused or contributed to the violation of water quality objectives or water quality standards?
2. At any time, has the discharge from the MS4 for which a Permittee is at least partially responsible, caused or contributed to a condition of nuisance?

3. At any time, has the discharge of pollutant(s) from the MS4 exceeded the MS4 Waste Load Allocation(s) for Wet Weather Discharges?
4. For pollutant(s) which continue to cause or contribute to water quality impairments, but for which TMDLs have not yet been developed or approved, what has the Permittee implemented to eliminate future water quality impairments?

STORM WATER QUALITY MANAGEMENT PROGRAM IMPLEMENTATION

A. General Requirements

B. Legal Authority

1. Does your municipal agency possess all the necessary legal authority to implement and enforce each requirement of this Order?
2. If the answer is no, explain why not.
3. By what date certain will the municipal agency have all the necessary legal authority?
4. Attach a copy of the new or updated statement by its legal counsel that the Permittee has obtained all necessary legal authority to comply with this Order through adoption of ordinances and/ or municipal code modifications.
5. After submitting the Statement from your legal counsel, was your city's municipal code (or other legal authority) changed (Any section that applies to or affects storm water permitting or requirements)? On what date(s) was it changed? Provide the changes.

C. Fiscal Resources

1. Provide a detailed Annual Budget Summary of the Permittee's allocation of funds expended to implement the activities required to comply with the conditions of this Order.
2. Indicate the source(s) of funding (whether general funds; and/ or Benefit Assessment Program funds; plan review fees; permit fees; industrial/ commercial user fee; revenue bonds; grants; or other funding mechanism. Each Permittee's Annual Budget Summary shall separately include:
3. Annual Budget Summary of expenditures applied to the storm water management program and also identify the storm water budget for the following year, using estimated percentages and written explanations where necessary, for the specific categories noted below:
 - (a) Program Overall Management Activities;
 - (1) Administrative costs
 - (b) Program Required Activities Implementation;
Provide an estimated percent breakdown of expenditures for the categories below:
 - (1) Illicit connection/ illicit discharge

- (2) Development planning
- (3) Development construction
- (4) Construction inspection activities
- (5) Industrial/ Commercial inspection activities
- (6) Public Agency Activities
- (7) Maintenance of Structural BMPs and Treatment Control BMPs
 - (A) Municipal Street Sweeping for Commercial/ Industrial landuse only;
 - (B) Catch basin clean-outs (including dumping fees);
 - (C) Storm drain clean-outs (including dumping fees); and
 - (D) Other costs (describe).
- (8) Public Information and Participation;
- (9) Monitoring Program; and
- (10) Miscellaneous Expenditures (describe).

D. Designation and Responsibilities of the Principal Permittee

The Principal Permittee shall submit within the Annual Program Report information on the implementation of the following:

1. Coordination and facilitation of activities to comply with the requirements of this Order;
2. Evaluation, assessment, and summary of the results of the monitoring program and the effectiveness of the implementation of BMPs and any recommended change.

E. Responsibilities of the Permittees

Each Permittee shall include within the Annual Program Report information on the implementation of the following:

1. A statement under penalty of perjury that the Permittee is or is not in compliance with the requirements of this Order and any subsequent modifications thereto.
2. A summary of how coordination occurs among its internal departments and agencies to ensure the implementation of the requirements of this Order.
3. Description of the intra-agency coordination by Agency departments (e.g. Community Development (Planning), Public Works, Sanitation, Engineering, Fire Department, Building and Safety, Code Enforcement, Public Health, Water and/ or Power Department, etc.) to ensure the successful implementation of the provisions of this Order.
4. In addition to the Budget Summary, identify any supplemental dedicated budgets for the storm water categories listed.
5. Identify the staff which participated at all committee or subcommittee meetings and when.

PART 4 - SPECIAL PROVISIONS**A. General Requirements**

1. Best Management Practice Substitution
 - (a) Did the Regional Water Board Executive Officer approve any site-specific BMP substitution for your agency?
 - (b) If so, describe implementation of that/ those BMP(s).

B. Watershed Initiative Participation

1. Describe your participation (Principal Permittee) in appropriate water quality meetings for watershed management planning. Include the following:
 - (a) Calleguas Creek Watershed Management Plan;
 - (b) Regional Monitoring Program;
 - (c) Santa Clara River Enhancement and Management Plan;
 - (d) Steelhead Restoration and Recovery Plan; and
 - (e) Southern California Stormwater Monitoring Coalition (SMC).

C. Public Information and Participation Program (PIPP)

1. Describe the Permittee successes in:
 - Measurably increasing the knowledge of the target audiences regarding the MS4, the impacts of storm water pollution on receiving waters and potential solutions to mitigate the problems caused;
 - Measurably changing the waste disposal and runoff pollution generation behavior of target audiences by encouraging implementation of appropriate solutions;
 - Involving and engaging communities in Ventura County to participate in mitigating the impacts of storm water pollution.
2. Residential Program
 - (a) Did the Permittee label each storm drain inlet that they own with a legible “no dumping” message.
 - (b) How many inlets were labeled this year?
 - (c) How many inlets were labeled cumulatively?
 - (d) Did the Permittee install signs with prohibitive language discouraging illegal dumping at designated public access points to creeks, other relevant water bodies, and channels?
 - (e) How many?

Public Reporting

- (a) Identify the staff person(s) who will serve as the contact person(s) for reporting clogged catch basin inlets and illicit discharges/ dumping, faded or lack of catch basin stencils, and general storm water management information.
- (b) Did the Permittee update this information by July 1 of this year?
- (c) The Principal Permittee shall compile a list of the general public reporting contacts from all Permittees and make this information available on the web site (<http://www.vcstormwater.org/contact.htm>) and upon request.

Outreach and Education

- (1) Provide documentation to show that the Permittees implemented the following activities:
- Storm Water pollution prevention advertising campaign.
 - Storm Water pollution prevention public service announcements.
 - Distribution of storm water pollution prevention public education materials to auto parts stores, home improvement centers and pet shops/ feed stores in regards to information on the proper storage and disposal of household waste materials, construction waste materials and vehicle waste fluids, the proper use of fertilizers and pesticides and the proper disposal of animal wastes.
 - Organization of watershed Citizen Advisory Groups/ Committees to develop/ implement effective methods to educate the public about storm water pollution.
 - Organization of events for residents and population subgroups.
 - Maintenance of the Countywide storm water website (www.vcstormwater.org), including educational materials.
- (2) Provide documentation to show that the Principal Permittee implemented the strategy to educate ethnic communities through culturally acceptable and effective methods.
- (3) Did each Permittee implement outreach efforts to residents and school children related to the proper disposal of litter, green waste, pet waste, proper vehicle maintenance, lawn care and water conservation practices?
- (4) Did the Permittees make demonstrable positive effects on the general public related to storm water quality?
- (5) On 4 above, explain how so.
- (6) Did the Principal Permittee, in cooperation with the Permittees, 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 on storm water pollution?

- (8) Provide the contact information for their appropriate staff responsible for storm water public education activities to the Principal Permittee and changes to contact information no later than 30 days after a change occurs.
- (9) Provide the assessment of the strategy to measure the effectiveness of in-school educational programs.

Businesses Program

- (a) Corporate Outreach
- (b) Provide a progress update on the Corporate Outreach program.

C. Industrial/ Commercial Facilities Program

Each Permittee shall require implementation of pollutant reduction and control measures at industrial and commercial facilities, with the objective of reducing pollutants in storm water runoff. Except as specified in other sections of this Order, pollutant reduction and control measures may be used alone or in combination, and may include Structural Treatment Control, Source Control BMPs, and operation and maintenance procedures, which may be applied before, during, and/ or after pollution generating activities. At a minimum, the Industrial/ Commercial Facilities Control Program Report shall include requirements to: (1) track, (2) inspect, and (3) ensure compliance with municipal ordinances at industrial and commercial facilities that are critical sources of pollutants in storm water runoff.

1. Inventory of Critical Sources

- (a) Describe how the critical sources are inventoried. (whether via a watershed-based inventory or database or GIS. Provide a sample.
- (b) Each Permittee shall include the following minimum fields of information for each critical sources industrial and commercial facility.
 - (1) Name of facility and owner/ operator.
 - (2) Address of facility.
 - (3) Coverage under the ISWGP or other individual or general NPDES permits or any applicable waiver issued by the Regional or State Board pertaining to runoff discharges.
 - (4) A narrative description including SIC (NAICS) codes that best describe the industrial activities performed and principal products used at each facility and status of exposure to storm water.
- (c) Did each Permittee update its inventory of critical sources annually?

(d) Critical Source Inventory Database

Did you (individually or jointly) update the Database for Critical Sources Inventory?	Yes <input type="checkbox"/>
	No <input type="checkbox"/>
Comments/ Explanation/ Conclusion:	

2. Inspection Program

(a) The Permittee shall verify the following for each inspection:

- (1) The facility has a current Waste Discharge Identification (WDID) number or a current No Exposure Certification for discharging storm water associated with industrial activity?
- (2) A Storm Water Pollution Prevention Plan available on-site?
- (3) The facility is effectively implementing BMPs in compliance with County and municipal ordinances including the source control BMPs outlined in Part 4.D. of this Order
- (4) The facility needs to implement additional treatment control BMPs where the storm water from the MS4 discharges to a CWA §303(d) listed water body?

Provide the reporting data as suggested in the following table.

Category	Initial Number of Facilities at the start of cycle proposed for inspection by categories (after the initial year, the updated number based on the new data)	Number of facilities inspected in the current reporting year	% Completed at the time of this report for present cycle (from the initial value, and from the updated value after first cycle)	Total number since permit adoption
Landfills				
TSDF				
Comments/ Explanation/ Conclusion:				

- Did each Permittee perform an initial inspection at all facilities in the categories listed no later than (two years after the adoption of the Order)?
- All facilities determined as having exposure of industrial activities to storm water are subject to a second compliance inspection. Were all inspections completed?
- Was there a minimum interval of six months between the first and the second compliance inspection per site as required?

BMPs Implementation

Provide the reporting data as suggested in the following table.

Category	Number of facilities inspected by category this reporting year	Number of facilities identified as adequately implementing BMPs as specified in this reporting year	Percent adequately implementing out of total in this reporting year	Number of facilities required to implement or upgrade in this reporting year	Number of facilities inspected by category in this reporting cycle	Number of facilities identified as adequately implementing BMPs as specified in this reporting cycle	Percent adequately implementing out of total in this reporting cycle	Number of facilities required to implement or upgrade in this reporting cycle	Total Number during this permit adequately implementing	Total Number during this permit required to implement or upgrade
Landfills										
etc...										

Comments/ Explanation/ Conclusion:

Enforcement Activities

Provide the reporting data as suggested in the following tables.

Enforcement Actions by categories (e.g. Warning letter, NOV, referral to D.A., etc.)	Number of facilities issued enforcement actions in the current reporting year	Number of facilities issued enforcement actions in the current reporting cycle	Number of facilities (re)inspected due to enforcement actions in current reporting year	Number of facilities (re)inspected due to enforcement actions in current reporting cycle	Number of facilities brought into compliance in the current reporting year	Number of facilities brought into compliance in current reporting cycle	Total number of enforcement actions since permit adoption (by category)
NOVs							
Etc...							

Facilities by category	Number of Warning letters	Number of NOVs	Number of Referrals	Number of Other(Explain)
Landfill				
Etc...				

Comments/ Explanation/ Conclusion:

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Nurseries and nursery centers

- (a) At nurseries subject to the agricultural waiver issued by the Regional Water Board, provide a spreadsheet with the following information:
- How many operators have enrolled under the waiver?
 - What is their identification number?
 - How many nonfilers did you notify to apply under the agricultural waiver?
- (b) Did you submit electronically semiannually to the Regional Water Board a list with the names of facilities notified to apply for the waiver?

Ensuring Compliance of Critical Sources

- (a) On how many sites did you determine that a BMP is infeasible, and require implementation of other BMPs that will achieve the equivalent reduction of pollutants in the storm water discharges?
- (b) For critical sources that discharge to ESAs or that are tributary to CWA § 303(d) impaired water bodies, does the Permittee require operators to implement additional controls to reduce pollutants in storm water runoff that are causing or contributing to exceedences of Water Quality Standards?

Investigation of Complaints Regarding Facilities – Transmitted by the RB Staff

- (a) How many investigations were conducted as a result of USEPA or Regional Water Board staff referrals of violators to the Permittee?
- (b) Was the investigation initiated within one business day of being contacted?
- (c) What were the results of each investigation?

D. Planning and Land Development ProgramLow Impact Development

- (a) Did all new development and redevelopment projects integrate Low Impact Development (LID) principles into project design?
- (b) How many did?
- (c) How many did not?
- (d) If not, Why not?

E. Numeric Hydromodification Mitigation Criteria

1. Hydrologic (Flow/ Volume/ Duration) Control

- (a) Did the Permittees require all new developments and redevelopment projects to implement hydrologic control measures, to prevent accelerated downstream erosion and to protect stream habitat in natural drainage systems?

- (b) How many did?
 - (c) How many did not?
 - (d) Why not?
2. Post Construction Storm Water BMP Program
- (a) For each project, did each Permittee require that during the construction of a single-family hillside home, actions be taken to:
 - (1) Conserve natural areas?
 - (2) Protect slopes and channels?
 - (3) Provide storm drain system stenciling and signage?
 - (4) Divert roof runoff to vegetated areas before discharge unless the diversion would result in slope instability? and
 - (5) Direct surface flow to vegetated areas before discharge unless the diversion would result in slope instability?
 - (b) Did each Permittee require that all development projects equal to 1 acre or greater be subject to conditioning and approval of post-construction BMPs as approved by the Regional Water Board in Board Resolution No. R 00-02?
 - (c) Did each Permittee require that the following development projects be subject to conditioning and approval of post-construction BMPs?
 - (1) Retail gasoline outlets 5,000 square feet or more of surface area; How many sites?
 - (2) Restaurants (SIC 5812) 5,000 square feet or more of surface area; How many sites?
 - (3) Parking lots 5,000 square feet or more of surface area or with 25 or more parking spaces; How many sites?
 - (4) Automotive service facilities (SIC 5013,5014,5541,7532-7534 and 7536-7539) [5,000 square feet or more of surface area]; How many sites? and
 - (5) Redevelopment projects in subject categories that meet Redevelopment thresholds. How many sites?
 - (d) Did each Permittee require that post construction BMPs be subject to conditioning and approval for development projects located in or directly adjacent to or discharging directly to an Environmentally Sensitive Area (ESA), where the development will:
 - (1) Discharge storm water and urban runoff that is likely to impact a sensitive biological species or habitat.
 - (2) Create 2,500 square feet or more of impervious surface area.

3. Numeric Water Quality Design Criteria

Projects disturbing land areas less than 50 acres

- (a) How many did the Permittee require that post-construction Treatment Control BMPs incorporate, at a minimum, a volumetric and/ or hydrologic (flow based) treatment control design standard, as identified below to mitigate (infiltrate, filter or treat) storm water runoff as specified below?
- (b) How many sites were exempted from the requirement?
- (c) Why were they exempted?

Projects disturbing land area of 50 acres or greater

For sites 50 acres or greater how many did the Permittee require that post-construction Treatment Control BMPs be,

- (a) Designed using an appropriate public domain hydrodynamic model (such as Storm Water Management Model (SWMM) 5 or Hydrologic Engineering Center – Hydrologic Simulation Program – Fortran (HEC-HSPF); and incorporate
- (b) Rainfall intensity based on hourly rainfall records;
- (c) An adjustment factor for within hour rainfall variability; and
- (d) Hydraulics of BMP Performance.
- (e) How many projects did this apply to?
- (f) Were there any sites that were exempted from the requirement?
- (g) How many sites were exempted?
- (h) Why were they exempted?

4. Applicability of Numerical Criteria

Did the Permittee require all projects equal to 1 acre or greater and the following additional projects to design and implement post-construction treatment controls to mitigate storm water pollution for the following?:

- (a) Automotive service facilities (SIC 5013, 5014, 5541, 7532-7534 and 7536-7539) [5,000 square feet or more of surface area].
- (b) Retail gasoline outlets [5,000 square feet or more of impervious surface area and with projected Average Daily Traffic (ADT) of 100 or more vehicles].
Subsurface Treatment Control BMPs which may endanger public safety (i.e., create an explosive environment) are considered not appropriate.
- (c) Restaurants (SIC 5812) [5,000 square feet or more of surface area].
- (d) Parking lots 5,000 square feet or more of surface area or with 25 or more parking spaces.
- (e) Projects located in, adjacent to or discharging directly to an ESA that meet threshold conditions identified above in 2(d).

- (f) Redevelopment projects in subject categories that meet Redevelopment thresholds.
 - (g) How many projects did this apply to?
 - (h) Were there any sites that were exempted from the requirement?
 - (i) How many sites were exempted?
 - (j) Why were they exempted?
5. Site Specific Mitigation
- (a) List how many sites did each Permittee require the implementation of a site-specific plan to mitigate post-development storm water for new development and redevelopment not identified in Section XX but which may potentially have adverse impacts on post-development storm water quality, with one or more of the following project characteristics:
 - (1) Vehicle or equipment fueling areas. How many?
 - (2) Vehicle or equipment maintenance areas, including washing
 - (3) and repair. How many?
 - (4) Commercial or industrial waste handling or storage. How many?
 - (5) Outdoor handling or storage of hazardous materials. How many?
 - (6) Outdoor manufacturing areas. How many?
 - (7) Outdoor food handling or processing. How many?
 - (8) Outdoor animal care, confinement, or slaughter. How many?
 - (9) Outdoor horticulture activities. How many?
 - (b) Were there any sites that were exempted from the requirement?
 - (c) How many sites were exempted?
 - (d) Why were they exempted?
6. Redevelopment Projects
- (a) Did the Permittees apply the post construction BMP requirements, or site specific requirements including post-construction storm water mitigation to all projects that undergo significant Redevelopment in their respective categories?
 - (b) How many?
 - (c) Were there any sites that were exempted from the requirement?
 - (d) How many sites were exempted?
 - (e) Why were they exempted?
7. Maintenance Agreement and Transfer
- (a) How many developments subject to post construction BMP requirements and site specific plan requirements actually provided verification of maintenance provisions for Structural and Treatment Control BMPs, including but not limited to legal agreements, covenants, CEQA mitigation requirements, and or conditional use permits?
 - (b) How many of each verification were received?

- (c) The developer's signed statement accepting responsibility for maintenance until the responsibility is legally transferred?
 - (d) A signed statement from the public entity assuming responsibility for Structural or Treatment Control BMP maintenance and that it meets all local agency design standards?
 - (e) Written conditions in the sales or lease agreement, which requires the recipient to assume responsibility for maintenance and conduct a maintenance inspection at least once a year?
 - (f) Written text in project conditions, covenants and restrictions (CCRs) for residential properties assigning maintenance responsibilities to the Home Owners Association for maintenance of the Structural and Treatment Control BMPs?
 - (g) Written conditions in the sales or lease agreement, which requires the recipient to assume responsibility for maintenance and conduct a maintenance inspection at least once a year?
 - (h) Another type of legally enforceable agreement that assigns responsibility for the maintenance of post-construction Structural or Treatment Control BMPs?
8. Development Planning Coordination and Enforcement
- (a) Did you inspect each new development and redevelopment project for post construction controls prior to approving and signing off for occupancy?
 - (b) How many?
 - (c) Were there any sites that were exempted from the requirement?
 - (d) How many sites were exempted?
 - (e) Why were they exempted?
9. Regional Storm Water Mitigation Program
- (a) Have you applied to the Regional Water Board for approval of a regional or sub-regional storm water mitigation program to substitute in part or wholly for on-site post-construction requirements?
10. Inspection and Tracking System for Post Construction Treatment BMPs
- (a) Did you implement the required Geographic Information System (GIS) or other electronic system for tracking projects conditioned for post construction treatment control BMPs?
 - (b) Does include the following information? (Answer each separately)
 - (1) Municipal Project ID?
 - (2) State WDID No.?
 - (3) Project Acreage?
 - (4) BMP Type and Description?
 - (5) BMP Location (GPS coordinates)?
 - (6) Date of Acceptance?
 - (7) Date of O&M Certification?
 - (8) Maintenance Records
 - (9) Inspection Date and Summary?

- (10) Corrective Action?
 - (11) Replacement or Repair Dates?
 - (c) Did you inspect all facilities to verify proper maintenance and operation of Treatment BMPs previously approved?
 - (d) Did you accomplish the following?
 - (e) BMP acceptance inspection to ensure proper installation?
 - (1) Inspection once every two years of high priority post-construction BMPs to ensure treatment effectiveness, hydraulic function, and vector risk minimization?
11. Developer Technical Guidance and Information
- (a) List dates as to when the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures was last updated to include the following:
 - (1) Hydrologic (Peak Flow) Control criteria for volume control described herein and the interim criteria based on hydrograph matching?
 - (2) Expected BMP pollutant removal performance including consistent effluent quality and removal efficiency ranges (International BMP Database, technical reports and the scientific literature?
 - (3) Improved Correlation of BMPs with storm water POC?
 - (4) Data on Observed Local Effectiveness and performance of implemented BMPs?
 - (5) BMP Maintenance and Cost considerations?
 - (6) Criteria to facilitate integrated water resources planning and management in the selection of BMPs, including water conservation, groundwater recharge, public recreation, multipurpose parks, open space preservation, and redevelopment retrofits?
12. Project Review and Inter Department Coordination
- (a) Did you ensure that a detailed BMP review was performed including BMP sizing calculations, BMP pollutant removal appropriateness, for each plan submitted with a signed certification?
 - (b) How many?
 - (c) Were there any sites that were exempted from the requirement?
 - (d) How many sites were exempted?
 - (e) Why were they exempted?
 - (f) Did you ensure that a clear structure for communication and delineated authority are established between and among municipal departments which have jurisdiction over project review, plan approval, project construction, and site maintenance?
 - (g) Explain how?

13. California Environmental Quality Act (CEQA) Document Update

Did you incorporate into the CEQA process procedures for considering potential storm water quality impacts and providing for appropriate mitigation when preparing and reviewing CEQA documents? (Answer each below separately.)

- (a) Potential impact of project construction on storm water runoff?
- (b) Potential impact of project post-construction activity on Storm Water runoff?
- (c) Potential for discharge of storm water from areas from material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas?
- (d) Potential for discharge of storm water to impair the beneficial uses of the receiving waters or areas that provide water quality benefit?
- (e) Potential for the discharge of storm water to cause significant harm on the biological integrity of the waterways and water bodies?
- (f) Potential for significant changes in the flow velocity or volume of Storm Water runoff that can cause environmental harm?
- (g) Potential for significant increases in erosion of the project site or surrounding areas?

15. General Plan Update

- (a) Was your General Plan amended, revised or updated to include watershed and storm water quality and quantity management considerations and policies when any of the following General Plan elements are updated or amended?

(Answer each separately)

- (1) Land Use?
 - (2) Housing?
 - (3) Conservation?
 - (4) Open Space?
- (b) Did you provide the Regional Water Board with the draft amendment or revision when a listed General Plan element or the General Plan was noticed for comment in accordance with Cal. Govt. Code § 65350 *et seq*?
 - (c) When?

E. Development Construction Program

1. Did you implement a program to control runoff from construction activity at all construction sites within your jurisdiction to ensure that the following requirements are effectively implemented? (Answer each separately)
 - (a) For construction projects within or adjacent to an environmentally sensitive area (ESAs), did you prohibit grading between October 1 and April 15?
 - (b) For construction projects, which include grading on slopes greater than 5:1, that no grading shall occur between October 1 and April 15?

- (c) All construction projects, which directly discharge into a sedimentation/ siltation impaired water body and is listed on the CWA §303 (d) list. No grading shall be occurring between October 1 and April 15?
 - (d) If grading operations were not completed before the rainy season began, was grading halted and erosion control measures put in place to minimize erosion until grading resumes after April 15?
2. Did you require construction site operators to seek separate coverage from the Regional Water Board wherever ground water dewatering may be necessary, is anticipated, or likely?
- (a) Small Construction Sites
 - (1) For each construction site did you require and inspect to ensure that at each construction site, the minimum set of BMPs were implemented to minimize erosion and sediment loss, and prevent pollution from construction waste?
3. For each construction site 1 acre and greater:
- (a) Did you review and approve a Local Storm Water Pollution Prevention Plan (Local SWPPP), for approval prior to issuance of a grading permit for construction projects?
 - (b) Did you inspect all construction sites for storm water quality requirements during routine inspections a minimum of once during the wet season?
 - (c) Was the Local SWPPP reviewed for compliance with local codes, ordinances, and permits?
 - (d) For inspected sites that have not adequately implemented their Local SWPPP, a follow-up inspection to ensure compliance shall take place within 2 weeks?
 - (e) If compliance had not been attained, did the Permittee take additional actions to achieve compliance (as specified in municipal codes)?
 - (f) How many?
 - (g) For small construction sites one acre and greater (or part of a larger plan of development or sale), did you require, prior to issuing any grading permit, demolition permit, building permit, or construction permit [or any other municipal authorization to move soil and/ or construct or destruct that involves soil disturbance], for all projects requiring coverage under the state general permit, proof of a Waste Discharger Identification (WDID) Number for filing a Notice of Intent (NOI) for coverage under the CASGP and a certification that a SWPPP has been prepared by the project developer?
 - (h) Does your agency accept a Local SWPPP as a substitute for the State SWPPP?
 - (i) Is the Local SWPPP at least as inclusive in controls and BMPs as the State SWPPP?
 - (j) Do you require proof of an NOI and a copy of the SWPPP at any time a transfer of ownership takes place for the entire development or portions of the common plan of development where construction activities are still on-going?
 - (k) What system do you use to track grading permits issued by your agency?

4. Linear Construction
 - (a) Do you require for any linear construction project or projects (cumulatively) that will cause one acre or more of soil disturbance but not more than 5 acres that coverage be obtained under the Small Linear Underground/ Overhead Construction Projects General Permit?
 - (b) Do you require proof of a Waste Discharger Identification Number (WDID) for filing a Notice of Intent (NOI) for coverage under the and a certification that a SWPPP has been prepared by the project developer, prior to issuing a grading permit, demolition permit building permit, or construction permit (or other authorization to move soil and/ or construct or destruct that involves soil disturbance)?

5. CASGP Violation Referrals
 - (a) Did you make any referral of violations of the new development and redevelopment post construction requirements and municipal storm water ordinances to the Regional Water Board?
 - (b) Did you make any referral for suspected violations of the CASGP or Linear Permit coverage requirements

F. Public Agency Activities Program

1. Sewage System Maintenance, Overflow, and Spill Prevention
 - (a) Did you implement a response plan for overflows of the sanitary sewer system within their respective jurisdiction that clearly identifies agencies responsible and telephone numbers and email for any contact?
 - (b) How many overflows did you have?
 - (c) How many did you respond to?
 - (d) Do you own and/ or operate a sanitary sewer system?

 - (e) If so, did you also Identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers to the MS4?
 - (f) Did you implement procedures and maintenance schedules to prevent sewage spills or leaks from sewage facilities from entering the MS4?
 - (g) If you are a Permittee with septic systems in your jurisdiction, how many do you have?
 - (h) Did you implement the following for flows of septic leachate to surface waters within their respective jurisdiction, which shall consist at a minimum of the following:
 - (1) Investigation of any complaints received?
 - (2) Immediately respond to overflows for containment, upon notification?
 - (3) Notification to appropriate agencies and public health agencies when a septic system fails and flows to the MS4?

2. Public Construction Activities Management
 - (a) Did you comply with all the Development Planning Program requirements in at public construction projects?
 - (b) Did you comply with all the Development Construction Program requirements at Permittee owned or operated construction sites?
 - (c) Did you obtain coverage under the CSWGP for all construction activities for (non linear) capital improvement project(s), or contracts, that individually or cumulatively equals or surpass the 1 acre land disturbance threshold?
 - (d) Did you obtain coverage under the Statewide General Permit for Storm water Discharges Associated with Construction Activity from Small Linear Underground/ Overhead Projects (Small LUP General Permit) for Small Linear Underground/ Overhead Projects disturbing at least 1 acre, but less than 5 acres (including trenching and staging areas)?

3. Vehicle Maintenance/ Material Storage Facilities/ Corporation Yards Management.
 - (a) Did you implement the required BMPs for each maintenance yard and activity specified in the tables Permittee shall implement the following BMPs at all Permittee owned, leased facilities including but not limited to vehicle/ equipment maintenance facilities, material storage facilities, and corporation yards, and at any area that includes the activities as described in the tables below. Answer each separately.

GENERAL BEST MANAGEMENT PRACTICES B-4	B-4
FLEXIBLE PAVEMENT	B-9
Asphalt Cement Crack and Joint Grinding/ Sealing	B-9
Asphalt Paving	B-10
Structural Pavement Failure (Digouts) Pavement Grinding and Paving	B-11
Emergency Pothole Repairs	B-13
Sealing Operations	B-14
RIGID PAVEMENT	B-15
Portland Cement Crack and Joint Sealing	B-15
Mudjacking and Drilling	B-16
Concrete Slab and Spall Repair	B-17
SLOPE/ DRAINS/ VEGETATION	B-19
Shoulder Grading	B-19
Nonlandscaped Chemical Vegetation Control	B-21
Nonlandscaped Mechanical Vegetation Control/Mowing	B-23
Nonlandscaped Tree and Shrub Pruning, Brush Chipping, Tree and Shrub Removal	B-24
Fence Repair	B-25
Drainage Ditch and Channel Maintenance	B-26
Drain and Culvert Maintenance	B-28
Curb and Sidewalk Repair	B-30
LITTER/DEBRIS/ GRAFFITI	
Sweeping Operations	B-32
Litter and Debris Removal	B-33
Emergency Response and Cleanup Practices	B-34
Graffiti Removal	B-36
LANDSCAPING	B-37
Chemical Vegetation Control	B-37
Manual Vegetation Control	B-39
Landscaped Mechanical Vegetation Control/ Mowing	B-40
Landscaped Tree and Shrub Pruning, Brush Chipping, Tree and Shrub Removal	B-41
Irrigation Line Repairs	B-42
Irrigation (Watering), Potable and Nonpotable	B-43
ENVIRONMENTAL	B-44
Storm Drain Stenciling	B-44
Roadside Slope Inspection	B-45
Roadside Stabilization	B-46
Storm Water Treatment Devices	B-48
Traction Sand Trap Devices	B-49
PUBLIC FACILITIES	B-50
Public Facilities	B-50

Table(General Best Management Practices) continued on next page.

Second draft Ventura County Municipal Separate Storm Sewer System Permit
Attachment H - Reporting Program No. CI 7388

BRIDGES	B-52
Welding and Grinding	B-52
Sandblasting, Wet Blast with Sand Injection and Hydroblasting	B-54
Painting	B-56
Bridge Repairs	B-57
Draw Bridge Maintenance	B-58
OTHER STRUCTURES	B-59
Pump Station Cleaning	B-59
Tube and Tunnel Maintenance and Repair	B-61
Ferryboat Operations	B-62
Tow Truck Operations	B-63
Toll Booth Lane Scrubbing Operations	B-64
ELECTRICAL	B-65
Sawcutting for Loop Installation	B-65
TRAFFIC GUIDANCE	B-67
Thermoplastic Striping and Marking	B-67
Paint Striping and Marking	B-68
Raised/ Recessed Pavement Marker Application and Removal	B-70
Sign Repair and Maintenance	B-71
Median Barrier and Guard Rail Repair	B-73
Emergency Vehicle Energy Attenuator Repair	B-75
SNOW AND ICE CONTROL	B-76
Snow Removal	B-76
Ice Control	B-77
STORM MAINTENANCE	B-78
Minor Slides and Slipouts Cleanup/ Repair	B-78
MANAGEMENT AND SUPPORT	B-80
Building and Grounds Maintenance	B-80
Storage of Hazardous Materials (Working Stock)	B-82
Material Storage Control (Hazardous Waste)	B-84
Outdoor Storage of Raw Materials	B-85
Vehicle and Equipment Fueling	B-86
Vehicle and Equipment Cleaning	B-87
Vehicle and Equipment Maintenance and Repair	B-88
Aboveground and Underground Tank Leak and Spill Control	B-90

- (b) Are all of your existing facilities that are not plumbed to the sanitary sewer with vehicle and equipment washing areas:
- (1) Self-contained? How many?
 - (2) Equipped with a clarifier? How many?
 - (3) Equipped with an alternative pre-treatment device? How many?
 - (4) To be plumbed to the sanitary sewer? How many? When?
 - (A) Are all new facilities, or during redevelopment of existing facilities (including fire stations), all vehicle and equipment wash areas to be plumbed to the sanitary sewer and be equipped with a pre-treatment device in accordance with requirements of the sewer agency? If not state why.

4. Landscape and Recreational Facilities Management

Control Program for Registered Pesticides

- (a) Did you adopt and implement policies, procedures, and/ or ordinances requiring the minimization of pesticide use and the use of integrated pest management (IPM) techniques in your operations and on municipal property?
- (b) What was your previous year's pesticide use? Answer in gallons or pounds for each type used.
- (c) Using estimated projections, what is your expected use this coming fiscal year? Answer in gallons or pounds for each type used.
- (d) Do you have commitments to reduce or phase-out, and ultimately eliminate use of pesticides that cause impairment of surface waters? State for each, by when.
- (e) Describe your Integrated Pesticide Management (IPM) program.
- (f) Attach the program elements.
- (g) Did you comply with the following requirements:?
 - (1) Use a standardized protocol for the routine and non-routine application of pesticides, herbicides (including pre-emergents), and fertilizers?
 - (2) Ensure no application of pesticides or fertilizers immediately before, during, or immediately after a rain event or when water is flowing off the area to be applied?
 - (3) Ensure that no banned or unregistered pesticides are stored or applied?
 - (4) Ensure that all staff applying pesticides are certified by the California Department of Food and Agriculture, or are under the direct supervision of a certified pesticide applicator?
 - (5) Implement procedures to encourage retention and planting of native vegetation and to reduce water, fertilizer, and pesticide needs?
 - (6) Store fertilizers and pesticides indoors or under cover on paved surfaces or use secondary containment?
 - (A) Reduce the use, storage, and handling of hazardous materials to reduce the potential for spills?
 - (B) Regularly inspect storage areas to ensure no environmental harm?

5. Storm Drain Operation and Management

Catch Basin Cleaning

(a) How many catch basins did you designate as one of the following:

Priority A: Catch basins that are designated as consistently generating the highest volumes of trash and/ or debris?

Priority B: Catch basins that are designated as consistently generating moderate volumes of trash and/ or debris?

Priority C: Catch basins that are designated as generating low volumes of trash and/ or debris?

(b) Did you clean all catch basins according to the following schedule?:

Priority A: A minimum of three times during the wet season and once during the dry season every year? How many?

Priority B: A minimum of once during the wet season and once during the dry season every year? How many?

Priority C: A minimum of once per year? How many?

(c) Did you ensure that any catch basin that is at least 25% full of trash and/ or debris was cleaned out? How many?

For each type of catch basin (A, B, or C) state how much trash and debris was collected and state the units (wet tons, dry pounds, etc...)

(1) Did you require for any special event that they arrange for temporary screens to be placed on catch basins or for catch basins in that area to be cleaned out subsequent to the event and prior to any rain event? How many events did this apply to?

(2) How much trash and debris was collected? (wet tons, dry pounds, etc...)

Trash Controls

(a) Did you install trash receptacles at transit stops as required?

(b) How many?

(c) How much trash and debris was collected? (wet tons, dry pounds, etc...)

(d) Did you install trash excluders, or similar devices upon catch basins to prevent the discharge of trash to the storm drain system?

(e) How many?

(f) How much trash and debris was collected? (wet tons, dry pounds, etc...)

Catch Basin Labels

(a) Did you inspect the legibility of the catch basin label by all inlets?

(b) How many?

(c) Were catch basins with illegible stencils shall be recorded and re-stenciled or re-labeled within 180 days of inspection?

- (d) How many were recorded?
- (e) How many were relabeled?

Storm Drain Maintenance

- (a) Did you inspect all Permittee-owned open channels and other drainage structures for debris and identify and prioritize problem areas of illicit discharge for regular inspection?
- (b) Do your maintenance activities assure that appropriate storm water BMPs are being utilized to protect water quality?
- (c) Did you remove trash and debris from open channel storm drains before the storm season?
- (d) Did you minimize the discharge of contaminants during MS4 maintenance and clean outs?
- (e) How?
- (f) Did you properly dispose of material removed?
- (g) How much trash and debris was collected? (wet tons, dry pounds, etc...)
- (h) Have you obtained coverage under the CASGP for Long-term maintenance programs for flood control channels (such as vegetation removal) if one or more acres of soil are disturbed by grading, clearing or excavation activities for an individual project or as part of several projects part of the Permittee's long-term maintenance plan?
- (i) How many projects?
- (j) Which projects?
- (k) Were all municipally owned treatment control BMPs as maintained as necessary to ensure optimal pollutant reduction?
- (l) Was any pooled water shall be discharged to the sanitary sewer system?
- (m) Was any of the pooled water treated to remove pollutants and discharged to the storm drain?
- (n) Was every discharge monitored to ensure compliance?

6. Streets and Roads Maintenance

- (a) Did you conduct street sweeping of curbed streets in commercial areas to control trash and debris at least 2 times per month?
- (b) How much trash and debris was collected? (wet tons, dry pounds, etc...)
- (c) Did you obtain coverage under the CASGP for long-term maintenance programs for roadside maintenance (such as: vegetation removal) if 1 or more acres of soil are disturbed including: grading, clearing or excavation activities that disturb 1 or more acres of land either for an individual project or as part of a long-term maintenance plan?

7. Parking Facilities Management

- (a) Were all Permittee-owned parking lots exposed to storm water cleaned to be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month?
- (b) How much trash and debris was collected? (wet tons, dry pounds, etc...)

8. Public Industrial Activities Management

- (a) Did you obtain separate coverage under the IASGP for any municipal activity subject to it for the discharge of storm water associated with industrial activity?
- (b) For how many facilities?
- (c) Which facilities?

9. Municipal Drinking Water System Discharges

- (a) From your municipal drinking system did you maintain the system by flushing hydrants or other fixtures?
- (b) How many gallons total were discharged in the year?
- (c) If the discharges in an annual period were less than 100,000 gallons for the entire city did you implement a BMP or suite of BMPs to ensure that the chlorine level of the discharge is 0.1mg/L or less?
- (d) Did you sample or take a test every time to ensure dechlorination of the water to 0.1mg/L or less?
- (e) Did you ensure that the BMP or suite of BMPs were implemented so that no erosion is caused by the discharge of the potable water?
- (f) What BMPs were implemented?

10. Emergency Procedures

- (a) Were there any emergencies that caused the Permittee to invoke this section? Explain the situation.

11. Municipal Employee (and municipal contractor) Training

- (a) Did you train all of your employees in targeted positions regarding the requirements of the overall storm water management program?
- (b) Did you promote a clear understanding of the potential for activities to pollute storm water?
- (c) Did they learn to identify opportunities to require, implement, and maintain appropriate BMPs in their work?
- (d) Did they learn the appropriate ways of identification, investigation, termination, cleanup, and reporting of illicit connections and discharges?
- (e) Will they ensure that the requirements of this Order are met?

- (f) For those employees or contractors who use or have the potential to use pesticides (whether or not they normally apply pesticides as part of their work), which includes pesticides available over the counter, did you address the potential for pesticide-related surface water toxicity?
 - (g) Proper use, handling, and disposal of pesticides?
 - (h) Least toxic methods of pest prevention and control?
 - (i) Encourage the use of IPM?
 - (j) Require the quantifiable reduction of pesticide use?
- (k) Training - All Permittees shall train all targeted employees who are responsible for on an annual basis. In public agency?

G. Illicit Connections/ Illegal Discharge Program

1. IC/ ID Program
 - (a) Did you implement an IC/ ID Program?
 - (b) The IC/ ID Program must be documented and available for review.
 - (c) Did you map all permitted connections to the storm drain system?
 - (d) Did you map all illicit connections and discharges on baseline maps?
 - (e) Did you transmit this information to the Principal Permittee?
 - (f) Did you use this mapping information to identify priority areas for further investigation?
 - (g) Did you eliminate all known illicit connections and illicit discharges?
2. Public Reporting
 - (a) Did you establish and maintain a phone hotline to receive illicit discharge/ connection complaints?
 - (b) Did you establish and maintain an internet homepage to receive illicit discharge/connection complaints?
 - (c) For all complaints received, did you document the location of the illicit discharge/ connection?
 - (d) Have you documented the actions undertaken in response to all illicit discharge/ connection complaints?
3. Illicit Connections
 - Screening for Illicit Connections
 - (a) Did you conduct field screening of your storm drain system for illicit connections?
 - (b) For those portions of the storm drain system consisting of storm drain pipes 36 inches in diameter of greater, how many miles did you field screen this year?
 - (c) Out of how many miles total?
 - (d) Did you conduct field screening for high priority areas identified during the mapping of illicit connections and discharges?

- (e) How many miles were completed this year?
- (f) Out of how many miles total?
- (g) How much of the storm drain system that is 50 years or older in age did you field screen?
- (h) Out of how many miles total?
- (i) Did you submit to the Principal Permittee a GIS layer showing the location and length of underground pipes greater than 18" in diameter and channels within their jurisdiction?
- (j) Did you also include the status of suspected, confirmed, and terminated illicit connections?
- (k) Did you maintain a list containing all connections under investigation for possible illicit connection and their status?
- (l) Did you attach that list to this Annual Report?

Response to Illicit Connections

- (a) Did you complete an investigation within 21 days of notice of a suspected illicit connection?
- (b) Did you determine the Source of each connection?
- (c) Did you determine the nature and volume of discharge through the connection?
- (d) Did you identify the responsible party of the connection?
- (e) How many suspected illicit connections were there this year?
- (f) Upon confirmation of the illicit nature of a storm drain connection did you terminate the connection within 180 days of completion of the investigation?
- (g) Did you document all illicit connection discoveries and your response to each?

4. Illicit Discharges

(a) Abatement and Cleanup

- (1) Did you respond and cleanup within 1 business day of discovery or of receiving a report of a suspected illicit discharge?
- (2) Did you keep records of all illicit discharge discoveries, reports of suspected illicit discharges and their response to the illicit discharges and suspected illicit discharges?
- (3) How many did you receive?
- (4) How many did you respond to?

(b) Investigation

- (1) Did you investigate illicit discharges during or immediately following containment and cleanup activities, and take enforcement action as appropriate?