

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

JUL 22 2013

Via Certified Mail:

No. 7000 0520 0021 6108 5566

Return Receipt Requested

Mr. Brian Yanez, Interim Director  
Public Works Department  
City of Santa Paula  
113 N. Mills Street  
Santa Paula, CA 93060

Re: City of Santa Paula Municipal Separate Storm Sewer System (MS4) Compliance  
Audit Report

Dear Mr. Yanez:

Enclosed please find the final audit report for the City of Santa Paula Storm Water Management Program (Program). On July 25, 2012, EPA Region 9 (EPA) and representatives from PG Environmental, LLC, an EPA contractor, and the Los Angeles Regional Water Quality Control Board (Regional Board) conducted an audit of the City's Program. The purpose of the audit was to assess the City's compliance with the requirements contained within the NPDES Storm Water Permit and Waste Discharge Requirements for the Municipal Separate Storm Sewer Systems within Ventura County (NPDES Permit No. CAS004002).

EPA's audit focused on evaluation of the City's compliance with the illicit connection and illicit discharge (IC/ID) elimination and waste load allocation (WLA) requirements of the Permit. EPA's evaluation of the City's compliance with the applicable WLAs focused on the *TMDL for Nitrogen Compounds in the Santa Clara River (Reach 3)*. In addition, EPA's evaluation included a review of the *Ventura County Stormwater Quality Management Program 2010/2011 Water Quality Monitoring Report* and includes findings specific to the City's compliance with applicable receiving water limitations. Because evaluation findings indicate that the City may not be implementing a comprehensive program to ensure compliance with the Nitrogen TMDL, EPA may expand its evaluation to include additional audit activities to ensure program enhancements adequately address all applicable discharge requirements.

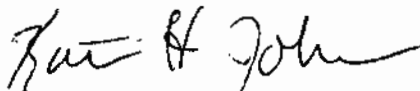
EPA found potential permit violations. Most significantly, the City failed to:

- Conduct field screening of its storm drain system to identify illicit connections as required by Part 4.H.I.3(a)(2) of the Permit;
- Maintain records of illicit connection investigations as required by Part 4.H.I.3(b) of the Permit;

- Develop procedures for the documentation of all reports of suspected IC/IDs or map all confirmed IC/IDs to identify priority areas for further investigation as required by Part 4.H.I.4 of the Permit;
- Submit, either independently or in conjunction with other stakeholders, an annual progress report with respect to the achievement of applicable WLAs as required by Part 5.VI.3(c)(1) of the Permit; and
- Submit a report to the Regional Board describing the additional BMPs that will be implemented to prevent or reduce the discharge of E. coli, fecal coliform, and aluminum in its stormwater discharges found to be causing or contributing to persistent exceedances of applicable Water Quality Standards as required by Part 2.3(a) of the Permit.

Please respond to the audit report with any updates on program enhancements or clarifying comments by Friday, September 13, 2013. Following receipt of the City's response, EPA will post the audit report along with the City's response on our website. Thereafter, EPA will follow-up with City management to ensure adequate resolution of all potential permit violations. If you have concerns or questions, please call me at (415) 972-3873, or refer staff to Greg Gholson at (415) 947-4209 or via email at [gholson.greg@epa.gov](mailto:gholson.greg@epa.gov).

Sincerely,



Kathleen H. Johnson, Director  
Enforcement Division

Enclosure:

City of Santa Paula MS4 Audit Report (w/attachments)

Cc via email with enclosure:

Renee Purdy, LA RWQCB



---

U.S. Environmental Protection Agency  
Region 9  
Enforcement Division  
75 Hawthorne Street  
San Francisco, CA 94105-3901

**MUNICIPAL SEPARATE STORM  
SEWER SYSTEM (MS4)  
COMPLIANCE INSPECTION**

**CITY OF SANTA PAULA,  
CALIFORNIA**

**INSPECTION REPORT**

**Inspection Date:**

**July 25, 2012**

**Draft Report Date:**

**July 18, 2013**

## CONTENTS

	Page
<b>SECTION 1.0 EXECUTIVE SUMMARY.....</b>	<b>1</b>
<b>SECTION 2.0 CITY OF SANTA PAULA STORMWATER PROGRAM.....</b>	<b>1</b>
2.1 PROGRAM AREAS EVALUATED .....	2
<b>SECTION 3.0 EVALUATION FINDINGS .....</b>	<b>3</b>
3.1 ILLICIT CONNECTIONS AND ILLICIT DISCHARGES ELIMINATION PROGRAM.....	3
3.2 TMDL IMPLEMENTATION .....	5
3.3 RECEIVING WATER LIMITATIONS - SANTA CLARA RIVER MASS EMISSION STATION WQS EXCEEDANCES .....	7
 <b>APPENDIX A:       ADDITIONAL INSPECTION REPORT MATERIALS</b>	
<b>APPENDIX B:       CATALOG OF REFERENCE MATERIALS</b>	



## **Section 1.0 Executive Summary**

The U.S. Environmental Protection Agency (EPA) conducted an inspection on July 25, 2012, of the City of Santa Paula, California (hereinafter, City), Municipal Separate Storm Sewer System (MS4) Program.

EPA reviewed documents, met and interviewed staff to gather information on overall program management, and conducted field activities to review the City's MS4 Program. The inspection focused on the three following program elements: (1) Illicit Connection and Illicit Discharge (IC/ID) Elimination Program, (2) portion of the City's TMDL Implementation Program, and (3) Receiving Water Limitations. At the conclusion of the inspection, EPA discussed preliminary observations with City representatives.

In this report, where applicable, the EPA has identified recommendations for program improvement and potential permit violations. Although this report includes potential permit violations, it is not a formal finding of violation. Most significantly, the City failed to:

- Conduct field screening of its storm drain system to identify illicit connections as required by Part 4.H.I.3(a)(2) of the Permit;
- Maintain records of illicit connection investigations as required by Part 4.H.I.3(b) of the Permit;
- Develop procedures for the documentation of all reports of suspected IC/IDs or map all confirmed IC/IDs to identify priority areas for further investigation as required by Part 4.H.I.4 of the Permit;
- Submit, either independently or in conjunction with other stakeholders, an annual progress report with respect to the achievement of the WLAs as required by Part 5.VI.3(c)(1) of the Permit; and
- Submit a report to the Regional Board describing the additional BMPs that will be implemented to prevent or reduce the discharge of E. coli, fecal coliform, and aluminum in its stormwater discharges found to be causing or contributing to persistent exceedances of applicable Water Quality Standards (WQS) as required by Part 2.3(a) of the Permit.

## **Section 2.0 City of Santa Paula Stormwater Program**

On July 25, 2012, representatives from the U.S. Environmental Protection Agency (EPA), the Los Angeles Regional Water Quality Control Board (Regional Board) and an EPA contractor, PG Environmental, LLC (hereinafter, collectively, the EPA Inspection Team) conducted an evaluation of the City of Santa Paula, California's (hereinafter, City), Municipal Separate Storm Sewer System (MS4) Program. EPA also evaluated the

Ventura County Watershed Protection District (VCWPD) and the Cities of Thousand Oaks, Oxnard, and Simi Valley MS4 Programs on June 27, June 28, July 24 and July 26, 2012, respectively.

Discharges from the City's MS4 and eleven other municipalities (hereinafter, Copermittees) are regulated under *Waste Discharge Requirements for Storm Water (Wet Weather) and Non-Storm Water (Dry Weather) Discharges from Small Municipal Separate Storm Sewer Systems Within the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein*, National Pollutant Discharge Elimination System (NPDES) Permit No. CAS004002, Order No. R4-2010-0108, (hereinafter, Permit), issued July 8, 2010. NPDES Permit No. CAS063339 was first adopted by the RWQCB in 1994 and re-issued in 2000 and 2010. The Permit is the third NPDES MS4 permit issued to the Copermittees. The permittees currently covered under the Permit include the Ventura County Watershed Protection District (Principal Copermittee), County of Ventura, and the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura (Ventura), Santa Paula, Simi Valley and Thousand Oaks.

The Permit authorizes the twelve Copermittees, including the City, to discharge stormwater from the MS4s into the Watershed Management Areas of Ventura River, Santa Clara River, Calleguas Creek, Malibu Creek, and miscellaneous Ventura Coastal drainages within Ventura County and Los Angeles County.

#### City Information

According to the City's website, the City has a population of 29,321 people. The City is 4.6 square miles in area and has an average annual rainfall of 18.7 inches. The City is located in the geographical center of Ventura County's Santa Clara River Valley which is dominated by agriculture. The City's primary receiving water is the Santa Clara River.

## **2.1 Program Areas Evaluated**

The inspection included an evaluation of the City's compliance with three of the stormwater management programs included in the Permit:

- Illicit Connection and Illicit Discharge (IC/ID) Elimination Program
- Total Maximum Daily Load (TMDL) Implementation for Nitrogen Compounds in the Santa Clara River (Reach 3)
- Receiving Water Limitations

In addition, EPA's evaluation included a review of the *Ventura County Stormwater Quality Management Program 2010/2011 Water Quality Monitoring Report* and includes findings specific to the City's compliance with applicable receiving water limitations. EPA did not, however, evaluate all components of the City's MS4 Program and this inspection report should not be considered a comprehensive evaluation of all individual program components.



## **Section 3.0 Evaluation Findings**

This section is organized to generally follow the structure of the Permit. For each section in the report, where applicable, EPA has identified potential permit violations. Potential permit violations are areas where the City is not fulfilling requirements of the Permit and/or the SWMP. Although this report may include potential permit violations, it is not a formal finding of violation.

The inspection findings are supported by interviews, observations and photographic evidence gathered during the inspection, as well as documentation that may have been obtained before, during or after the inspection. This inspection report does not attempt to comprehensively describe all aspects of the City's MS4 Program, fully document all lines of questioning conducted during personnel interviews, or document all in-field verification activities conducted during site visits.

Additional inspection report materials, including an inspection schedule, sign-in sheet, list of site visits conducted during the inspection, and site visit reports with photograph logs, are included in Appendix A.

Multiple documents were referenced by the EPA Inspection Team during the inspection process and development of this inspection report (e.g., the Permit, MS4 annual reports). A list of these reference materials is included as Appendix B. The documents identified in Appendix B have not been included in the submittal of this inspection report. Copies of the materials are maintained by U.S. EPA Region 9 and can be made available upon request.

### **3.1 Illicit Connections and Illicit Discharges Elimination Program**

Part 4.H of the Permit requires the City to implement a program to eliminate illicit connections and illicit discharges to the storm drain system. The City must document its IC/ID procedures, make them available for public review, and develop a map to identify priority areas for further investigation. In addition, the City must track all IC/IDs, establish and maintain a phone hotline and internet site to receive reports of IC/ID complaints, conduct field screening of its storm drain system for illicit connections, and investigate, abate, and document all reported illicit discharges.

Specifically, Part 4.H.I.1(a) of the Permit requires the City to document its IC/ID procedures and make them available for public review. The City's IC/ID program is implemented primarily by the City's Public Works Director and Senior Engineering Technician who explained that the City's most significant illicit discharge challenge was the frequent occurrence of sanitary sewer overflows (SSOs). The City Senior Engineering Technician explained that SSO prevention and response were main focuses of the Public Works Department. The EPA Inspection team asked the City for a copy of its IC/ID program. The City Senior Engineering Technician stated that the City did not have documented IC/ID procedures. However, the City's stormwater Ordinance, found in Chapter 54 of the City's municipal code provides an outline of the City's IC/ID program



(see Appendix B, B.8). The city ordinance describes illicit discharges and connections, the City's inspection program, and a system of escalating enforcement when non-compliance is observed.

#### *Recommendation for Program Improvement*

It was apparent through discussions with City staff that they did not fully understand the scope of their responsibilities and authorities. EPA recommends that the City more fully utilize the resources and expertise within the Ventura County Watershed Protection District (WPD) to facilitate the development of a robust IC/ID program including procedures for illicit discharge identification and elimination. Through discussions with other Copermitees, the EPA Inspection Team learned that routine countywide stormwater committee meetings provide excellent opportunities for technical program support and information sharing. Permit committee meeting participation could be an effective use of staff time for a program with limited resources.

#### **3.1.1 Storm Drain System Mapping**

Part 4.H.I.3(a)(1)(A) of the Permit requires the City to develop a map showing the location and length of underground pipes 18 inches and greater in diameter and channels within their permitted area and operated by the permittee. The Permit further specifies that the City must use this map to conduct screening to identify priority areas for further investigation and elimination of IC/IDs.

The City Senior Engineering Technician presented the EPA Inspection Team with the City's storm drain system map and stated that the entire storm drain system had been mapped in 1993 including all channels and pipes 18 inches in diameter or greater (see Appendix B, B.16). The City Senior Engineering Technician also explained that the City's storm drain master map was updated as needed by a consultant. As a component of the inspection, the EPA Inspection Team conducted site visits to several of the City's MS4 outfalls including its designated monitoring outfall. Observations associated with these site visits are included in Appendix A.

#### **3.1.2 Illicit Connections**

Part 4.H.I.3(a)(2) of the Permit requires the City to conduct field screening of its storm drain system for illicit connections. Specifically, the City was required to conduct field screening of all portions of the system with pipes greater than 36", older than 50 years, or areas identified as "high priority" no later than May 7, 2012. Parts 4.H.I.3(a)(3) and 4H.I.3(b) of the Permit require the City to maintain records of all connections under investigation for possible illicit connections.

#### *Potential Permit Violations*

*The City had not conducted field screening of its storm drain system to identify illicit connections. [Part 4.H.I.3(a)(2)]*

The City Senior Engineering Technician stated that the City had not conducted any field screening of its storm drain system.

*The City did not maintain records of connection investigation. [Parts 4.H.1.3(a)(3) and 4.H.1.3(b)]*

The City Senior Engineering Technician stated that the City did not have a specific mechanism in place to record and report illicit connections.

### **3.1.3 Illicit Discharges**

Part 4.H.1.4 of the Permit requires the City to: respond to reports of illicit/illegal discharges with actions to abate, contain and/or clean-up all illegal discharges; investigate all illicit/illegal discharges during or immediately following containment and/or clean-up activities and take appropriate enforcement action to eliminate the illegal discharge; and maintain records of all illicit/illegal discharges, its response and the formal enforcement action taken to eliminate the discharge.

The City Senior Engineering Technician explained that ten SSO-related illicit discharges had occurred in the City in the past year and that very few illicit discharges had occurred in the City over the last few years that were not directly attributable to SSOs. The City compiled and submitted documents following the EPA's inspection that identified four SSOs during calendar year 2011, two SSOs during the first half of calendar year 2012, and no records of non-SSO illicit discharges during the past three calendar years (see Appendix B, B.17). In addition, City staff provided files related to three non-SSO illicit discharges from prior years (i.e. 2004-2007) (see Appendix B, B.2, B.10, and B.11). Based on a review of these documents, EPA determined that two of the instances discussed in these records did not constitute illicit discharges but rather documented the City's enforcement response to non-discharge related violations of the statewide NPDES Storm Water Construction General Permit (CAS00002). Further, the EPA Inspection Team conducted a screening inspection to look for illicit discharges at an industrial park while en route to a City MS4 outfall. While observing the industrial park, the City Senior Engineering Technician stated that the City did not have the staff to implement an I/C Facilities Program and that City had not been conducting inspections of industrial and commercial areas.

#### *Potential Permit Violation*

*The City had not developed procedures for the documentation of all reports of suspected IC/IDs or mapped all confirmed IC/IDs to identify priority areas for further investigation. [Part 4.H.1.4 ]*

City staff explained that the City was in the process of finalizing a request for proposals (RFP) to provide industrial pretreatment services. EPA recommends that the City use the RFP to also solicit IC/ID services through the same contractor that provides industrial pretreatment services. In addition to having the acquired contractor perform IC/ID compliance activities, the City should consider cross-training its industrial pretreatment



inspectors on IC/ID identification as a means of incorporating IC/ID investigations into routine industrial pretreatment inspections.

### 3.2 TMDL Implementation

Part 5.I of the Permit incorporates provisions to ensure that Ventura County MS4 Copermittees comply with wasteload allocations (WLAs) and other requirements of TMDLs for impaired waters impacted by the Copermittees' discharges. Part 5.IV of the Permit lists the TMDLs that are covered in the Permit. TMDLs listed in the Permit for reaches of the Santa Clara River to which the City discharges are (1) TMDL for Nitrogen Compounds in the Santa Clara River (Reach 3), and (2) TMDL for Chloride in the Santa Clara River (Reach 3).

The EPA Inspection Team assessed the City's compliance with the WLAs, compliance monitoring, and actions and special studies specified within Part 5.VI.3 of the Permit for the TMDL for Nitrogen Compounds in the Santa Clara River. Specifically, Part 5.VI.3 of the Permit requires the City to:

- Implement BMPs to achieve the following WLAs applicable to River Reach 3: Ammonia nitrogen 30-day average 2.0 mg/L; Ammonia nitrogen 1-hour average 4.2 mg/L; and Nitrate + Nitrite nitrogen 30-day average 8.1 mg/L;
- Monitor its compliance with the WLAs through receiving water monitoring conducted in accordance with the Santa Clara River Nitrogen TMDL Monitoring Program approved by the Executive Officer; and
- Submit an annual report, independently or in conjunction with other Copermittees, detailing progress toward achievement of the WLAs.

Following the inspection, EPA conferred with staff from the Los Angeles RWQCB who explained that the VCWPD submitted a Comprehensive Water Quality Monitoring Plan for the Santa Clara River Watershed (Final CMP) in March, 2006. The Final CMP included an assessment of existing receiving water monitoring locations against current and future TMDL requirements. Based on this assessment, among other factors, the Los Angeles RWQCB approved use of data collected by the VCWPD at the Santa Clara River mass emission station (Site No. 03N21W32SW1, Santa Clara River at Freeman Diversion) by the City of Santa Paula to determine compliance with the TMDL for Nitrogen Compounds in the Santa Clara River. However, City staff stated that they had not reviewed the results from the Watershed Protection District's mass emissions monitoring to determine if the applicable WLAs were being exceeded.

#### *Potential Permit Violations*

*The City failed to submit, either independently or in conjunction with other stakeholders, an annual progress report with respect to the achievement of the WLAs. [Part 5.VI.3(c)(1)]*

Based on interviews with City staff and a thorough review of the *2010/2011 Ventura Countywide Storm Water Quality Management Program – Monitoring Program Annual Report* EPA determined that no report specific to the City's progress toward compliance with the TMDL for Nitrogen Compounds in the Santa Clara River was submitted to the Regional Water Board for consideration.

### **3.3 Receiving Water Limitations - Santa Clara River Mass Emission Station WQS Exceedances (2010/2011 Monitoring Season)**

Pursuant to the receiving water limitations specified within Part 2 of the Permit, discharges from the MS4 that cause or contribute to a violation of a water quality standard (WQS) are prohibited. If an exceedance of a WQS persists, notwithstanding implementation of the Permit, the Copermittee is required to submit a report to the Regional Board describing BMPs currently implemented as well as additional BMPs that will be implemented to prevent or reduce the discharge of pollutants causing or contributing to the exceedance of a WQS.

Under the approach described by the Watershed Protection District in section 9.4.1 of the 2010/2011 Annual Report (p. 9-8), if a WQS is exceeded at a mass emission station, the upstream major outfall sample is evaluated to determine if the same pollutant is present at levels in excess of the applicable WQS. If so, the Copermittee discharging through the major outfall is considered to be responsible for causing or contributing to the exceedance of a WQS. If two or more WQS exceedances are detected for the same constituent within the same monitoring season, then the elevated level is determined to be persistent.

Based on a review of the *Ventura County Stormwater Quality Management Program 2010/2011 Water Quality Monitoring Report* dated December 2011, the EPA Inspection Team learned that exceedances of the E. coli, fecal coliform and aluminum water quality standards (WQS) were detected at the Santa Clara River mass emissions station (ME-SCR) during multiple 2010/2011 wet weather sampling events. Elevated levels of these same pollutants were detected at the Santa Paula major outfall monitoring station (MO-SPA) during all 2010/2011 wet weather monitoring events and therefore, the WQS exceedances are considered "likely caused or contributed to" by the City's MS4 discharge. These exceedances are considered "persistent" because elevated levels in receiving waters and urban runoff were detected during multiple wet weather sampling events within the same monitoring period. Therefore, the City of Santa Paula was required to submit a report to the Regional Board that describes existing BMPs and new BMPs that will be implemented to prevent or reduce the discharge of E. coli, fecal coliform, and aluminum in accordance with Parts 2.3(a) of the Permit. The submittal of this report is the first step in an iterative process described in Parts 2.3(a)-(d) of the Permit whereby the Regional Board Executive Officer has an opportunity to require modifications to the City's proposed additional BMPs. Permittees are to submit any required modifications to the report for the Executive Officer's approval, and implement the approved modified BMPs along with any required monitoring according to an approved schedule. After the additional BMPs are implemented, if there are still



exceedances of Receiving Water Limitations, a report with another set of additional BMPs to be implemented is submitted for the Executive Officer's approval and another iteration of the process is implemented. When the required reports of additional BMPs are not submitted in the first place, there isn't implementation of the iterative process laid out in Parts 2.3(a)-(d) of the Permit to address exceedances of Receiving Water Limitations.

*Potential Permit Violation*

*The City failed to submit a report to the RWQCB Executive Officer describing the additional BMPs that will be implemented to prevent or reduce the discharge of E. coli, fecal coliform, and aluminum in its stormwater discharges to address exceedances of receiving water limitations. [Part 2.3(a)]*

The Annual Report, submitted by the VCWPD with input from the City of Santa Paula, included a description of the BMPs currently being implemented to address these pollutants but excluded any discussion of additional BMPs that will be implemented to prevent or reduce the concentration of pollutants identified as causing or contributing to exceedances of applicable WQSs.

## Appendix A – Additional Inspection Report Materials

	Page
A.1 – INSPECTION SCHEDULE.....	2
A.2 – INSPECTION SIGN-IN SHEET .....	3
A.3 – LIST OF SITE VISITS CONDUCTED DURING THE INSPECTION .....	4
A.4 – CITY MONITORING OUTFALL SITE VISIT REPORT AND PHOTOGRAPH LOG .....	5
A.5 – CITY MS4 OUTFALL SITE VISIT REPORT AND PHOTOGRAPH LOG .....	8
A.6 – CITY MS4 OUTFALL TO VCWPD MS4 SITE VISIT REPORT AND PHOTOGRAPH LOG .....	10

**A.1 – Inspection Schedule**

Agenda for MS4 Program Inspection City of Santa Paula, California July 25, 2012		
Day	Time	Program/Agenda Item
<b>Wednesday,                      July 25,                      2012</b>	8:00 am - 8:30 am	Kick-off Meeting/Program Management Overview (Office)
	8:30 am - 9:30 am	Illicit Discharge/Illicit Connection (IC/ID) (Office)
	9:30 am - 10:30 am	
	10:30 am - 11:30 am	TMDL Implementation (Office))
	11:30 am - 12:30 pm	
	12:30 pm - 1:30 pm	Lunch Break
	1:30 pm - 3:30 pm	IC/ID and TMDL Implementation (Field)
	3:30 pm - 4:00 pm	
	4:00 pm - 4:30 pm	Internal Discussion <sup>1</sup>
4:30 pm - 5:00 pm	Closing Conference <sup>2</sup> (Tentative Time Slot)	

<sup>1</sup> Internal Discussion – Time for inspectors to arrange notes and prepare information to be discussed with the Municipality at the Closing Conference. City participation is not expected.

<sup>2</sup> The City is encouraged to invite representatives from all applicable organizational divisions/departments.

US EPA ARCHIVE DOCUMENT

**A.2 – Inspection Sign-in Sheet**

INSPECTION SIGN-IN SHEET		
ENTITY:	City of Santa Paula	DATE(S): July 25, 2012
NAME	ORGANIZATION/DEPT	TITLE
Brad Milner	Milner-Villa Consulting	Consultant
Raul E. Gaitan	rgaitan@scity.org	Senior Engineering Technician
ARNE ANSELM	VENTURA COUNTY WATERSHED PROTECTION DIST. ARNE.ANSELM@VENTURA.OCA	WATER QUALITY MANAGER
Armando Stuenkel	USEPA Region 9 NPDES PERMITS OFFICE	Environmental Scientist
Candice Owen	EPA Contractor	Inspector

US EPA ARCHIVE DOCUMENT



### **A.3 – List of Site Visits Conducted during the Inspection**

The EPA Inspection Team visited the following sites during the inspection:

- Outfall from Detention Basin near Dove Court
- City Monitoring Outfall
- City MS4 Outfall
- City MS4 Outfall to Ventura County Watershed Protection District (VCWPD) MS4

The EPA Inspection Team generated site visit write-ups for the following sites, which are included as Appendices A.4 – A.7:

- City Monitoring Outfall
- City MS4 Outfall
- City MS4 Outfall to VCWPD MS4

## **A.4 – City Monitoring Outfall Site Visit Report and Photograph Log**

**Site Name:** City Monitoring Outfall

**Site Location:** Southeast of the Santa Paula Airport

**Date of Visit:** July 25, 2012

**Entry Time:** 1500 hrs (approx)

**Exit Time:** 1515 hrs (approx)

**Site Owner and/or Operator:** City of Santa Paula

**Site Contact:** Not applicable

**Conducted by:** Candice Owen (PG Environmental, LLC) and Robyn Stuber (U.S. EPA Region 9)

**Accompanied by:** Raul Gaitan (Senior Engineering Technician) and Brad Miller (City Consultant)

**Site Visit Report Prepared by:** Candice Owen (PG Environmental, LLC)

### **Site Summary**

The City Monitoring Outfall consisted of a roughly 36-inch diameter culvert (Photograph 1). The City Engineering Technician stated that stormwater flowed through the natural area to the south of the outfall and then flowed to the Santa Clara River. The City Engineering Technician and City Consultant stated that the Ventura County Watershed Protection District conducted all monitoring activities for the City

### **Site Observations**

- A homeless encampment was located in the area just below the outfall and articles of trash were observed in the City Monitoring Outfall (Photographs 1 and 2).
- The Ventura County Watershed Protection District monitoring box was located directly uphill north of the City Monitoring Outfall (Photograph 3).



**Photograph 1.** City Monitoring Outfall – View of the 36-inch diameter culvert outfall. Note the sampling probe which had been installed at the outfall and trash within the outfall.



**Photograph 2.** City Monitoring Outfall – View of trash associated with the homeless encampment located directly below the City Monitoring Outfall to the south.



**Photograph 3. City Monitoring Outfall – View of VCWPD monitoring box located north of the City Monitoring Outfall.**



## **A.5 – City MS4 Outfall Site Visit Report and Photograph Log**

**Site Name:** City MS4 Outfall

**Site Location:** East of Ojai Road

**Date of Visit:** July 25, 2012

**Entry Time:** 1550 hrs (approx)

**Exit Time:** 1610 hrs (approx)

**Site Owner and/or Operator:** City of Santa Paula

**Site Contact:** Not applicable

**Conducted by:** Candice Owen (PG Environmental, LLC) and Robyn Stuber (U.S. EPA Region 9)

**Accompanied by:** Raul Gaitan (Senior Engineering Technician) and Brad Miller (City Consultant)

**Site Visit Report Prepared by:** Candice Owen (PG Environmental, LLC)

### **Site Summary**

The outfall from the City's MS4 consisted of a 54-inch corrugated metal pipe (Photograph 1). The outfall discharged runoff from an area of the City that had a varied land use including small horse farming activities. The City Engineering Technician stated that an additional 34-inch corrugated metal pipe outfall was also present near this location; however, it was not viewed during this site visit.

### **Site Observations**

- The 54-inch corrugated metal pipe outfall was dry at the time of the site visit and the outfall pipe was clean of debris and sediment (Photograph 2).



**Photograph 1. City MS4 Outfall East of Ojai Road – View of the 54-inch CMP outfall.**



**Photograph 2. City MS4 Outfall East of Ojai Road – Closer view of the outfall shown in Photograph 1. The outfall was dry and the outfall pipe was clean of debris and sediment at the time of the site visit.**

## **A.6 – City MS4 Outfall to VCWPD MS4 Site Visit Report and Photograph Log**

**Site Name:** City MS4 Outfall to VCWPD MS4

**Site Location:** Near the Intersection of North Santa Maria Street and South Steckel Drive

**Date of Visit:** July 25, 2012

**Entry Time:** 1610 hrs (approx)

**Exit Time:** 1615 hrs (approx)

**Site Owner and/or Operator:** City of Santa Paula

**Site Contact:** Not applicable

**Conducted by:** Candice Owen (PG Environmental, LLC) and Robyn Stuber (U.S. EPA Region 9)

**Accompanied by:** Raul Gaitan (Senior Engineering Technician) and Brad Miller (City Consultant)

**Site Visit Report Prepared by:** Candice Owen (PG Environmental, LLC)

### **Site Summary**

This outfall consisted of two large concrete box culverts (Photograph 1). Discharges from the City MS4 Outfall flowed through a trapezoidal concrete channel and eventually to the Santa Clara River.

### **Site Observations**

- A small quantity of water was flowing from the outlet into the concrete VCWPD channel (Photograph 2).





**Photograph 1.** City MS4 Outfall to VCWPD MS4 – View of the two large concrete box culverts through which discharges from the City MS4 would enter a channel owned and operated by the VCWPD.



**Photograph 2.** City MS4 Outfall to VCWPD MS4 – View of VCWPD channel looking south from the box culverts shown in Photograph 1. Note that water was flowing in the channel at the time of the site visit.





## **Appendix B – Catalog of Reference Materials**

The materials listed in this appendix are relevant to the evaluation but have not been included in the submittal of this inspection report. Copies of materials noted below are maintained in U.S. EPA Region 9 records and can be made available upon request.

- B.1 – Ventura Countywide Stormwater Quality Management Program Annual Report (2010–2011 Permit Year)
- B.2 – Memorandum from the Regulatory Compliance Specialist to Public Works Director/City Engineer regarding ongoing sewage release from a RV dump/disposal point. Dated December 6, 2004.
- B.3 – Completed Public Works Pollution Complaint form dated 12/30/2003
- B.4 – Work Order Authorization to clean up an SSO dated 3/6/2012
- B.5 – Completed Collection System Event Callout Sheet dated 3/6/2012
- B.6 – Completed Proposition 65 Report Form dated 3/29/2012
- B.7 – Completed Proposition 65 Report Form dated 6/20/2012
- B.8 – Chapter 54: Stormwater Quality Management of the City of Santa Paula Municipal Code
- B.9 – City of Santa Paula Request For Proposals for Wastewater Collection Systems Operations
- B.10 – Letters from Public Works Director/City Engineer to Ms. Tiffany Sukay in regards to the illicit discharge of mud and sediment dated February 5, 2007 and April 20, 2007.
- B.11 – Notice of Correction from Public Works Regulatory Compliance Specialist to Stuart Gildred in regards to a violation of City ordinance. Dated August 11, 2004.
- B.12 – Chapter 14: Administrative Citations of the City of Santa Paula Municipal Code
- B.13 – Attachment A to Resolution No. 03-011 Amendment to the Water Quality Control Plan – Los Angeles Region to Incorporate the Santa Clara River Nitrogen Compounds TMDL
- B.14 – U.S. EPA Region IX TMDL for Chloride in the Santa Clara River, Reach 3
- B.15 – Attachment A to Resolution No. R10-006 Amendment to the Water Quality Control Plan – Los Angeles Region to Incorporate the TMDL for Indicator Bacteria in the Santa Clara River Estuary
- B.16 – City of Santa Paula Storm Drain Master Map dated January 5, 1993
- B.17 – List of illicit discharges (SSO and non-SSO) from email dated July 30, 2012
- B.18 – Memorandum of Agreement to provide equal cost sharing for Santa Clara River Bacteria TMDL monitoring and reporting activities.

