UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUL 2 2 2013

Via Certified Mail:
No. 7000 0520 0021 6108 5559
Return Receipt Requested

Mr. Rob Roshanian, Interim Director
Department of Public Works
City of Oxnard
305 W. 3rd Street
Oxnard, CA 93030

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

Dear Mr. Roshanian:

Enclosed please find the final audit report for the City of Oxnard Storm Water Management Program (Program). On July 24, 2012, EPA Region 9 (EPA) and representatives from PG Environmental, LLC, an EPA contractor, and the Los Angeles Regional Water Quality Control Board (Regional Board) conducted an audit of the City's Program. The purpose of the audit was to assess the City's compliance with the requirements contained within the NPDES Storm Water Permit and Waste Discharge Requirements for the Municipal Separate Storm Sewer Systems within Ventura County (NPDES Permit No. CAS004002).

EPA's audit focused on evaluation of the City's compliance with the industrial/commercial (I/C) facilities and illicit connection/illicit discharge (IC/ID) requirements of the Permit, and entailed a review of documents and interviews of program management and field staff. In addition, EPA's evaluation included a review of the *Ventura County Stormwater Quality Management Program 2010/2011 Water Quality Monitoring Report* and includes findings specific to the City's compliance with applicable receiving water limitations.

EPA found the following components of the City's Program noteworthy:

- The City has implemented a robust IC/ID Elimination Program using various tools to receive reports, track complaints and identify and eliminate illicit discharges to its system; and

- The City used water quality data collected as part of an in-stream battery removal project to promote proper hazardous waste handling practices as part of its public outreach efforts.

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

- Perform a follow-up inspection within four weeks from the date of an initial inspection at an industrial facility where stormwater deficiencies were documented as required by Part 4.D.I.3(c)(1) of the Permit; and

- Submit a report to the Region Board describing the additional BMPs that will be implemented to prevent or reduce the discharge of pollutants in its stormwater discharges found to be causing or contributing to persistent exceedances of applicable water quality standards (WQS) as required by Part 2.3(a) of the Permit.

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

Sincerely,

Kathleen H. Johnson, Director
Enforcement Division

Enclosure: City of Oxnard MS4 Audit Report (w/attachments)

Cc via email with enclosure:
Jeremy Grant, City of Oxnard
Renee Purdy, LA RWQCB

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

# MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) COMPLIANCE INSPECTION

## CITY OF OXNARD, CALIFORNIA

## INSPECTION REPORT

**Inspection Date:**
**July 24, 2012**

**Report Date:**
**July 18, 2013**

## CONTENTS

# Section 1.0 Executive Summary

The U.S. Environmental Protection Agency (EPA) conducted an inspection on July 24, 2012, of the City of Oxnard, California (hereinafter, City), Municipal Separate Storm Sewer System (MS4) Program.

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

In this report, where applicable, EPA has identified noteworthy aspects of the City's stormwater program implementation, recommendations for improvement, and potential permit violations. Although this report may include potential permit violations, it is not a formal finding of violation.

EPA found the following component of the City's current program noteworthy:

- The City has implemented a robust IC/ID Elimination Program using various tools to receive reports, track complaints and identify and eliminate illicit discharges to its system.

- The City used water quality data collected as part of an in-stream battery removal project to promote proper hazardous waste disposal practices as part of its public outreach efforts.

EPA also found potential permit violations. Most significantly:

- The City failed to perform a follow-up inspection within four weeks from the date of initial inspection at an industrial facility where stormwater deficiencies were documented; and

- The City failed to submit a report to the RWQCB Executive Officer describing the additional BMPs that will be implemented to prevent or reduce the discharge of E. coli and fecal coliform in its stormwater discharges.

# Section 2.0 City of Oxnard Stormwater Program

On July 24, 2012, the U.S. EPA, representatives from the Los Angeles Regional Water Quality Control Board (Regional Board) and an EPA contractor, PG Environmental, LLC (hereinafter, collectively, the EPA Inspection Team) conducted an evaluation of the City of Oxnard, California's (hereinafter, City), Municipal Separate Storm Sewer System (MS4) Program. In addition, EPA evaluated the Ventura County Watershed Protection District (VCWPD) and the cities of Thousand Oaks, Santa Paula, and Simi Valley's MS4 Programs on June 27, June 28, July 25 and July 26, 2012, respectively.

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

The Permit authorizes the twelve Copermittees, including the City, to discharge or contribute to discharges of stormwater from Phase I MS4s into the Watershed Management Areas of Ventura River, Santa Clara River, Calleguas Creek, Malibu Creek, and miscellaneous Ventura Coastal streams within Ventura and Los Angeles Counties.

City Information

According to the 2010 U.S. Census, the City is approximately 39.2 square miles with a population of 197,899 people. The City is located in the County of Ventura about 35 miles west of the Los Angeles city limits. City staff stated that the City is adjacent to an agricultural center for various fruits and vegetables. The City is located adjacent to the Pacific Ocean and the primary receiving waters are Calleguas Creek, Revolon Slough, and Beardsley Wash.

## 2.1 Program Areas Evaluated

The inspection included an evaluation of the City's compliance with the following three stormwater management components required by the Permit:

- Industrial / Commercial (I/C) Facilities Program
- Illicit Connection and Illicit Discharge (IC/ID) Elimination Program
- Receiving Water Limitations

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

# Section 3.0 Evaluation Findings

This section is organized to generally follow the structure of the Permit. For each section in the report, where applicable, EPA identified noteworthy aspects of the City's stormwater program implementation, recommendations for improvement, and potential permit violations. Potential permit violations are areas where the City is not fulfilling requirements of the Permit. 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 City's MS4 Program, fully document all lines of questioning conducted during personnel interviews, or document all in-field verification activities conducted during site visits.

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

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

## 3.1 Industrial / Commercial Facilities Program

As stated at Part 4.D.I of the Permit, the City must require implementation of pollutant reduction and control measures at industrial and commercial (hereinafter, I/C) facilities with the objective of reducing pollutants in stormwater. The City's program must include requirements to track, inspect, and ensure compliance with municipal ordinances at I/C facilities that are critical sources of pollutants in stormwater. The I/C program must include, at a minimum, the specific requirements in Part 4.D.I.1–4 of the Permit, which cover inventory and inspection of critical sources, ensuring compliance of critical sources, and interagency coordination.

The City's I/C program was well documented with multiple records, forms and informational documents located on a City shared network drive. The program was coordinated by the City Wastewater Environmental Specialist with oversight from the City Technical Services Manager. City staff stated that its I/C program had been in place

before current Permit requirements took effect and that many of the tools used to conduct program activities had been developed through Ventura County MS4 subcommittee collaboration as part of a requirement of the previous MS4 permit. Although participation by the Copermittees is not required in the current permit, City staff explained that the City is still an active participant in the subcommittees.

City staff explained that the individual subcommittees discuss various requirements, concerns, and lessons learned for the specific program areas of the Permit. City staff provided the EPA Inspection Team with multiple examples of I/C subcommittee discussion topics including agreeing on classifications used to filter critical sources and development of inspection checklist templates for different types of facilities. City staff stated that, in addition to providing valuable information for the City's I/C program, the subcommittees were helpful in all areas of Permit compliance. The City provided examples of helpful topics from the illicit connection and illicit discharge (hereinafter, IC/ID) subcommittee meetings. These topics include using illicit discharges data to focus public outreach and education efforts on local issues affecting water quality (e.g. mobile detailing); and deciphering the location of the illicit discharge field screening locations required by the Permit.

To demonstrate its participation in the subcommittee meetings, City staff presented the EPA Inspection Team with a printout of a presentation given by City staff at one of the meetings on identification of MS4 screening points and illicit discharges (see Appendix B, B.13).

### 3.1.1 Inventory of Critical Sources

Part 4.D.I.1 of the Permit requires the City to maintain a watershed-based inventory or database of critical sources and update the inventory annually. The Permit also dictates specific information that must be retained for each facility. Critical sources are defined by the Permit and include, among others, restaurants, automotive service facilities, and nurseries.

City staff explained that its I/C inventory was primarily generated through filtering SIC codes on business licenses and then performing quality assurance to ensure the proper facilities were included on the list. The City had created separate inventories for different categories of facilities. City staff stated that the inventories were up-to-date at the time of the inspection.

### 3.1.2 Inspection of Critical Sources

Part 4.D.I.2 of the Permit identifies specific requirements for the City's I/C program, including required inspection frequencies and BMPs for each category of critical sources defined in the Permit.

City staff explained that an inspection schedule and associated spreadsheet had been developed to track inspection accomplishments against the inspection frequencies

specified in the Permit. City staff further explained that City inspectors are assigned sections of the City and associated critical sources for I/C inspections and provide a number of documents used to support the I/C compliance program. These documents included a model inspection checklist for critical sources to facilitate comprehensive inspections (see Appendix B, B.17, B.18, and B.20).

The EPA Inspection Team observed City inspectors conduct two industrial inspections which are detailed in Appendix A.3. The City inspectors used a checklist, developed through participation in the I/C subcommittee, that includes specific BMPs to be evaluated during inspections for various facility types (see Appendix B, B.17). City inspectors conducted each inspection methodically using the City stormwater inspection checklist specific to that type of facility. During the inspections, the City Wastewater Environmental Specialist and the City Inspector referred to records of past inspections and inquired about issues observed during those inspections (see Appendix B, B.15).

City staff explained that City inspectors emphasize building a rapport with the facility representatives to aid in compliance and foster a good working relationship. City staff additionally explained that they ensure consistency among inspectors by having a senior inspector "shadow" a newer inspector. City staff stated that they had found education to be more effective than enforcement for affecting change at I/C facilities, but explained that the City has enforcement capabilities and conducts progressive enforcement as needed. The City's enforcement capabilities are described in the City's Storm Water Quality Management Ordinance and discussed in the section below.

### 3.1.3 Ensure Compliance of Critical Sources

Part 4.D.I.3 of the Permit requires the City to ensure that source control BMPs are properly utilized at critical sources to eliminate or reduce pollutants in stormwater runoff. The Permit requires the City to conduct follow-up inspections within 4 weeks from the date of the initial inspection when an operator has failed to adequately implement all necessary BMPs. In addition, the City is required to take progressive enforcement actions to ensure that non-compliant facilities are brought into compliance within a reasonable time period. Section 22-226 of the City's stormwater ordinance provides that when an illicit discharge is observed, the City can issue a notice of violation or a cease and desist order, and provide a specific time-table for correction of the issues that led to the discharge.

Records provided to the EPA Inspection Team indicate that City staff performed an inspection of the Rincon Recycling Facility on March 11, 2011 and issued a "Notice of Violation" for stormwater violations on that same day. The "Notice of Violation" (see Appendix B, B.16) cites a number of stormwater violations including illicit discharges of paper pulp, cardboard, paper and plastic to the MS4; failure to implement BMPs to reduce pollutants in stormwater; and failure to implement a stormwater pollution prevention plan. Review of the City's case file for this matter indicates that a follow-up inspection was conducted on November 28, 2011 (see Appendix B, B.15), well outside of the four-week timeframe specified in the Permit for follow-up inspections.

*Potential Permit Violation*

*The City failed to perform a follow-up inspection within four weeks from the date of initial inspection at an industrial facility where stormwater deficiencies were documented. [Part 4.D.I.3(c)(1)]*

Part 4.D.I.3(c)(1) of the Permit states that when a Permittee inspects a facility and determines an operator has failed to adequately implement all necessary BMPs, the Permittee shall perform a follow-up inspection within four weeks from the date of the initial inspection. The City found violations at the Rincon Recycling facility during an inspection in March 2011 but failed to perform a follow-up inspection within 4 weeks as required by the Permit. According to documentation provided by the City, the follow-up inspection was performed in November 2011.

### 3.1.4 Interagency Coordination

Part 4.D.I.4(b) of the Permit states that for facilities in violation of the municipal stormwater ordinance and subject to the statewide Industrial General Stormwater Permit, a Permitee may escalate referral of such violations to the Regional Water Board provided the Permittee makes a good faith effort to return the facility to compliance through the use of progressive enforcement. City staff stated that they had experienced difficulties in returning some facilities to compliance through the use of follow-up inspections, notices of violation (NOVs), and warning letters. However, the City was unable to demonstrate that it had developed formal procedures for referring recalcitrant facilities to the Regional Board.

*Recommendation for Program Improvement*

*The City should develop procedures to ensure that progressive enforcement includes referral to the Regional Board for industrial/commercial facilities that fail to return to compliance following the issuance of a NOV, warning letter, or other enforcement response.*

## 3.2 Illicit Connections and Illicit Discharges Elimination Program

As stated at Part 4.H.I of the Permit, the City must implement a program to eliminate IC/IDs to the storm drain system. The program shall document, track, and report all such cases in accordance with the elements and performance measures specified in Part 4.H.I.1–4 of the Permit, including implementation and tracking of IC/IDs; public reporting; screening and response for illicit connections; and investigation, abatement and cleanup, and documentation for illicit discharges.

The City has developed an effective relationship between multiple City departments to implement the IC/ID program. For example, the City Technical Services Manager explained that the City's Public Works Department collaborates with the City's Code Compliance Department and the Certified Unified Program Agencies (CUPA) to address IC/ID issues, and that the Public Works Department educates these departments on IC/ID

response. City staff stated that if City Code Compliance Department staff saw an illicit connection or illicit discharge, they were instructed to call the Public Works Department. The two departments would then work together to resolve the IC/ID issue.

The City provided two examples of this collaboration which led to global resolution of water issues. In one example, the City dealt with a business's odor pollution and leakage of liquids onto the street through enforcement of both the City's industrial pretreatment and MS4 programs. In another example, the City used information collected during a stream cleanup conducted by troubled youth. The City identified that the location of batteries found during the cleanup correlated to spikes in lead levels recorded during ocean monitoring. The City removed the batteries from the stream and then incorporated proper battery disposal information into subsequent public outreach efforts.

*Positive Attribute*

*The City of Oxnard's collaboration between various city departments led to innovative use of information in public outreach efforts following stream clean-up efforts.*

### 3.2.1 Public Reporting of IC/ID Complaints

Part 4.H.I.2 of the Permit requires the City to establish a hotline and internet site for receiving reports of IC/ID complaints and to maintain records of IC/ID locations and responses. City staff stated that the City had received 60 to 70 calls pertaining to illicit discharges per year through a hotline or by other forms of communication. The City presented the EPA Inspection Team with a number of forms and documents used to record IC/IDs and implement the City's program including "Illicit Connections Report" form (see Appendix B, B.7), "Illicit Discharge Report" form (see Appendix B, B.8), and "Temporary Use Permit Application Information" (see Appendix B, B.30). The EPA Inspection Team reviewed an example of a completed "Illicit Connections Report" form dated January 13, 2011 which explained that a clothes washer was discharging soapy water to an adjacent alley and that the connection was removed 12 days after the report was issued (see Appendix B, B.7).

### 3.2.2 Storm Drain System Mapping

Part 4.H.I.3(a)(1)(A) of the Permit requires the City to develop a map showing the location and length of underground pipes 18 inches and greater in diameter and channels within their permitted area and operated by the permittee. City staff explained that the City had developed a geographic information system (GIS)-based map of its storm sewer system which included the portions of the system consisting of storm drain pipes 6 inches or greater. City staff explained that they update the GIS-based map of the system with information from new construction by scanning as-built drawings into the system.

### 3.2.3 Storm Drain System Field Screening

Part 4.H.I.3(a)(2) of the Permit requires the City to conduct field screening of its storm drain system for illicit connections no later than May 7, 2012. City staff reported that it met this deadline.

City staff explained that the City's process for field screening included dividing the City into sub-watersheds to more easily identify field screening locations. When an illicit discharge is identified during the field screening process, City staff follows guidance detailed in a field screening protocol document. City staff added that identified dry weather flows are sampled and traced back to the source. The City provided the EPA Inspection Team with a copy of the City's "Illicit Discharge/Illegal Connections Map" dated January 2009 through June 2012 (see Appendix B, B.23) and also provided a detailed list of "Illicit Discharges/Illegal Connections" which were identified during fiscal year 2011-2012 (see Appendix B, B.26).

### 3.2.4 Illicit Connections and Illicit/Illegal Discharge Training Program

Part 4.G.I.8(c) of the Permit requires the City to train all employees and contractors who are responsible for illicit connections and illicit/illegal discharges. City staff explained that training regarding IC/ID was provided to various City departments, including general services and administration, fleet services, parks and special districts and facilities. The City provided sign-in sheets and agendas for various training sessions (see Appendix B, B.3). However, it was unclear to EPA that a set protocol was in place for training documentation and tracking. The City Wastewater Environmental Specialist stated that a set schedule for training sessions for all levels of the City had not been created, but that training was typically conducted every year.

City staff did give one example of targeted training. The City determined that mobile detailers/mobile car washes were a significant potential source of illicit discharges to the City's MS4. To address this issue, the City Public Works Department provided specific training to City Code Compliance Department staff regarding mobile detailers/mobile car washes. In addition, the City also provided training and information to mobile detailers/mobile car washes (see Appendix B, B.28 and B.19).

*Recommendation for Program Improvement*

*The City should develop procedures to ensure that formal IC/ID training is conducted annually and adequately documented.*

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

Pursuant to the receiving water limitations specified within Part 2 of the Permit, discharges from the MS4 that cause or contribute to a violation of a water quality standard (WQS) are prohibited. If an exceedance of a WQS persists, notwithstanding implementation of the Permit, the Copermittee is required to submit a report to the

Regional Board describing BMPs currently implemented as well as additional BMPs that will be implemented to prevent or reduce the discharge of pollutants causing or contributing to the exceedance of a WQS.

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

Based on a review of the *Ventura County Stormwater Quality Management Program 2010/2011 Water Quality Monitoring Report* dated December 2011, EPA learned that exceedances of the E. coli, fecal coliform and aluminum water quality standards (WQS) were detected at the Santa Clara River mass emissions station (ME-SCR) during multiple 2010/2011 wet weather sampling events. Elevated levels of E. coli and fecal coliform were detected at the Oxnard major outfall monitoring station (MO-OXN) during multiple 2010/2011 wet weather monitoring events and are therefore considered "likely caused or contributed to" by the MS4 discharge.[1] The E. coli and fecal coliform exceedances are considered "persistent" because elevated levels in receiving waters and urban runoff were detected during multiple wet weather sampling events within the same monitoring period. Therefore, the City of Oxnard was required to submit a report to the Regional Board that describes existing BMPs and new BMPs that will be implemented to prevent or reduce the discharge of E. coli and fecal coliform in accordance with Parts 2.3(a) of the Permit. The submittal of this report is the first step in an iterative process described in Parts 2.3(a)-(d) of the Permit whereby the Regional Board Executive Officer has an opportunity to require modifications to the City's proposed additional BMPs. Permittees are to submit any required modifications to the report for the Executive Officer's approval, and implement the approved modified BMPs along with any required monitoring according to an approved schedule. After the additional BMPs are implemented, if there are still exceedances of Receiving Water Limitations, a report with another set of additional BMPs to be implemented is submitted for the Executive Officer's approval and another iteration of the process is implemented. When the required reports of additional BMPs are not submitted in the first place, there isn't implementation of the iterative process laid out in Parts 2.3(a)-(d) of the Permit to address exceedances of Receiving Water Limitations.

[1] Because no receiving water monitoring locations exist downstream of MO-OXN, the VCWPD explained in its 2010/2011 Annual Report that water quality at the upstream mass emission station (ME-SCR) will be assumed to represent receiving water quality downstream of MO-OXN for purpose of applying the "cause or contribute/persistence" methodology.

*Potential Permit Violation*

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

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

# Appendix A – Additional Inspection Report Materials

# A.1 – Inspection Schedule

| Agenda for MS4 Program Inspection<br>City of Oxnard, California<br>July 24, 2012 | | |
|---|---|---|
| **Day** | **Time** | **Program/Agenda Item** |
| **Tuesday, July 24, 2012** | 8:00 am - 8:30 am | Kick-off Meeting/Program Management Overview **(Office)** |
| | 8:30 am - 9:30 am | Industrial/Commercial **(Office)** |
| | 9:30 am - 10:30 am | |
| | 10:30 am - 11:30 am | Illicit Connection/Illicit Discharge (IC/ID) **(Office))** |
| | 11:30 am – 12:30 pm | |
| | 12:30 pm – 1:30 pm | Lunch Break |
| | 1:30 pm - 3:30 pm | Industrial/Commercial and IC/ID **(Field)** |
| | 3:30 pm – 4:00 pm | |
| | 4:00 pm – 4:30 pm | Internal Discussion[1] |
| | 4:30 pm – 5:00 pm | Closing Conference[2] (Tentative Time Slot) |

[1] Internal Discussion – Time for inspectors to arrange notes and prepare information to be discussed with the Municipality at the Closing Conference. City participation is not expected.
[2] The City is encouraged to invite representatives from all applicable organizational divisions/departments.

# A.2 – Inspection Sign-in Sheet

| INSPECTION SIGN-IN SHEET | | |
|---|---|---|
| ENTITY: City of Oxnard | | DATE(S): 7/24/12 |
| NAME | ORGANIZATION/DEPT | TITLE |
| Jeremy Grant | City of Oxnard/Waste Water | Wastewater Environmental Specialist |
| MARK Pumford | City of Oxnard | Technical Services Manager |
| Robyn Stuber | USEPA Region 9 | Environmental Scientist |
| Jeff Hershman | City of Oxnard | Wastewater Environmental Specialist |
| Harumi Goya | RWQCB | Engineering Geologist |
| Kurt Oberst | City of Oxnard | Envirn. Specialist |
| John Talmage | City of Oxnard | Environmental Specialist |
| Candice Owen | PG Envr | EPA Contractor |
| | | |
| | | |
| | | |
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# A.3 – List of Site Visits Conducted during the Inspection

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

- PTI Technologies Inc. Facility
- Rincon Recycling Facility
- El Rio Drain Outfall
- City MS4 Outfall

The EPA Inspection Team generated site visit write-ups for the following sites, which are included as Appendices A.4 – A.6:

- PTI Technologies Inc. Facility
- Rincon Recycling Facility
- El Rio Drain Outfall

# A.4 – PTI Technologies Inc. Facility Site Visit Report and Photograph Log

**Site Name:** PTI Technologies Inc. Facility
**Site Location:** Del Monte and Camino del Sol

**Date of Visit:** July 24, 2012
**Entry Time:** 1310 hrs (approx)
**Exit Time:** 1330 hrs (approx)

**Site Owner and/or Operator:** Not obtained

**Site Contact:** Jim Templin (Environmental Health and Safety Manager)

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

**Accompanied by:** Mark Pumford (City of Oxnard), Jeremy Grant (City of Oxnard), and City Inspector (City of Oxnard)

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

## Site Summary

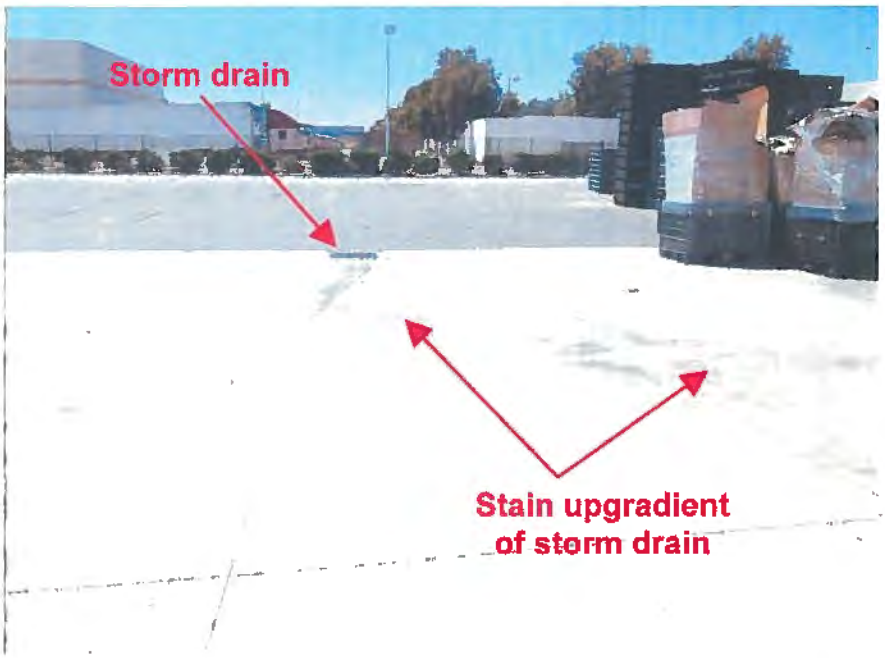
PTI is an industrial facility which manufactures aerospace filtration products. During the inspection, the EPA Inspection Team focused on the outdoor areas of the facility which would be exposed to stormwater. The PTI facility consisted of a back paved yard with a loading area and hazardous material and hazardous waste storage shed (Photographs 1 and 2). The facility had obtained coverage under the California General Permit for Storm Water Discharges Associated with Industrial Activities (Industrial General Permit). City staff stated that the City had conducted multiple inspections at the PTI facility over the past few years. During the site visit, the City Inspector asked a facility representative to see the stormwater pollution prevention plan (SWPPP) and then conducted an inspection of the outdoor industrial area.

## Site Observations

- The City Inspector had the facility Environmental Health and Safety Manager open the hazardous material/hazardous waste storage shed (Photographs 3 and 4).
- The City Inspector also asked to see the "stormceptor" stormwater management structure located near the northern end of the facility (Photograph 5). The stormceptor was an underground permanent stormwater management structure which received flow from the parking area in the central portion of the facility. The stormceptor was intended to remove floatables, solids, hydrocarbons, and metals from stormwater discharges prior to discharge to the MS4.The City inspector explained that during a typical inspection he

would require PTI staff to open the manhole on the stormceptor to observe the condition of the structure.

- A stain from what appeared to be a petroleum product was present on the impervious surface to the southwest of the hazardous materials shed and upgradient of a storm drain inlet (Photographs 1 and 2). The petroleum stain appeared to the EPA Inspection Team to not have recently occurred. The City inspector stated that he would typically discuss stains and evidence of spills with facility representatives during an inspection.




**Photograph 1. PTI Facility I/C Site Visit – View of the paved yard located on the west side of the building. Note the stain on the impervious surface between the hazardous materials storage shed and the storm drain.**


**Photograph 2. PTI Facility I/C Site Visit – Additional view of the paved yard located on the west side of the building. Notewww the additional view of the stain shown in Photograph 1.**


**Photograph 3. PTI Facility I/C Site Visit – View of hazardous materials shed located on the northern side of the paved yard.**

**Photograph 4. PTI Facility I/C Site Visit – View of a room in the hazardous materials shed shown in Photograph 3 located on the northern side of the paved yard.**


**Photograph 5. PTI Facility I/C Site Visit – View of access manhole for stormceptor located on the north end of the facility.**

# A.5 – Rincon Recycling Facility Site Visit Report and Photograph Log

**Site Name:** Rincon Recycling Facility
**Site Location:** 720 Pacific Avenue

**Date of Visit:** July 24, 2012
**Entry Time:** 1400 hrs (approx)
**Exit Time:** 1420 hrs (approx)

**Site Owner and/or Operator:** Not obtained

**Site Contact:** Not obtained

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

**Accompanied by:** Mark Pumford (City of Oxnard), Jeremy Grant (City of Oxnard), and City Inspector (City of Oxnard)

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

## Site Summary

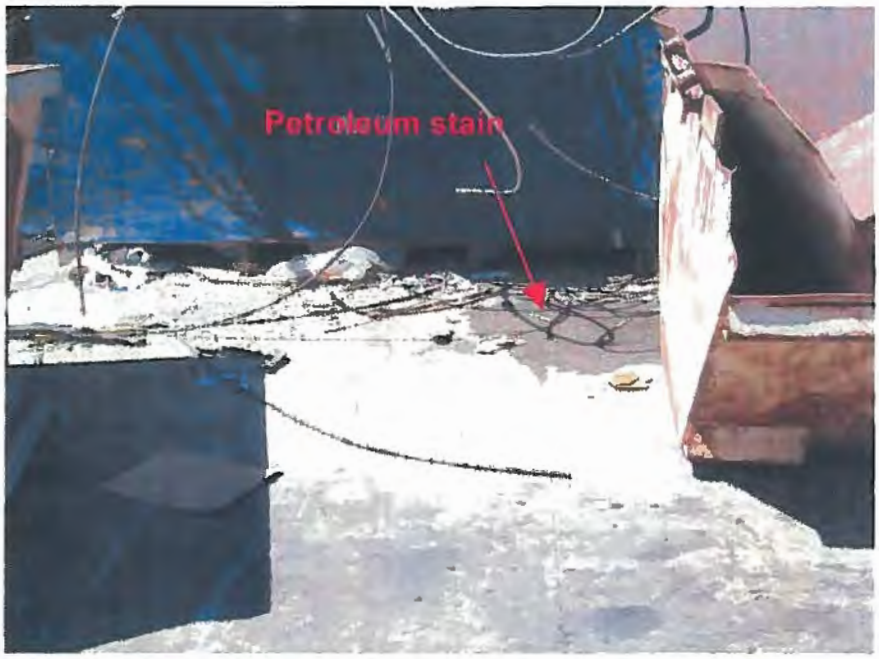
The Rincon Recycling facility consisted of both indoor and outdoor recycling and processing of various recyclable materials. The facility had obtained coverage under the California General Permit for Storm Water Discharges Associated with Industrial Activities (Industrial General Permit). Multiple areas of the site were in a general state of disarray and did not have stormwater BMPs in place. The City Wastewater Environmental Specialist led this site inspection. The City Wastewater Environmental Specialist asked to speak with the site manager; however the manager was not onsite and a company representative walked with the City Wastewater Environmental Specialist during the inspection. The City Wastewater Environmental Specialist explained to the EPA Inspection Team that because stormwater BMPs were not in place throughout the site and the facility owner was not present, he would typically not complete the inspection. Instead, he would schedule a time to come back and conduct the inspection with the facility owner to emphasize the issues on site and speak with the person most capable of making changes.

## Site Observations

- Piles of materials were stored uncovered throughout the site (Photographs 1 and 2).
- A petroleum stain was observed outdoors on an impervious surface along the north side of the facility (Photographs 3 and 4).
- Loose cardboard and paper were located in multiple areas of the site (Photographs 5 and 6).


**Photograph 1. Rincon Facility I/C Site Visit – View looking south of materials stored at the facility without coverage.**


**Photograph 2. Rincon Facility I/C Site Visit – Additional example of materials stored without coverage on the north side of the facility.**




**Photograph 3. Rincon Facility I/C Site Visit – View of a petroleum stain located outdoors on an impervious surface on the north side of the facility.**

**Photograph 4. Rincon Facility I/C Site Visit – Close-up view of the petroleum stain shown in Photograph 3.**

**Photograph 5. Rincon Facility I/C Site Visit – View of loose cardboard and paper located in the central area of the facility.**

**Photograph 6. Rincon Facility I/C Site Visit – Additional view of loose cardboard and paper located in the central area of the facility.**

# A.6 – El Rio Drain Outfall Site Visit Report and Photograph Log

**Site Name:** El Rio Drain Outfall
**Site Location:** Near the intersection of North Oxnard Boulevard and East Vineyard Avenue

**Date of Visit:** July 24, 2012
**Entry Time:** 1430 hrs (approx)
**Exit Time:** 1440 hrs (approx)

**Site Owner and/or Operator:** City of Oxnard

**Site Contact:** Not applicable

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

**Accompanied by:** Mark Pumford (City of Oxnard), Jeremy Grant (City of Oxnard), and City Inspector (City of Oxnard)

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

**Site Summary**

The outfall from the City MS4 to the Ventura County Water Protection District (hereinafter; VCWPD) MS4 consisted of four 36-inch diameter pipes and one box outlet (Photograph 1).

**Site Observations**

- A small amount of water was observed flowing from each of the 36-inch pipes into the VCWPD channel. City staff stated that the flow was from residential irrigation.
- Algal growth and some trash were present in the VCWPD channel (Photographs 1 and 2).


**Photograph 1. City MS4 Outfall – El Rio Drain Outfall – View of the outfall from the City MS4 to the VCWPD. Note the algal growth and trash in the channel.**

**Photograph 2. City MS4 Outfall – El Rio Drain Outfall – Close-up view of the outfall from the City MS4 to the VCWPD.**

# Appendix B – Catalog of Reference Materials

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

B.1 – California Regional Water Quality Control Board Order No. R4-2010-0108, National Pollutant Discharge Elimination System (NPDES), Permit No. CA S004002, *Waste Discharge Requirements for Storm Water (Wet Weather) and Non-Storm Water (Dry Weather) Discharges from Small Municipal Separate Storm Sewer Systems Within the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein*

B.2 – Ventura Countywide Stormwater Quality Management Program Annual Report (2010–2011 Permit Year)

B.3 – Agendas and sign-in sheets from City training meetings

B.4 – Two completed "Notice of Violation" forms

B.5 – "Notice of Violation" form

B.6 – Permit subcommittee email agenda

B.7 – Completed "Illicit Connection Report" form dated 01/13/2011

B.8 – Completed "Illicit Discharge Report" form dated 04/26/2012

B.9 – Statement of Legal Authority sent to RWQCB on July 3, 2012

B.10 – "Warning Notice" form

B.11 – *Watershed Protection Tips* educational materials

B.12 – *BMPs for Stormwater Pollution Control – Automotive Related Industries*

B.13 – Presentation on determining IC/ID field survey points given by City staff at Permit subcommittee meeting

B.14 – Completed "Stormwater Inspection Checklist – Industrial Facilities" dated 6/27/2012

B.15 – Completed "Stormwater Inspection Checklist – Industrial Facilities" for Rincon dated 03/11/2011 and 11/28/2011

B.16 – Completed "Notice of Violation" form for Rincon dated 03/11/2011

B.17 – "Stormwater Inspection Checklist – Industrial Facilities" form

B.18 – "Stormwater Inspection Checklist – Construction Activities" form

B.19 – *Mobile Car Wash and Detailers* pamphlet

B.20 – "Technical Services Program – Source Control, Food Establishment Inspection Checklist"

B.21 – "Automotive Service Facility/Retail Gasoline Outlet Inspection Report" form

B.22 – "Complaint Investigation Report" form

B.23 – Co-Permittee Illicit Discharges/Illegal Connections for City of Oxnard January 2009-June 2012 Map

B.24 – *Businesses & Industrial for a Clean Environment*

B.25 – City of Oxnard 2030 Plan Map

B.26 – Co-Permittee Illicit Discharges / Illegal Connections FY 2011-2012

B.27 – City of Oxnard Storm Water Quality Management City Code Article XII

B.28 – Presentation given by City to mobile car washers and detailers on June 3, 2009

B.29 – Letter from Assistant Public Works Director to City Council concerning Article XII of City Code

B.30 – "Temporary Use Permit Application Information"

B.31 – Program management matrix printout