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County of Sacramento

November 1, 2013

Kathleen H. Johnson, Director
United States Environmental Protection Agency – Region IX
Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105-3901

**RE: COUNTY OF SACRAMENTO MUNICIPAL SEPARATE STORM SEWER SYSTEM
(MS4; NPDES Permit No.: CAS082597) COMPLIANCE AUDIT REPORT**

Dear Ms. Johnson:

Thank you for the opportunity to respond to your Compliance Audit Report of September 23, 2013 for the audit conducted on August 15 and 16, 2012. The audit was conducted by the EPA Region 9 and representatives of the Central Valley Regional Water Quality Control Board (Regional Water Board) and attended by representatives of the State Water Resources Control Board. The audit focused on the Sacramento County-specific Programs of: Program Management, Industrial and Commercial, Municipal Operations and Illicit Discharge ; and, the Sacramento Stormwater Quality Partnership (Partnership) Programs of: Regional Industrial and Commercial and Monitoring.

Both the County and the Partnership appreciated the positive interactions (feedback and suggestions) that occurred during the audit as well as the positive feedback provided by the EPA during the post-audit verbal summary. Also appreciated is the written recognition of the positive elements of our Program. While the Compliance Audit Report draws attention to several, 'program deficiencies and potential permit violations,' these appear to be primarily reporting errors, miscommunications and/or misunderstandings. To avoid confusion, the County will restate the EPA comment and then provide our response.

Section 3.3.1

Audit comment: "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."

Response:

An outdated version of the Roseville Road Auxiliary Yard SWPPP was mistakenly provided during the audit. The Roseville Road Auxiliary Yard SWPPP had been updated in July of 2012 (copy attached).

Audit comment: “The County should also ensure that the Muni-SWPPPs are evaluated a second time prior to the end of the Permit-term.”

Response:

Per the County’s Work Plan, Muni-SWPPPs were evaluated during the final year of the Permit-term (2012-2013). The second round of Muni-SWPPP evaluations were performed in July of 2012, and the evaluation results were provided to the EPA during the audit. The evaluation results are also reported in the 2012/2013 Annual Report provided to the EPA on October 1, 2013.

Section 3.3.2

Audit comment: “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.”

Response:

The County of Sacramento Department of Water Resources annually inspects all open creeks and channels within the Sacramento County Stormwater Utility Boundary for which it provides maintenance. Annual inspections are performed to assess pesticide application and maintenance needs and are currently performed through contracted services. Creeks and channels also are inspected by County maintenance staff as they perform maintenance activities. Annual reporting numbers have only reflected the additional miles inspected by County staff, mainly for sections of creeks and channels that were scheduled for maintenance but upon supervisorial inspection did not require maintenance.

Future documents will be adjusted to reflect that all maintained open creeks and channels are visually inspected and will report the additional miles, inspected by the County, of creeks and channels that were not maintained.

Section 3.1.3

Audit comment – 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”.

Response:

As discussed during the audit, the Department of General Services (DGS) performs in-house annual stormwater training for all maintenance staff (annual attendance summaries [2010-2013] attached). The County of Sacramento Department of Water Resources (DWR) assists DGS with the in-house training by overseeing the training material (provided during the audit) and updating when needed. DWR performs training for field staff that are more likely to discover illicit discharges and connections, which includes staff within DWR and Department of Transportation. Annual reports have only reflected the training performed by DWR and will be adjusted in the future to report all stormwater training performed within the County of Sacramento.

Section 3.4

Audit comment: “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.”

Response:

The County currently includes in its Illicit database the name of the person responsible for an illicit discharge, if known. However, a name is not a unique identifier sufficient to legally defend an elevated level of enforcement for multiple infractions. Therefore, the County is evaluating potential unique identifiers (e.g. California Driver’s License, Social Security Number, etc.) that might be defensibly obtained and maintained within the Illicit database.

Audit comment: “The EPA also recommends future SQIP revisions include illicit discharges in addition to illicit connections as part of field screening activities.”

Response:

The County currently includes illicit discharges as well as illicit connections as part of its field screening activities. Annual stormwater training for field staff includes identification and reporting procedures for illicit connections as well as illicit discharges.

Section 3.6

Audit comment: “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 the 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”

Response:

Though the County did not declare a baseline, data from municipal maintenance activities are widely used as pollutant load reduction activities and accepted as Level 4 Assessment Outcomes regardless of an established baseline (e.g. CASQA guidance, the Santa Clara Urban Runoff Pollution Prevention Program and Contra Costa Clean Water Program). Regardless, our understanding of effectiveness assessments and that which is required to establish the Level of assessment has changed. While it seems intuitive that all wastes being physically removed from the

drainage system are being prevented from discharging, the County proposed in the ROWD/LTEA (submitted March 15, 2013) as a SQIP amendment that waste removal be reduced to a Level 1 assessment.

If necessary, baseline data for established programs could have been based upon the previous year's data, in which the County has over ten years of reported municipal maintenance data. A period of the ten years of data could have been statistically manipulated to establish a baseline. Yet, due to the variability in the annual data collected through load removal activities, evaluation against a baseline will not yield sufficient results to make an informed management decision for adjusting implemented BMPs or maintenance protocols.

Section, 3.7.1

Audit comment: "None of the RWQEs reviewed by the 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 WQs."

Response:

As required by the Permit (Provision D.3.d. Program Management: SQIP Modification): "Proposed SQIP revisions will be part of the annual review process and incorporated in the Annual Report." The Permittees proposed revisions to the SQIP as part of the Annual Reports that included new BMPs proposed in RWQEs; and therefore, the RWQEs incorporate by reference, instead of specifically contain, proposed revisions to the SQIP.

Example: The Pesticide Plan, which was referenced as a submittal under RWQEs, contains a detailed implementation schedule, and references monitoring and evaluation activities to be conducted.

Audit comment: "EPA did not find any examples in which RWQEs were approved by the Regional Board Executive Officer."

Response:

The RWQE concept desired by the EPA appears to conflict with the procedure desired by the Regional Water Board as specified in the Permit provisions (cited and quoted above). The Permittees incorporate by reference Plans into RWQEs. The Permittees have prepared and submitted a Fecal Waste Reduction Plan, a Pesticide Plan, Lead and Copper Control Strategies, a Mercury Plan, and a Sediment Strategy. The Plans/Strategies (not the RWQEs) are approved by the Regional Water Board.

Example: As referenced in the RWQE of the 2003/2004 Annual Report (Chapter 2; page 14), the Permittees submitted a comprehensive Pesticide Plan as part of the 2003/2004 Annual Report (Appendix I). The Pesticide Plan is 'incorporated by reference' as part of the 2003/2004 RWQE. The Pesticide Plan was approved by the Regional Water Board and finalized without significant change in April 2006.

As noted by the EPA, RWQE's have been submitted for the constituents listed in Table 1 between 2003 and 2007. Additional RWQEs have not been necessary since the previous Permit term (2007). The Permittees acknowledge that Regional Water Board approval has not been specifically issued for these RWQE's; however, the Regional Water Board has approved most of the associated Plans/Strategies; and, the Permittees cannot be held responsible for Regional Water Board

procedures that differ from EPA desires. The Permittees believe that we have complied with the intent and requirements to address stormwater pollutants by implementing BMPs identified for each of these constituents in a timely and good faith manner.

The Permittees will work with the Regional Water Board during the current Permit renewal process to evaluate the pollutant reduction strategy development and approval process. In the Permittees March 2013 Report of Waste Discharge, a watershed scale control approach was suggested, whereby, the Permittees would evaluate the benefit of control strategies with tools such as the Watershed Treatment Model (WTM).

Table 1

Bacteriological indicators (Fecal Coliform and E. coli.)
Total Dissolved Solids and Specific Conductance (electrical conductivity/EC)
Diazinon
Copper
Turbidity
Polycyclic Aromatic Hydrocarbons
Dichlorodiphenyltrichloroethane (DDT)
Mercury
Pentachlorophenol
Chlorpyrifos
Gamma-hexachlorocyclohexane (gamma-BHC or Lindane) and Degradation By-Products
Lead
Zinc

Audit Comment – 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 MS4 Program Compliance Inspection Sacramento County, California 15 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.”

Response:

It is the opinion of the Permittees that, as outlined above, we are implementing the intent of the EPA’s recommendation. This deficiency comment relies upon the stated false-premise that the submitted RWQEs lack mechanisms to determine the result of new or improved BMPs. As we noted in the response above, the Pesticide Plan (as an example) includes detailed implementation schedules, and mechanisms for evaluating progress. Also, the Permittees utilize their extensive monitoring program, target pollutant assessment procedures, and ongoing annual evaluations to

help evaluate their progress in implementing BMPs.

Due to the nature of many stormwater pollutant sources and the inherent variability associated with stormwater data, we expect that some of our most effective control measures (e.g. the bulleted items of Section 3.5.1 ‘Pesticide Program’ of the EPA’s Audit Report) will take many years to produce measureable improvements in receiving waters. An examination of one year of data is not sufficiently robust to reasonably assess program and control measure effectiveness. Annual changes in management practices are difficult within the framework of permit requirements and the SQIP, which are updated approximately every five years. It is more efficient to make these assessments as part of the Report of Waste Discharge and permit renewal. In our Annual Reports, we have regularly assessed the progress of BMPs that are expected to be long term.

Examples:

1. The RWQE for copper identified the Brake Pad Partnership as the key BMP. We consistently reported on the progress of this effort which eventually resulted in legislation that will, by 2025, reduce the major source of copper in stormwater.
2. The RWQE for each of the pesticides identified the need for better regulations at the state and national levels. As noted above and in the EPA’s Audit Report, the Permittees, ‘Participated in efforts which led to the ban of diazinon and chlorpyrifos and the newly established California Department of Pesticide Regulation Surface Water Protection Regulations that will apply to all certified professional applicators of pyrethroids. As reported in the 2011/2012 Annual Report (Appendix 2.5I), implementing these BMPs have sufficiently reduced diazinon and chlorpyrifos concentrations to allow delisting of local receiving waters.

Moreover, the RWQE constituents are not specific to Sacramento County as other statewide and nationwide municipal programs commonly observe them. Sacramento County urban runoff water quality compares favorably to other municipal programs; and, we have demonstrated through our monitoring program that our new development standards have resulted in significant improvements to urban runoff water quality. These development standards are critical to improving water quality as our communities grow and redevelop. In many cases further reductions of these constituents will require statewide legislative actions.


Audit Comment – Program Deficiency: ‘In addition, “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”

Response:

We do not concur with this comment. As recognized by the audit, the Permit states, “so long as the Permittees have complied with the procedures set forth above and are implementing the revised SQIP, the Permittees do not have to repeat the same procedure for continuing or recurring exceedances of the same receiving water limitations unless directed by the Regional Water Board Executive Officer to develop additional BMPs.” The Permittees maintain that on an ongoing basis, primarily documented in Annual Reports, that we have evaluated the progress in implementing the BMPs identified in the RWQEs, and considered the need to adjust programs as necessary. Furthermore, especially in the case of long term pollutant control efforts (e.g. Brake Pad Partnership and affecting state and federal pesticide regulations), we have been able to achieve significant progress without the need to propose additional SQIP changes because the original BMPs were written broadly enough to allow flexibility in their implementation which have allowed for actual water quality improvements.

Sacramento County appreciates the opportunity provided by the EPA to respond to the audit comments and provide additional information and example-documentation. Please do not hesitate to contact Dana Booth (Stormwater Quality Program Manager; BoothD@SacCounty.net) if you desire additional information or documentation.

Sincerely,

 Date: 10/29/13

MICHAEL L. PETERSON, Director

Department of Water Resources

Attachments:

North Area Corp Yard SWPPP
DGS: Annual Training Summary (2010 – 2013)

Cc via email:

Luis Garcia-Bakarich	(United States Environmental Protection Agency)
Elisabeth Lee, PE	(Central Valley Regional Water Quality Control Board)
Sherill Huun, PE	(City of Sacramento)
Chris Fallbeck, PE	(City of Citrus Heights)
Darren Wilson, PE	(City of Elk Grove)
Sarah Staley, PE	(City of Folsom)
Bill Forest, PE	(City of Galt)
Britton Snipes, PE	(City of Rancho Cordova)



COUNTY OF SACRAMENTO

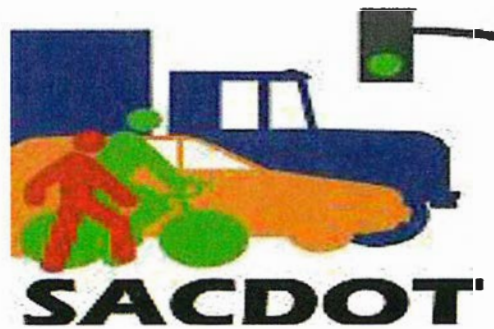
Public Works Agency

Department of Transportation

STORM WATER POLLUTION PREVENTION PROGRAM

ROSEVILLE & WATT SATELLITE STORAGE YARD

Pavement, Roadside, Bridges, Hazardous Materials, Trees and
Landscape Maintenance Sections



July 9, 2012

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1.0 INTRODUCTION

1.1 Purpose

The purpose and intent of this plan is to reduce to the maximum extent practical or eliminate pollutants discharged into the waters of Sacramento County in the Magpie Creek drainage basin from a Department of Transportation satellite storage facility located at the northwest corner of Roseville Road and Watt Avenue. This plan, created and monitored by the Sacramento County Department of Transportation is in the best interests of the community. Putting these measures in place will protect one of these community's vital resources.

The primary objective of the Stormwater Pollution Prevention Program at Roseville & Watt will be to:

- Identify potential pollutant sources.
- Implement best management practices, which will reduce or eliminate pollutant discharges into the waters of the Magpie Creek drainage within the County of Sacramento.
- Monitor the effectiveness of practices put in place by specific observations and measurements of sediments.

The program will remain flexible and will be altered as such factors as new products, changing regulations, facility operation changes or other factors that may affect the site are introduced.

This Stormwater Pollution Prevention Program specific to the Roseville & Watt location will incorporate best management practices to include:

- Restrictions on use of facility.
- Assessment of materials stored
- Limitation of quantities stored.
- Spill prevention, response, and minimization.
- Employee training
- Facility configuration to minimize off site movement
- Elimination of unpermitted non-storm water discharges

1.2 Background

The site known as "Roseville & Watt" is located on the north side of Roseville Road just east of Watt Avenue. The physical street address is 4949 Roseville Road, Sacramento, California. The Roseville & Watt location is controlled by the Department of Transportation. The Roseville & Watt satellite storage site has historically offered the Department of Transportation a cost savings to our customers by providing a secure materials, equipment, and hazardous waste storage site north of the American River and in the eastern portion of Sacramento County. The facility has and will continue to play a vital role in our emergency operations response by providing an easily accessible twenty-four hour a day secure location for stockpiling flood fighting and road repair materials. Additionally the site is a secure location to position equipment and store contaminated absorbent materials gathered by Department of Transportation's responses to spills of vehicle fluids on the County's road system and within the stormwater conveyance system.

1.2.1 Hazardous Materials Storage

The Sacramento County Department of Transportation does store hazardous materials at the Roseville and Watt site. These materials are a possible source of stormwater contamination if not properly contained. The hazardous materials with the most potential to contaminate stormwater stored at the Roseville and Watt site originate from illegal spills or dumping of materials on the road right of way and stormwater conveyance structures. This hazardous material product consists of mixed materials with an absorbing medium stored in a 20-yard roll away bin rented from and serviced by Parc Specialty Contractors. These hazardous materials are disposed of every 90 days or sooner if the volume of materials warrant.

Other hazardous operational materials stored at the Roseville and Watt site inside the locked shed are Solid-a-Sorb (Diatomaceous earth -clay, for absorbing hazardous fluids), and QPR 2000 (Plastic bagged asphalt mix, for emergency pothole patching).

Please see attached Consolidated Contingency Plan, Hazardous Materials Inventory(s), Business Owner/Operator Identification, Business Activities, and site maps in Hazardous Materials section.

1.3 Site Description

The Department of Transportation's Roseville & Watt satellite storage yard is physically located on the north side of Roseville Road east of Watt Avenue. The site is bounded on the north by Union Pacific Railroad property, to the west by Sacramento Regional Sanitation District property and is contiguous to Roseville Road to the south and west. The site is hexagonal in shape with sides measuring 180' x 230' x 27' x 50' x 435' x 20' and approximately ½ acre in area. The portion of the facility is fully enclosed by a chain link fencing with two gates facing Roseville Road, which are locked when not actively in use.

With the exception of the driveway entrance, the site is separated from the road by oleanders and fences. The oleanders are irrigated and maintained through Department of Transportation Contract Management. All adjoining property owners utilize the same entrance driveway from Roseville Road. (Sacramento Municipal Utility District, Sacramento Regional Sanitation District, and Pacific Gas & Electric) The driveway entrance to the facilities is paved. See attached Facility Map.

1.4 Drainage and Site Description

The site drains in sheet flows generally to the east and south into the landscaped areas. Magpie Creek is to the west approximately ½ mile. As the site itself is composed of asphalt grindings and road base material, much of the rain falling on the site percolates into the ground. The ground beneath the site is heavy clay soils, which do not readily absorb rainwater. The only observable ponding is to the northeast of the fenced area. No stormwater from off-site flows onto the storage area. No storm drains inlets are located on the site.

2 STORM WATER POLLUTION PREVENTION PROGRAM

2.1 Potential Pollutant Source Identification and Best Management Practices

The Roseville & Watt auxiliary storage yard has potential stormwater pollution sources, which may impact stormwater discharges. The potential pollutant sources identified are:

- Sediment from exposed soil, uncovered stockpiles of rock, sand, ground asphalt, broken concrete, and other materials commonly related to construction activities.
- Petroleum hydrocarbons from parked equipment, vehicle field refueling and maintenance activities.
- Other wastes and/or debris, which may be found in roadside ditches such as but not, limited to; rusty metals, paper products, decaying vegetative matter, plastics, and chemicals.
- Hazardous materials with solid-a-sorb removed from pavement surfaces.
- Tracking from dirt, sand, and other possible contaminants onto the paved roads.
 - ❖ Note: As adjacent property owners also utilize the entrance/exit on Roseville Road the Department of Transportation will work cooperatively with the entities to reduce tracking of debris from those locations onto Roseville Road.
- To the west, outside the fenced area, is a transient camp, which can generate debris of trash, and other possible contaminants.
- The Sacramento Regional Sanitation District has a “dump” station, which utilizes the common driveway and is a potential source of tracking and accidental spills of sewage from commercial vehicles utilizing the site.

To minimize stormwater contamination the following best management practices are in place:

- County crews, supervision, and engineering staff have been and are continuing to be trained in the sources of and the methods of reducing stormwater pollution from maintenance and construction activities.
- County Department of Transportation crews are restricted as to the use of the sites and the materials, which may be stored at Roseville & Watt.
- The haul routes within the site are stabilized gravel and paved entrance/egress materials to minimize tracking.
- The entrance gate is closed and locked when not in use.
- The site will be inspected a minimum of once a week for possible sources of stormwater contaminates.
- Any possible contaminates found during these inspections will be cleaned up as soon as is possible.
- Roseville Road at the entrance to the storage site and the driveway to the storage site will be swept a minimum of once a week.
- Temporarily stockpiled materials will be regularly removed and kept to a minimum.
- Accidental spills of potential stormwater contaminates will be immediately and properly cleaned up.

2.2 Department of Transportation Storage and Stockpile Areas.

The Sacramento County Department of Transportation is the sole authorized user of the fenced storage area located on Roseville Road west of Watt Avenue. The Department of Transportation utilizes, and has primary control of the fenced storage site known as Roseville & Watt.

The Department of Transportation also utilizes the location occasionally to temporarily park equipment. General Stormwater BMPs will be observed as applies to parking vehicles at remote locations.

The Roseville Road satellite storage area is highly fluid as to the precise locations of stockpiles and typed of materials to be stored. As such, materials and equipment will be constantly changing location and volume.

2.3 General Storm Water Management Site Practices.

General storm water management practices in place are to restrict the use of the fenced facility to authorized County Department of Transportation crews only. Also by reducing the quantity of materials stockpiled, removing some materials before the rainy season, restricting the type of materials stored, and enforcing general best management practices for equipment parking and refueling of equipment potential pollutants will be reduced to the maximum extent practical.

2.4 Department of Transportation Roles and Responsibilities.

The Department of Transportation will take lead responsibility in monitoring and maintaining the Roseville and Watt satellite storage yard. The Department of Transportation will seek cooperation and assistance with Sacramento Municipal Utility District, Sacramento Regional Sanitation District, and Pacific Gas & Electric in all aspects of maintaining and monitoring the site.

- The Department of Transportation will on a weekly basis inspect the area for possible stormwater contaminate sources.
- The Department of Transportation will ensure the haul routes within the site are kept well compacted, stabilized and grade or level the area as needed.
- During or immediately after a rainstorm the Department of Transportation will inspect the Roseville & Watt site for possible stormwater pollution.
- This plan will be reviewed annually, upon discovery of possible sources of storm water pollution, or upon knowledge of applicable laws and regulations or their interpretation.
- The Department of Transportation will continually train personnel in stormwater protection. Department of Transportation Best Management Practices for Stormwater Protection will be enforced. See general Department of Transportation Stormwater Best Management Practices.

2.5 Elimination of Unpermitted Non-Stormwater Discharges

There are no unpermitted non-stormwater discharges at the Roseville & Watt site by the Department of Transportation. By policy and practice no discharge is allowed with the exception of surface watering to control dust when the activity in the area warrants such measures. However, upon discovery of an accidental spill of possible stormwater contaminates within or upon the common area or driveway by the adjacent property owners, their customers, sub contactors or others, those concerned property owners will be notified as to the violation. The Department of Transportation will mitigate any such spills in such a manner, as they do not contaminate the stormwater system.

2.6 Site Compliance Evaluation

The Department of Transportation with assistance from County of Sacramento Water Resources will perform an annual in-depth site evaluation.

2.7 Stormwater Pollution Prevention Personnel

The Department of Transportation controlled portion of the Roseville & Watt site persons responsible for site management are

Department of Transportation
Department of Transportation

Michael Garcia 875-5141
Jeff Welchman 875-5125

3 STORMWATER MONITORING AND SITE INSPECTION

The stormwater monitoring and site inspection plan will consist of:

- Stormwater visual inspections
- Measuring siltation at critical locations
- Non-stormwater discharge visual inspections
- Retention of self-inspections records

3.1 Non-Stormwater Discharge Visual Inspections

3.1.1 Inspection Criteria and Checklist

Inspection of the site will be done each time the yard maintenance crew restocks the site. The inspection will be assigned to the yard maintenance crew to assure consistency and to gain an intimate knowledge of changes taking place within and around the site. These observations will include but not be limited to the following:

- The presence of oil or other vehicular fluids spilled and not cleaned up.
- Discoloration caused by fluid, oxidation, or materials stockpiled.
- Smells not normally associated with the area.
- General security of the area.
- The presence of materials, which may be washed, or float off site.
- The presence and or volume of tracking of materials at the entry/exit.
- The presence of dust or other materials, which may be blown off site.
- General cleanliness of the area to include trash and sanitary conditions.
- Stockpiled materials are not migrating out of designated storage area.
- Changes to the site or abnormal conditions will be investigated.
- Inspect materials stockpiled to assure they are authorized.
- Insure temporarily stored materials are removed in a timely manner.
- Inspect security of Hazardous Materials bin to assure there is no leakage or spillage.

Records of inspections will be maintained and retained by the yard maintenance supervisor. Any condition found to be not in compliance would be corrected immediately.

3.1.2 Observation Frequency

Documented visual inspections will be conducted by trained Department of Transportation personnel a minimum of once per month.

3.1.3 Observation Points

The following observations points will be checked and observations recorded on the Roseville Rd. SWPPP checklist. (See Policy & Forms)

1. Entrance gate and driveway.
2. The perimeter of the fence for security & trash build-up.
3. Grounds and haul routes within the site.
4. Hazardous Materials bin.
5. All equipment parked on site.
6. Metal storage shed.
7. All material storage piles.

3.2 Stormwater Discharge Visual Inspections

3.2.1 Observation Criteria and Checklist

Inspection of the site will be done during rain events when these events occurring during regular work hours , or within two working days after such an event. The inspection will be assigned to the yard maintenance crew to assure consistency and gain an intimate knowledge of changes taking place within the site. These observations will include but not be limited to the following:

- The presence of oil or other vehicular fluids spilled and not cleaned up.
- Discoloration caused by fluid, oxidation, or materials stockpiled.
- Smells not normally associated with the area.
- General security of the area.
- The presence of materials, which may be washed, or float off site.
- The presence and or volume of tracking of materials at the entry/exit gate.
- General cleanliness of the area to include trash and sanitary conditions.
- Stockpiled materials are not migrating out of designated storage area.

- Changes to the site or abnormal conditions will be investigated.
- Inspect materials stockpiled to assure they are authorized.
- Running water escaping the area.
- Ponding water that has sheen, smell, or discoloration.
- Rutting from vehicular use.
- Ground stability within the site.
- Security of the Hazardous Materials bin.

3.2.2 Observation Frequency

Documented inspection of the site will be done during rain events when these events occurring during regular work hours , or within two working days after such and event. Additionally, a documented inspection of the site will be done a minimum of once a month.

3.2.3 Observation Points

The following observations points will be checked and observations recorded on the Roseville Rd. SWPPP checklist. (See Policy & Forms)

1. Entrance gate and driveway.
2. The perimeter of the fence for security
3. Grounds and haul routes within the site.
4. Hazardous Materials bin.
5. All equipment parked on site.
6. Metal storage shed.
7. All material storage piles.

5 Inspection Checklists



MATERIALS STORED AT "ROSEVILLE & WATT"

The following materials/items may be stored or stockpiled at "Roseville & Watt."

- Asphalt Grindings
- Quarry Rock
- Sand
- Rock "Chips"
- Cobbles
- Crushed Rock
- Road base material
- Broken Asphalt
- Wood Rounds/Lumber
- Locked Watertight Storage Shed (s)
- Heavy Equipment

The following materials/items may be temporarily stored or stockpiled at "Roseville & Watt."

- Ditch dig-out materials (dry only)
- Road base repair dig-out materials
- Top Soil
- Broken Concrete (dust)
- Treated Lumber
- Rusty Pipe

The above materials must be removed before expected rainfall.

The following materials/items may not to stored or stockpiled at "Roseville & Watt."

- Paint or Paint Grindings
- Liquid Petroleum Products
- Pesticides
- Contaminated Ditch Spoils
- Wet Dig-Out Material
- Garbage or Trash



Roseville & Watt Stormwater Protection Program Observation Checklist

Yes No

- Is the entrance gate secure?
- Is there tracking of materials from the storage area onto the road?
- Is the gate in good condition? (Not Rusting or Damaged)
- Is the vegetation in proper condition for the season? There should be no dead or unnaturally discolored plants and soils.
- Are waddles in place and in serviceable condition?
- Is there evidence of siltation downstream of the driveway in the gutter?
- Are the sheds secure?
- Do the sheds show rust or decay?
- Is anything leaking from the sheds?
- Are the stockpiled materials eroding, slumping, or sliding?
- Are the stockpiled materials authorized?
- Is there mud or debris being tracked by vehicles off site?
- Are the haul routes within the site muddy?
- Is there trash on the inside or outside of the fence?
- Is there any discoloration of soils or materials such as rust or unnatural sheen from petroleum products?



Roseville & Watt Stormwater Protection Program Observation Checklist - Reference

- | Yes | No | |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Is the entrance gate secure? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is there tracking of materials from the storage area onto the road? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Is the gate in good condition? (Not Rusting or Damaged) |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Is the vegetation in proper condition for the season? There should no dead or unnaturally discoloration of plants and soils. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Are waddles in place and in serviceable condition? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is there evidence of siltation downstream of the driveway in the gutter? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Are the sheds secure? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Do the sheds show rust or decay? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is anything leaking from the sheds? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Are the stockpiled materials eroding, slumping, or sliding? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Are the stockpiled materials authorized? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Is there mud or debris being tracked by vehicles off site? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Are the haul routes within the site muddy? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is there trash on the inside or outside of the fence? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is there any discoloration of soils or materials such as rust or unnatural sheen from petroleum products? |

Note: X in the box checked indicates no action necessary. If not investigation and corrections are indicated.

County of Sacramento
 Department of General Services

2011 Stormwater Pollution Prevention Tailgate Topic Training Pay Period#19

DATE	PRESENTER	NUMBER OF STAFF
	Randall Tillery	9
8/26/11	Dan Lasyone	7
8/26/11	Kim Crandall	11
8/26/11	Fred Gallardo	4
8/29/11	Tim Hollingsworth	1
8/29/11	Mike Shintaku	3
8/30/11	Rhodelio Monje	8
8/30/11	Richard Kirland	14
8/31/11	Robert Stanley	14
9/1/11	Anthony Roberts	11
9/1/11	Kevin Wallace	6
9/1/11	George Mason	8
9/1/11	Donald Lang	11
9/1/11	Mike Granville	2
9/1/11	Cory Wyler	5
9/2/11	David Eaton	5
9/6/11	Tom Martin	4
9/12/11	David Sutcliffe	5
9/13/11	David Nickel	6
9/13/11	Tim Burnett	6
9/15/11	Mike Eller	6
9/16/11	John Perkins	4
9/20/11	Kevin Deboy	1
9/28/11	Danny Ernst	6
10/14/11	Rick Nadeau	6
TOTAL		165

County of Sacramento
 Department of General Services

2012 Stormwater Pollution Prevention Tailgate Topic Training

DATE	PRESENTER	NUMBER OF STAFF
7/2/12	Tim Hollingsworth	2
7/2/12	Gary Martin	3
7/2/12	Richard Kirkland	14
7/3/12	Cory Wyler	9
7/3/12	Rhodelio Monje	9
7/5/12	Randall Tillery	9
7/5/12	Mike Granville	5
7/5/12	Rob Stanley	11
7/5/12	Shirley Lyles	5
7/6/12	Fred Gallardo	5
7/9/12	Mike Eller	8
7/10/12	Tim Burnett	11
7/10/12	Rick Nadeau	10
7/11/12	Floyd Scott Jr.	9
7/12/12	Tom Martin	4
7/13/12	George Mason Jr.	10
7/18/12	Melody Tator	5
7/19/12	David Nickel	5
7/19/12	Dale Engblom	12
7/26/12	Pat McCoskey	11
7/27/12	Dan Lasyone	4
8/2/12	Kevin Deboy	1
8/7/12	David Sutcliffe	3
8/9/12	Donald Lang	10
TOTAL		175

County of Sacramento
 Department of General Services

2013 Stormwater Pollution Prevention Tailgate Topic Training Pay Period #19

DATE	PRESENTER	NUMBER OF STAFF
8/23/13	David Sutcliffe	4
8/26/13	Don Riddle	8
8/27/13	Tim Hollingsworth	1
8/27/13	Ronald Wirth	11
8/28/13	Rhodelio Monje	10
8/28/13	Robert Stanley	16
8/28/13	George Mason	12
8/28/13	Robert Turner	12
8/29/13	Richard Kirkland	9
8/29/13	Mike Granville	4
8/29/13	Floyd Scott Jr.	13
8/30/13	David Eaton	7
9/3/13	Gary Martin	2
9/4/13	Dan Rife	15
9/4/13	Melody Tator	5
9/4/13	Tom Martin	3
9/10/13	David Nickel	4
9/12/13	Fred Gallardo	5
9/16/13	Mike Eller	8
10/2/13	William Farrell	8
10/4/13	Donald Lang	10
10/16/13	Kevin Deboy	1
TOTAL		168

