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Robert Erlich
Storm Water Coordinator
City of South Lake Tahoe
1052 Tata Lane
South Lake Tahoe, CA 96150

Bob Costa
Public Works Manager
Placer County Department of Public Works
3091 County Center Drive, Suite 220
Auburn, CA 95603

Steve Kooyman
Supervising Civil Engineer
El Dorado County Department of Transportation
924B Emerald Bay Road
South Lake Tahoe, CA 96150

Re: City of South Lake Tahoe, El Dorado County and Placer County Municipal
Separate Storm Sewer System (MS4) Compliance Audit Report

Dear Messrs. Erlich, Kooyman and Costa:

Enclosed is the final audit report for the City of South Lake Tahoe, El Dorado County and Placer County's (collectively Permittees) Storm Water Management Programs (SWMPs). During the week of July 13, 2009, PG Environmental, LLC, an EPA contractor, conducted an audit of the Permittees' SWMPs to evaluate compliance with the California NPDES Permit for Discharges of Storm Water and Urban Runoff from the Permittees' MS4s, Lahontan Regional Board Order Number R6T-2005-0026 (Permit).

The Permit establishes minimum requirements for SWMPs to address the water quality impacts from storm water and non-storm water discharges. The audit included document reviews, interviews with City and County program managers, and field verification inspections. The audit identified the following significant deficiencies by the Permittees in the implementation of core requirements of the Permit and respective SWMPs:

- failure by the City of South Lake Tahoe to develop and annually update industrial and commercial site inventories based on potential threats to water quality;

- failure by the City of South Lake Tahoe and El Dorado County to develop and implement a program to inspect high priority commercial sites;
- failure by the City of South Lake Tahoe and El Dorado County to develop and implement storm water pollution prevention standard operating procedures and practices for municipally-owned or operated equipment yards and maintenance shops;
- failure by El Dorado County to establish adequate legal authority to control pollutant discharges into its MS4;
- failure by the City of South Lake Tahoe to educate municipal personnel on non-storm water disposal alternatives and illicit discharge detection and elimination observations and follow-up reporting; and
- failure by the City of South Lake Tahoe and El Dorado County to develop and implement a program to actively seek and eliminate illicit discharges and connections to their MS4s.

EPA will follow up separately with the Lahontan Regional Water Quality Control Board and the Tahoe Regional Planning Agency 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 MS4s improve their storm water management programs at <http://cfpub1.epa.gov/npdes/stormwater/casestudies.cfm>.

If you have any questions, please contact Greg Gholson of my staff at (415) 947-4209 or via email at gholson.greg@epa.gov. For legal questions, please contact Jessica Kao, Assistant Regional Counsel, at (415) 972-3922 or by email at kao.jessica@epa.gov.

Sincerely,

Alexis Strauss, Director
Water Division

Enclosure:

City of South Lake Tahoe, El Dorado County and Placer County MS4 Compliance Audit Report

cc (w/encl):

Harold Singer, Executive Officer, Lahontan RWQCB

Lauri Kemper, Supervising Water Resources Control Engineer, Lahontan RWQCB

Joanne Marchetta, Executive Director, TRPA