

**Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4**

This form summarizes the requirements in Order No. 01-182. Each Permittee must complete this form in its entirety, except for those requirements applicable only to the Principal Permittee. Only report activities that were performed during the previous fiscal year. Upon completion, this form shall be submitted to the Principal Permittee, by the date specified by the Principal Permittee, for inclusion in the unified Annual Storm Water Program Report. Attachments should be included where necessary to provide sufficient information on program implementation.

The goals of this Report are to: 1) concisely document implementation of the Storm Water Quality Management Program (SQMP) during the past fiscal year; 2) evaluate program results for continuous improvement; 3) to determine compliance with Order 01-182; and 4) to share this information with other Permittees, municipal decision makers, and the public.

!	YOU MUST FILL OUT ALL THE INFORMATION REQUESTED <i>Do not leave any of the sections blank.</i>
N/A	If the question does not apply to your municipality, please indicate N/A in the space provided and provide a brief explanation
U	If the information requested is currently unavailable, please indicate U in the space provided and give a brief explanation.

This Report Form consists of the following sections:

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I. Program Management

- A. Permittee Name: City of Vernon
- B. Permittee Program Supervisor: Samuel Kevin Wilson, P.E.
 Title: Director of Community Services & Water
 Address: 4305 Santa Fe Avenue
 City: Vernon Zip Code: 90058
 Phone: (323) 583-8811 ext. 245 Fax: (323) 826-1435
- C. In the space below, briefly describe how the storm water program is coordinated within your agency's departments and divisions. Include a description of any problems with coordination between departments. To facilitate this, complete the Table 1.

The City of Vernon's Stormwater Management Program is administered by two departments, the Community Services and Water (CSWD) and the Health and Environmental Control Departments (HECD). Public Agency Activities are primarily managed by the CSWD while the remainder of the Stormwater Quality Management Plan is primarily administered by the HECD. The Vernon Fire and Police departments play a supporting role in the Illicit Discharge/Elimination Program.

TABLE 1 - Program Management

Storm Water Management Activity	Division/Department	# of Individuals Responsible for Implementing
1. Outreach & Education	HECD	6
2. Industrial/Commercial Inspections	HECD	6
3. Construction Permits/Inspections	CSWD, HECD	6
4. IC/ID Inspections	HECD	6
5. Street sweeping	CSWD	Contracted
6. Catch Basin Cleaning	CSWD	3
7. Spill Response	Fire Dept., HECD, CSWD	36
8. Development Planning (project/SUSMP review and approval)	HECD	1
9. Trash Collection	CSWD	3

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D. Staff and Training

Attach a summary of staff training over the last fiscal year. This shall include the staff name, department, type of training, and date of training.

See Attachment A.

E. Budget Summary

- 1. Does your municipality have a storm water utility? Yes No
- If no, describe the funding source(s) used to implement the requirements of Order No. 01-182.

General Fund.

- 2. Are the existing financial resources sufficient to accomplish all required activities? Yes No
- 3. Complete Table 2 to the extent that accurate information is available (indicate U in the spaces where the information is unavailable), and report any supplemental dedicated budgets for the same categories on the lines below the table.
- 4. List any additional state/federally funded projects related to storm water.

The Gateway Integrated Regional Water Management Joint Powers Authority granted the City of Vernon \$309,500 for the Catch Basin Insert Project. The project provided for the purchase and installation of L.A. Regional Water Quality Control Board approved Connector Pipe Screens or Automated Retractable Screens to all stormwater catch basins within the City of Vernon.

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TABLE 2

Program Element	Expenditures in Previous Fiscal Year	Estimated Amount Needed to implement Order 01-182
1. Program management		
a. Administrative costs	\$70,811.00	\$75,000
b. Capital costs	-	-
2. Public Information and Participation		
a. Public Outreach/Education	\$8,915.91	\$10,000
b. Employee Training	\$11,036.27	\$12,000
c. Corporate Outreach	-	\$ 3,500
d. Business Assistance	\$2,888.25	\$ 3,500
3. Industrial/Commercial inspection/ site visit activities	\$10,784.84	\$40,000
4. Development Planning	\$2674.62	\$3,000
5. Development Construction	\$8,153.92	\$10,000
a. Construction inspections		
6. Public Agency Activities		
a. Maintenance of structural and treatment control BMPs	\$0.00	\$30,000
b. Municipal street sweeping	\$142,800.00	\$150,000
c. Catch basin cleaning	\$23,075.89	\$ 30,000
d. Trash collection/recycling	\$36,829.23	\$ 40,000
e. Capital costs	\$0.00	-
f. Other	\$1,111.00	\$ 2,000
7. IC/ID Program		
a. Operations and Maintenance	\$7591.09	\$ 10,000
b. Capitol Costs	-	-
8. Monitoring	\$0	\$0
9. Other	\$0	\$0
10. TOTAL	\$326,672.02	\$419,000

List any supplemental dedicated budgets for the above categories:

None.

List any activities that have been contracted out to consultants/other agencies:

None.

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II. Receiving Water Limitations (Part 2)

- A. Are you aware, or have you been notified, of any discharges from your MS4 that cause or contribute to a condition of nuisance or to the violation of any applicable water quality standards? Yes No
- B. Has the Regional Board notified you that discharges from your MS4 are causing or contributing to an exceedance of water quality standards? Yes No
- C. If you answered Yes to either of the above questions, you must attach a Receiving Water Limitations (RWL) Compliance Report. The Report must include the following:
1. A description of the pollutants that are in exceedance and an analysis of possible sources; *Not applicable.*
 2. A plan to comply with the RWL (Permit, Part 2); *Not applicable.*
 3. Changes to the SQMP to eliminate water quality exceedances; *Not applicable.*
 4. Enhanced monitoring to demonstrate compliance; and *Not applicable.*
 5. Results of implementation. *Not applicable.*

III. SQMP Implementation (Part 3)

- A. Has your agency implemented the SQMP and any additional controls necessary to reduce the discharges of pollutants in storm water to the maximum extent practicable? Yes No
- B. If your agency has implemented additional or different controls than described in the countywide SQMP, has your agency developed a local SQMP that reflects the conditions in its jurisdiction and specifies activities being implemented under the appropriate elements described in the countywide SQMP? Yes No
- C. Describe the status of developing a local SQMP in the box below.

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The City of Vernon has been actively enhancing the operations and public outreach portions of the local SQMP in order to increase its pollution prevention efforts. The following are brief descriptions of these SQMP operational and public outreach improvements;

- The Developmental Planning and Construction Programs have been improved by integrating: (1) Los Angeles Regional Board recommendations that resulted from the Developmental Planning Program audits conducted in 2003; (2) policies and procedures that address program challenges encountered in the previous years; and (3) Health & Safety concerns addressing vector control issues. In addition, all submitted building, plumbing, and/or mechanical plans that are not subject to the Development Planning Program are evaluated by the HECD for stormwater exposure and potential for illicit discharge. If the potential is significant, the project is conditioned to minimize stormwater exposure and/or potential to discharge.
- The illicit discharge/connection program has been improved by effectively integrating the HECD's investigation procedures with the department's hazardous/non-hazardous materials emergency response procedures. In addition, the City's interdepartmental coordination has been enhanced to improve efficiency of the illicit discharge/connection program.
- The commercial/industrial inspection program has been improved by increasing the routine inspections to (at minimum) twice during the 5-year permit period for both Tier I and Tier II facilities. In addition, the HECD has also implemented inspections for commercial/industrial facilities which are not in a Federal or State identified Standard Industrial Classification code requiring inspection but cause exposure concerns.

- D. If applicable, describe an additional BMP, in addition to those in the countywide SQMP, that your city has implemented to reduce pollutants in storm water to the maximum extent practicable.

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The City of Vernon has continued to be aggressive in its efforts to minimize pollution to the MS4. The following are Vernon implemented BMPs that reach beyond the current MS4 permit requirements:

1. The City of Vernon Health & Environmental Control Department (HECD) hosted, and presented pollution prevention information at, a Stormwater Business Compliance Seminar. The seminar included participation from the Vernon Chamber of Commerce, Vernon businesses, Vernon Community Services and Water Department (CSWD), and the Los Angeles Regional Water Quality Control Board.
2. Vernon HECD also coordinated its inaugural Earth Day Open House. Participants included representatives from the Vernon Chamber of Commerce, several Vernon Businesses, Vernon Light and Power Department, and LA Metro.
3. The Vernon HECD also distributed a reverse 911 facsimile and e-mail message to all Vernon businesses advising them of the public review and comment period for the Draft General Industrial Activity Stormwater Permit (GIASP). The City of Vernon provided educational support to help business owners and operators understand the technical language and potential impacts of the draft GIASP.
4. The Vernon CSWD is in the final stages of completing the installation of Connector Pipe Screens or Automatic Retractable Screens to all 438 City and 437 County-owned stormwater catch basins within the City of Vernon. Not only will project completion result in an impressive 100% trash removal from run-off but also signifies full compliance with the L.A. River Trash Total Maximum Daily Load 5 years ahead of the compliance deadline.
5. The City of Vernon HECD presented a Pollution Prevention (P2) and Sustainability Workshop, in conjunction with developing a P2 informational pamphlet, for the local community. The workshop and pamphlet were tailored to help local businesses reduce their carbon footprint in addition to increasing the public's awareness of stormwater pollution prevention responsibilities.
6. As part of the occupancy process for all new businesses, business operators are given pollution prevention educational material prior to the issuance of an occupancy permit.
7. The City of Vernon continues to support and promote its Beverage Container Recycling Program.
8. Stormwater BMP consultations and site evaluations in relation to construction, post construction, and operational stormwater exposures are provided for businesses.
9. The HECD has enhanced its commercial/industrial facilities inspections to, at minimum, two times during the permit period for both Tier I and Tier II facilities.
10. The City of Vernon's Commercial/Industrial Facilities Inspection Program includes facilities that are not identified in the MS4 permit as requiring inspection but cause exposure concerns.
11. A Rainwater Diversion System Guide (RDSG) is provided to developers/contractors which describes design options to prevent illicit discharges caused by operator error and system blockages/failures at proposed facilities requiring frequent outdoor wash down activities. Since rain diversion systems usually involve the use of a pump or overflow system, typically resulting in standing water, the RDSG also addresses environmental and health concerns involving vectors and provides acceptable solutions to minimize standing water.
12. All submitted building, plumbing, and/or mechanical plans that are not subject to the Development Planning Program are evaluated by the HECD for stormwater exposure and potential for illicit discharge. If the potential is significant, the project is conditioned to minimize stormwater exposure and/or potential to discharge.
13. Developmental Construction Program site inspections are conducted during and following rain events to evaluate BMP implementation and compliance in addition to the inspection requirement under Part 4, E., 2., (b).
14. City owned catch basins are cleaned twice per year, once during the dry weather season and once prior to the wet weather season.
15. The HECD participated and presented stormwater and sustainability information at the Food Industry Business Roundtable Annual Conference.

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16. The City requires submittal and approval of de-silting BMP systems prior to de-watering operations at construction sites.
17. BMP field evaluation procedures are performed prior to final building sign-off to ensure Standard Urban Stormwater Mitigation Plan (SUSMP) compliance and BMP performance.
18. The City maintains and updates a list of treatment control BMPs that are not approved for installation in Vernon.
19. As part of the SUSMP submittal the City recommends developers to describe any source control BMPs.
20. At least one Development Planning Program field inspection is required prior to final building approval and two field inspections are required if the project involves a rain diversion system.
21. BMP inspection and maintenance logs are recommended to be included as part of a SUSMP submittal.
22. As part of the SUSMP submittal, the City recommends all proposed outdoor hose bibs be labeled (for "irrigation use only" or "Do Not Allow Discharge to Storm Drain") or rendered inoperable (without use of tools) to minimize illicit discharges.
23. To supplement the City's existing storm drain stencil loan program, the Vernon HECD and CSWD has initiated a new program of installing stainless steel storm drain markers on private property catch basins. This complimentary service is a long term alternative to the traditional stenciling of the popular "No Dumping, Drains to Ocean" warning to storm drain catch basins which typically require re-stenciling annually.
24. The HECD is in the process of developing a Sustainability Action Plan (SAP) for the City. The SAP is intended to be a living document that will guide the City in developing and maintaining its sustainable infrastructure and minimizing its carbon footprint.
25. The City of Vernon is a member of the Los Angeles County Recycling Market Development Zone (RMDZ) Program. The RMDZ Program combines recycling with economic development to fuel new businesses, expand existing ones, create jobs, and divert waste from landfills.
26. The City contracts with a private contractor to sweep all City streets on a weekly basis in order to control the amount of trash that enters the MS4 system.
27. The HECD hosted its annual e-waste collection event.
28. The City continues to take an active role in the Los Angeles River Metals TMDL Reach 2 Coordinated Implementation Plan Technical Committee.
29. The City entered into a Memorandum of Agreement with the Gateway Cities Council of Government for the administration and cost sharing to conduct scientific studies to develop site specific objectives in response to the Los Angeles River and Tributaries Metals TMDL.
30. The City continued its support for the Brake Pad Partnership's work to reduce copper in brake pads that resulted in legislation being passed.
31. The City of Vernon HECD is a key member in a newly formed Vernon Environmental Committee. The purpose of the committee is to facilitate dialogue and understanding between Vernon businesses, several local environmental justice groups, the City of Vernon, and other environmental regulators towards our mutual goal of protecting the environment.
32. The City of Vernon continues to promote its Used Oil Recycling Program. The local school staff, students, and teachers play a key role in the success of the program. The program is supported and sponsored by many Vernon businesses in addition to Cal Recycle.
33. The Vernon HECD has initiated a policy to ensure that an Environmental Health Specialist is on duty during non-business hours to respond to any hazardous/non-hazardous/sewage spills in addition to other public health emergencies. Environmental Health Specialists provide technical and enforcement authority support to the City's primary emergency responders.
34. The City of Vernon Fire Department maintains an ISO Class 1 rating with an average response time of less than 3 minutes.
35. The Stormwater Program Manager in the Vernon HECD has obtained QSD/P certification from the State Water Resources Control Board.
36. In 2011, HECD participated in the Vernon School Earth Day Event. The event provided students with an opportunity to participate in five environmentally themed learning stations.

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E. Watershed Management Committees (WMCs)

1. Which WMC are you in? Los Angeles River
2. Who is your designated representative to the WMC? Claudia Arellano and Jerrick Torres
3. How many WMC meetings did you participate in last year? 9
4. Describe specific improvements to your storm water management program as a result of WMC meetings.

The meetings provide a forum for information about the status of the programs and requirements the cities are to meet. The compliance for TMDL's is discussed and direction is provided. LARWMC meetings have, for the most part, served to provide basic information regarding "issues of the day" and provided a forum for the discussion of major issues and sometimes the resolution of these issues by the meeting members. The watershed meetings provide varying perspectives on common issues. The WMC has also served as a hub for coordinating and sharing information of several technical committees.

5. Attach any comments or suggestions regarding your WMC.

There is a need to have open discussions, between jurisdictions, on problem solving of common operational/procedural/regulatory challenges related to permit compliance. LARWMC meetings need to be more proactive in addressing watershed-specific pollution issues. Concrete actions should be taken more often in response to the mandates of the Board. The LA Regional Water Quality Board should attend all the meetings to provide direction and interpretation of their permit requirements. The participation of the Board has been non-existent. Definitive answers should be provided when the WMC makes a specific request.

F. Storm Water Ordinance

1. Have you adopted a storm water and urban runoff ordinance to enforce all requirements of Order 01-182? Yes No
If not, describe the status of adopting such an ordinance.

Not applicable.

2. If yes, have you already submitted a copy of the ordinance to the Regional Board? Yes No
If not, please attach a copy to this Report.
3. Were any amendments made to your storm water ordinance during the last fiscal year? Yes No
If yes, attach a copy of amendments to this Report.

G. Discharge Prohibitions

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1. List any non-storm water discharges you feel should be further regulated:

There are no other non-stormwater discharges that we feel should be further regulated.

2. List any non-storm water discharges you feel should be exempt, and provide an explanation for each:

We feel that all non-stormwater discharges that are currently listed as exempt discharges in the current Municipal Stormwater Permit should continue to be exempt in any future stormwater permits.

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IV. Special Provisions (Part 4)

A. Public Information and Participation (Part 4.B)

In addition to answering the following questions, attach a summary of all storm water education activities that your agency conducted or participated in last year.

1. No Dumping Message

- a) How many storm drain inlets does your agency own? 438
- b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? 438
- c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? 438

If this number is less than the number in question 1.b, describe why all inlets have not been marked, the process used to implement this requirement, and the expected completion date.

Not applicable.

- d) How many public access points to creeks, channels, and other water bodies within your jurisdiction have been posted with no dumping signage in the past year? None. The City of Vernon does not have legal jurisdiction over any portion of the Los Angeles River that runs through the City.

Describe your agency's status of implementing this requirement by the date required in Order No. 01-182.

The City conducted a survey to determine its compliance responsibility with respect to this requirement. It revealed that it had no water bodies requiring anti-dumping signage. However, the County of Los Angeles Flood Control District has posted no dumping signage at several points along that portion of the Los Angeles River that runs through Vernon.

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2. Reporting Hotline

- a) Has your agency established its own hotline for reporting and for general storm water management information? Yes No
- b) If so, what is the number? (323) 583-8811
- c) Is this information listed in the government pages of the telephone book? Yes No
- d) If no, is your agency coordinated with the countywide hotline? Yes No
- e) Do you keep record of the number of calls received and how they were responded to? Yes No
- f) How many calls were received in the last fiscal year? 13
- g) Describe the process used to respond to hotline calls.

During regular business hours, reports of possible illicit discharges that pose an immediate risk to the public health or property are directed to the Fire Department and HECD for immediate emergency response. If there is no immediate risk to public health or property, the report is directed to HECD for immediate emergency investigation and clean-up enforcement authority. During non-business hours, depending on the magnitude and type of material of spill, reports of possible illicit discharges are directed to Vernon Dispatch Center to determine and request a Fire Department, Community Services, or HECD response.

- h) Have you provided the Principal Permittee with your current reporting contact information? Yes No
- i) Have you compiled a list of the general public reporting contacts for all Permittees and posted it on the www.888CleanLA.com web site (Principal Permittee only)? Yes No
If not, when is this scheduled to occur? Not applicable.

3. Outreach and Education

- a) Describe the strategy developed to provide outreach and bilingual materials to target ethnic communities. Include an explanation of why each community was chosen as a target, how program effectiveness will be determined, and status of implementation. (Principal Permittee only)

Not applicable.

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- b) Did the Principal Permittee organize quarterly Public Outreach Strategy meetings that you were aware of? Yes No
- How many Public Outreach Strategy meetings did your agency participate in last year? 4
- Explain why your agency did not attend any or all of the organized meetings.

City staff attended each quarterly meeting either in person or through webcast.

Identify specific improvements to your storm water education program as a result of these meetings:

The City of Vernon provided stormwater pollution prevention pamphlets, provided by the Principal Permittee, during Vernon's 2011 Stormwater Business Compliance Workshop and Annual Earth Day Open House. The pollution prevention pamphlets were coordinated through these Public Outreach Strategy Meetings.

List suggestions to increase the usefulness of quarterly meetings:

The meetings should be more focused on promoting awareness of specific pollutants on receiving water quality especially those that are subject to a TMDL. The focus of the outreach should be to define the benefits and the consequences of non-compliance to the TMDLs. Specific target constituencies should be emphasized to change the group behavior. Furthermore, the frequency of meetings should be increased to every other month.

If quarterly Public Outreach Strategy meetings were not organized, explain why not and when this requirement will be implemented (*Principal Permittee only*).

Not applicable.

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- c) Approximately how many impressions were made last year on the general public about storm water quality via print, local TV, local radio, or other media? *The Principal Permittee achieved 130 million paid impressions and 30.3 million added-value impressions from media buys through the stormwater program. The City of Vernon contributed to the Principal Permittee's education outreach campaign media buy-in program. The City estimates that through its other public education outreach media that it made about 55,000 impressions on its own.*
- d) Describe efforts your agency made to educate local schools on storm water pollution.

There is only has one school, located in the City of Vernon, which is part of the Los Angeles Unified School District. In 2011, HECD participated in the Vernon School Earth Day Event. The event provided students with an opportunity to participate in five environmentally themed learning stations. The learning occurred through crafts, hands-on learning, games and activities. The five stations included The Importance of Trees, SCDC Mobile Technology Center, Edible Earth Parfait, Earth Day Environmental Jeopardy Quiz and Recycling Rescue Relay. In addition, each year the HECD secures a used oil grant and sponsors a drawing contest depicting recycling and pollution prevention with awards and prizes for the winners.

- e) Did you provide all schools within each school district in Los Angeles County with materials necessary to educate a minimum of 50 percent of all school children (K-12) every 2 years on storm water pollution (*Principal Permittee only*)? Yes No
If not, explain why.

Not applicable.

- f) Describe the strategy developed to measure the effectiveness of in-school educational programs, including assessing students' knowledge of storm water pollution problems and solutions before and after educational efforts (*Principal Permittee only*).

Not applicable.

For Permit Years 2-5, attach an assessment of the effectiveness of in-school storm water education programs.

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- g) What is the behavioral change target that was developed based on sociological data and other studies (*Principal Permittee only*)?

Not applicable.

If no target has been developed, explain why and describe the status of developing a target.

Not applicable.

What is the status of meeting the target by the end of Year 5?

Not applicable.

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4. Pollutant-Specific Outreach

a) Attach a description of each watershed-specific outreach program that your agency developed (*Principal Permittee only*). All pollutants listed in Table 1 (Section B.1.d.) must be included.

Not applicable.

b) Did your agency cooperate with the Principal Permittee to develop specific outreach programs to target pollutants in your area? Yes No

c) Did your agency help distribute pollutant-specific materials in your city? Yes No

d) Describe how your agency has made outreach material available to the general public, schools, community groups, contractors and developers, etc...

The HECD has recently revised its internet page to include stormwater education information and printable pamphlets that would assist the general public, business operators, property owners, and developers. Stormwater pollution prevention educational materials along with information regarding the City of Vernon's Development Planning and Development Construction Plan Submittal requirements are also made available to the public at the CSWD and HECD customer service counters. Materials specific to schools were distributed during HECD's participation in the schools environmental education event and by the "Environmental Defenders Program." General audience pollution prevention educational materials are also made available during community events and through the Vernon Chamber of Commerce. In addition, industrial and commercial BMP materials are distributed to subject businesses as part of the City's Industrial/Commercial Inspection Program. Furthermore, stormwater pollution prevention information was distributed at the City of Vernon's 2011 Stormwater Business Compliance Workshop, Earth Day Open House, and in the Vernon School Earth Day Event.

5. Businesses Program

a) Briefly describe the Corporate Outreach Program that has been developed to target gas stations and restaurant chains (*Principal Permittee only*).

Not applicable.

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- b) How many corporate managers did your agency (*Principal Permittee only*) reach last year? **N/A**
- c) What is the total number of corporations to be reached through this program (*Principal Permittee only*)? **N/A**
- d) Is your agency meeting the requirement of reaching all gas station and restaurant corporations once every two years (*Principal Permittee only*)? Yes No
If not, describe measures that will be taken to fully implement this requirement.

Not applicable.

- e) Has your agency developed and/or implemented a Business Assistance Program? Yes No
If so, briefly describe your agency's program, including the number of businesses assisted, the type of assistance, and an assessment of the program's effectiveness.

The HECD coordinated Vernon's 2011 Stormwater Business Compliance Workshop and Annual Earth Day Open House. The HECD participated and presented stormwater and sustainability information at the Food Industry Business Roundtable Annual Conference. The HECD also provides consultative services in regards to pollution prevention, BMPs, compliance with the GIASP, developmental planning, and developmental construction. In addition, the Department also provides on-site evaluations to address site specific challenges related to stormwater. Approximately 600 businesses were assisted. Beyond this, it should be noted that Vernon conducts annual industrial inspections, which includes inspections for BMP issues and illicit connections/discharges.

- 6. Did you encourage local radio stations and newspapers to use public service announcements? Yes No
How many media outlets were contacted? **5**
Which newspapers or radio stations ran them?

The Vernon Sun, Pasadena Star News, San Gabriel Valley Tribune, and Whittier Daily News. The City of Vernon also issued a press release.

Who was the audience?

General audience.

- 7. Did you supplement the County's media purchase by funding additional media buys? Yes No
Estimated dollar value/in-kind contribution: **\$2,500**

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Type of media purchased: Print and radio/TV
Frequency of the buys: Once
Did another agency help with the purchase? Yes No

8. Did you work with local business, the County, or other Permittees to place non-traditional advertising? Yes No

If so, describe the type of advertising.

The primary types of non-traditional pollution prevention advertising have been as follows:

- Vernon HECD coordinated and presented a Stormwater Business Compliance Workshop with participation from the Vernon Chamber of Commerce, L.A. Regional Water Quality Control Board, and local businesses.
- Vernon HECD coordinated an Earth Day Open House which was hosted by the Vernon Chamber of Commerce and included participation from local businesses.
- The HECD participated and presented stormwater and sustainability information at the Food Industry Business Roundtable Annual Conference.
- The City's storm drain stenciling program requires new and existing private property catch basins to be stenciled.
- The cooperation of the Vernon Chamber of Commerce to offer the City's pollution prevention information pamphlets to its members.
- The City publishes an annual used oil recycling calendar.
- The Vernon HECD also hosts an annual E-Waste collection event.

9. Did you establish local community partnerships to distribute educational storm water pollution prevention material? Yes No

Describe the materials that were distributed:

The City has developed a partnership with the Vernon Chamber of Commerce. This partnership allows the Chamber of Commerce to distribute educational pollution prevention material describing stormwater permits, BMPs, SWPPPs, and lists of stormwater related websites.

Who were the key partners? City of Vernon and the Vernon Chamber of Commerce.

Who was the audience (businesses, schools, etc.)?

Businesses.

10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes No
How many events did you attend? 5

11. Does your agency have a website that provides storm water pollution prevention information? Yes No

If so, what is the address? http://www.cityofvernon.org/city_services/environmental_health.htm

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12. Has awareness increased in your community regarding storm water pollution? Yes No
 Do you feel that behaviors have changed? Yes No

Explain the basis for your answers. Include a description of any evaluation methods that are used to determine the effectiveness of your agency's outreach.

During Vernon's 2011 Stormwater Business Compliance Workshop, the number of attendants was significantly better than expected which can be interpreted as an increase in stormwater awareness. Vernon's Earth Day Open House and E-Waste collection events have also resulted in significant community participation. The Food Industry Business Roundtable (a regional organization) requested Vernon's HECD to participate and present stormwater and sustainability information at their Annual Conference. Implementation of the Commercial/Industrial, Development Planning/Construction, Illicit Discharge/Connection programs have also helped increase awareness. Prompt correction of violations and voluntary implementation of BMPs help determine the effectiveness of the City's outreach program. Continuous education and information distribution to the businesses and owners during site visits and inspections have made a significant impact on the outreach efforts of the City. Because of the attention that runoff pollution has been getting in the general press, together with the City's public information program outreach efforts, sensitivity to this environmental concern has increased.

13. How would you modify the storm water public education program to improve it on the City or County level?

The County of Los Angeles should make a stronger effort to inform permittees of the availability of various public education materials. Notifications from the County should be more frequent (through the e-mail list) detailing the materials, seminars, events that are scheduled. Concentrated efforts directed at specific constituencies should take place at various times during the year as well as the generic messages. Materials developed at the County should be made available to the cities or purchased in bulk for the cities to use in their programs. In addition, public employee stormwater education should not be isolated to strictly the public works department, whether County or city. To comply with current permit requirements and to set the "example" to the public, all city and County field employees (i.e. Fire, Police, Health, Parks and Recreation, etc.) should be required to be stormwater educated.

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B. Industrial/Commercial Facilities Program

1. Critical Source Inventory Database

Did you (individually or jointly) update the Database for Critical Sources Inventory? Yes No

Comments/Explanation/Conclusion: The City individually developed, and routinely updates, a critical source inventory database derived from Standard Industrial Classifications (SIC) codes listed on business licenses.

2. Inspection Program

Provide the reporting data as suggested in the following tables.

Category	Initial Number of Facilities at the start of cycle proposed for inspection by categories (after the initial year, the updated number based on the new data)	Number of facilities inspected in the current reporting year	% Completed at the time of this report for present cycle (from the initial value, and from the updated value after first cycle)	Total number since permit adoption
Landfills	None	None	0	None
TSDf	4	2	375%	15
...	541	105	378%	2,039

Comments/Explanation/Conclusion:

3. BMPs Implementation

Provide the reporting data as suggested in the following table.

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Category	Number of facilities inspected by category in this reporting year	Number of facilities identified as adequately implementing BMPs as specified in this reporting year	% adequately implementing out of total in this reporting year	Number of facilities required to implement or upgrade in this reporting year	Number of facilities inspected by category in this reporting cycle	Number of facilities identified as adequately implementing BMPs as specified in this reporting cycle	% adequately implementing out of total in this reporting cycle	Number of facilities required to implement or upgrade in this reporting cycle	Total Number during this permit adequately implementing	Total Number during this permit required to implement or upgrade
Landfills	None	None	None	None	None	None	None	None	None	None
...										

Comments/Explanation/Conclusion:

As part of the Commercial/Industrial Inspection Program, the Environmental Health Department requests facility operators to submit a Notice of Non-Applicability to the LARWQCB if it is determined that the inspected facility does not require coverage under the State General Industrial Activity Stormwater Permit.

4. Enforcement Activities

Provide the reporting data as suggested in the following tables.

Enforcement Actions by categories (e.g. Warning letter, NOV, referral to D.A., etc.)	Number of facilities issued enforcement actions in the current reporting year	Number of facilities issued enforcement actions in the current reporting cycle	Number of facilities (re)inspected due to enforcement actions in current reporting year	Number of facilities (re)inspected due to enforcement actions in current reporting cycle	Number of facilities brought into compliance in the current reporting year	Number of facilities brought into compliance in current reporting cycle	Total number of enforcement actions since permit adoption (by category)
	41	41	508	41	508	41	477
							736

Facilities by category	Number of Warning letters	Number of NOVs	Number of Referral	Number of Other
105	0	41	3	0

Comments/Explanation/Conclusion:

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5. Program Implementation Effectiveness Assessment

Please give a brief assessment of the implementation of the program in removing pollutants from the storm water discharges. Please provide an explanation. Suggested improvements or adjustments based on the knowledge gained through this reporting period activities must be reflected in a change in the SQMP, if warranted.

Highly Effective

Somewhat Effective

Non-effective

Comments/Explanation/Conclusion:

The inspection program implementation is highly effective when considering that nearly all industrial facilities are inspected on a yearly basis. Inspected facilities are either in compliance or directed to comply with State and/or City stormwater codes. New commercial/industrial businesses, which are determined to be subject to stormwater inspections, are advised of the City and State's stormwater requirements prior to issuing occupancy permits. A number of illicit discharges were discovered as well and terminated as a result of inspections. The HECD has also implemented a storm drain stenciling and new steel marker program for all industrial and commercial properties in addition to requesting all industrial and commercial businesses to post pollution warnings signs on outdoor hose bibs or to make them inoperable. The inspection program has also resulted in several referrals of businesses to the LARWQCB.

6. You must also submit a quarterly electronic submittal of your Industrial/Commercial Facilities Program activities. Per both Los Angeles County and the Los Angeles Regional Water Quality Control Board the mechanism to submit a quarterly electronic report of Industrial/Commercial Facilities Program has not been established.

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C. Development Planning Program (Part 4.D)

1. Does your agency have a process to minimize impacts from storm water and urban runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under CEQA, Section 404 of the CWA, local ordinances, and other legal authorities? Yes No
 Attach examples showing how storm water quality impacts were addressed in environmental documents for projects over the past year. *The City of Vernon does not drain to natural drainage systems.*

2. Does your agency have procedures to include the following requirements in all priority development and redevelopment projects:
 - a) Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground? *Due to the City of Vernon's zoning being historically established as "exclusively industrial", and as recommended by the Los Angeles Regional Water Quality Control Board approved Standard Urban Stormwater Mitigation Plan for Los Angeles County, the City of Vernon does not promote the use of infiltration BMPs.* Yes No

 - b) Minimize the quantity of storm water directed to impermeable surfaces and the MS4? *Due to the City of Vernon's zoning being historically established as "exclusively industrial", and as recommended by the Los Angeles Regional Water Quality Control Board approved Standard Urban Stormwater Mitigation Plan for Los Angeles County, the City of Vernon does not promote the use of infiltration BMPs.* Yes No

 - c) Minimize pollution emanating from parking lots through the use of appropriate treatment control BMPs and good housekeeping practices? Yes No

 - d) Provide for appropriate permanent measures to reduce storm water pollutant loads from the development site? Yes No

3. List the types and numbers of BMPs that your agency required for priority projects to meet the requirements described above.

[Please see the attachment titled Plan Approval BMP Chart 2011 which](#)

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provides a table specifying type and quantity of BMPs approved for installation.

4. Describe the status of the development or implementation of peak flow controls in Natural Drainage Systems.

The City of Vernon does not drain into any natural drainage systems.

5. Has your agency amended codes and/or ordinances to give legal effect to the SUSMP changes required in the Permit? Yes No

6. Describe the process your agency uses to include SUSMP design standards in new development and redevelopment project approvals.

All development projects undergo an evaluation process to determine if they are subject to SUSMP requirements and to what extent, based on the type of subject development or redevelopment project. All applicants are provided with information describing the program, the requirements, and the procedures to comply. The HECD provides consultations, by request, at any stage of the development planning process. Upon plan review completion, if plans are not complete, the HECD provides a stormwater plan correction list which explains the SUSMP deficiencies. Not only are stormwater plans reviewed for SUSMP compliance, but also reviewed for hazardous materials exposure and vector control concerns. It should also be noted that all submitted building, plumbing, and/or mechanical plans that are not subject to the Development Planning Program are evaluated by the HECD for stormwater exposure and potential for illicit discharge. If the potential is significant, the project is conditioned to minimize stormwater exposure and/or potential to discharge.

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7. How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- a) Residential 0
 - b) Commercial 0
 - c) Industrial 7
 - d) Automotive Service Facilities 0
 - e) Retail Gasoline Outlets 0
 - f) Restaurants 0
 - g) Parking Lots 1
 - h) Projects located in or directly adjacent to or discharging directly to an environmentally sensitive area 0
 - i) Total number of permits issued to priority projects 0
8. What is the percentage of total development projects that were conditioned to meet SUSMP requirements? 100%
9. How has your agency prepared to reduce the SUSMP threshold for industrial/commercial facilities to 1 acre from 100,000 square feet in 2003?

As of March of 2003, the City revised all of its developer/contractor hand-outs, checklists, and associated material to reflect this change. New informational booklets were designed to specifically address all aspects of the SUSMP requirements. The stormwater information is given to all project developers prior to the design stage and provides all the requirements and procedures needed to satisfy the SUSMP requirements. Moreover, the HECD of the City of Vernon completes another checklist for the development to satisfy all other environmental health requirements.

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10. After 2003, how many additional projects per year will require/did require implementation of SUSMP requirements as a result of the lower threshold? 8
11. Does your agency participate in an approved regional or sub-regional storm water mitigation program to substitute in part or wholly SUSMP requirements for new development? Yes No
12. Has your agency modified its planning procedures for preparing and reviewing CEQA documents to consider potential storm water quality impacts and provide for appropriate mitigation? Yes No

If no, provide an explanation and an expected date of completion.

Not applicable.

13. Did your agency update any of the following General Plan elements in the past year?
- a) Land Use Yes No
 - b) Housing Yes No
 - c) Conservation Yes No
 - d) Open Space Yes No

If yes, please describe how watershed and storm water quality and quantity management considerations were included.

There has been no opportunity to incorporate stormwater quality/quantity considerations into the subject General Plan elements during this permit year.

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- 14. How many targeted staff were trained last year?
7 HECD, 45 CSWD, 78 Fire Dept., and 15 Light & Power Dept.
- 15. How many targeted staff are trained annually?
7 HECD, 45 CSWD, 78 Fire Dept., and 15 Light & Power Dept.
- 16. What percentage of total staff are trained annually? 100%
- 17. Has your agency developed and made available development planning guidelines? Yes No
- 18. If no, what is the expected date that guidelines will be developed and available to developers?
- 19. What is the status of completion of the technical manual for siting and design of BMPs for the development community?

The Principal Permittee has developed a draft technical manual for this purpose, which has been reviewed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

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D. Development Construction Program

1. Describe your agency's program to control runoff from construction activity at all construction sites within its jurisdiction.

The City continues to require compliance with Development Construction Program requirements as indicated in previous annual reports. Projects of one acre or more require General Construction Activity Storm Water Activity Permits (GCASP), while projects less than one acre require minimum BMPs in keeping with project characteristics. Development Construction booklets detailing the construction site BMP requirements and discharge prohibitions of construction are provided to all permittees and inspectors of the City of Vernon. Each construction site is inspected at least once, during construction, for compliance with stormwater requirements. If the construction phase of a project continues through the rainy season, the site is inspected during and after a rain event (regular business hours) to survey BMP effectiveness and compliance.

2. Does your agency require the preparation, submittal, and implementation of a Local Storm Water Pollution Prevention Plan (Local SWPPP) prior to the issuance of a grading permit for all sites that meet one or all of the following criteria?

a) Will result in soil disturbance of one acre or greater Yes No

b) Is within, directly adjacent to, or is discharging directly to an environmentally sensitive area Yes No

c) Is located in a hillside area Yes No

3. Attach one example of a local SWPPP. *Not applicable.*
4. Describe the process your agency uses to require proof of filing a Notice of Intent for coverage under the State General Construction Activity Storm Water permit and a certification that a SWPPP has been prepared prior to issuing a grading permit?

The Vernon HECD completes a preliminary review of all submitted development and redevelopment plans to determine if the project is subject to the GCASP. If the HECD determines that the project is subject to the GCASP, the developer is required to submit a signed certified SWPPP in addition to a copy of the State Water Resources Control Board's letter that specifies a Waste Discharge Identification (WDID) number for the project prior to issuance of the permit. This information was submitted in hard copy in the 2008 annual report submittal.

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- 5. How many building/grading permits were issued to sites requiring Local SWPPPs last year? 1
- 6. How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? 1
- 7. How many building/grading permits were issued to construction site less than one acre in size last year? 7
- 8. How many construction sites were inspected during the last wet season? 31
- 9. Complete the table below.

Type of Violation	# of Violations	% of Total Inspections	# of Follow-up Inspections	# of Enforcement Actions
Off-site discharge of sediment	4	0	4	4
Off-site discharge of other pollutants	0	0	0	0
No or inadequate SWPPP	0	0	0	0
Inadequate BMP/SWPPP implementation	4	0	4	4

- 10. Describe the process for taking enforcement actions against construction site violations, including the types of actions that are taken.

Depending on the degree of the violation, an instance of non-compliance of the development construction program triggers either a verbal warning or issuance of an Order to Comply notice. If Non-compliance persists, an order to comply letter is issued and the matter then becomes a code enforcement case. However, the verbal warning, coupled with the threat of referral to the regional board for GCASP enforcement action, has been sufficient to compel compliance, thus far.

- 11. Describe the system that your agency uses to track the issuance of grading permits.

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The City of Vernon CSWD tracks the issuance of grading permits through HdL Permit Tracking System which is a proprietary electronic tracking and filing system. CSWD also maintains a paper copy on file of each grading permit.

E. Public Agency Activities (Part 4.F)

1. Sewage System Maintenance, Overflow, and Spill Prevention (only applicable to agencies that own and/or operate a sanitary sewer system)

- a) Has your agency developed and implemented a response plan for sanitary sewer overflows that includes the requirements in Order 01-182? Yes No
- b) How many sanitary sewer overflows occurred within your jurisdiction? 0
- c) How many did your agency respond to? 0
- d) Did your agency investigate all complaints received? Yes No
- e) How many complaints were received? 0
- f) Upon notification, did your agency immediately respond to overflows by containment? Yes No
- g) Did your agency notify appropriate sewer and public health agencies when a sewer overflowed to the MS4? Yes No
- h) Did your agency implement a program to prevent sewage spills or leaks from sewage facilities from entering the MS4? Yes No

If so, describe the program:

The City of Vernon has developed and implemented a Sanitary Sewer Management Plan in accordance to the Statewide General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems (Water Quality Order No. 2006-0003).

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- i) Did your agency implement a program to identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers to the MS4? Yes No

If so, describe the program:

The City of Vernon CSWD maintains trained staff with equipment to clean and inspect all sewers throughout the year. Trained staff are capable of eliminating all blockages and remediating all spills. Staff identify and repair minor exfiltration and overflows and will report any major failures. In the event of significant structural failures, engineering staff will provide technical support to ensure an expeditious and structurally sound repair. The CSWD has videotaped all sewer lines and developed a master plan for the long term rehabilitation of the sewer system. In addition, the CSWD has commenced a sewer lining project for sewers in poor condition.

2. Public Construction Activities Management

- a) What percentage of public construction sites 5 acres or greater in size did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit ? %
- b) Give an explanation for any sites greater than 5 acres that were not covered:

All sites greater than 1 acre required coverage under the GCASP.

- c) What is the total number of active public construction sites? 0
- How many were 5 acres or greater in size? 0

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- d) (After March, 2003) Did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit coverage for public construction sites for sites one acre or greater? Yes No

3. Vehicle Maintenance/Material Storage Facilities/Corporation Yards Management

- a) Did your agency implement pollution prevention plans for each public vehicle maintenance facility, material storage facility, and corporation yard? Yes No

- b) Briefly describe how your agency implements the following, and any additional, BMPs to minimize pollutant discharges in storm water:

- (1) Good housekeeping practices
- (2) Material storage control
- (3) Vehicle leaks and spill control
- (4) Illicit discharge control

- **Good housekeeping practices** are discussed in the annual stormwater training for target employees and are implemented in accordance with its Public Agency Activities Program.
- **Material storage control** BMPs are discussed in the annual stormwater training for target employees and are implemented in accordance with its Public Agency Activities Program.
- **Vehicles leaks and spill control** BMPs are discussed in the annual stormwater training for target employees and are implemented in accordance with its Public Agency Activities Program.
- **Illicit discharge control** BMPs are discussed in the annual stormwater training for target employees and are implemented in accordance with its Public Agency Activities, Illicit Connection, and Illicit Discharge Elimination Programs. Emergency services for major discharges are coordinated between the Vernon Fire, Community Services & Water, and Health & Environmental Control, and Police departments.

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- c) Are all Permittee owned and/or operated vehicle/equipment wash areas self-contained, covered, equipped with a clarifier, and properly connected to the sanitary sewer? Yes No
If not, what is the status of implementing this requirement?

Not applicable.

- d) How many Permittee owned and/or operated vehicle/equipment wash areas are scheduled to be redeveloped to include the BMPs listed above? None.

4. Landscape and Recreational Facilities Management

- a) Has your agency developed a standardized protocol for the routine and non-routine application of pesticides, herbicides (including pre-emergents), and fertilizers? Yes No

Briefly describe this protocol:

City of Vernon requires landscape maintenance personnel to: (1) apply minimum amounts of any necessary material; and (2) avoid application of material prior, during, or immediately after rain events. Target City staff has also been trained to incorporate integrated pest management (IPM), whenever possible, as a means of reducing the need for pesticides.

- b) How does your agency ensure that there is no application of pesticides or fertilizers immediately before, during, or immediately after a rain event or when water is flowing off the area to be applied?

Affected City personnel are State Certified Pesticide Applicators and are required to complete continuing education classes, in the proper application of pesticides and fertilizers, to maintain their certification.

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- c) Are any banned pesticides, herbicides, fungicides, or rodenticides stored or applied in your agency's jurisdiction that you know of? Yes No

If so, list them:

Not applicable.

- d) What percentage of your agency's staff that apply pesticides are certified by the California Department of Food and Agriculture, or are under the direct supervision of a certified pesticide applicator? 100%

- e) Describe procedures your agency has implemented to encourage retention and planting of native vegetation and to reduce water, fertilizer, and pesticide needs:

Landscape maintenance staff have been provided training that encourages the planting of native and drought tolerant vegetation, which is consistent with the City's water conservation program. Impacted City staff have also been trained to incorporate integrated pest management (IPM), whenever possible, as a means of reducing the need for pesticides.

5. Storm Drain Operation and Management

- a) Did your agency designate catch basin inlets within its jurisdiction as Priority A; Priority B; and Priority C? Yes No

- b) How many of each designation exist in your jurisdiction?
- | | |
|-------------|-----|
| Priority A: | 0 |
| Priority B: | 7 |
| Priority C: | 431 |

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- c) Is your city subject to a trash TMDL? Yes No
- d) If yes, describe the activities and/or implementation measures that your agency conducted pursuant to the TMDL and any other trash reduction efforts that occurred.

The Vernon CSWD is in the final stages of completing the installation of Connector Pipe Screens or Automatic Retractable Screens to all 438 City and 437 County-owned stormwater catch basins within the City of Vernon. Project completion will result in 100% trash removal from run-off in addition to full compliance with the L.A. River Trash TMDL 5 years ahead of the compliance deadline.

The City of Vernon also installed 269 catch basin excluders and completed the installation of trash receptacles at all transit stops. The trash receptacles installed make a total of 88 installed in the City. Street sweeping is completed for all streets on a weekly basis while catch basins that collect trash are cleaned twice per year.

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- e) How many times were all Priority A basins cleaned last year? N/A
- f) How many times were all Priority B basins cleaned last year? 2
- g) How many times were all Priority C basins cleaned last year? 2
- h) How much total waste was collected in tons from catch basin clean-outs last year?
6,175.9 cu.ft.
- i) Attach a record of all catch basins in your jurisdiction. This shall identify each basin as City or County owned, and Priority A, B, or C. For all basins that are owned and operated by your agency, include dates that each was cleaned out over the past year.
- j) Did your agency place and maintain trash receptacles at all transit stops within its jurisdiction. Yes No
- k) How many new trash receptacles were installed last year? 0
- l) Did your agency place special conditions for events that generated substantial quantities of trash and litter including provisions that:
 - (1) Provide for the proper management of trash and litter generated from the event? Yes No
 - (2) Arrange for temporary screens to be placed on catch basins? Yes No
 - (3) Or for catch basins in that area to be cleaned out subsequent to the event and prior to any rain? Yes No
- m) Did your agency inspect the legibility of the catch basin stencil or labels? Yes No
 What percentage of stencils were legible? 100%

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n) Were illegible stencils recorded and re-stenciled or re-labeled within 180 days of inspection? Yes No

o) Did your agency visually monitor Permittee-owned open channel storm drains and other drainage structures for debris at least annually and identify and prioritize problem areas of illicit discharge for regular inspection? Yes No

Is the prioritization attached?
 Prioritization is unnecessary since they are all inspected and cleaned-out annually. Debris accumulation in these structures is minimal. Yes No

p) Did your agency review its maintenance activities to assure that appropriate storm water BMPs are being utilized to protect water quality? Yes No

What changes have been made?
 No changes have been made. The prescribed BMPs appear to be adequate.

q) Did your agency remove trash and debris from open channel storm drains a minimum of once per year before the storm season? The City of Vernon has one open channel storm drain that is cleaned of all trash and debris a minimum of once per year prior to the storm season. Yes No

r) How did your agency minimize the discharge of contaminants during MS4 maintenance and clean outs?
 Maintenance/clean-outs are either performed manually or mechanically with the use of a vacuum truck. Neither of these methods result in the discharge of contaminants or pollutants to the MS4.

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s) Where is removed material disposed of?

Material is transported to Vernon's storage yard where it is stored in covered trash bins. The material is then taken to the landfill for disposal.

6. Streets and Roads Maintenance

a) Did your agency designate streets and/or street segments within its jurisdiction as one of the following:

- (1) Priority A – streets and/or street segments that are designated as consistently generating the highest volumes of trash and/or litter? *There are no Priority A streets in Vernon.* Yes No
- (2) Priority B - streets and/or street segments that are designated as consistently generating moderate volumes of trash and/or litter? Yes No
- (3) Priority C – streets and/or street segments that are designated as generating low volumes of trash and/or litter? Yes No

b) Did your agency perform all street sweeping in compliance with the permit and according to the following schedule:

- (1) Priority A – These streets and/or street segments shall be swept at least two times per month? *There are no Priority A streets in Vernon.* Yes No
- (2) Priority B - Each Permittee shall ensure that each streets and/or street segments is cleaned at least once per month? Yes No
- (3) Priority C – These streets and/or street segments shall be cleaned as necessary but in no case less than once per year? Yes No

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- c) Did your agency require that saw cutting wastes be recovered and disposed of properly and that in no case shall waste be left on a roadway or allowed to enter the storm drain? Yes No
- d) Did your agency require that concrete and other street and road maintenance materials and wastes be managed to prevent pollutant discharges? Yes No
- e) Did your agency require that the washout of concrete trucks and chutes only occur in designated areas and never into storm drains, open ditches, streets, or catch basins leading to the storm drain system? Yes No
- f) Did your agency train its employees in targeted positions (whose interactions, jobs, and activities affect storm water quality) regarding the requirements of the storm water management program to:
 - (1) Promote a clear understanding of the potential for maintenance activities to pollute storm water? and Yes No
 - (2) Identify and select appropriate BMPs? Yes No

7. Parking Facilities Management

- a) Did your agency ensure that Permittee-owned parking lots be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. Yes No
- b) Were any Permittee-owned parking lots cleaned less than once a month? How many? Yes No None.

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8. Public Industrial Activities Management
- a) Did your agency, for all municipal activity considered an industrial activity under USEPA Phase I storm water regulations, obtain separate coverage under the State of California General Industrial Activities Storm Water Discharge Permit no later than December 31, 2001? Yes No
- b) Does your agency serve a population of less than 100,000 people? Yes No
9. Emergency Procedures
- a) In case of real emergencies, did your agency repair essential public services and infrastructure in a manner to minimize environmental damage? Yes No
- b) Were BMPs implemented to the extent that measures did not compromise public health and safety? Yes No
10. Feasibility Study
- a) Did your agency cooperate with the County Sanitation Districts of Los Angeles County to prepare a study which investigates the possible diversion of dry weather flows or the use of alternative treatment control BMPs? Yes No
- b) Did your agency review its individual prioritized list and create a watershed based priority list of drains for potential diversion and submit a listing of priority diversions to the Regional Board Executive Officer? Yes No

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F. Illicit Connections and Illicit Discharges (IC/ID) Elimination Program (Part 4.G)

1. Attach a copy of your agency's IC/ID Elimination Implementation Program (Part 4.G.1.a.).
2. Attach a map of your storm drain system showing all permitted connections (if available), and the locations of all illicit connections and discharges that occurred last year (Part 4.G.1.b). If your agency has not completed this requirement, describe the status of the development of a baseline map, including an expected completion date.

This task was implemented by the February 3, 2003 deadline specified in the current MS4 permit. Illicit connections and discharges that were reported and investigated during the 2010-2011 permit year are plotted on a CAD map. (see attachment)

3. Describe your enforcement procedures for eliminating illicit discharges and terminating illicit connections.

If an investigation by Vernon HECD confirm an illicit discharge, HECD would issue a written Notice of Violation, to the responsible person, with directives to immediately discontinue the discharge and remove all evidence of the discharge from City property. If an illicit connection is verified, HECD would issue a notice to the responsible person to properly remove the connection within 2 weeks. If the responsible party continues to violate the discharge prohibition or fails to remove the illicit connection, an administrative hearing is held to discuss required compliance and potential legal action. If the violation persists, the case is referred to the LARWQCB or the District Attorney.

4. Describe your record keeping system to document all illicit connections and discharges.

All reports or illicit discharges and connections and their disposition are documented on hard-copy forms and are tracked through a database maintained at the City of Vernon. Required reporting data are plotted on CAD drawings and maintained at the City. (see attachment)

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5. What is the total length of open channel that your agency owns and operates? 500 ft.
6. What length was screened last year for illicit connections? 500 ft.
7. What is the total length of closed storm drain that your agency owns and operates? 71,798 ft.
8. What length was screened last year for illicit connections? 71,798 ft.
9. Describe the method used to screen your storm drains.

The City of Vernon storm drain maintenance personnel perform visual inspections of the storm drains through manholes to determine if there are upstream discharges. If an upstream discharge is detected, then the representative would verify that the discharge is from a legal connection.

10. Provide the reporting data for illicit connections as suggested in the following table (you may submit a spreadsheet from your database that contains the information). Data is based on illicit discharges from private property entering public catch basin.

Year	Total # reported/ identified	Total # investigated	# that conveyed exempt discharges or NPDES permitted	# that conveyed illicit discharges that were terminated	# that were removed	# that resulted in enforcement action	# that resulted in <i>other</i> actions
01/02							
02/03							
03/04	0	0	0	0	0	0	0
04/05	0	0	0	0	0	0	0
05/06	0	0	0	0	0	0	0
06/07	0	0	0	0	0	0	0
07/08	0	0	0	0	0	0	0
08/09	7	7	0	0	0	0	0
09/10	15	15	0	0	0	0	0
10/11	7	7	0	0	0	0	0

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11. Explain any *other* actions that occurred in the last year.
No further actions to report.

12. What is the average time it takes your agency to initiate an illicit connection investigation after it is reported?

Immediately to 48 hours depending on the type of discharge.

a) Were all identified connections terminated within 180 days? Yes No

b) If not, explain why.

13. Provide the reporting data for illicit discharges as suggested in the following table (you may submit a spreadsheet from you database that contains this information).

Year	Total # reported	Total # that were discontinued/ cleaned up voluntarily through enforcement and the source was identified	# that were cleaned up but the source could not be identified	# that resulted in no evidence of discharge	# that were determined to be conditionally exempt	# that were exempt or in compliance and the source identified	# that resulted in enforcement action
01/02							
02/03							
03/04							
04/05	27	27	0	0	0	0	0
05/06	34	33	0	0	0	0	0
06/07	36	36	0	0	0	0	0
07/08	25	25	0	0	0	0	0
08/09	7	7	0	0	0	0	0
09/10	15	15	0	0	0	0	0
10/11	13	13	0	0	0	0	0

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14. What is the average response time after an illicit discharge is reported? 24
Hours

a) Did any response times exceed 72 hours? Yes No

b) If yes, explain why.

All complaints to the City are investigated within 72 hours.

15. Describe your agency's spill response procedures.

The City of Vernon has developed and implemented a Spill Response Plan which detail required actions for City employees responding to sewage spills, hazardous and non-hazardous materials spills, and illicit discharges. The Spill Response Plan is available for review at Vernon City Hall.

16. What would you do differently to improve your agency's IC/ID Elimination Program?

The City of Vernon has implemented and maintains all measures necessary for an effective IC/ID Elimination Program.

17. Attach a list of all permitted connections to your storm sewer system.

The list is in hard copy and is maintained at the City of Vernon, Community Services and Water Department.

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V. Monitoring

Briefly describe any storm water monitoring activities that are not required by Order No. 01-182 that your municipality conducted, participated in, or received funding to conduct in the past fiscal year. These activities should correspond with the dollar amount you listed in Table 2. [Not applicable.](#)

VI. Assessment of Program Effectiveness

- A. Attach a summary of the effectiveness of your storm water management program. This summary should include, at a minimum, the following:
1. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form;
[Based on City of Vernon's responses to the questions in this form, the City of Vernon exceeds the requirements of the current municipal stormwater; therefore, our assessment is that the City of Vernon is in full compliance with the municipal stormwater permit.](#)
 2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;
[The City of Vernon uses the following methods to determine effectiveness of its stormwater management program;](#)
 - a.) [Through Health & Environmental Control Department's \(HECD\) Multi-Disciplinary Inspection Program;](#)
 - b.) [Through business participation in City sponsored programs such as the Stormwater Business Compliance Workshop, Earth Day Open House, E-Waste Recycling Events, Used Oil Recycling Program, Pollution Prevention Workshop, private storm drain stenciling/marker program, etc.;](#)
 - c.) [Through communication and collaboration with the Los Angeles Regional Water Quality Control Board \(LARWQCB\);](#)
 - d.) [Through the City's effective execution of its Illicit Discharge/Connection Elimination Program; and,](#)
 - e.) [By attending the L.A. River Watershed Management Committee, Executive Advisory Committee, and Public Education meetings and discussing common challenges with representatives of other municipalities.](#)
 3. A summary of the strengths and weaknesses of your agency's storm water management program;
[The continuing challenge, as with most municipalities even before the current economic climate, is the lack of funding to sustain the program.](#)

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4. A list of specific program highlights and accomplishments;

Public Education and Business Outreach

The City of Vernon Health & Environmental Control Department (HECD) hosted, and presented pollution prevention information at, a Stormwater Business Compliance Seminar. The seminar included participation from the Vernon Chamber of Commerce, Vernon businesses, Vernon Community Services and Water Department (CSWD), and the Los Angeles Regional Water Quality Control Board. Attendance was better than expected which suggests that businesses understand they play an important role in protecting the environment.

HECD participated in the Vernon School Earth Day Event. The event provided students with an opportunity to participate in five environmentally themed learning stations. The learning occurred through crafts, hands-on learning, games and activities. The five stations included The Importance of Trees, SCDC Mobile Technology Center, Edible Earth Parfait, Earth Day Environmental Jeopardy Quiz and Recycling Rescue Relay.

The HECD participated and presented stormwater and sustainability information at the Food Industry Business Roundtable Annual Conference.

The Vernon HECD also distributed a reverse 911 facsimile and e-mail message to all Vernon businesses advising them of the public review and comment period for the Draft General Industrial Activity Stormwater Permit (GIASP). The City of Vernon provided educational support to help business owners and operators understand the technical language and potential impacts of the draft GIASP.

Vernon HECD coordinated its inaugural Earth Day Open House. Participants included representatives from the Vernon Chamber of Commerce, several Vernon Businesses, Vernon Light and Power Department, and LA Metro. This cooperative event turned out to be very well attended and highly successful.

Commercial/Industrial Facilities Control Program

- a) The HECD has effectively integrated stormwater inspections with the inspections required by other programs under the department's jurisdiction such as the Hazardous Materials Inspection Program, the Garment Inspection Program, the Food Processing Inspection Program, and the Solid Waste Inspection Program.
- b) The HECD exceeds the current municipal NPDES permit requirement regarding industrial and commercial inspections by inspecting both tier I and tier II facilities twice during the 5 year permit period.
- c) The HECD's commercial/industrial facilities inspection program includes facilities that are not identified in the MS4 permit as requiring inspections but cause exposure concerns.
- d) As part of HECD's routine commercial/industrial stormwater inspections, evaluations of any existing treatment control BMPs are performed to provide recommendations as necessary.

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- e) The City of Vernon maintains close collaboration with the Los Angeles Regional Water Quality Control Board Compliance and Enforcement Department to compliment an effective Industrial/Commercial Facilities Control Program.

Developmental Construction and Developmental Planning Program

HECD has improved the developmental planning and developmental construction program by integrating (1) Los Angeles Regional Board recommendations that resulted from the Developmental Planning Program audits conducted in 2003, (2) policies and procedures that address program challenges encountered in the previous year, and (3) Health & Safety concerns addressing vectors issues. The following are the specific improvements that are not required under the municipal permit:

- a) HECD has developed a Rainwater Diversion System Guide (RDSG) to prevent illicit discharges caused by operator error and system blockages/failures at proposed facilities requiring frequent outdoor wash down activities. Since rain diversion systems usually involve the use of a pump or overflow system, typically resulting in standing water, the RDSG also addresses Health and Safety concerns involving vectors and provides acceptable solutions to minimize standing water.
- b) HECD has implemented a treatment control BMP field testing procedure to evaluate the following issues:
- Ponding of water causing potential vector problems
 - Flooding due to restricted flow or limited total dynamic head pressure
 - Poor trash removal performance
 - BMP access and visibility issues to facilitate inspection and maintenance
 - Verifying surface drainage pattern as specified in approved Standard Urban Stormwater Mitigation Plans (SUSMP)
 - Verifying adequate slopes of pipes and trench drains
- c) HECD has developed a list of treatment control BMPs that are not approved for installation in Vernon.
- d) HECD has implemented procedures to conduct at least two field Developmental Planning inspections during treatment control BMP installation as a requirement for building permit closure approval and three field inspections if the project involves a rain diversion system.
- e) HECD requires that an inspection and maintenance log be submitted as part of the SUSMP submittal.
- f) HECD requires, as part of the SUSMP submittal, that all proposed outdoor hose bibs be labeled (for "irrigation use only" or "Do Not Allow Discharge to Storm Drain") or rendered inoperable (without the use of tools) to minimize illicit discharges.
- g) HECD requires that source control BMPs be described as part of the SUSMP submittal.

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- h) HECD conducts Developmental Construction BMP inspections during and following rain events to evaluate BMP implementation and compliance.
- i) HECD has implemented requirements for submittal and approval, prior to use, of de-silting BMPs for de-watering operations.
- j) HECD has improved the illicit discharge/connection program by effectively integrating investigation procedures with the department's hazardous/non-hazardous materials emergency response procedures. All hazardous/non-hazardous material incidents where an HECD representative responds will trigger an illicit discharge/connection investigation.
- k) The Fire Department and HECD have implemented an automatic e-mail system that simplifies referrals of suspect spills or discharges to be investigated by the HECD.

5. A description of water quality improvements or degradation in your watershed over the past fiscal year;

The Vernon CSWD is in the final stages of completing the installation of Connector Pipe Screens and Automatic Retractable Screens to all 438 City and 437 County-owned stormwater catch basins within the City of Vernon.

The City of Vernon is not aware of any water quality degradation in its watershed over the past fiscal year.

6. Interagency coordination between cities to improve the storm water management program;

The County of Los Angeles, as Principal Permittee, has halted almost all efforts to coordinate cooperation among permittees in the watershed. The Los Angeles River Watershed Committee, the Executive Advisory Committee, and the various subcommittee meetings are instrumental in the distribution of information concerning the improvement of the stormwater management program.

7. Future plans to improve your agency's storm water management program; and

The City of Vernon has actively participated in the development of the Metals TMDL Implementation Plan for Reach 2 of the Los Angeles River. The City of Vernon plans to execute the Implementation Plan in accordance to the Metals TMDL compliance schedule.

8. Suggestions to improve the effectiveness of your program or the County model programs.

The City of Vernon has incorporated all reasonable suggestions to its Stormwater Program in order to improve effectiveness. There are no additional suggestions that would improve effectiveness of the Stormwater Program at this time.

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- B. On a scale of 1 to 10 (10 being full implementation of requirements by their deadlines), rate your municipality's level of compliance with Order No. 01-182.

11

- C. List any suggestions your agency has for improving program reporting and assessment.

The City of Vernon recommends improvement on the clarity and conciseness of annual report questions. Also, there are many superfluous questions that are unrelated to determining compliance with the Clean Water Act. (i.e. All the questions in Section VI.)

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VII. Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility, of a fine and imprisonment for knowing violations.

Executed on the ___ day of _____, 20_,

at _____.

Printed Name _____ Title _____

(Signature) _____

Signature by duly authorized representative