



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

**JUL 01 2014**

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Mr. Raul Godinez, Executive Director  
Public Works Agency  
City of Santa Ana  
20 Civic Center Plaza (M-21)  
Santa Ana, CA 92701

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

Dear Mr. Godinez:

Enclosed please find the final audit report for the City of Santa Ana Storm Water Management Program (Program). On August 28, 2013, EPA Region 9 (EPA) and PG Environmental, LLC, an EPA contractor, 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 *National Pollutant Discharge Elimination System (NPDES) Areawide Urban Storm Water Runoff Permit* (NPDES Permit No. CAS618030).

EPA's audit focused on evaluation of the City's compliance with the Illicit Discharges/Illicit Connections (ID/IC), and Industrial Facilities program requirements of the Permit. EPA has identified noteworthy aspects of the City's storm water program, recommendations for improvement, and potential permit violations. Specifically, EPA found the following component of the City's program noteworthy:


- The City demonstrated implementation of a comprehensive ID/IC elimination program including creative use of new technology (i.e. smart phone app) to facilitate public reporting of suspected illicit discharges; use of a 24 hour "call" schedule to ensure availability of trained personnel after hours should immediate response to a significant illicit discharge be necessary; and proactive application for Orange County Transportation Authority (OCTA) grant funds for trash and litter control projects.

EPA also identified potential permit violations. Most notably:

- The City's database of industrial facilities lacked required information on site ownership, applicable site SIC code(s), site size and latitude/longitude data as required by Section IX.1 of the Permit, limiting the usefulness of the database as a tool for program management.

Please respond to the audit report with any updates or program enhancements or clarifying comments by Friday, July 18, 2014. Following receipt of the City's response, EPA will post the report along with the City's response on our website. If you have any 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](mailto:gholson.greg@epa.gov).

Sincerely,



Kathleen H. Johnson, Director  
Enforcement Division

Enclosures:

City of Santa Ana MS4 Audit Report (w/attachments)

Cc via email with enclosures:

Michelle Beckwith, Santa Ana RWQCB



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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**

**SANTA ANA  
CALIFORNIA**

**INSPECTION REPORT**

**Inspection Date:  
August 28 – 29, 2013**

**Report Date:  
June 27, 2014**

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## **Section 1.0 Executive Summary**

On August 28-29, 2013, the U.S. Environmental Protection Agency (EPA) and staff from PG Environmental, LLC, an EPA contractor, conducted an inspection of the City of Santa Ana, California's Municipal Separate Storm Sewer System (MS4) Program.

EPA reviewed documents, interviewed staff and conducted field activities to review the City's MS4 Program. The inspection focused on the City's (1) Illicit Discharges/Illicit Connections (ID/IC) - Litter, Debris and Trash Control, and (2) Industrial Facilities Inspection program elements. At the conclusion of the inspection, EPA discussed preliminary observations with City representatives.

In this report, where applicable, EPA has identified noteworthy aspects of the City's storm water program, recommendations for improvement, and potential permit violations.

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

- The City demonstrated implementation of a comprehensive ID/IC elimination program including creative use of new technology (i.e. smart phone app) to facilitate public reporting of suspected illicit discharges; use of a 24 hour "call" schedule to ensure availability of trained personnel after hours should immediate response to a significant illicit discharge be necessary; and proactive application for Orange County Transportation Authority (OCTA) grant funds for trash and litter control projects.

EPA also identified potential permit violations. Most notably:

- The City's database of industrial facilities lacked required information on site ownership, applicable site SIC code(s), site size and latitude/longitude data as required by Section IX.1 of the Permit, limiting the usefulness of the database as a tool for program management.

## **Section 2.0 Santa Ana Stormwater Program**

On August 28-29, 2013, a representative of the U.S. EPA, Greg Gholson, and an EPA contractor, PG Environmental, LLC, conducted an inspection of the City's MS4 Program. EPA also evaluated the County of Orange and City of Orange MS4 Programs on August 26-27 and August 27-28, 2013, respectively.

Discharges from the City's MS4, the Orange County Flood Control District (OCFCD) and twenty-six (26) other municipalities are regulated under *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region, Areawide Storm Water Permit*, National Pollutant Discharge Elimination System (NPDES) Permit No. CAS618030, Order No. R8-2009-0030 as amended by Order No. R8-2010-0062, (hereinafter, Permit), issued October 29, 2010. The Permit is the fourth NPDES MS4 permit issued to the Co-permittees. The Co-permittees currently covered under the Permit include Orange County (Principal Permittee and Co-permittee), OCFCD and the incorporated cities of Anaheim, Brea, Buena Park, Costa Mesa, Cypress, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, Irvine, Laguna Hills, Laguna Woods, La Habra, La Palma, Lake Forest, Los Alamitos, Newport Beach, Orange, Placentia, Santa Ana, Seal Beach, Stanton, Tustin, Villa Park, Westminster, and Yorba Linda (Co-permittees).

The Permit authorizes the Co-permittees to discharge or contribute to discharges of storm water from Phase I MS4s into the Watershed Management Areas of the San Gabriel River drainage area; Huntington Harbor and Bolsa Bay drainage area; Santa Ana River drainage area; Newport Bay drainage area; and the Irvine and Newport Coast Areas of Special Biological Significance. These Watersheds are tributaries to the Pacific Ocean.

### City Information

According to the 2010 U.S. Census, Santa Ana is approximately 27 square miles with a population of 324,528. It is the county seat and second most populous city in Orange County. The City is located adjacent to the Santa Ana River, approximately 10 mile inland from the Pacific Ocean and about 32 miles southeast of downtown Los Angeles. Discharges from the City's MS4 flow into Santiago Creek (a tributary to the Santa Ana River), the Santa Ana Delhi Channel (a tributary to Newport Bay), and the Garden Grove/Wintersburg Channel (a tributary to Bolsa Bay and the Bolsa Chica Ecological Reserve).

### **2.1 Program Areas Evaluated**

EPA's inspection entailed an evaluation of the City's compliance with the following two storm water management components of the Permit:

- Illicit Discharges/Illicit Connections (ID/IC) - Litter, Debris and Trash Control; and
- Municipal Inspections of Industrial Facilities.



EPA 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 describes the findings of the EPA evaluation. Within each sub-section, where applicable, EPA has identified recommendations for improvement and program deficiencies. 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.

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 or fully document all lines of questioning conducted during personnel interviews. Additional inspection report materials, including an industrial inspection checklist, sign-in sheet, and photograph log are included in Appendix A.

Multiple documents were referenced by the EPA Inspection Team during the inspection process and development of this report (e.g., the Permit, MS4 annual reports). In addition, the City provided the EPA Inspection Team with multiple documents during the inspection process. 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 EPA Region 9 and can be made available upon request.

### **3.1 Illicit Discharge/Illicit Connections - Litter, Debris and Trash Control**

Section VII of the Permit requires the City to (1) prohibit all illicit connections to the MS4 through ordinances, inspections, monitoring programs, and enforcement actions, (2) control the discharge of spills, leaks, or dumping of any material other than storm water or authorized non-storm water into the MS4, (3) have a training program for municipal inspections to carry out program requirements, and (4) implement appropriate controls to reduce or eliminate the discharge of trash and debris to waters of the U.S.

#### **3.1.1 Prohibition of Illicit Discharges and Illicit Connections**

Section VII.1 of the Permit requires the Co-permittees to "prohibit all illicit connections to the MS4 through ordinances, inspections, monitoring programs, and enforcement actions." During EPA's inspection, City staff demonstrated knowledge of these requirements as they were able to answer specific questions related to the City's code of ordinances. EPA also reviewed City code Part II, Chapter 18, Article IV, Section 18.155

and found it addresses the requirement through prohibition of any illicit connection and/or discharge (see Appendix B – B.1).

### **3.1.2 Illicit Discharges and Illicit Connections Elimination**

City staff explained that inspection and monitoring for illicit discharges and connections is accomplished, in part, through receipt of reports of ID/ICs from the public via its Public Works Hotline, the County's Spill Response Hotline, and/or a newly developed Smartphone App (see Appendix B – B.2). Staff further explained that other City departments, most notably Fire and Police departments, routinely report suspected ID/ICs directly to storm water program staff. All tips of alleged ID/ICs are documented using the City's Pollution Notification/Investigation Request Form (see Appendix B – B.3) before being entered into the City's ID/IC Database (see Appendix B – B.4).

In addition, as part of its Countywide storm water monitoring program, Orange County field staff routinely monitor receiving waters within the Santa Ana River watershed in both wet and dry weather conditions. If receiving water monitoring data indicates an illicit discharge is occurring, County staff immediately notify the City (often real time due to use of the County's mobile sampling and analytical laboratory) of the issue for response. City staff provided documentation of a recent tip forwarded by County field staff concerning a suspected ID/IC. City staff responded by identifying the suspected illicit connection, documented no flow conditions, and worked with the site owner to have the suspected discharge point (i.e. PVC pipe) permanently capped (see Appendix B – B5).

City staff explained that reports of suspected illicit discharges are tracked using an Excel spreadsheet provided by the County to facilitate uniform end-of-year reporting. EPA reviewed the City's ID/IC data and noted a significant increase in reported illicit discharges during reporting year 2012/13 (i.e. 137 reported ID/ICs), over reporting years 2011/12 and 2010/2011 (i.e. 64 and 34 reported ID/ICs, respectively). Storm water program staff attributed the increase in reported illicit discharges to effective outreach to other City department on the impacts of illicit discharges on receiving water quality. According to City staff, the most common types of ID/ICs are mobile/commercial car detailers, residential oil spills, and construction site discharges of sediment (i.e. track-out).

City procedures include rotating storm water field staff through a 24 hour "call" schedule to ensure availability of personnel after hours should immediate response to a significant illicit discharge (i.e. sanitary sewer overflow) be necessary. Response to illicit discharges is managed through maintenance of a contract with two environmental remediation contactors, Ocean Blue Environmental and United Stormwater. Both companies are available to the City for spill response and storm drain cleaning. In addition, the City partially funds, along with other co-permittees, an implementation agreement with Orange County to allow for County spill response and clean-up as needed.



Regarding the City's enforcement of illicit connections or discharges, City staff explained that it historically relied on the issuance of Notices of Noncompliance (see Appendix B – B.5) as its preferred response to documented IC/IDs. According to City staff, that approach was only partially effective at promptly addressing ID/ICs. For this reason, City staff engaged its Attorney's Office in calendar year 2012 for assistance in developing procedures and forms necessary to support the issuance of administrative field citations (see Appendix B – B.6). Staff explained that the issuance of field citations by its inspectors during face-to-face interactions with the dischargers has proved to be a more effective approach at requiring prompt action to address illicit discharges.

In response to EPA's request, City staff provided documentation of three recent ID/IC investigations in which field citations had been used to document the illicit discharge, require immediate corrective actions, and advise the discharger of the potential of additional enforcement response, including administrative fines, if compliance is not achieved by the date/time indicated in the field citation (see Appendix B – B.7). All case files reviewed by EPA documented the corrective actions taken to eliminate the illicit discharge within the 120 day timeframe prescribed within Section VII.1 of the Permit.

### **3.1.3 Illicit Discharges and Illicit Connections Training for Municipal Staff**

Section VII.3 of the Permit requires the permittees to evaluate its current ID/IC training program and revise its program as needed to address the expertise and competencies required by municipal inspectors. EPA reviewed the City's ID/IC related training program, which includes, among other elements, an annual review of the Countywide Drainage Area Management Plan (DAMP) and the City's Local Implementation Plan (LIP), both of which address ID/IC permit requirements. In addition, City staff provided copies of its annual Industrial/Commercial Kick-off Meeting training materials which address required core program competencies including allowable non-storm water discharges, prohibited discharges, and inspector responsibilities (see Appendix B – B7). EPA did not identify any deficiencies in the City's ID/IC training program for municipal staff.

### **3.1.4 Litter, Debris and Trash Control**

Section VII.4 of the Permit requires the permittees to "implement appropriate control measures to reduce and/or eliminate the discharge of trash and debris to water of the U.S." City staff explained that both structural and non-structural BMPs have been employed to prevent trash and/or debris from being discharged to surface waters within its jurisdiction. Non-structural control measures include: routine street sweeping; annual cleaning of storm drain catch basins; and placement of trash receptacles at bus stations (paid by private sector communications firm in exchange for advertising space).

City staff explained that it continues to be aggressive in applying for grant funds from the Orange County Transportation Authority (OCTA) for trash related projects. Recent efforts to control trash and debris through use of structural BMPs, funded through use of OCTA grants have included installation of 65 retractable screens and pipe connector

screens on/within storm drains located in trash hot spots within the City's civic center, and installation of 70 pipe connector screens within storm drains west of the Santa Ana River. According to City staff, a third structural trash and debris control project was recently approved, and installation of a storm water pretreatment unit (i.e. hydrodynamic separator) on a major storm drain line conveying storm water from the downtown area to the Santa Ana Delhi Channel was due to start in September 2013.

In addition to the trash control projects discussed above, City staff explained that several significant trash control projects were being pursued through use of City and OCTA funds, including: installation of 500 pipe connector screens within storm drains located along arterial roadways and high density areas within the City; and a multi-city (i.e. Santa Ana, Costa Mesa, and Newport Beach) cost-share project to install trash tracks and hydrodynamic separators within the Santa Ana/Delhi Channel. In addition to trash control, this project is being designed to control selenium, nutrients and bacteria by diverting flow within the channel for landscape irrigation at a local golf course, and to the Orange County publicly-owned treatment works (POTW) for further treatment.

### **3.2 Municipal Inspections of Industrial Facilities**

Section IX of the Permit requires the City to implement an inspection program of industrial facilities within its jurisdiction. This program must include (1) management of an inventory of all industrial facilities that have the potential to discharge pollutants to the MS4, (2) development of inspection priorities based on each facility's relative risk to water quality, (3) inspection procedures addressing field review of storm water BMPs, written documentation of BMP implementation and maintenance procedures, collection of photographic documentation of any water quality violation, and establishment of inspection frequencies for all high and medium risk facilities consistent with Permit requirements, and (4) enforcement procedures including sanctions for non-compliance sufficient to require compliance with the Permit.

#### **3.2.1 Industrial Facilities Inventory**

Section IX.1 of the Permit requires the City to maintain an inventory of industrial facilities within its jurisdiction. The inventory must: include all industrial sites that have the potential to discharge pollutants to waters of the U.S.; be updated annually; and be maintained in a computer-based database system and include relevant site ownership information, SIC code information, General Industrial Permit WDID # (if applicable), facility size, location and latitude/longitude information.

City staff explained that it uses a contractor (i.e. AMEC) to implement its industrial facilities inspection program. According to City staff, AMEC is responsible for annual updates to the City's list of industrial sources that have the potential to discharge pollutants to the MS4. AMEC staff explained that this is accomplished by cross referencing the City's master list of licensed businesses (~25,000 businesses) with the State's SMARTS database of NPDES permitted facilities, and publicly available commercial databases consistent with written City procedures (see Appendix B – B.8).

Review of the City's industrial facilities database following the inspection identified a total of 1,117 regulated stormwater industrial sources within the City's jurisdiction (see Appendix B – B.9). EPA found that the database lacks information required by the Permit. Specifically, the database lacks information on site ownership, applicable site SIC code(s), site size, and latitude/longitude data.

#### *Potential Permit Violation*

*The City's industrial facilities database lacked information on site ownership, applicable site SIC code(s), site size, and latitude/longitude data as required by Section IX.1 of the Permit.*

Although the City maintains a comprehensive database of industrial sites with the potential to discharge pollutants to the MS4 within its jurisdiction, the omission of required information limits the usefulness of the database as a tool for program management (e.g. generation of inspection targeting lists based on SIC codes of concern, size, etc).

### **3.2.2 Risk Based Inspection Priorities**

Section IX.2 of the Permit requires the City to establish priorities for industrial facility inspections based on relative risk to water quality (i.e. high, medium, low). At a minimum, a high priority designation is required for facilities subject to the requirements of Toxic Release Inventory (TRI) Program (i.e. Section 313 of the Emergency Planning and Community Right-to-Know Act); requiring coverage under the State's Industrial General Storm Water Permit; with a high potential for, or history of, unauthorized, non-storm water discharges; and that are tributary to, and within 500 feet of, an area defined by the Ocean Plan as an Area of Special Biological Significance.

City staff provided a prioritized list of industrial facilities (see Appendix B – B10) and explained that the 125 high risk sites were identified through application of the Permit-prescribed criteria summarized above. City staff further explained that all remaining industrial facilities were assigned an inspection priority of medium (55 sites) or low (937 sites) based on use of a standard scoring system considering: type of activity; material used; waste generated; pollutant discharge potential; non-storm water discharges; size of facility; and proximity to an environmentally sensitive water body.

### **3.3.3 Municipal Inspection of Industrial Facilities**

Section IX.3 of the Permit requires the City to conduct inspection of industrial facilities within its jurisdiction. The City's inspections must include review of material and waste handling and storage practices, written documentation of pollution control BMP implementation and maintenance procedures, photographic documentation of any water quality violations, and evidence of past or present unauthorized, non-storm water discharges and enforcement actions.

The City has established contracts with two companies (i.e. AMEC and EEC) to perform inspections of industrial facilities. Contract inspectors use a City-developed "Industrial / Commercial Facility Inspection Form" (see Appendix B – B.10) and activity-specific BMP fact sheets to assess the adequacy of material and waste handling and storage procedures, and BMP implementation and maintenance. EPA reviewed the City's inspection form and found it to be a useful tool to guide field inspectors through a review of BMP implementation and facility compliance history, as well as for documenting any required corrective actions necessary to address inspection findings.

As part of the inspection, EPA observed the City's contract inspector (i.e. AMEC) perform two unannounced inspections of high risk industrial facilities (i.e. RBC Transport Dynamics Corp, and Men-Cal Recycling). The inspector appeared knowledgeable as to a wide-range of appropriate activity-specific BMPs and demonstrated an ability to establish rapport with facility representatives that appeared valuable in encouraging prompt response to inspection findings. Inspection findings were documented in the field using the City's inspection form and clearly communicated to facility representatives, along with recommended corrective actions, during the inspections.

Sections IX.3 and 4 of the Permit require the City to inspect all high priority facilities at least once a year, medium priority facilities once every two years, and low priority facilities at least once per permit cycle. City staff provided EPA a fiscal year 2012/2013 inspection tracking spreadsheet, detailing annual inspection accomplishments for each of its inspection contractors. EPA reviewed this data and noted that all (125) high risk sites and at least 20% of all low risk sites (187) had been inspected within the previous inspection year. However, EPA noted that only 32% of the City's medium risk site had been inspected within the previous inspection year. City staff acknowledged this shortfall and explained that an increased number medium risk industrial site inspections were planned for inspection year 2013/2014.

### **3.3.4 Enforcement Procedures**

Section IX.7 of the Permit requires the City to enforce its ordinance and permits at all industrial facilities to maintain compliance with the Permit. In addition, penalties for non-compliance must be adequate to return facilities to compliance and enforcement procedures must include verbal or written warnings for minor violations at the time of inspection. Written enforcement orders for violations that pose a threat to water quality must consider monetary penalties, bonding requirements, and/or permit denial or revocation depending on the severity of the violation.

According to City staff, if inadequate material or waste handling or storage practices, or improperly installed or maintained BMPs are observed during site inspections, the City uses its enforcement authorities to return the facility to compliance. City staff provided documentation of its enforcement response to identified violations of its storm water ordinance over the past three years. This documentation included, among other information: eighteen (18) administrative citations issued during fiscal year 2012/2013;



fourteen (14) notices of non-compliance issued during fiscal year 2011/2012; and fourteen (14) notices of non-compliance issued during fiscal year 2010/2011.

In addition, City staff provided complete enforcement files for three recent enforcement actions (i.e. Global Metal Recycling, Inc., Men-Cal Recycling, and Hardy & Harper, Inc.) issued in response to documented storm water violations (see Appendix B – B11). EPA reviewed these case files following the on-site inspection and found that the City properly documented inspection findings through collection of photographic evidence and use of the City's inspection form, including detailed narrative comments within the observation/comments section of the form; scheduled and conducted follow-up inspections to ensure timely corrective actions to address inspection findings; and issued written enforcement actions citing its municipal code and administrative penalty authorities.

### **3.3.5 Training Program for Storm Water Managers, Planners, Inspectors and Municipal Contractors**

Section XVI, Parts 1 – 9 detail the training requirements of the principal permittee (i.e. Orange County) and the individual Co-permittees (e.g. City of Santa Ana) should a Co-permittee choose to exercise the option of developing and conducting its own training program. City staff explained that while it participates in County-sponsored training sessions as appropriate, it has developed its own storm water training program. City staff provided EPA a copy of the County's *Training Program Framework – Core Competencies* (see Appendix B – B12) and explained that it requires all new staff to complete introductory training addressing core program competencies (including ID/IC requirements as discussed earlier in this report). In addition, the City hosts an annual, refresher training workshop for field staff prior to the start of each rainy season. According to City staff, the focus of the refresher training changes annually based on program needs and feedback from field inspectors. Review of City-developed refresher training materials indicate that these sessions have recently addressed proper use of inspection checklists and inspection tracking data entry requirements; follow-up inspection requirements; and review of storm water sampling analytical results.

City staff also provided EPA copies of its post-training questionnaire, which was developed to ensure trainees acquire the requisite knowledge in the storm water program to carry out their duties, and training records for its contract inspectors. Review of training records by EPA following the inspection indicated that the scope of the City's storm water training may be too narrow to adequately address Permit requirements. Specifically, Section XVI.3 of the Permit requires routine training for each category of trainees (i.e. managers, inspectors, planners, contractors, public works employees). Inspection training records provided by City staff detailed training accomplishments by contract field inspectors, but excluded records specific to City storm water management, field staff, planners, and/or public works employees.

*Recommendation for Improvement*

*The City should expand its storm water training program to include training modules addressing core competencies and annual refresher training requirements for each category of trainees (e.g. managers, inspectors, planners, public works employees); testing procedures for all new training modules; and recordkeeping procedures to track completion of requisite training across all categories of trainees.*



**Santa Ana, CA  
Municipal Separate Storm Sewer System (MS4)  
Compliance Audit Report**

**Appendix A**

mk 8/29/13



**City of Santa Ana**  
**Water Quality Ordinance Section 18-155**  
**Industrial / Commercial Facility Inspection Form**

Date: \_\_\_\_\_ Time: \_\_\_\_\_ Inspector: Mike Lowther  
 Reason For Inspection     Initial     Routine     Follow-up     Routine + Follow-up

**I. SITE AND GENERAL INFORMATION**

Facility Name: ALL NISAN INF. MAZD AUTO DISMANTLING      Contact Name: HYDARYACIL, AERAM  
 Site Address: 826    E    WASHINGTON    AVENUE      Phone Number: 7148134569  
 SIC Code: \_\_\_\_\_      Field Verified SIC/NAICS    5015  
 Describe primary business activity: AUTO SALVAGE YARD  
 Facility Type: Industrial      General Industrial Stormwater Permit?    If Yes, 8 301023116  
 Does facility have a valid Business License?     If Yes, Business License No: 323542     No/Expired  
 Latitude: 33.7556128129      Longitude: -117.858838732

**II. ACTIVITIES / BMP ASSESSMENT**

Photos     Yes     No      Number of Photos:

Activities - Check each activity present at the site.	BMP			Implementation Effectiveness			
	Yes	No	N/A	Very Poor	3	2	Excellent
<input type="checkbox"/> <b>Vehicle or Equipment Fueling</b>				4	3	2	1
1. Is fueling area designed to prevent run-on of stormwater and the runoff of spills?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are employees trained in proper fueling, cleanup, and spill response procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are absorbent materials readily available for small spills?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is fueling area inspected regularly for spills and/or leaks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> <b>Vehicle or Equipment Washing/Steam Cleaning</b>							
1. Is designated wash area used?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is wash area equipped with clarifier and connected to sanitary sewer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is designated wash area designed with complete containment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is clarifier or oil/water separator maintained regularly? Is maintenance documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> <b>Vehicle or Equipment Maintenance and Repair</b>							
1. Is maintenance performed in designated area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is equipment kept clean, no build-up of oil and grease?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are drip pans and containers used in areas where drips or leaks may occur?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are used oil and oil filters, antifreeze, batteries, fluids, etc. recycled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> <b>Outdoor Loading/Unloading of Materials</b>							
1. Are delivery vehicles parked so spills and leaks can be contained?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the loading/unloading dock/area covered to reduce exposure of materials to rain?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is loading/unloading dock/area designed to prevent stormwater run-on?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are forklift operators properly trained to use heavy equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are materials loaded near storm drain inlets?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> <b>Outdoor Storage of Materials/Products/Equipment</b>							
1. Are covers used to protect items stored outside? (Check covering type used) <input type="checkbox"/> Plastic <input type="checkbox"/> Roof <input type="checkbox"/> Canopy <input type="checkbox"/> Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are materials/products on pallets or other structures that keep them off the ground?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are hazardous materials stored in properly designed containment areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are spill containment pallets used?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are berms, curbs, or other structures in place to minimize pollutants from entering the stormwater streams?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> <b>Waste Handling and Disposal</b>							
1. Are materials recycled whenever possible?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are dust and particulates properly managed (indoors and outdoors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are wastes segregated and separated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is storage area designed to prevent stormwater runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are waste dumpsters covered?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> <b>Building and Grounds Maintenance</b>							
1. Are pesticides and fertilizers used and stored properly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are areas swept regularly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is washdown by hosing prohibited?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are wash water, sweeping, and sediments disposed properly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are materials used in repair and minor remodeling (paints, etc.) stored properly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are paved surfaces adequately maintained (no crumbling asphalt or concrete)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> <b>Erodible Surface Areas</b>							
1. Are areas of exposed/disturbed soil properly managed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Do any landscaped areas require re-vegetation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> <b>Employee Stormwater Management Training</b>							
1. Do employees receive general training for managing runoff from site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Do employees receive training for preventing pollution and controlling runoff from site (BMP implementation)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are training records and educational materials available for review?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 4 No BMPs Used and stormwater pollution likely.
- 3 Some BMPs used but not effective
- 2 Some BMPs used and moderately effective
- 1 All necessary BMPs used and very effective

