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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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Via Certified Mail:  
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Return Receipt Requested

SEP 23 2013

Michael Peterson, Director  
Sacramento County Department of Water Resources  
827 7<sup>th</sup> Street; Room 301  
Sacramento, CA 95814

Re: County of Sacramento Municipal Separate Storm Sewer System (MS4) Compliance  
Audit Report

Dear Mr. Peterson:

Enclosed please find the final audit report for the County of Sacramento Storm Water Management Program (Program). On August 15 and 16, 2012, EPA Region 9 (EPA) and representatives the Central Valley Regional Water Quality Control Board (Regional Board) conducted an audit of the County's Program. The purpose of the audit was to assess the County's compliance with the requirements contained within the NPDES Storm Water Permit and Waste Discharge Requirements for the Municipal Separate Storm Sewer Systems within Sacramento County (NPDES Permit No. CAS082597).

EPA's audit focused on evaluation of the County's compliance with the program management, industrial and commercial, municipal operations, and illicit discharge elimination requirements of the Permit. During the audit, EPA reviewed documents, interviewed program managers and field staff, and performed site visits.

EPA found the following positive elements of the County's current program. Specifically the County:

- provides funding for the Business Environmental Resource Center (BERC); and
- demonstrates leadership in local and statewide efforts to reduce pesticide pollution in stormwater.


EPA also found program deficiencies and potential permit violations. Most significantly, the County did not:

- update and keep current the Municipal Stormwater Pollution Prevention Plan for the Roseville Yard;
- provide a thorough effectiveness assessment for specific Municipal Operations program elements; and
- complete the process outlined in the permit for past Reports of Water Quality Exceedances.

Please respond to the audit report with any updates on program enhancements or clarifying comments by Friday, November 1, 2013. Following receipt of the County's response, EPA will post the audit report along with the County's response on our website. Thereafter, EPA will follow-up with County

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 Luis Garcia-Bakarich at (415) 972-3237 or via email at [garcia-bakarich.luis@epa.gov](mailto:garcia-bakarich.luis@epa.gov).

Sincerely,



Kathleen H. Johnson, Director  
Enforcement Division

**Enclosures:**

County of Sacramento MS4 Audit Report (w/attachments)

**Cc via email with enclosure:**

Elizabeth Lee, Central Valley RWQCB  
Dana Booth, County of Sacramento  
Sherill Huun, City of Sacramento  
Britton Snipes, City of Rancho Cordova  
Sarah Staley, City of Folsom  
Bill Forrest, City of Galt  
Darren Wilson, City of Elk Grove  
Chris Fallbeck, City of Citrus Heights



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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**

**SACRAMENTO COUNTY,  
CALIFORNIA**

**INSPECTION REPORT**

**Inspection Date:  
August 15-16, 2012**

**Report Date:  
September 23, 2013**



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## Section 1.0 Executive Summary

On August 15-16, 2012, the U.S. Environmental Protection Agency (EPA) audited the Sacramento County, California (hereinafter, County), 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 County's MS4 Program. The audit focused on the County's: Program Management; Industrial/Commercial Program; Municipal Program; Illicit Discharge Program; Water Quality Based Programs; Program Effectiveness Assessment; and Monitoring Program. At the conclusion of the audit, EPA discussed preliminary observations with County representatives.

In this report EPA identifies positive elements of the County's stormwater program, program recommendations, program deficiencies, and a potential permit violation. Although this report identifies a potential violation, it is not a formal finding of violation.

EPA found the following positive elements of the County's current program. Specifically, the County:

- developed and continues to support the Business Environmental Resource Center which provides local businesses environmental compliance resources including information to educate business owners in stormwater protection; and
- demonstrated leadership in the local and statewide efforts to reduce pesticides pollution in stormwater.

EPA also found program deficiencies and potential permit violations. Specifically, the County did not:

- update and keep current the Municipal Stormwater Pollution Prevention Plans for the Roseville Yard;
- provide a thorough effectiveness assessment for their Municipal Operations Program that compares current activity against a baseline level; and
- complete the process outlined in the permit for past Reports of Water Quality Exceedance.

## Section 2.0 Sacramento County's Stormwater Program

On August 15-16, 2012, representatives from the U.S. Environmental Protection Agency (EPA), and the Central Valley Regional Water Quality Control Board (RWQCB), (hereinafter, collectively, the EPA Inspection Team) conducted an evaluation of the County's, MS4 Program. A similar audit was conducted August 7-8, 2012, of the City of Elk Grove's stormwater program.

Stormwater discharges from the County's MS4 and the MS4s of six other entities (hereinafter, Permittees) are regulated under *Waste Discharge Requirements, Cities of Citrus Heights, Elk Grove, Folsom, Galt, Rancho Cordova, Sacramento, and County of Sacramento, Storm Water Discharges from Municipal Separate Storm Sewer System, Sacramento County, National Pollutant Discharge Elimination System (NPDES) Permit No. CAS082597, Order No. R5-2008-0142, (hereinafter, Permit).* The Permit was adopted in September 2008. The Permit was originally issued in 1990 and this is the Permittees' fourth permit term.

Provision D.2 of the Permit required the Permittees to develop a Stormwater Quality Improvement Plan (hereinafter, SQIP) which includes program elements to prevent or reduce the discharge of pollutants in stormwater to the maximum extent practicable. The SQIP is also required be submitted for public review and comment, and Regional Board approval. The SQIP is required to contain the following components: Program Management, Program Effectiveness Assessment, as well as specific Program Elements. The SQIP was finalized in November 2009 and approved by the Regional Board in January 2010. Provision D.3.c of the Permit requires the Permittees to implement the SQIP consistent with the schedule specified in the Permit and specifies that the SQIP is an enforceable part of the Permit.

The Permittees have formed a collaborative group called the Sacramento Stormwater Quality Partnership (hereinafter, Partnership), which consists of representatives from the seven Permittees subject to the Sacramento area-wide stormwater Permit. Each Permittee contributes funding to the Partnership, and Sacramento County and/or the City of Sacramento take the lead on implementing various regional stormwater program activities. The Permittees established a Memorandum of Understanding (MOU) on April 22, 2003, as required by provision D.3.e.i of the Permit, which defines the Permit requirements to be addressed via the Partnership and how the Permittees will share in their individual responsibilities to meet permit requirements. As explained in the Executive Summary of the SQIP, the SQIP describes two types of activities, those conducted collectively by all of the Permittees (i.e., Partnership or regional activities) and those conducted individually by each Permittee (i.e., Permittee-specific or individual activities). Among other things, the Permittees have agreed to share resources through the Partnership to develop a common Monitoring Program and a Commercial/Industrial Program, both of which are considered "Partnership Activities."

In 2002, EPA performed a similar MS4 audit of Sacramento County as well as the Cities of Folsom, Galt, and Sacramento, focusing on, among others, the following program elements: Program Management, Monitoring, Construction, Illicit Discharge, and Commercial/Industrial. The 2002 Audit noted deficiencies with dry weather screening for illicit discharges as well as the inspection and enforcement of commercial and industrial facilities among all Permittees evaluated, including the County. The 2002 Audit also noted deficiencies specific to the County

such as an inadequate employee training program, a lack of storm sewer maintenance prioritization, and management of municipal yards, specifically highlighting non-stormwater discharges and a facility pollution prevention plan for an auxiliary yard that had not been updated to reflect current conditions and potential pollutant sources.

### County Information

The County has the largest portion of the land base and population of the seven Permittees. Unincorporated Sacramento County has a population of 539,156 and an area of 232 square miles. According to the SQIP, land use in the County is approximately: 33 percent residential, 4 percent commercial, 10 percent industrial, 10 percent parks and open space, 20 percent agricultural, and 24 percent other (institutional, roads/freeways, etc). According to documents supplied by the County, the County's MS4 consists of over 380 major outfalls (discharge pipes 36" or greater), 350 miles of open channels, 1,000 miles of underground pipes, 45,000 storm drain inlets and 28 stormwater pump stations. See Appendix B: 2010-2011 Annual Report and Sacramento County MS4 Program Information. The County's stormwater runoff ultimately discharges to the Sacramento, American, and Cosumnes Rivers.

### **2.1 Audit Organization**

Portions of the following program components/elements were evaluated during the audit:

- Program Management;
- Industrial/Commercial Program;
- Municipal Program;
- Illicit Discharge Program;
- Water Quality Based Programs;
- Program Effectiveness Assessment; and
- Monitoring Program.

The EPA did not evaluate all components of the County's MS4 Program and this inspection report should not be considered a comprehensive evaluation of all MS4 Program elements.

### **3.0 Audit Findings**

This section is organized to generally follow the structure of the Permit. Within each sub-section, where applicable, EPA has identified noteworthy aspects of the County's stormwater program, recommendations for improvement, program deficiencies, and potential permit violations. Potential permit violations are areas where the City is not fulfilling requirements of the Permit. Program deficiencies are areas of concern that may prevent successful program implementation or areas that, unless action is taken, have the potential to result in non-compliance in the future. This report also provides recommendations for improved program implementation. Although this report includes 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 County'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 a 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). In addition, the County provided the EPA Inspection Team with documents during the inspection. A list of these reference materials is included in [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 Program Management**

Sections D.3 thru D.7 of the Permit require that all elements of the SQIP be implemented on schedule and all requirements of the Permit be complied with. The Program Management component of the SQIP includes, but is not limited to, County Programs and Staffing, Legal Authority, Training, and Program Effectiveness Assessment.

##### **3.1.1 County Programs and Staffing**

The Stormwater Quality Section is responsible for implementation and coordination of the Stormwater Quality Program for the County and administers many of the program elements with 9.5 full-time employees. The Stormwater Quality Section is within the Drainage Division of the Water Resources Department of the Municipal Services Agency. The Stormwater Quality Section develops and implements the County's SQIP, Annual Work Plan, Annual Report, and collaborates with the other Permittees and agencies via a Memorandum of Understanding (MOU). During the Audit, the Stormwater Quality Section manager described additional internal collaboration with other County Agencies, Departments and Programs including meetings with the other managers and cross-training by staff. For example, two dedicated stormwater inspectors and a supervisor within the Environmental Management Department (EMD) administer the Commercial and Industrial Stormwater Compliance Program (CISCP) for all Permittees.

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### **3.1.2 Legal Authority**

Section D.4 of the Permit requires Permittees to maintain adequate legal authority to control pollutant discharges from the MS4s. The County has adopted a Stormwater Ordinance (Chapter 15.12 of the County Code – see [Appendix B](#)) to provide authority to manage stormwater and control discharges. The ordinance prohibits (with exceptions) the discharge of non-stormwater to the storm sewer system or to natural surface waters.

In addition to the ordinance, the County has developed an enforcement escalation policy (see [Appendix B](#)). The policy is publicly available and defines the scope of actions to follow when a facility is found to be non-compliant. The actions addressed in the policy include show cause letters, consent orders, stipulation and orders, unilateral orders, referrals, and penalties. The policy provides penalty adjustment factors, including considerations for economic benefit, level of cooperation, compliance history, and considerations for projects or training “in lieu of” penalty actions. Additionally, the policy requires a “re-inspection fee” to be charged if the County needs to re-inspect a site found to be deficient. The County has established a matrix for the number of re-inspections that will be required based on the type of violation found in their initial assessment. The re-inspection fees serve to cover the additional cost the County incurs to conduct re-inspections, as well as serving as an additional incentive for facilities to maintain compliance.

During audit discussions, County staff described how they use the enforcement escalation policy. The County uses the policy in both the Illicit Discharges and Commercial/Industrial Programs and has obtained penalties as well as corrective actions. For example, on March 20, 2009, the County issued a Notice of Violation to California Tile and Granite Corp., after discovering an illegal connection to the MS4 and illicit discharges of waste water during channel maintenance activities. The County required the facility to eliminate the discharges which was achieved by plugging the connection with concrete. This and additional examples of past actions are included in [Appendix B](#).

### **3.1.3 Stormwater Training**

Chapter 3.2 of the SQIP provides an overview of the training requirements conducted by the County and states the County will track and report training accomplishments each year in the annual report. Table 3.2-2 in the SQIP provides a list of targeted employees and states a minimum training frequency. Table 3.5-1 of the SQIP for Municipal Operations states that the County will conduct annual refresher training for targeted employees and track the number of training activities and employees in attendance.

The members of the Stormwater Quality Section stated that they had all taken numerous trainings provided internally or by CASQA. The County also provided examples of cross-training throughout the administration by demonstrating some of the regular trainings for Permittees as well as County Maintenance, Department of Transportation, and Code Enforcement (among others) that provide staff with information about the stormwater program elements such as the Municipal, Commercial/Industrial and Illicit Discharge Detection and Elimination Programs (see [Appendix B](#)). EPA Inspection Team members routinely asked County personnel if they had participated in stormwater awareness trainings, and all responded



affirmatively, in fact two stated that they assisted Stormwater Quality Section staff in delivering the trainings.

### Program Deficiency

MO.10 of the County's 2010/2011 Annual Report states that the County's Department of Transportation and Department of Water Resources received Municipal Operations training; however, Table 3.2-2 in the SQIP states that three other Municipal Operations Departments/Groups from the General Services Department, specifically the Facilities Management Division, Fleet Services Division, and Parking Services Division, in addition to the operators of County-owned facilities should also receive annual stormwater training, which was not discussed in the annual report. The County must ensure that training required by the SQIP is delivered, tracked, and reported in the annual reports.

## **3.2 Commercial/Industrial Program**

Section D.9 of the Permit identifies the objectives and control measures that the County is required to implement through their Stormwater Program to control stormwater discharges from commercial and industrial facilities within the County. Section D.9.b requires the Permittees to address nine priority commercial and industrial sectors, including, among others, auto repair shops, equipment rental companies, restaurants, kennels, and nurseries. Chapter 3.4 of the County's SQIP refers to Chapter 2.7 of the SQIP (Partnership Activities – Regional Commercial/Industrial Program) as part of their strategy to comply with Section D.9 of the Permit. The Partnership has assigned responsibility for the commercial/industrial program to the County's Environmental Management Department (EMD) which also oversees other programs, such as Retail Food Protection and Underground Storage Tanks. As discussed earlier, EPA audited the commercial and industrial programs in 2002 and found deficiencies with the inspection and enforcement elements. In 2004, EMD began implementing the Commercial and Industrial Stormwater Compliance Program (CISCP) for the nine priority sectors County-wide on behalf of all seven Permittees. Under EMD, the CISCP established inspection protocols, a tracking system, a training program for inspectors, a commitment to inspect all facilities every three years, outreach materials for each industrial sector, and an enforcement escalation policy. Chapter 3.4 of the SQIP also states the Stormwater Quality Section implements the Complaint-Based Stormwater Compliance Program (CBSCP) by investigating complaints of businesses. Where a business is covered by the CISCP, the Stormwater Quality Section will refer the facility to EMD for investigation, all others will be investigated and associated progressive enforcement will be conducted by the County's Stormwater staff. In 2008, US EPA presented a national award to the County in recognition for their stormwater management excellence in implementing the Commercial/Industrial Program.

Section 9.a.ii of the Permit requires the Permittees to develop and maintain an inventory of priority industrial and commercial facilities. EMD maintains a database of over 30,000 businesses, of which approximately 4,700 exist within the nine priority sectors as described in the Permit. EMD updates the database with new businesses identified through internet searches, field investigations, and referrals from the CBSCP in response to tips/complaints generated by the public and other County personnel such as maintenance or other EMD inspectors.

Section 9.a.iv of the Permit requires the Permittees to conduct inspections of priority industrial facilities at a frequency that takes into account the threat to water quality posed by the facility. Chapter 2.7.1 of the SQIP states that EMD will conduct inspections of all priority commercial and industrial facilities at least once every three years. The 2010-2011 Annual Report stated that EMD had initiated its third-triennial cycle of priority industry inspections and had completed 1,598 inspections during the 2010-2011 reporting period.

Annual trainings are conducted for EMD inspectors to increase stormwater awareness among the inspectors to help detect and report stormwater concerns and promote public outreach. The 2010-2011 Annual Report states that 37 EMD inspectors received annual stormwater refresher training during the reporting period. During the Audit, EPA observed EMD stormwater inspectors conduct inspections of two facilities, and conduct program outreach to a newly opened auto body facility. More details of the two facility inspections are included in Appendix A (O'Donnell Truck and Engine and Aba Daba Rents).

As described in Chapter 2.7.5 of the SQIP, in addition to the Commercial/Industrial inspection and enforcement program, the County provides outreach materials, at least twice per permit term, to other businesses that are considered temporary or intermittent sources of unauthorized non-stormwater discharges or stormwater pollution, such as carpet cleaners, automotive washing and detailing, and swimming pool contractors. Several examples of the outreach materials were provided by the County and are included in Appendix B.

The County also funds a full-time employee at the Sacramento Business Environmental Resource Center (BERC). The BERC, established in 1993, as a one-stop, non-regulatory permit assistance center to help Sacramento County businesses understand and comply with federal, state, and local environmental regulations including stormwater. BERC is a free and confidential service provided to local businesses that offer evaluations, advice and consulting on how to be in compliance with environmental laws. While not directly a part of the Sacramento County Stormwater program, this resource is available to all businesses operating within the County who wish to receive stormwater compliance advice.

#### Positive Attribute

The County's BERC program and additional direct outreach to businesses that may impact stormwater discharges is an efficient way to help sources comply with stormwater requirements.

### **3.3 Municipal Program**

Section D.10 of the Permit identifies the control measures the County is required to implement to control stormwater discharges from municipally managed features. The County's Municipal Program requires, among other things, internal training, implementation of BMPs for public facilities, and maintenance of the storm drain system.

#### **3.3.1 Municipal Facilities**

Permit Section D.10.a.iii requires the Permittees to implement pollution prevention BMPs for public facilities having the potential to discharge to the storm drain system. The County owns fourteen facilities, eight of which have coverage under the California Industrial General Permit

(IGP). Chapter 3.5 of the SQIP states the County has created and implemented Municipal Stormwater Pollution Prevention Plans (Muni-SWPPPs) for facilities not covered under the IGP, and that these plans will be reviewed and updated during this Permit term (September 2008-September 2013). Table 3.5-1 of the County's SQIP states that the County will conduct two site evaluations of facilities that are managed by Muni-SWPPPs during the permit term. The Muni-SWPPPs detail, among other things, sources of potential pollutants, facility-specific BMPs, and facility layout maps. Municipal facilities covered under the IGP are inspected by EMD under the CISCIP, and the other six facilities are inspected by the County Stormwater Quality Section.

The EPA inspection team visited two municipal facilities covered by the IGP, and details of those site visits can be found in Appendix A: North Area Recovery Station and Bradshaw Road Branch Corporation Yard. Other materials collected during the site visit can be found in Appendix B. At these facilities, the team observed numerous BMPs deployed (temporary and permanent) as well as house-keeping and spill response activities. The team briefly reviewed the SWPPP for the Bradshaw Road facility and observed that the SWPPP was current and being implemented.

The EPA inspection team also visited one municipal facility that was not covered by the IGP and details of that site visit can be found in Appendix A: Roseville Road Auxiliary Yard. Other materials collected during the site visit can be found in Appendix B. The Muni-SWPPP for this yard was dated 2003. It identified potential pollution generating activities, facility-specific BMPs, and included facility maps; however, facility contacts and the site map were outdated. The 2009-2010 Annual Report documents the first effectiveness evaluation conducted on June 16, 2010, for the Roseville Road Auxiliary Yard Muni-SWPPP and recommended the site contacts for this facility be updated.

#### Program Deficiency

Chapter 3.5 of the SQIP states that the County will evaluate and update the Muni-SWPPPs during the Permit-term. The Muni-SWPPP for the Roseville Road Auxiliary Yard had not been updated to reflect evaluation findings in the 2009-2010 Annual Report. The County should ensure it has a process in place to update all Muni-SWPPPs based on the evaluation findings. The County should also ensure that the Muni-SWPPPs are evaluated a second time prior to the end of the Permit term.

#### **3.3.2 Storm Drain System Maintenance**

Permit Section D.10.a.v requires the County to maintain the storm drain system to remove debris accumulation and prevent flooding. Section D.10.b.iv requires the County to implement a Storm Drain System Maintenance Program that prevents or reduces pollutants in runoff to the maximum extent practicable. Sections D.10.a.xi and D.10.b.xi require the County to conduct an effectiveness assessment as part of annual reporting to determine the effectiveness of BMPs and identify any necessary program modifications. Discussion regarding the Storm Drain System Maintenance Program effectiveness assessment is located in Section 3.6 of this report. Chapter 3.5 of the County's SQIP states that the County has prioritized catch basin and sump cleaning based on criteria which include proximity to sensitive receiving waters. The SQIP also requires the County to conduct visual observation of all open creeks and channels annually to check for erosion, vegetation, debris, illicit connections and flow obstructions. The County stated that most

day-lighted portions of the system ditches, creeks, channels, and detention basins are cleaned annually; however, the system of under-ground pipes takes approximately 20 years to fully service.

#### Potential Permit Violation

Chapter 3.5 of the SQIP states the County will visually inspect all creeks and channels on an annual basis. In Table 3.5-7 of the 2009-2010 Annual Report, the County reports 364 miles of open channel (319 miles of unlined channel and 45 miles of concrete-lined channel). Of that, 35 of the 364 miles were inspected (32/3 – unlined/lined) and 78 miles were maintained (59/19 – unlined/lined). In Table 3.5-6 of the 2010-2011 Annual Report, the County reports 357 miles of open channel (317/40 – unlined/lined). Of that, 26 miles were inspected (25/1 – unlined/lined), and 143 miles were maintained (113/30 unlined/lined). Based on information contained in the 2009-2010 and 2010-2011 Annual Reports, the County did not conduct visual observation of all creeks and channels.

### **3.4 Illicit Discharge Detection and Elimination Program (IDDE)**

Section D.11 of the Permit identifies the objectives and control measures the County is required to implement through their Stormwater Program to control illicit discharges and illegal connections to the storm sewer system. The Permit requires the County to proactively detect illicit discharges and illegal connections, investigate, eliminate, and mitigate (where applicable) prohibited discharges, maintain a database for documenting prohibited discharges and have a hotline for public reporting. Chapter 3.6 of the County's SQIP describes their IDDE program including an illicit connection screening program; however the SQIP does not describe how they screen for illicit discharges. The County trains field staff to promote a continuous field presence to identify and report illicit discharges to the storm drain system.

During the Audit, the County presented a study that was conducted between 1993 and 1995 where the County collected samples of dry weather flows and analyzed those samples to determine if it pollution levels were attributable to an illicit connection. (See Appendix B). The County found no evidence of illicit connections from dry weather discharge analytical monitoring, and based on these results the County concluded that continued active analytical monitoring of outfalls was not an efficient use of resources. The County's IDDE Program currently consists of continuous field screening by trained maintenance staff and responding to tips and complaints.

According to Chapter 3.6 of the SQIP, if illicit discharges or connections are found within the County, they are referred to County stormwater staff for investigation. The County has developed an investigation flow chart to evaluate potential illicit discharges. The flow chart details the investigation and response procedures the County will follow when an illicit discharge is detected. The County presented several cases where illicit discharges and illegal connections were detected and eliminated. (See Appendix B).

Permit Section D.11.a.v requires the County to maintain a database to record IDDE information. Chapter 3.6 of the SQIP states that the County will maintain a database to track complaints, referrals, inspections and enforcement actions and that the locations of illicit discharges and connections will be plotted on a map to target areas for outreach or additional investigation.

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During the Audit the County demonstrated their illicit discharge tracking database “Illicit,” which tracks the properties where prohibited discharges occur, but does not consistently track the individual responsible for the illicit discharge or connection.

Permit Section D.11a.ii requires the County to proactively detect illicit discharges and connections through the use of public reporting. According to Chapter 3.6 of the SQIP, the County will maintain two hotlines: the CUBS Nuisance Abatement Hotline and “875-RAIN.” To promote citizen involvement, “875-RAIN” is advertised directly on inlet: “No Dumping, Drains to Creek” placards, giving the public an accessible method to call in observations. Additionally, the County has developed outreach materials County maintenance staff provides to individuals who are responsible for illicit discharges.

During the audit, County and EPA inspectors observed an auto detailing operation discharging wash water and rinsate to the storm drain. The County Stormwater Quality Section inspector informed the facility operator about the Stormwater code and provided him with informational materials about how to minimize discharges from vehicle washing. (See [Appendix A](#)).

#### Program Recommendation

EPA recommends the County include in its Illicit database, the name of the person responsible for the illicit discharges, if known, to track those who may receive multiple “warnings” at different locations to help determine appropriate enforcement response. The EPA also recommends future SQIP revisions include illicit discharges in addition to illicit connections as part of field screening activities.

### **3.5 Water Quality Based Programs**

Section D.27 of the Permit requires the Permittees to implement the Target Pollutant identification and prioritization process described in the SQIP. The Permittees are required to evaluate pollutants that cause or contribute to exceedances of water quality standards and known or probable impairment of beneficial uses. At a minimum, the Permittees are required to develop control programs for pesticides and mercury. Section 2.5 of the SQIP identifies the Target Pollutant Program as a Partnership activity and identifies pesticides, mercury, copper, lead and pathogens as target pollutants.

#### **3.5.1 Pesticide Program**

Section D.27.a of the Permit specifically requires the Permittees to address pesticide impairment of urban streams through promoting Integrated Pest Management (IPM) in municipal operations and to residents, businesses and public agencies through public outreach. The permit further requires Permittees to implement the Regional Water Board-approved Pesticide Plan, implement IPM, conduct public outreach, conduct surveys of retail pesticide sales, address their own use of pesticides, including diazinon and chlorpyrifos, and participate in statewide and national efforts to promote adequate evaluation and regulation of pesticides. Chapter 2.5 of the SQIP describes the strategies the Permittees will use to address pesticides in surface water including promoting IPM within the County, providing outreach to pesticide applicators (commercial and residential), and participating in pesticide regulatory processes.



Through implementation of the Pesticide Plan (approved by RWQCB on April 12, 2006), the County has:

- Researched urban pesticide pathways to better understand how pesticides in urban stormwater link to surface waters.
- Conducted outreach at retail stores to inform consumers of safe pesticide use, and train retail staff on pesticide management.
- Collected baseline data on the County's pesticide use, threshold levels and application frequencies. The County will use this data to identify areas where IPM by County Departments may reduce pesticide use.
- Actively engaged in research and efforts to control pesticides at the state and national level to support better regulations for evaluating aquatic toxicity of pesticides, including the certification and labeling of pesticides.
- Participated in efforts which led to the ban of diazinon and chlorpyrifos, and to the newly established California Department of Pesticide Regulation Surface Water Protection Regulations that will apply to all certified professional applicators for pyrethroids.

While the Permit and the SQIP place these requirements on all Permittees, the County has demonstrated leadership on this issue through its role in the Partnership as well as utilizing County Stormwater staff resources to support studies and programs that have impacts beyond the County's MS4. For example, the County has participated in third party certification such as the Our Water Our World and EcoWise programs.

### **3.6 Program Effectiveness Assessment**

Section D.3.b of the Permit requires the Permittees to include a program effectiveness assessment and recommended modifications for each Program Element in the Annual Reports. and requires each Annual Report to build upon the previous year's efforts. Section D.29 of the Permit details the requirements of both the annual program effectiveness assessment, as well as a long term effectiveness assessment (LTEA). Section D.29.a requires the Permittees to identify the direct and indirect measurements used to track the effectiveness of their programs as well as the outcome levels at which the assessment is occurring in their Annual Reports. Pursuant to Section D.29.c, this information is to be used to improve their SQIPs and identify new BMPs, or modify existing BMPs. Additionally, Section D.30 of the Permit specifically requires Permittees to comply with a Monitoring and Reporting Program (MRP) to determine the effectiveness of the stormwater program. Section I.B.5 of the MRP requires the Permittees to conduct an annual effectiveness assessment for each program element, as defined by the SQIP. Sections I.B.5.a-f requires the Permittees to address specific questions based on the outcome level assigned for each program element to determine effectiveness.

The Permittees assign an outcome level, ranging from 1-6, for each program, element, activity or BMP described in the SQIP. Level 1 involves documentation of the activities performed and is appropriate for program elements which are newly developed or involve compliance with permit reporting requirements. The performance standard for Level 1 outcomes (e.g., the metric used to quantify the progress toward program implementation) may include the number of construction inspections performed, or number of training events conducted. The SQIP further stipulates that outcome levels greater than Level 1 require the establishment of a baseline so changes from



year-to-year can be gauged against the baseline, building upon previous efforts. Ultimately, Level 6 outcomes demonstrate improved water quality over time to a point where WQS exceedances attributable to urban stormwater do not occur.

As described in Chapter 2.3 of the SQIP, the Permittees' effectiveness assessment approach was developed using guidance provided in the *CASQA Municipal Stormwater Program Effectiveness Assessment Guidance* manual (CASQA Guidance Manual) (CASQA, 2007). The SQIP states that the Permittees use their effectiveness assessments as part of a 4-step iterative approach to improve their storm water program: (1) Plan and Develop; (2) Implement; (3) Evaluate and Assess; and (4) Refine and Modify. (See Figure 2.3-1 Stormwater Program Iterative Process, CASQA). Under this approach, a program element is considered effective if it is achieving a desired outcome. (As previously stated, outcome levels are determined by the Permittees; however, effectiveness for each outcome level is determined by assessing the primary questions stated in the MRP.) Pursuant to the SQIP, on an annual basis, each Permittee will report progress toward producing desired outcomes and will include recommendations for modifying or adding activities to improve the program.

EPA reviewed the County's Program Effectiveness Assessments for several program elements including their public education program and municipal operations program. EPA found the County had conducted a thorough effectiveness assessment of what was working and what was not working for the public education element, and provided recommendations in the annual report for how the County should focus its future efforts to establish a more effective public education program. The effectiveness assessment completed for the public outreach program is consistent with the requirements of the permit.

For the Municipal Operations Program, the County has assigned outcome Level 4 for Storm Drain System Maintenance. Level 4 outcomes focus on reducing pollutant loading into the storm drain system and also require an established baseline for comparison of successive years' performance to determine effectiveness. Although the County reports annually the amount of material removed from the storm drain system and other maintenance activities on the system, the County did not analyze the data by comparing current results against a baseline for the effectiveness assessment determine if the Storm Drain System Maintenance Program is appropriate or should be modified. The effectiveness assessment for the Municipal Operations Program also falls short of the goal to continually improve the cost-effectiveness and environmental benefits of the storm drain maintenance program established in Section IV of the manual "Procedures for Manhole and Pump Station Sump Inspection and Cleaning" (Appendix 3C of the SQIP).

#### Program Deficiency

The County's annual effectiveness assessments of the Municipal Maintenance Program, MO.5.1, 5.2, 5.3, and 7.1 (all Level 4 Outcomes) provided in the 2010-2011 Annual Report are not complete. SQIP Chapter 2.3.2 states that Outcome levels beyond 1 require the establishment of a baseline. These assessments report the activities performed, the volumes of pollutants removed from the system, and state that collected wastes are therefore prevented from discharge; however, the County does not discuss whether the Municipal Maintenance Program is effective at reducing the pollutants because the County does not have a baseline to compare reductions

against and there is no determination if modification or improvement of the SQIP or BMPs is necessary.

### ***3.7 Monitoring Program***

Section D.30 of the Permit requires Permittees to comply with a Monitoring and Reporting Program (MRP) to determine the effectiveness of the stormwater program. The MRP outlines numerous tasks for the Permittees to complete and requires annual reporting. Specifically, MRP Part II, Sections B & C require the Permittees to monitor water quality at four river sites, three urban tributary sites, and three urban discharge sites as described in the Permit. Chapter 2.4 of the SQIP further describes the Monitoring and Reporting Program and requires monitoring for three wet weather events and one dry weather event at each site each year, with no monitoring every third year for the three urban discharge monitoring sites (urban discharge monitoring was not conducted in the 2010-2011 monitoring period). The MRP I.B.4 also requires the Permittees to summarize the monitoring data in the annual report and discuss if urban discharges may have caused or contributed to an exceedance of a Water Quality Standard (WQS) or other constituent limit.

#### ***3.7.1 Receiving Water Limitations***

Sections A.2 and C.2 of the Permit prohibit discharges that cause or contribute to an exceedance of a water quality standard (WQS). Section C.1 also prohibits discharges that cause a variety of conditions, including, but not limited to, specific increases in turbidity, exceedance of certain fecal coliform concentrations, and fungi, slimes, or other objectionable growths. Pursuant to Section C.3, if the Permittee causes or contributes to a violation of a WQS or when discharges from the MS4 cause a condition described in C.1, the Permittee is required to submit a Notice of Water Quality Exceedance (NWQE) within 90 days and a Report of Water Quality Exceedance (RWQE) with the annual report.

Section C.3. requires the RWQE to describe:

- BMPs currently being implemented;
- additional BMPs that will be implemented to prevent or reduce pollutants that are causing or contributing to the exceedance of WQSs;
- proposed revisions to the SQIP;
- an implementation schedule with milestones and performance standards for new BMPs, if applicable;
- a monitoring program; and
- the rationale for new or improved BMPs, including a discussion of expected pollutant reductions and how implementation of additional BMPs will prevent future exceedance of WQSs.

Following the submittal of the RWQE containing the aforementioned elements:

- the Regional Board Executive Officer may require modifications to the RWQE;
- within 30 days following approval of the RWQE by the Executive Officer, the Permittees must revise the SQIP and monitoring program to include modified BMPs that have been and will be implemented, an implementation schedule, and any additional monitoring required; and

- after the revised SQIP is approved, the revised SQIP and monitoring program must be implemented in accordance with the approved schedule.

Section C.3 of the Permit states that as long as the Permittees have complied with all the procedures of this section, and are implementing the revised SQIP, they are not required to repeat this procedure for continuing or recurring exceedances of the same WQS. The Permittee's previous permit contained similar language regarding Receiving Water Limitations.

EPA reviewed the 2008/2009, 2009/2010, and 2010/2011 Annual Reports and found the County provides in each Annual Report a summary of NWQEs for each receiving water sample that exceeded a WQS in urban tributaries or rivers. The Partnership also submits an annual RWQE that identifies constituents that exceed WQSs for receiving water where MS4 discharges may cause or contribute to the exceedance. In all Annual Reports reviewed, the Partnership stated that no new constituents were added for the reporting year. The Partnership also indicated that all exceedances of WQS were either continuing or recurring exceedances or could not demonstrate that MS4 discharges cause or contribute to the receiving water exceedance. For the ten constituents listed in table 2.4-11 of the 2010/2011 Annual Report that are continuing exceedances, the Partnership relies on past RWQEs, most of which were submitted in the 2002/2003 through the 2006/2007 reporting periods. According to the 2010/2011 Annual Report, the last time the Partnership added any new constituents to the RWQE list was in 2006/2007, when lead and zinc were added. Although no new constituents have been added since then, the Partnership indicated in the Annual Report that it annually reviews exceedances to determine if there are notable changes in the trends. Furthermore, the Partnership stated the constituents addressed by a RWQE are included in the Target Pollutant Program analysis and prioritized accordingly, as described in the November 2009 SQIP. EPA did not review the Target Pollutant Program during this Audit.

In addition to reviewing the annual reports, EPA reviewed RWQEs submitted with the 2003/2004, 2004/2005 and 2006/2007 annual reports, as required by the previous permit (NPDES No. CAS082597). The Partnership identifies existing BMPs for all constituents, but only describes new BMPs for Pentachlorophenol and Chlorpyrifos (both reported in 2004/2005). For all other constituents listed in past RWQEs, the Partnership does not propose additional BMPs. None of the RWQEs reviewed by EPA propose revisions to the SQIP, implementation schedules with milestones and performance standards for new BMPs, monitoring programs, or the rationale for new or improved BMPs, including a discussion of expected pollutant reduction and how implementation of additional BMPs will prevent future exceedance of WQSs. EPA did not find any examples in which RWQEs were approved by the Regional Board Executive Officer. It is unclear when, if ever, Permittees have responded to exceedances of WQSs by implementing improved BMPs to prevent or reduce the discharge of pollutants contributing to these exceedances in compliance with Section C.3.

Program Deficiency:

Since none of the reviewed RWQEs identify milestones or document monitoring to determine the result of implementation of new or improved BMPs, EPA recommends that when an exceedance of a WQS persists, the Partnership should annually re-evaluate each RWQEs to determine if there are potential water quality benefits in following the process laid out in Section

C.3. This would include assessing whether any established performance standards and original milestones are being met, and if new or improved BMPs can be implemented to address the exceedances.

## **Appendix A – Additional Inspection Report Materials**

### **Reports of Site Inspections / Visits Performed by U.S. EPA**

- A.1 Strong Ranch Slough Water Quality Sampling Location**
- A.2 Roseville Road Auxiliary Yard**
- A.3 North Area Recovery Station**
- A.4 O'Donnell Truck and Engine Repair**
- A.5 Old School Auto Detailing**
- A.6 Aba Daba Rentals**
- A.7 Bradshaw Road Branch Center Corporation Yard**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Clean Water Act Compliance Office  
MS4 Site Visit Report

NPDES Permit # CAS082597  
Permittee: Sacramento County

**Site Location:** Strong Ranch Slough Water Quality Sampling Location  
**Date and Time of Visit:** 8/16/2012 (0855 hours)  
**Site Owner and/or Operator:** Sacramento County Department of Water Resources  
**Site Contact:** Dana Booth  
**Conducted by:** Luis Garcia-Bakarich  
**Accompanied by:** EPA: John Tinger, Peter Kozelka  
RWQCB: Elizabeth Lee, Jennifer Sparks, Sean Cross  
Sacramento Co: Dana Booth, Ken Ballard, Sharon Merker

**Summary Prepared by:** Luis Garcia-Bakarich  
**Report Finalized on:** 1/31/13

**Site Visit Summary**

As part of EPA's evaluation of the Monitoring Program, the inspection team made a short stop to view a location where urban runoff water quality sampling takes place prior to discharging into receiving waters.

**Site Background**

The facility is part of the Partnership's Monitoring Program. The water samples are collected via a conduit that collects water from the thalweg of Strong Ranch Slough. County officials explained that where Strong Ranch Slough discharges to the American River (approximately 0.2 miles downstream), water passes through a trash weir to remove large debris and a settling sump to remove heavier particles that pass through the weir. The site was secured with a chain-link and barbed-wire fence, and the sampling station was secured by a locked enclosure.

**Site Observations**

A steady flow of water was observed without any recent precipitation. The water was generally clear with algae and other aquatic vegetation observed. Minimal debris consisting of terrestrial plant detritus was entrained within the flow.

**Attachments**

Photo log  
Site visit photos (2)





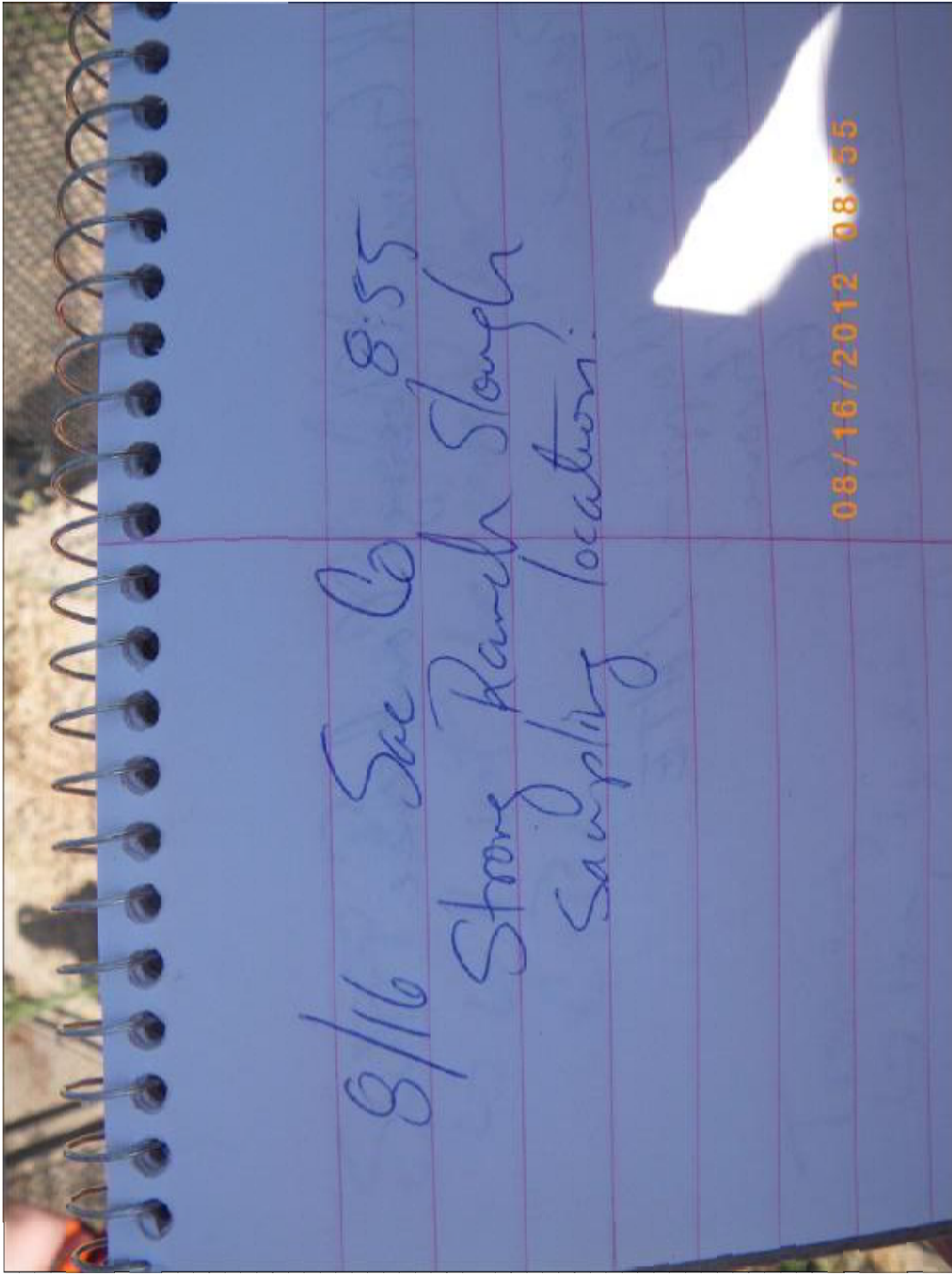
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Attachment 1  
Photo Log**

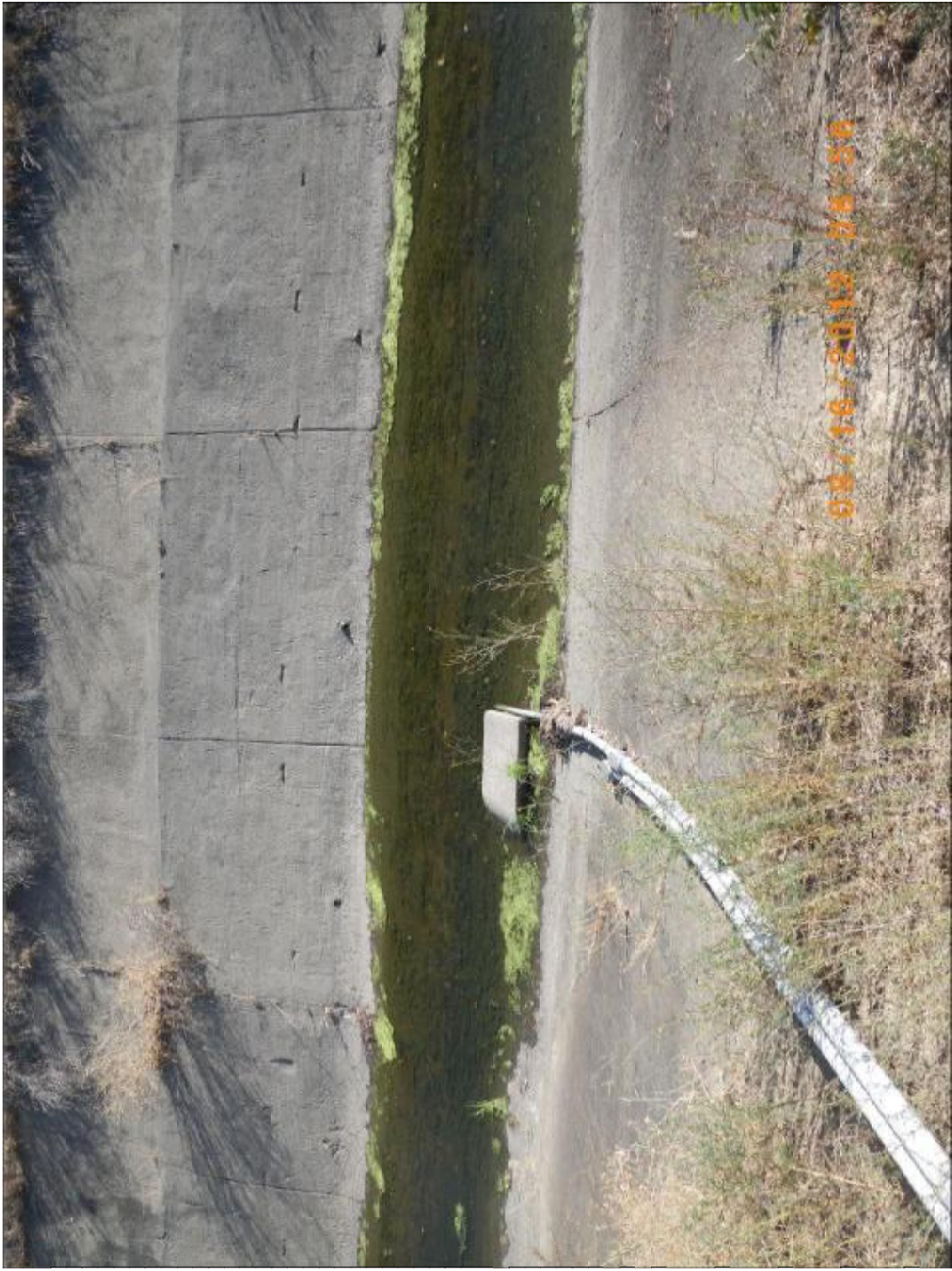
**Site Name:** Strong Ranch Slough Water Quality Sampling Location  
**Date of Inspection:** 8/16/2012  
**Photographer:** Luis Garcia-Bakarich  
**Camera:** Pentax Optio W80  
**Report Prepared by:** Luis Garcia-Bakarich

**IMGP0918:** Title Page

**IMGP0919:** Water quality sampling location within Strong Ranch Slough.



IMG0918



IMGP0919



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REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Clean Water Act Compliance Office  
MS4 Site Visit Report

NPDES Permit # CAS082597  
Permittee: Sacramento County

**Site Location:** Roseville Road Auxiliary Yard  
**Date and Time of Visit:** 8/16/2012 (0855 hours)  
**Site Owner and/or Operator:** Sacramento County Department of Transportation  
**Site Contact:** Jeff Welchman  
**Conducted by:** Luis Garcia-Bakarich  
**Accompanied by:** EPA: John Tinger, Peter Kozelka  
RWQCB: Elizabeth Lee, Jennifer Sparks, Sean Cross  
Sacramento Co: Dana Booth, Ken Ballard, and Sharon Merker

**Summary Prepared by:** Luis Garcia-Bakarich  
**Report Finalized on:** 1/31/13

**Site Visit Summary**

As part of EPA's evaluation of the Municipal Operations Program, the inspection team went to the yard to evaluate how Municipal SWPPPs are implemented.

**Site Background**

The Roseville Road Auxiliary Yard is approximately 1 acre and is used as a staging area to support County road projects. A Muni-SWPPP had been created for the facility. The County had not filed a separate Notice of Intent for coverage by the California industrial general storm water permit. County Department of Water Resources staff periodically inspects the facility and works with Department of Transportation staff to address any potential pollution discharge concerns.

**Site Visit Summary and Observations**

The EPA inspection team toured the facility on foot at observed the various operational areas. The site was observed to be an unpaved, flat surface with no drain inlets on site. BMPs observed consisted of a vegetated strip along one perimeter, and several perimeter straw wattles (IMGP0922). County officials stated that the yard is prepared for the rainy-season by installing or maintaining perimeter controls such as straw wattles or vegetated areas. No evidence of erosion or sediment leaving the site was observed. Minor sediment track-out to the street was observed (IMGP0923). The facility manager responded that the entrance is swept once per week, and the entrance was due for sweeping on the following day. Heavy equipment was staged on the yard with a portable toilet, and a storage container that stores hazardous materials. No maintenance, fueling or other activities are conducted on site. Bulk material stalls were created from "Jersey-rails". Bulk material was also stockpiled throughout the yard. County



officials stated that bulk materials are typically stockpiled until a sufficient volume of material has been accumulated as to constitute a truck-load for transfer to a transfer station or a landfill.

### **SWPPP Review**

- The SWPPP is dated January 1, 2003.
- The SWPPP identifies the receiving water as Magpie Creek.
- The SWPPP identifies several BMPs to minimize pollutant exposure to storm water such as: restrictions on use, limitations of quantities stored, and facility configuration.
- The site was configured such that all activity and material storage occurred within a buffered distance from the perimeter.
- The SWPPP identifies two SacDOT personnel (Craig Heuer and Glen Phillips); however, during the site visit, the audit team met Jeff Welchman who was introduced as the responsible official.
- The SWPPP provides an Inspection Criteria and Checklist specifically developed for the Roseville and Watt Yard.
- The SWPPP states that records of inspection will be maintained and retained by the yard maintenance supervisor; however, this specific position was not identified within the SWPPP.
- The SWPPP provides conflicting site inspection schedules. Section 2.2.1 states that inspections will be performed weekly. Section 3.1.1 states that inspection will be performed each time the yard maintenance crew restocks the yard. Section 3.1.2 states that visual inspections will be conducted by trained personnel a minimum of once per month. Section 3.2.1 describes wet-weather inspections.
- The SWPPP Map reflects conditions that were likely present during plan development in 2003. The SWPPP map is no longer reflective of site configuration. The site map does not depict access points to the yard, it does not indicate where temporary or permanent BMPs should be deployed, and it does not demonstrate surface flow direction or potential discharge points.

### Recommendations:

- Establish a SWPPP revision frequency to keep facility manager/contacts and site maps current.
- Establish a records retention policy, SWPPP statements imply that site inspection records will be kept indefinitely.
- Identify the individual and clarify the scope of authority for the yard maintenance supervisor, since it is unclear if this is a County-wide position or facility-specific.
- Review and consolidate inspection discussion to reduce conflicts.

### **Attachments**

Photo log

Site visit photos (10)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Attachment 1**  
**Photo Log**

**Site Name:** Roseville Road Auxiliary Yard  
**Date of Inspection:** 8/16/2012  
**Photographer:** Luis Garcia-Bakarich  
**Camera:** Pentax Optio W80  
**Report Prepared by:** Luis Garcia-Bakarich

**IMGP0920:** Title Page

**IMGP0921:** Portable toilet and plastic barrels.

**IMGP0922:** Straw wattle perimeter control.

**IMGP0923:** Ingress/egress to yard with some observable trackout.

**IMGP0924:** Hazardous materials storage container.

**IMGP0925:** Material safety data sheets for hazardous materials stored within container.

**IMGP0926:** Side view of stockpiled materials from road project spilling over containment rails.

**IMGP0927:** Back view of stockpiled materials from road project spilling over containment rails. Bulk of the spillage had been cleared by heavy machinery.

**IMGP0928:** Vegetated area between material stockpile clean-out pathway and Roseville Road.

**IMGP0929:** Additional bulk material stockpiles throughout the yard.



8/16 ~~7~~ 9:26

Roseville Rd.  
Aux Yard

08/16/2012 09:27

IMG0920

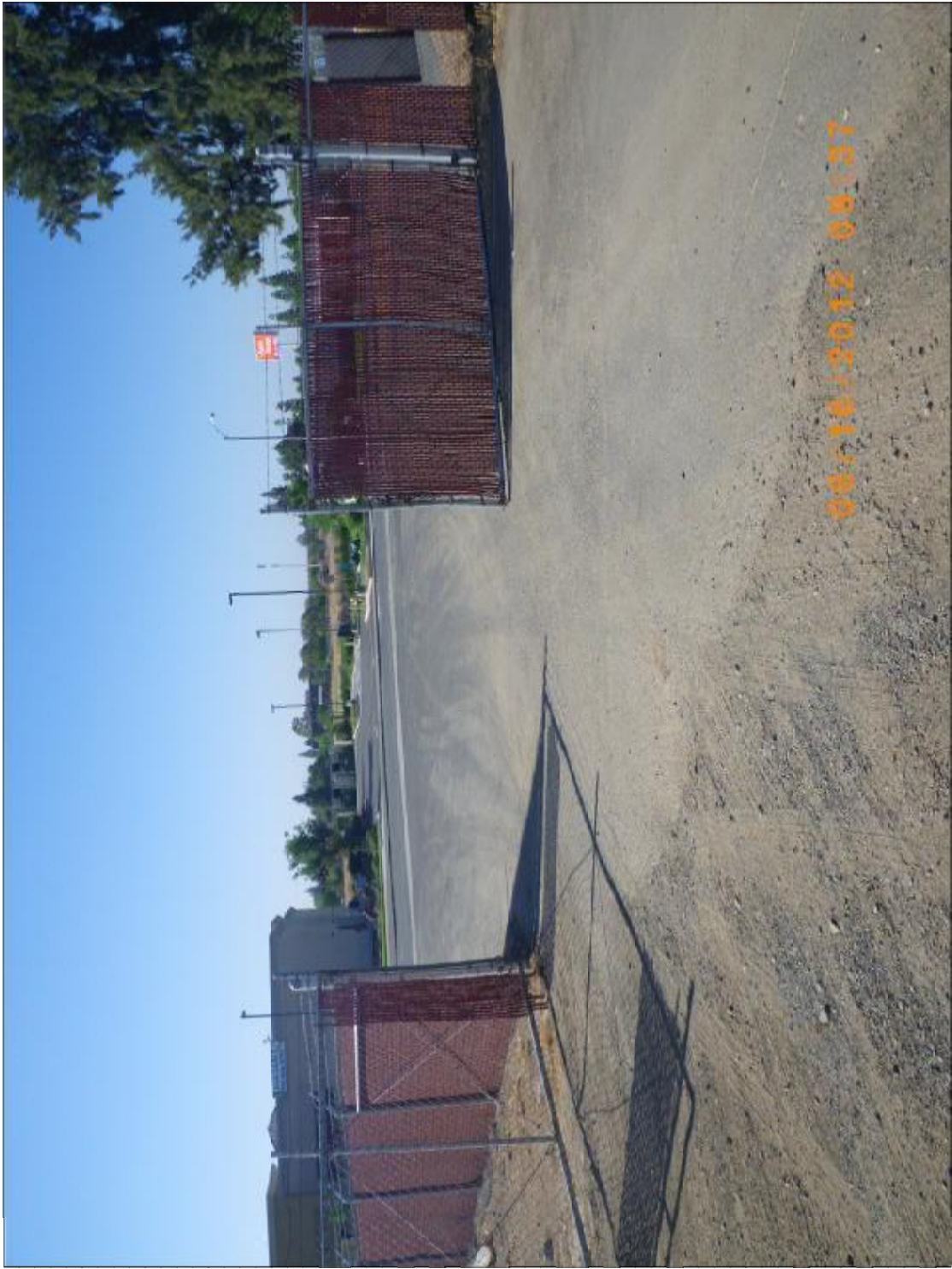


IMGP0921



IMGP0922





IMGP0923



IMGP0924



IMGP0925





IMGP0926



IMGP0927





IMGP0928



2013年10月13日

IMG0929





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Clean Water Act Compliance Office  
MS4 Site Visit Report

NPDES Permit # CAS082597  
Permittee: Sacramento County

**Site Location:** North Area Recovery Station  
4450 Roseville Rd Sacramento, CA

**Date and Time of Visit:** 8/16/2012 (0950hours)

**Site Owner and/or Operator:** Sacramento County Waste Management and Recycling

**Conducted by:** Luis Garcia-Bakarich

**Accompanied by:** EPA: John Tinger, Peter Kozelka  
RWQCB: Elizabeth Lee, Jennifer Sparks, Sean Cross  
Sacramento Co: Dana Booth, Ken Ballard, Sharon Merker,

**Summary Prepared by:** Luis Garcia-Bakarich

**Report Finalized on:** 1/31/13

**Site Visit Purpose**

As part of EPA's evaluation of Sacramento County's Municipal Operations Program, the inspection team stopped at the station to observe implementation of storm water pollution prevention controls.

**Site Background**

The 28 acre facility serves as a green waste and refuse transfer station. The facility is also a collection location for household hazardous wastes. The County has filed a Notice of Intent for coverage under the California Industrial General Permit Order No. 97-03-DWQ (IGP) and developed a SWPPP in accordance with the IGP. Most or all of the storm water at the site flows to drop inlets and to a detention pond located on site. The County did not specify where the pond discharges.

**Site Visit Summary**

The inspection party conducted a windshield tour of the facility, and the inspection team viewed a majority of the facility entirely from within the vehicles for safety. The site tour included the facility entrance, roadways, the refuse transfer station, the green waste collection and processing location, and the vehicle and equipment fueling, maintenance and washing station. The facility SWPPP was not collected or reviewed. The site tour did not include observing the condition of the detention pond due to time constraints.

**SWPPP Review and Site Inspection**

- The SWPPP was not collected or reviewed for this location.
- The inspection team observed some unattended leaks from hydraulic lines associated with large trailers.

- Very little track-out was observed from the facility; however, aerial images of the facility depict staining on the roadways entering the facility, a possible indicator that collection trucks leak liquids from the collected refuse throughout the collection area.
- The operational areas were observed to be completely paved with perimeter berms.
- A sweeper was observed in operation on site during the site inspection.
- The main refuse, maintenance, and washing bays had permanent roofs.
- Minor spills at the maintenance area were observed with absorbent deployed.
- No trash was observed outside the site boundaries, and virtually no trash was observed within the site boundaries except in designated disposal areas.
- All observed drop inlets at the facility were protected with filter fabric inserts, wattles, and gravel bags.

### **Attachments**

Photo log

Site visit photos (11)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Attachment 1**  
**Photo Log**

**Site Name:** North Area Recovery Station  
**Date of Inspection:** 8/16/2012  
**Photographer:** Luis Garcia-Bakarich  
**Camera:** Pentax Optio W80  
**Report Prepared by:** Luis Garcia-Bakarich

**IMGP0930:** Title Page

**IMGP0931:** Main entrance to the facility with a vegetated and storm water detention basin which treats most of the facility's storm water prior to discharge to the MS4. Filter fabric was also observed in the drop inlet.

**IMGP0932:** Signage directing residents and customers to various locations.

**IMGP0933:** A drop inlet protected with gravel bags and filter fabric.

**IMGP0934:** Portion of the transfer station with evidence of recent sweeper activity.

**IMGP0935:** A drop inlet protected with gravel bags and filter fabric.

**IMGP0936:** Active sweeper making a circuit of the facility.

**IMGP0937:** Drop inlet protected by gravel bags and filter fabric.

**IMGP0938:** Drop inlets protected by filter fabric.

**IMGP0939:** Vehicle washing station.

**IMGP0940:** Vehicle maintenance shop area with absorbent deployed on the pavement surface.

8/16 9:53  
Lanth Area Recovery Station

08/16/2012 09:53

IMG0930



IMGP0931



IMGP0932





IMGP0933



IMGP0934





IMGP0935



IMGP0936



IMGP0937



IMGP0938





IMGP0939



IMG0940





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Clean Water Act Compliance Office  
MS4 Site Visit Report

NPDES Permit # CAS082597  
Permittee: Sacramento County

**Site Location:** O'Donnell Truck and Engine Repair  
2515 Arden Way Sacramento, CA

**Date and Time of Visit:** 8/16/2012 (1024 hours)

**Conducted by:** Sharon Merker Environmental Management Division

**Accompanied by:** EPA: John Tinger, Peter Kozelka  
RWQCB: Elizabeth Lee, Jennifer Sparks, Sean Cross  
Sacramento Co: Dana Booth, Ken Ballard, Sharon Merker

**Summary Prepared by:** Luis Garcia-Bakarich

**Report Finalized on:** 1/31/13

**Site Visit Purpose**

As part of EPA's evaluation of Sacramento County's Commercial and Industrial Stormwater Compliance Program (CISCP), the inspection team conducted an unannounced inspection of O'Donnell Truck and Engine Repair.

**Site Background**

O'Donnell Truck and Engine Repair is an automotive service facility and is approximately 0.25 acres.

**Site Visit Summary**

The County Inspector contacted the owner/manager of the facility and announced the inspection. The owner/manager initially refused access; however, after a brief conference between the Inspector and the owner/manager, access was granted on the condition that only exterior portions of the facility would be subject to inspection. The Inspector noted that much of the work occurs under cover, within the shop area. The owner/manager complained that a neighboring facility that conducts auto-body work allowed significant amounts of dust and paint chips to escape their facility and accumulate on the yard of O'Donnell Truck and Engine Repair. The Inspector stated that she will visit the facility, and she did after concluding the inspection. At the conclusion of the inspection, the Inspector issued a violation and required improved house-keeping. The owner took immediate steps to begin cleaning the area of concern while the Inspector was printing the violation. The Inspector agreed to make contact with the property owner to address issues such as roof drainage and wind-blown garbage and the facility. Owner/manager agreed to provide pictures to demonstrate compliance. Pictures were emailed to the County on August 27, 2012 by the owner/manager, and the County considers the matter closed.

**Site Observations**

- There was accumulated scrap equipment and parts, trash, and sediments.

- Coverage for scrap equipment and parts was marginal and there was not a regular schedule for pick up.
- The Inspector raised concerns about the northeast corner of the facility due to oil staining, accumulation of sediment and trash, and being the storm water discharge point from the facility.

**Attachments**

Photo log

Site visit photos (7)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Attachment 1  
Photo Log**

**Site Name:** O'Donnell Truck and Engine Repair  
**Date of Inspection:** 8/16/2012  
**Photographer:** Luis Garcia-Bakarich  
**Camera:** Pentax Optio W80  
**Report Prepared by:** Luis Garcia-Bakarich

**IMGP0942:** Facility entrance.

**IMGP0943:** Dumpster closed.

**IMGP0944:** Labeled and closed waste oil container.

**IMGP0945:** Low point in the yard, where storm water discharges, accumulations of dirt, roof gravels, weeds and trash. Oil staining was also observed in the soils.

**IMGP0946:** Scrap parts staged on shelves waiting for pick up by scrap metal hauler.

**IMGP0947:** Palletized scrap metals partially covered by a tattered tarp.

**IMGP0948:** Other palletized scrap metals with minimal coverage.



IMGP0942





IMGP0943



IMGP0944



IMGP0945





IMGP0946





IMGP0947



IMGP0948



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Clean Water Act Compliance Office  
MS4 Site Inspection Report**

**NPDES Permit # CAS082597  
Permittee: Sacramento County**

**Site Location:** Old School Auto Detailing  
**Date and Time of Visit:** 8/16/2012 (1100 hours)  
**Conducted by:** Ken Ballard Sacramento County Water Resources  
**Accompanied by:** EPA: John Tinger  
**Summary Prepared by:** Luis Garcia-Bakarich  
**Report Finalized on:** 1/31/2013

**Site Visit Purpose**

To observe the County's Response to observed illicit discharges.

**Site Background**

Old School Auto Detailing performs auto washing a detailing for clients. The facility is based out of a warehouse and the exterior portions of the facility include impervious parking/staging areas that all discharge to the County MS4.

**Site Observations**

While en-route to a planned inspection at O'Donnell Truck and Engine Repair, the inspection party encountered Old School Auto Detailing discharging prohibited wash water rinsate to the County MS4. The wash water was observed to be flowing directly to the storm drain and soap suds were observed within the drop inlet. A County Official and an EPA representative contacted the operator and provided storm water compliance information. County staff informed the business of county code that prohibited discharges of washwater to the storm drain system. The operator was aware of the stormwater ordinance prohibiting the discharge of wash water; however, no BMPs to prevent the discharge were observed by the EPA. County staff worked with the operator, who offered to install a barrier and pump system to collect the washwater. County staff stated they will write a follow-up letter to the operator, and will perform random drive-by inspections in the future to verify compliance.

**Attachments**

Photo log  
Site visit photos (9)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Attachment 1  
Photo Log**

**Site Name:** Old School Auto Detailing  
**Date of Inspection:** 8/16/2012  
**Photographer:** Luis Garcia-Bakarich  
**Camera:** Pentax Optio W80  
**Report Prepared by:** Luis Garcia-Bakarich

**IMGP0941:** Stretched luxury vehicle in the process of being washed and detailed, rinsate discharging to MS4. This photo was take while en-route to O'Donnell Truck and Engine Repair inspection. All following photos were taken approximately 50 minutes later.

**IMGP0949:** The vehicle wash area after washing was completed.

**IMGP0950:** Storm water drainage swale conducting the rinsate towards a drop inlet.

**IMGP0951:** Uncovered dumpsters outside the auto detailing facility. (Not verified if they were actually associated with the auto detailing business.)

**IMGP0952:** Rinsate discharging into the drop inlet.

**IMGP0953:** Same as IMGP095 however from the opposite angle.

**IMGP0954:** Same as IMGP0953.

**IMGP0955:** Vehicle rinsate accumulated within the drop inlet.

**IMGP0956:** Same as IMGP0956 however; depicting soap bubbles.





IMGP0941



IMGP0949



IMGP0950





IMGP0951





IMGP0952



IMGP0953





IMGP0954



IMGP0955





IMGP0956



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Clean Water Act Compliance Office  
MS4 Site Visit Report

NPDES Permit # CAS082597  
Permittee: Sacramento County

**Site Location:** Aba Daba Rentals  
4351 Auburn Boulevard Sacramento, CA

**Date and Time of Visit:** 8/16/2012 (1232 hours)

**Conducted by:** Luis Garcia-Bakarich

**Accompanied by:** EPA: John Tinger, Peter Kozelka  
RWQCB: Elizabeth Lee, Jennifer Sparks, Sean Cross  
Sacramento Co: Dana Booth, Ken Ballard, Sharon Merker

**Summary Prepared by:** Luis Garcia-Bakarich

**Report Finalized on:** 1/31/2013

**Site Visit Purpose**

As part of EPA's evaluation of Sacramento County's Commercial and Industrial Stormwater Compliance Program (CISCP), EPA conducted an oversight inspection of Aba Daba Rentals, a facility that had recently been inspected by the County. No significant deficiencies were identified at that time.

**Site Background**

Aba Daba Rentals is an equipment rental company that maintains its rental equipment on site. The facility occupies an area of approximately 1.5 acres. This facility had significant deficiencies identified during an inspection early in the development of the CISCP and had made several improvements to their operations as a result of the earlier enforcement. This facility also had a positive track record since the initial involvement of the CISCP.

**Site Visit Summary**

Upon arrival, EPA observed the County Inspector contact the facility owner/manager, and proceeded to conduct a storm water inspection. The Inspector examined the equipment storage and maintenance areas. Some equipment was stored under cover, and the facility was in the process of improving storage within storage containers. The Inspector noted recent diesel fuel spills from portable generators that had been over-filled by renters. There was also evidence of past spills that had been cleaned up with absorbent, indicating that this has been an ongoing problem and that the facility had taken no preventative actions to address this problem aside from cleaning up spills after they occur. The County Inspector concluded that the facility would need to develop a compliance plan and would require additional follow-up.

The inspector noted a maintenance area where active maintenance was occurring. The Inspector noted an unattended trailer that was receiving paint touch-ups and having its brake system maintained. The Inspector also noted unattended saw dust from wood working on the ground

associated with the construction of storage features within the containers. The facility owner/manager stated that when a customer needs assistance, the attendee would often leave the maintenance area to provide customer service, and that the areas are generally cleaned before the end of the shift.

**Attachments**

Photo log  
Site visit photos (7)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Attachment 1  
Photo Log**

**Site Name:** Aba Daba Rents  
**Date of Inspection:** 8/16/2012  
**Photographer:** Luis Garcia-Bakarich  
**Camera:** Pentax Optio W80  
**Report Prepared by:** Luis Garcia-Bakarich

**IMGP0957:** Title Page

**IMGP0958:** Covered storage of gas-powered rental equipment.

**IMGP0959:** Equipment wash pad that drains to a sand/oil separator and is plumbed to the sanitary sewer.

**IMGP0960:** Location where equipment is loaded and unloaded from flatbed trucks.

**IMGP0961:** Spilled diesel fuel from over-filled fuel tank on a portable generator. Staining from past spills and evidence of cleanup with absorbent.

**IMGP0962:** Maintenance work on a trailer, the brake fluid reservoir is open, and a drip pan is underneath. There is observable brake fluid and spray paint in the drip pan.

**IMGP0963:** Maintenance work on a trailer with evidence of spilled fluids under the brake line, no drip pan was in the vicinity of this work.



9/16/12

Aba Daba Rents  
12:32

08/16/2012 12:33

IMG0957



IMGP0958



IMGP0959





IMGP0960





IMGP0961



IMGP0962





IMGP0963



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Clean Water Act Compliance Office  
MS4 Site Visit Report

NPDES Permit # CAS082597  
Permittee: Sacramento County

**Site Location:** Bradshaw Road Branch Center Corporation Yard  
4001 Bradshaw Center Road Sacramento, CA

**Date and Time of Visit:** 8/16/2012 (1329 hours)

**Site Owner and/or Operator:** Sacramento County Fleet Services, Water Resources, and  
Waste Management and Recycling

**Site Contact:** James Collins

**Conducted by:** Luis Garcia-Bakarich

**Accompanied by:** EPA: John Tinger, Peter Kozelka  
RWQCB: Elizabeth Lee, Jennifer Sparks, Sean Cross  
Sacramento Co: Dana Booth, Ken Ballard, Sharon Merker,  
James Collins, Karen Carney

**Summary Prepared by:** Luis Garcia-Bakarich

**Report Finalized on:** 1/31/2013

**Site Visit Purpose**

As part of EPA's evaluation of Sacramento County's Municipal Operations Program, the inspection party stopped Bradshaw Road Corporation Yard to evaluate how municipal services are managed.

**Site Background**

The 33 acre site serves several County departments such as general and fleet services, public works central warehouse, regional parks and recreation, transportation, waste management and recycling, water resources, and the and technical services material lab. The County has filed a Notice of Intent (NOI) for coverage under the California Industrial General Permit Order No. 97-03-DWQ (IGP) and developed a SWPPP in accordance with the IGP.

**Site Visit Summary**

The inspection party was met by James Collins and Karen Carney who provided some basic information about the facility and then conducted a site tour. The EPA toured the Fleet Services facility, and the EPA viewed approximately 12 acres or 1/3 of the facility. The site tour covered vehicle maintenance and washing facilities, equipment and vehicle storage, fueling stations, and storm water treatment facilities.

**SWPPP Review and Site Inspection**

- The SWPPP is dated May 17, 2010 and was certified by David Casey on June 8, 2010.



- The SWPPP identifies all the areas of activity, describes activities that occur within those areas, and it describes the BMPs that are employed at each of the areas for the activities and identified pollutants.
- Much of the area drains to a 10,000 gallon storm vault located on site equipped with oil water separators. Facility personnel indicated that all new DIs associated with the new construction of the fleet maintenance building have been plumbed to the storm vault, although it was not clear from the SWPPP which DI's drain to the storm vault and which do not. Regular maintenance of the stormvault is contracted with the vendor.
- The SWPPP identifies regular sweeping of the yard as a BMP, and the County representatives explained that the County's sweepers are parked in the Fleet Services lots making them immediately accessible for sweeping the grounds prior to or at the end of a shift. The regularity of the sweeping schedule was not confirmed; however, the yards did appear maintained.
- The SWPPP describes catch basin filter inserts as a BMP used throughout the yard and the facility maps show which catch basins should have filters installed. During the site tour, EPA observed that some catch basins identified on the facility maps lacked such inserts (see photos IMGP0980 and IMGP0982).
- The SWPPP states that Drain Inlets (DIs) are to be labeled with "No dumping flows to river" emblems; however members of the audit team noted that not all DIs were so labeled in the central portions of the Fleet Services parking area.
- Fleet service and maintenance is conducted indoors with no potential for stormwater contact.
- A chemical storage area is maintained outside alongside the fleet services building but is contained under a roof with no potential for stormwater contact. The chemicals were observed to be stored over secondary containment.
- Outdoor storage areas near the fleet maintenance area contained various types of equipment and materials. No oily parts or potentially stormwater issues were observed. Several small spills were observed in the fleet storage areas but had been treated with sorbent materials.
- The car wash was roofed and enclosed on 2 sides, with washwater plumbed to the sewer line with no evidence of track out observed.
- At the fueling station, spill kits were observed and no evidence of spills was observed.
- Appendix "Plates" provides facility maps that demonstrate creation date and revision dates of the maps.

#### Recommendations:

- The DIs should be clearly labeled with "no dumping drains to river".
- The SWPPP should be revised to indicate which DIs flow to the storm vault for treatment prior to discharge.
- The County should ensure that all specified BMPs are fully implemented on a quarterly basis.

#### Attachments

Photo log

Site visit photos (23)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Attachment 1  
Photo Log

**Site Name:** Bradshaw Road Branch Corporation Yard  
**Date of Inspection:** 8/16/2012  
**Photographer:** Luis Garcia-Bakarich  
**Camera:** Pentax Optio W80  
**Report Prepared by:** Luis Garcia-Bakarich

**IMGP0964:** Title Page

**IMGP0965:** Floor drains, tires staged outside vehicle maintenance shop, and covered tire storage area (background).

**IMGP0966:** Ancillary, covered staging/storage bay with secondary containment for hazardous fluids such as fuel and hydraulic fluids.

**IMGP0967:** Another view of the bay described in IMAGE 3. Metal pipe, barrels, rubbish and a fume hood are depicted.

**IMGP0968:** Oxygen cylinders stored in a controlled access area within the bay described in IMAGE 3.

**IMGP0969:** View of the ancillary bay described in IMAGE 3-5.

**IMGP0970:** Lay-down area for surplus materials that will be sold at auction. A piece of equipment that had potential storm water pollutants was covered with a brown tarp.

**IMGP0971:** Brown tarp described in previous image was in good condition, weighted down, and also bungee-corded (not depicted).

**IMGP0972:** Bay 14: Vehicle wash bay. Some staining was observed trailing from the proximity of the bay entrance however; no active non-storm water discharges were observed. Facility personnel reported that vehicle rinsate drains into a sand/oil separator prior to discharging to the sanitary sewer.

**IMGP0973:** Garbage truck that had been in an accident and was sequestered to the yard as evidence had been drained of hazardous fluids. Some staining was evident from the fluid removal as was absorbent material used in response to the spill. A drip pan was staged under the oil pan to collect any residual dripping.

**IMGP0974:** Garbage (different than the one depicted in IMGP0973) truck with a ruptured hydraulic line during a maintenance inspection. Yard staff responded to the spill with absorbent and drip pans.

**IMGP0975:** ASTs with lubricants stored indoors, in the lube room.

**IMGP0976:** Exterior of the lube room.

**IMGP0977:** Man-hole cover for storm water sewer system.

**IMGP0978:** General location of the 6-chambered storm water treatment vault.

**IMGP0979:** Cover for a 6-chambered storm water treatment vault.

**IMGP0980:** The last drop inlet prior to the 6-chambered storm water treatment vault.

**IMGP0981:** LNG fueling station. LNG was being delivered.

**IMGP0982:** Drop inlet within a road way that demonstrated a durable, metal identifier for public awareness.

**IMGP0983:** Absorbent staged at the gasoline fueling depot.

**IMGP0984:** Vehicle wash bay.

**IMGP0985:** Twin-can absorbent trolley located throughout the corporation yard.

**IMGP0986:** One can with clean absorbent, the other empty can for used absorbent.

8/16

127

Bradshaw Rd. Branch Corp

08/16/2012 13:29

IMG0964





IMGP0965



IMGP0966



IMGP0967





IMGP0968





IMGP0969



IMGP0970



IMGP0971





IMGP0972





IMGP0973



IMGP0974



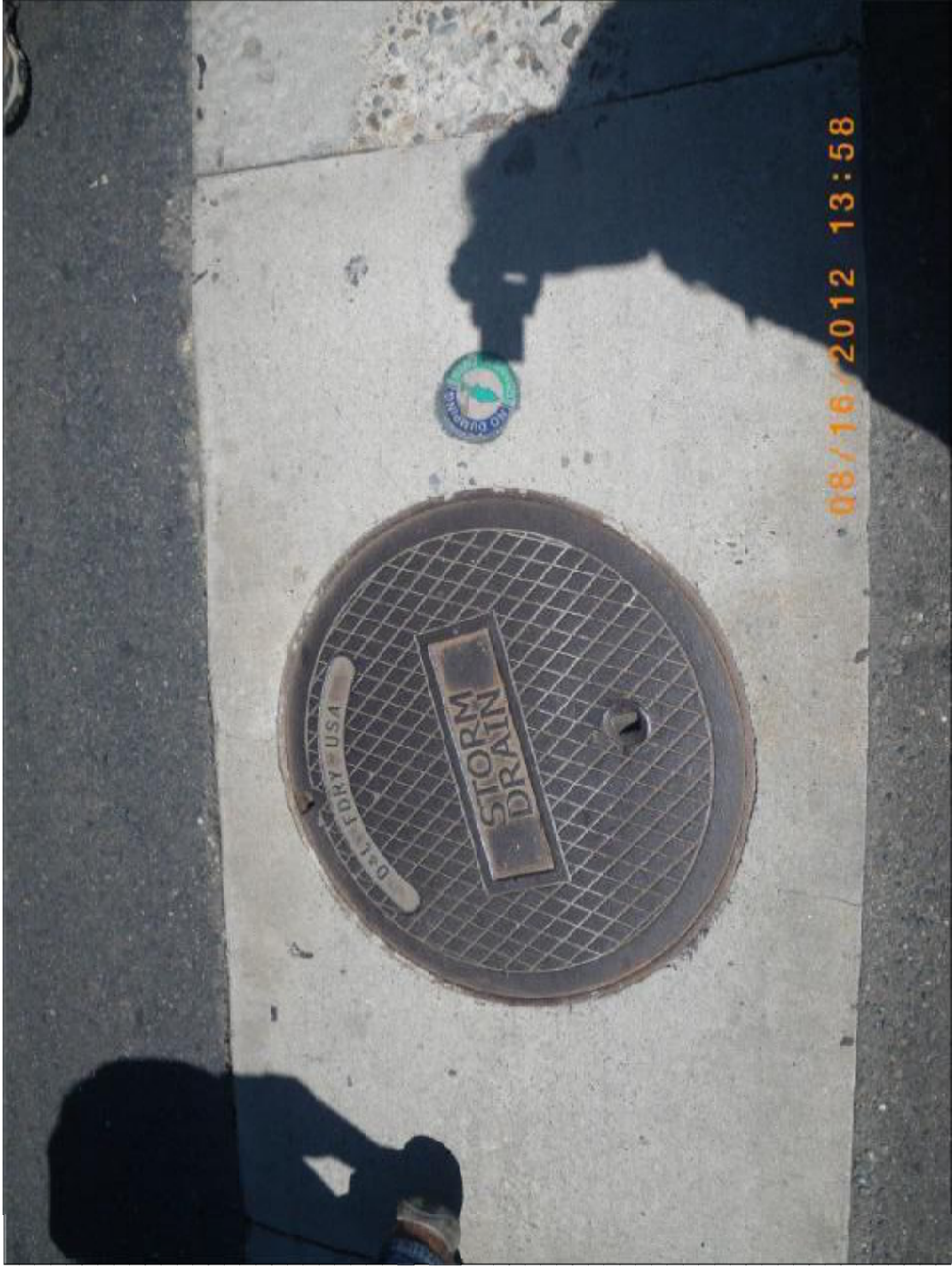
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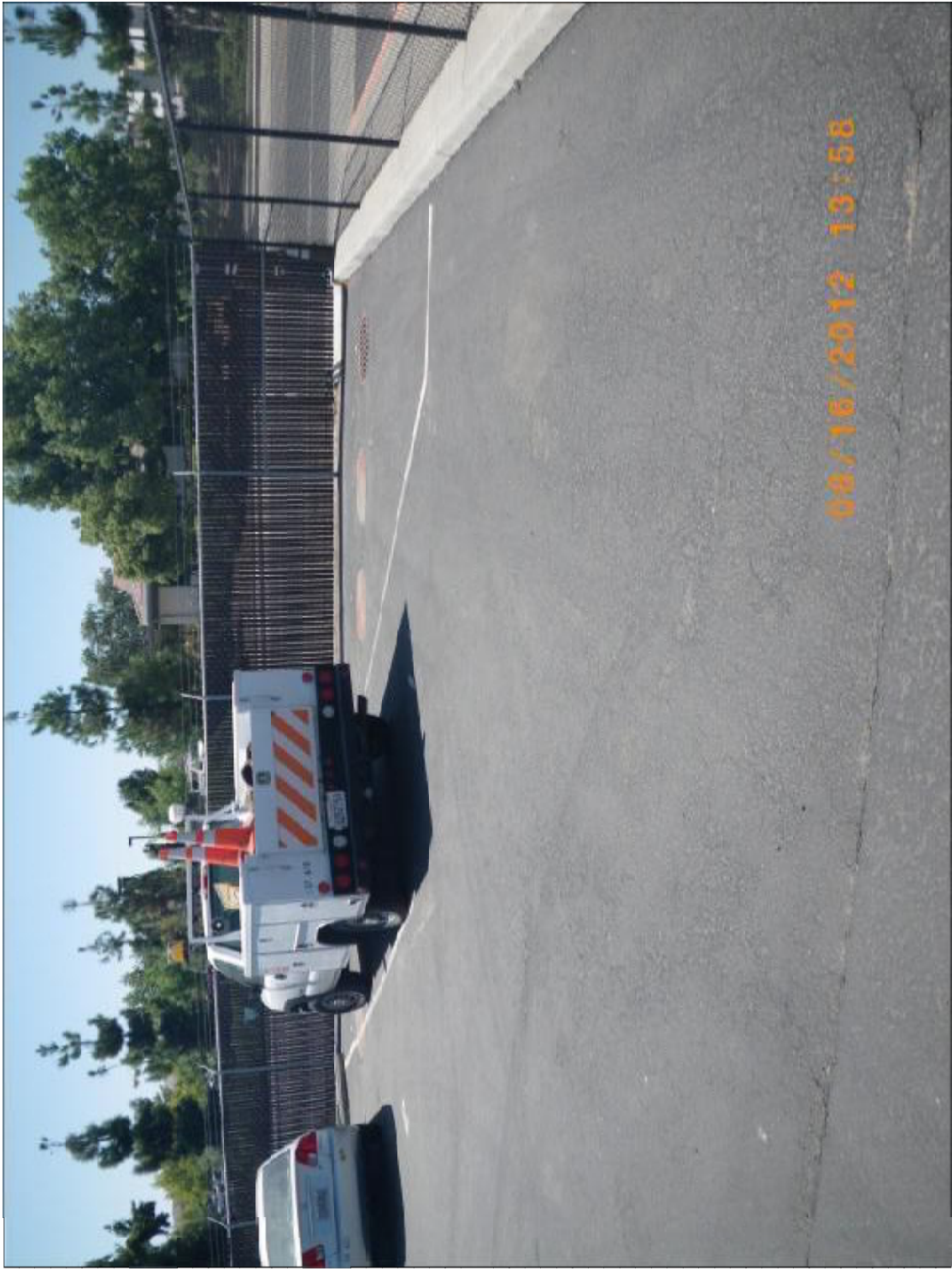


IMGP0976





IMGP0977

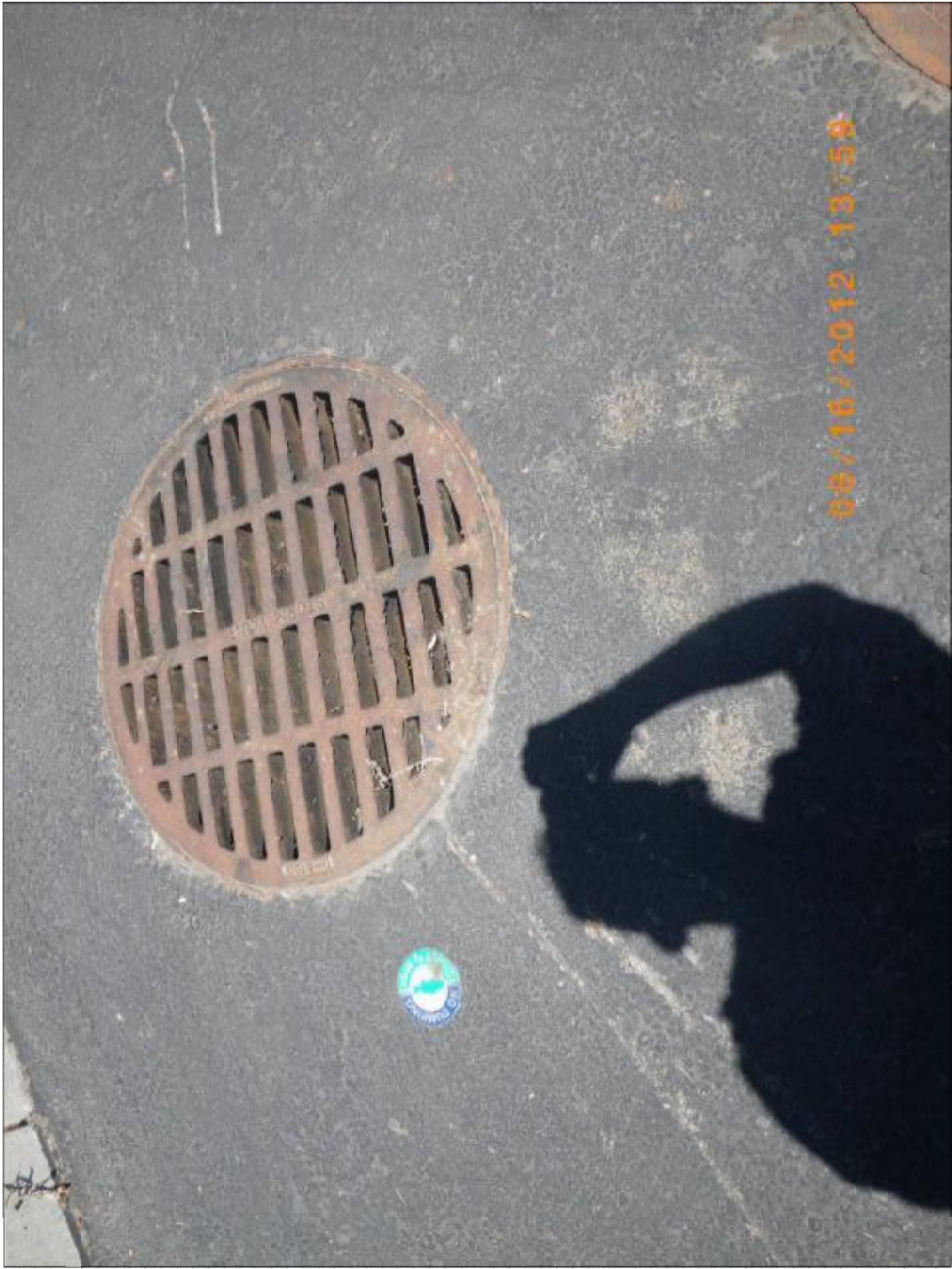


IMGP0978



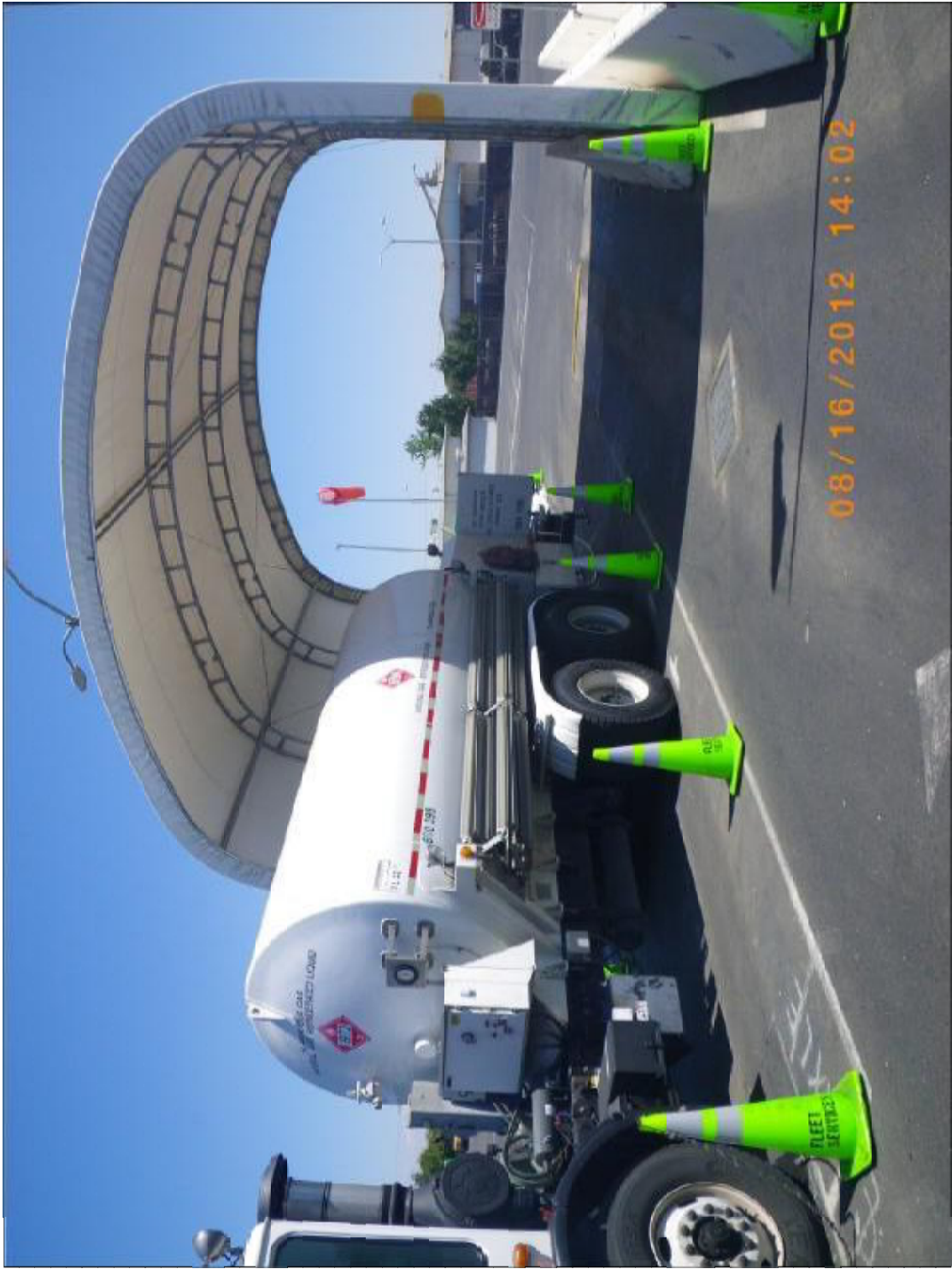
IMGP0979





IMGP0980





IMG0981



IMGP0982





IMGP0983



IMGP0984





IMGP0985



IMGP0986

## **Appendix B – Catalog of Materials Supplied by Sacramento County**

Materials listed in Appendix B are not included in our audit report to Sacramento County. Copies of materials noted below are maintained at U.S. EPA Region 9 and can be made available upon request. These materials were not generated by U.S. EPA but were obtained by EPA during our Audit of the Sacramento County MS4 permit.

- B.1 NPDES Permit CAS082597. September 11, 2008**
- B.2 Stormwater Quality Improvement Plan. November, 2009**
- B.3 2008-2009 Annual Report.**
- B.4 2009-2010 Annual Report.**
- B.5 2010-2011 Annual Report.**
- B.6 2003 Memorandum of Understanding.**
- B.7 County Stormwater Ordinance.**
- B.8 EPA Inspection Announcement and Information Request Letter. July 17, 2012**
- B.9 Sacramento County Records Compilation Binder. August, 2012. Topics covered: Program Management, Monitoring, Pesticide Plan, Illicit Discharge, and Municipal Operations.**
- B.10 Sacramento County Environmental Management Department Commercial / Industrial Stormwater Compliance Program (binder). Topics covered: Policies and Procedures, Enforcement, Correspondence, Forms, Outreach and Education, Stormwater Ordinance, and EMD / Permittee MOUs.**
- B.11 County Presentations on Topics covered in B.9 & B.10**
- B.12 2010 Updated Stormwater Pollution Prevention Program for the Branch Center Corporation Yard located on Bradshaw Road, Sacramento, CA.**
- B.13 2003 Stormwater Pollution Prevention Program for the Roseville Road Auxiliary Yard.**
- B.14 Public Education Brochures, Industry-specific Outreach Brochures, and Illicit Discharge Outreach door hangers.**
- B.15 1992-1995 Illicit Connection Field Screening Study**
- B.16 Procedures for Conduction Ongoing Field Screening for Illicit Connections**
- B.17 Investigation Flow Chart**
- B.18 Illicit Discharge Response Flow Chart**
- B.19 Water Resources Drainage Maintenance Manual**
- B.20 Water Resources Inspection and Enforcement Policy**
- B.21 Commercial/Industrial Enforcement Process Flow Chart**
- B.22 Employee Stormwater Awareness Survey**
- B.23 Sample Employee Training Sign-in Sheets**
- B.24 April 2006 Approved Pesticide Plan**
- B.25 Pesticide Reports, Studies, Surveys, Policy Papers, Informational Brochures, and County Employee Training Materials (17 electronic documents)**
- B.26 Sacramento County Organizational Charts**
- B.27 County Land-Use Map**