

US EPA ARCHIVE DOCUMENT

Via Certified Mail:  
No. 7007 0710 0003 6240 3404  
Return Receipt Requested

David Ellison  
Acting City Manager  
City of Scottsdale  
3939 N. Drinkwater Boulevard  
Scottsdale, AZ 85251

Re: Transmittal of the City of Scottsdale Municipal Separate Storm Sewer System (MS4) Compliance Audit Report

Dear Mr. Ellison:

Enclosed is the final audit report for the City of Scottsdale's Storm Water Management Program (SWMP). During the week of June 8, 2009, PG Environmental, LLC, an EPA contractor, and staff from ADEQ conducted an audit of the City's SWMP to evaluate compliance with the Arizona NPDES Permit for Discharges of Storm Water Runoff from the Scottsdale MS4, No. AZS000020 (Permit). The audit revealed significant deficiencies in the City's implementation of pollution control measures.

The NPDES Permit establishes minimum requirements for a storm water pollution control and management program. The audit reviewed implementation of the City's SWMP in light of the requirements established in the Permit. The audit included document reviews, interviews with City program managers, and field verification inspections. As detailed in the audit report, the City's implementation of pollution control measures has been significantly deficient in the southern portion of its MS4 boundary and non-existent in the northern portion of its MS4 boundary. The City has:

- failed to implement an inspection program to control pollutants from industrial and non-industrial facilities;
- failed to effectively implement a field screening program for illicit discharge detection and elimination;
- failed to conduct effective inspections of private construction sites; and
- failed to properly report complete analytical storm water monitoring results.

EPA will follow up separately with the City on the deficiencies noted above and in the audit report. The final audit report will be posted on EPA's website at <http://www.epa.gov/region09/water/npdes/ms4audits.html>.

In the meantime, your staff may wish to review the case studies that EPA has developed for each of the minimum control measures to help MS4's improve their storm water management programs at <http://cfpub1.epa.gov/npdes/stormwater/casestudies.cfm>.

If you have any questions, please contact Rick Sakow of my staff at (415) 972-3495 or via email at [sakow.rick@epa.gov](mailto:sakow.rick@epa.gov). For legal questions, please contact Jessica Kao, Assistant Regional Counsel, at (415) 972-3922 or by email at [kao.jessica@epa.gov](mailto:kao.jessica@epa.gov).

Sincerely yours,

Alexis Strauss, Director  
Water Division

Enclosure:

City of Scottsdale Municipal Separate Storm Sewer System (MS4) Compliance Audit Report

cc (with enclosure):

Ashley Couch, City of Scottsdale Stormwater Management Director

Bill Erickson, City of Scottsdale Stormwater NPDES Coordinator

Cynthia Campbell, ADEQ

Chris Henninger, ADEQ