

**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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**Reporting Year 2011- 2012**

**I. Program Management**

- A. Permittee Name: The City of Carson
  
- B. Name: Patricia Elkins  
 Title: Storm Water Quality Programs Manager  
 Address: 2390 E. Dominguez Street  
 City: Carson ZIP Code 90810  
 Phone: 310-847-3529 Fax 310-830-0946

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 Storm Water Quality Programs Manager is the manager in the Development Services Work Group responsible for Carson's NPDES compliance programs and other related storm water quality programs which includes but is not limited to coordination with other divisions and work groups within the City such as Public Safety, Public Works, Engineering, Planning, and Emergency Service.

The Public Safety Division of the Public Services Work Group consists of 1 manager, 2 supervisors and 10 code enforcement officers who spend approximately 20% of their time on NPDES related issues. In most cases, the Public Safety Division is the first responder to calls of illicit discharges and has authority to issue citations.

The Public Works Division of the Development Services Work Group is also contacted if the illicit discharge is within the street. This division consists of 1 manager, 4 supervisors, 1 administrator and 50 full time employees who respond to service requests and emergency calls. This division is also responsible for managing the street sweeping contract, the waste management contract and the emergency cleanup contract. If an illicit discharge affects the storm drain, the LA County Department of Public Works (LACDPW) is also contacted.

The Engineering Division of the Development Services Work Group is responsible for administering public infrastructure improvement projects and permits. This division with assistance from the Storm Water Quality Programs Manager is responsible for maintaining NPDES compliance on publicly funded projects as well as permit projects. This division consists of 1 manager, 4 engineers, 1 supervising inspector and 3 inspectors.

The Planning Division of the Economic Development Work Group is responsible for reviewing all planning projects and coordinates with the Storm Water Quality Programs Manager responsible for the initial SUSMP review of all planning projects. Projects are evaluated for both voluntary and required NPDES compliance. On occasion, large and/or complex projects are submitted to a third party consultant for additional review.

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Development Planning projects are ultimately reviewed in detail and approved by the LACDPW. LACDPW is also contracted for other storm water quality related activities such as the Building & Safety Division for plan check and building construction inspection. Catch basin cleaning is also currently contracted through the LACDPW.

Although employees in all Work Groups (especially field staff) are trained to report illicit discharges, ultimately it is the responsibility of the Emergency Services Division of the Public Services Work Group to coordinate emergency responses that are hazardous in nature. If an illicit discharge is sewer related, the County Sanitation District is contacted immediately. This organizational arrangement has been effective in coordinating and communicating compliance-related issues among and by the various divisions/departments as identified on the following table.

**TABLE 1**

<b>Storm Water Management Activity</b>	<b>Division/Department</b>	<b># of Individuals Responsible for Implementing</b>
1. Outreach & Education	Public Information, LACDPW	3
2. Industrial/Commercial Inspections	LACDPW and Consultants	3
3. Construction Permits/Inspections	Building and Safety, Engineering	13
4. IC/ID Inspections	Public Safety	13
5. Street sweeping	Public Works	2
6. Catch Basin Cleaning	Public Works/LACDPW	2
7. Spill Response	Public Safety, Emergency Services, Public Works	3
8. Development Planning (project/SUSMP review and approval)	Planning, Storm Water Quality Programs, Building and Safety	11
9. Trash Collection	Public Information, LACDPW	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 uploaded attachment.](#)

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 Funds.](#)

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.

[None.](#)

**TABLE 2**

<b>Program Element</b>	<b>Expenditures in Fiscal Year 2011-2012</b>	<b>Estimated Amount Needed to implement Order 01-182</b>
1. Program management		
a. Administrative costs	\$159,560.00	\$167,000.00
b. Capital costs		
2. Public Information and Participation		
a. Public Outreach/Education	\$11,500.00	\$16,500.00
b. Employee Training	\$5,570.00	\$5,570.00
c. Corporate Outreach	\$5,570.00	\$5,570.00
d. Business Assistance	\$5,570.00	\$5,570.00
3. Industrial/Commercial inspection/ site visit activities		\$105,000.00
4. Development Planning	\$7,800.00	\$7,800.00
5. Development Construction		
a. Construction inspections	\$8,000.00	\$13,000.00
6. Public Agency Activities		
a. Maintenance of structural and	\$46,000.00	\$46,000.00

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treatment control BMPs		
b. Municipal street sweeping	\$731,420.00	\$731,420.00
c. Catch basin cleaning	\$50,000.00	\$50,000.00
d. Trash collection/recycling		
e. Capital costs	\$28,000.00	
f. Other		\$5,000.00
7. IC/ID Program	0	0
a. Operations and Maintenance		
b. Capital Costs		
8. Monitoring	\$11,000.00	\$107,500.00
9. Other	\$98,000.00	\$127,000.00
10. Trash TMDL Compliance	\$232,000.00	\$322,000.00
11. TOTAL	\$1,400,530.00	\$1,714,930.00

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

A consultant is retained to assist the City with MS4 permit compliance in all program areas. In addition, other consultants are retained on an as-needed basis for specific assignments, including the preparation of a metals implementation plan for the Los Angeles River.

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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;
  2. A plan to comply with the RWL (Permit, Part 2);
  3. Changes to the SQMP to eliminate water quality exceedances;
  4. Enhanced monitoring to demonstrate compliance; and
  5. Results of implementation.

**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.

As mention in previous reports, the development planning/SUSMP program has been SQMP localized and is in the process of being revised to reflect the Regional Board's preference for infiltration post-construction runoff pollution mitigation controls.

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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.

Not applicable.

E. Watershed Management Committees (WMCs)

1. Which WMC are you in? [Dominguez Channel, however the City also attends Los Angeles River WMC meetings because it partially drains into the Los Angeles River by way Compton Creek.](#)
2. Who is your designated representative to the WMC? [Patricia Elkins or her designee.](#)
3. How many WMC meetings did you participate in last year? [4 for Dominguez Channel and 4 for Los Angeles River. The City also attended several Los Angeles Stormwater Permit Group meetings to discuss the new MS4 permit which included a discussion of watershed management approaches to TMDL compliance.](#)
4. Describe specific improvements to your storm water management program as a result of WMC meetings.  
[Although WMC meetings have been extremely informative and useful they have not resulted in any direct improvement to the City's storm water quality management program. The City expects this to change once it implements its TMDL implementation plans and monitors at the outfall \(or manhole nearest to it\) to evaluate BMP performance in attaining TMDL WLAs.](#)
5. Attach any comments or suggestions regarding your WMC. [Continue to focus on TMDL issues.](#)

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.

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.

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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

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

None at this time.

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

This issue was discussed by the DCWMC as a ROWD-related matter. A recommendation was made to exempt additional non-storm water discharges but the Regional Board has not responded. However, the City is not likely to exempt any non-stormwater discharges in the future because of its plan to reduce low flows to the MS4.

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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? **216**
- b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? **All city-owned**
- c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? **216**

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? **Not applicable.**

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

**As mentioned in previous annual reports, 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 maintains no dumping signage at all access points to the Dominguez Channel.**

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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? **1.888.CLEANLA**
- 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? **16**

g) Describe the process used to respond to hotline calls.

**Reports of illicit discharges/connections are evaluated for immediate response. The first task is to determine what kind of discharge is being reported by asking the reporting party if the discharge is discolored or has an odor and if it is in progress. If the discharge is in progress and appears to be particularly harmful (e.g., dumping of what could be considered hazardous or toxic materials/waste) the matter is referred to fire or police for an immediate response. If the discharge is sewage, the incident is referred to public works for an immediate response and to the County Sanitation District. For less serious discharges (e.g., wash water), a visit is scheduled as soon as possible.**

- 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](http://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.**

- 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.

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The City's consultant attended each quarterly meeting. On occasion, the City sent staff as well.

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

Although extremely informative and helpful, the public education quarterly meetings did not result in specific improvements to the City's outreach program. This is likely to change once the TMDLs are implemented through the next MS4 permit. Public education outreach will be specific to nutrients, trash, metals, bacteria, and toxics.

List suggestions to increase the usefulness of quarterly meetings:

As mentioned in last year's annual report, the meetings should be more focused on promoting awareness of specific pollutants on receiving water quality – especially those that have been elevated to "TMDL" status.

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

- 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 estimates that its audio and video PSAs reach 35 million impressions. The City estimates that it has made about 30,000 impressions. It should be noted that the City is not subject to this public education outreach task.

- d) Describe efforts your agency made to educate local schools on storm water pollution.

As explained in previous annual reports, the City notified all schools within its jurisdiction, informing them of the Environmental Defenders Program and encouraging school administrators to take advantage of it.

- 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.

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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.

- 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. **NA**

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...

As mentioned previously, materials are made available at the public works and planning counters where general audience BMPs are located -- along with information regarding development planning and development construction requirements. Materials specific to schools are distributed by way of the "Environmental Defenders Program." General audience BMPs are also made available during various community events. Beyond this, industrial and commercial-BMP materials are distributed to subject businesses as part of the City's industrial/commercial inspection program. It should be noted that the City has updated its BMP handouts -- in English and Spanish -- to include: sewage spills (for businesses and residents); swimming pool discharges; mortar and concrete usage (for contractors); household activities that can cause runoff pollution and BMPs that can used to prevent pollution; tips for pet care to minimize the discharge of fecal matter to the MS4; guidelines for fund-raising car washes; a condensed version of "The Ocean Begins at Your Door;" tips for landscaping and gardening (businesses and residents); a guide for restaurants; and guidelines for carpet cleaning activities (businesses and residents). **See uploaded examples of materials.**

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.**

b) How many corporate managers did your agency (*Principal Permittee only*) reach last year? **Not applicable.**

c) What is the total number of corporations to be reached through this program (*Principal Permittee only*)? **Not applicable.**

d) Is your agency meeting the requirement of reaching all gas station and restaurant corporations once every three years (*Principal Permittee only*)? Yes  No

If not, describe measures that will be taken to fully implement this requirement.

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e) Has your agency developed and/or implemented a Business Assistance Program?

Not applicable to this City. Nevertheless, the City plans to make available information affecting all businesses, including BMPs, on its web-site, which is currently under development.

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.

Not applicable.

6. Did you encourage local radio stations and newspapers to use public service announcements?

Yes  No

How many media outlets were contacted? 4

Which newspapers or radio stations ran them? Please refer to the County of Los Angeles' response to this question.

Who was the audience? General

7. Did you supplement the County's media purchase by funding additional media buys? Indirectly by way of the flood control assessment.

Yes  No

Estimated dollar value/in-kind contribution: Materials obtained from the Keep America Beautiful Campaign

\$5,000

Type of media purchased:

Print and radio/TV

Frequency of the buys:

Not applicable

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.

9. Did you establish local community partnerships to distribute educational storm water pollution prevention material?

Yes  No

Describe the materials that were distributed:

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Not applicable.

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

10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes  No   
How many events did you attend? **3**
11. Does your agency have a website that provides storm water pollution prevention information? Yes  No   
If so, what is the address? **ci.carson.ca.us**
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.  
**It might be assumed that 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. This was validated by the results of a survey that was conducted by the Principal Permittee. A better way to evaluate such effectiveness would be to use outfall monitoring data for stormwater and non-stormwater. The data would then be used to evaluate BMP performance in attaining water quality standards, including BMPs.**
13. How would you modify the storm water public education program to improve it on the City or County level?  
**Again, to revise it to address TMDLs.**



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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: [N/A: all inspections have been completed.](#)

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
<a href="#">Industrial</a>	<a href="#">N/A</a>	<a href="#">N/A</a>	<a href="#">N/A</a>	<a href="#">N/A</a>
<a href="#">Auto</a>	<a href="#">N/A</a>	<a href="#">N/A</a>	<a href="#">N/A</a>	<a href="#">N/A</a>
<a href="#">RGOs</a>	<a href="#">N/A</a>	<a href="#">N/A</a>	<a href="#">N/A</a>	<a href="#">N/A</a>
<a href="#">Restaurants</a>	<a href="#">N/A</a>	<a href="#">N/A</a>	<a href="#">N/A</a>	<a href="#">N/A</a>
Comments/Explanation/Conclusion:		<a href="#">This information was reported in the previous annual report. All required inspections of industrial and commercial facilities were completed 6 years ago.</a>		

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**3. BMPs Implementation**

Provide the reporting data as suggested in the following table.

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
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Comments/Explanation/Conclusion: N/A: all inspections have been completed.

**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)
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Facilities by category	Number of Warning letters	Number of NOV's	Number of Referral	Number of Other (verbal warnings with follow-up action)
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A

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:

It must be assumed that the inspections will result in a reduction of runoff pollution from the subject facilities.

6. You must also submit a quarterly electronic submittal of your Industrial/Commercial Facilities Program activities.

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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. [See uploaded attachment.](#)

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? Yes  No

b) Minimize the quantity of storm water directed to impermeable surfaces and the MS4? 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.

[See BMP survey.](#)

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

[Generally, any project sited in an area that drains into an unlined conveyance is required to assure that post-construction runoff co-efficient or "Q" does not exceed the pre-development runoff co-efficient/"Q." In any case, the principal permittee has developed proposed peak flow controls that are now under regional board review.](#)

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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 projects are submitted through the planning process for review. The plans are distributed to the internal and external departments for review and comment. The Storm Water Quality Programs Manager reviews the projects and imposes conditions to implement the NPDES program. When the conditions are adopted by the City, plans are prepared that reflect the requirements. These plans are checked and inspected to assure that the facilities are built and operate as intended.

7. How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?

- a. Residential 2
- b. 1 Acre Industrial/Commercial 2
- c. Automotive Service Facilities 5
- d. Retail Gasoline Outlets 0
- e. Restaurants 0
- f. Parking Lots 0
- g. Projects located in or directly adjacent to or discharging directly to an environmentally sensitive area 4

Total number of permits issued to priority projects (only grading permits were issue to these projects) 0

What is the percentage of total development (non-priority and priority) projects that were conditioned to meet SUSMP requirements? 13%

8. 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/contract hand-outs, check lists, and other related material to reflect this change.

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9. After 2003, how many additional projects per year will require/did require implementation of SUSMP requirements as a result of the lower threshold? **Certainly there was an increase because more projects are subject. The City has not tracked for this data because it is labor intensive.**

Unknown.

10. 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

11. 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? **See uploaded attachment.**

Yes  No

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

12. 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 was no opportunity to incorporate storm water quality/quantity considerations into the subject General Plan elements during this permit year.**

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13. How many targeted staff were trained last year? 4
14. How many targeted staff are trained annually? 4
15. What percentage of total staff are trained annually? (Note: response references total "affected" staff) 100%
16. Has your agency developed and made available development planning guidelines? See uploaded attachment. Yes  No
17. If no, what is the expected date that guidelines will be developed and available to developers?
18. 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 is currently under regional board review. Though not approved, the City continues to use the manual as one as several reference tools, which has been helpful. The City has also referenced the County's LID manual as another SUSMP compliance resource.

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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 fully implements the development construction program. With respect to 1 acre or more soil disturbing projects, the City compels compliance with GCASWP requirements. No grading permit is issued without the subject applicant showing evidence of having applied for GCASWP coverage (viz., a WDID number). For projects that disturb less than 1 acre of soil, grading permits are conditioned on conforming with the minimum BMPs prescribed by the City.

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? The City no longer requires an L-SWPPP because (1) the current permit no longer requires one and (2) the General Construction Activity Stormwater Permit does not acknowledge its use as a substitute.

- 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 - City has no hillside areas (areas that are on 25% or greater slope) Yes  No

3. Attach one example of a local SWPPP - As mentioned above L-SWPPPs are no longer a requirement

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?

Prior to grading approval, Drainage and Grading Engineer requires applicant to submit a copy of Construction Permit Receipt with WDID#. WDID# must be placed on project plans. Further, the City requires evidence of an applicant's submittal of a NOI and SWPPP through the State Board's SMART system.

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- i. How many building/grading permits were issued to sites requiring Local SWPPPs last year? 0
  - ii. How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? 13
5. How many building/grading permits were issued to construction site less than one acre in size last year? 533

How many construction sites were inspected during the last wet season?

All constructions sites over and under one acre are inspected prior and during the wet season and additionally if a violation is observed. 26

Complete the table below.

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

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

For construction sites within the City’s right of way city inspectors can shut a project down if the contractor does not response to a notice of deficiency in a timely manner. For building construction sites, Building and Safety inspectors issue a verbal warning and if the contractor fails to comply immediately, a notice of violation is issued and the project is shut-down, until compliance is achieved.

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

Grading permits are kept on file. Prior to March 10, 2003, all grading permits were conditioned on permit requirements for soil disturbing projects over 5 acres, 2 acres and less than 5 acres, and less than 2 acres. After March 10, 2003, conditions were amended to reflect the lower thresholds for development construction program requirements called for under the current permit.

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**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? 1
- c. How many did your agency respond to? 1
- d. Did your agency investigate all complaints received? Yes  No
- e. How many complaints were received? 1
- 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:

See uploaded attachment. Also note that the City is subject to the State's WDR for sanitary sewer systems, which requires separate sewer release reporting requirements.

- 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:

See uploaded attachment. The City also implements the Sewer System Management Plan (SSMP), which is aimed at the minimizing sewer releases to the MS4.

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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?

100 %

b. Give an explanation for any sites greater than 5 acres that were not covered:

Please note that it is the City's policy to require any project that is expected to result in the disturbance of 1 acre or more of soil by grading, clearing, and/or excavating to obtain a General Construction Activity Stormwater Permit.

c. What is the total number of active public construction sites?

0

How many were 5 acres or greater in size?

0

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

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- **Good housekeeping practices** are implemented in accordance with its City's storm water pollution prevention plan and its public agency program.
- **Material storage control** BMPs are implemented in accordance with its City's storm water pollution prevention plan and its public agency program.
- **Vehicles leaks and spill control** BMPs are implemented through the City's storm water pollution prevention plan and its public agency program.
- **Illicit discharge control** BMPs are implemented through the City's storm water pollution prevention plan, its public agency program, and its illicit connection/discharge detection and elimination program.

- 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?

- 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:

Basically, the protocol or "SOP" calls for impacted landscape and building maintenance personnel to (1) apply minimum amounts of each significant material; and (2) avoid application during storm events or impending storm events. Personnel are licensed by DPR and use integrated pest management.

- 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?

Impacted City personnel were given training in the proper application of pesticides and chemical organic fertilizers.

- 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:

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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:  
 As mentioned in previous annual reports, landscape maintenance staff has been provided training that encourages the planting of native and drought tolerant vegetation, which is also in keeping with the City's water conservation program. Impacted City staff has also been encouraged, also by training, 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: 27  
 Priority C: 194

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.

A tiny fraction of the city is within the LA River watershed. There are 12 catch basins within that portion of the city that drain into Compton Creek – a tributary to the LA River. Initially, a Trident Curb Screen was installed on each of the 12 catch basins. The City has replaced these with 11 connector pipe screens and 1 retractable screen.

A portion of the city is within the Machado Lake watershed. There are 224 catch basins within that portion of the city that drain into Wilmington Drain – a tributary to Machado Lake. A Trident Curb Screen was installed on 38 of the 224 catch basins. These 38 catch basins were selected as the highest priority based on two consecutive years of inspections. The City may change-out these screens and replace them with retractable ones and also install connector pipe screens where feasible. The City has also applied for a Proposition 84 grant to install debris excluders in its catch basins connected to Machado Lake (see *highlights* section).

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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? Twice
- g. How many times were all Priority C basins cleaned last year? Once
- h. How much total waste was collected in tons from catch basin clean-outs last year? About 3-4 tons
- 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. See uploaded attachment.
- 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? None.
- l. Did your agency place special conditions for events that generated substantial quantities of trash and litter including provisions that:
- i. Provide for the proper management of trash and litter generated from the event? Yes  No
- ii. Arrange for temporary screens to be placed on catch basins? Screens are not, but viscine and sand bags are used to prevent entry of material into catch basins. Yes  No
- iii. Or for catch basins in the affected event 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%
- 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? Not applicable. Yes  No   
Is the prioritization attached? Not applicable. 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?

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None. 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?

Yes  No

- r. How did your agency minimize the discharge of contaminants during MS4 maintenance and clean outs?

Maintenance/clean-outs are either performed by hand or mechanically with the use of a vacuum truck. Neither of these methods results in the discharge of contaminants or pollutants to the MS4.

- s. Where is removed material disposed of?

Material is taken to the corporate yard where it is stored in a covered trash bins. The material is then taken to a landfill for disposal. When the work is outsourced, it is not stored at the corporate yard.

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?

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? (Note: All streets are swept once per week).

Yes  No

2. Priority B - Each Permittee shall ensure that each streets and/or street segments is cleaned at least once per month? (Note: All streets are swept once per week).

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? (Note: All streets are swept once per week).

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? Yes  No   
 How many? 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? **Note: Not applicable because there was none.** Yes  No
- b. Were BMPs implemented to the extent that measures did not compromise public health and safety? **Not applicable.** 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? **This was completed last year.** 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? **This was completed last year.** 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.). [See uploaded attachment.](#)
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 2003-2004 were plotted on GIS and a copy of the required GIS files were transmitted to the principal permittee in November of 2004 for map plotting and has been completed each year thereafter. The City will continue to track illicit connections and discharge using GIS.

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

As reported last year, the City's policy regarding illicit discharges and connections is as follows:

- Upon discovery of an in progress illicit discharge, code enforcement or police, or fire dept. is summoned – depending on the type of material being discharge.
- A discovery of a suspect illicit connection is investigated for verification. If it is in fact an illicit connection, enforcement action is initiated almost immediately.

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

All reports of illicit discharges and connections and their disposition are tracked on hard-copy forms. Required reporting data are then converted into GIS format (specifically, Arc View). Please note that the City has generated enough IC/ID data generate its own reports and trend analyses.

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- 5. What is the total length of open channel that your agency owns and operates? None
- 6. What length was screened last year for illicit connections? N/A  
22 miles
- 7. What is the total length of closed storm drain that your agency owns and operates?
- 8. What length was screened last year for illicit connections? None
- 9. Describe the method used to screen your storm drains.

Field screening for storm drains less than 36" in diameter was limited to reports of suspected illicit connections from storm drain maintenance personnel while conducting catch basin clean-outs (regularly scheduled and unscheduled, based on reports of clogged catch basins). Beyond this, industrial/commercial inspections included observations for on-site illicit connections.

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).<sup>1</sup>

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							
04/05							
05/06							
06/07							
07/08							
08/09							
09/10							
10/11							
11/12	0	0	0	0	0	0	0

<sup>1</sup>Please note that illicit connections are detected because the MS4 permit defines an illicit connection as an "unpermitted connection." The City, however, does not permit connections.

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11. Explain any *other* actions that occurred in the last year.

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 discharges.

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							
05/06							
06/07							
07/08							
08/09							
09/10							
10/11							
11/12	14	4	6	0	0	4	0

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14. What is the average response time after an illicit discharge is reported? **1 hour**

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

2. If yes, explain why.

15. Describe your agency's spill response procedures.

In the event of a release to the MS4, the City's protocol calls for preventing the material from entering the storm drain (catch basin or channel) through containment and/or by placing a barrier in front of the catch basin inlet. The next step is to properly remove the material. In the event of a sewage release the County Sanitation District is contacted immediately and is responsible for cleanup. In the event of a hazardous materials release, the Fire Department is responsible for properly removing and disposing the material depending on type.

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

Provide incentives to City field personnel to report suspect or actual illicit connections. Also, the City is developing a web-site that will allow for anyone to report an illicit connection or discharge. This will greatly improve the time it takes to report and respond to an illicit connection or discharge complaint.

17. Attach a list of all permitted connections to your storm sewer system. **The City does not permit connections to the MS4.**

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**SUMMARY OF PROGRAM EFFECTIVENESS**

**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. [The City has agreed to participate in a special studies program with other MS4 permittees to: \(1\) establish site-specific WERs for metals; and \(2\) determine to what extent atmospheric deposition accounts for metals loadings in the Los Angeles River watershed. The City also plans to conduct outfall monitoring as soon as the next MS4 permit is issued.](#)

**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;
  2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;
  3. A summary of the strengths and weaknesses of your agency's storm water management program;
  4. A list of specific program highlights and accomplishments;
  5. A description of water quality improvements or degradation in your watershed over the past fiscal year;
  6. Interagency coordination between cities to improve the storm water management program;
  7. Future plans to improve your agency's storm water management program; and
  8. Suggestions to improve the effectiveness of your program or the County model programs.
- 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.
- C. List any suggestions your agency has for improving program reporting and assessment.

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### **Program Effectiveness Summary**

1. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form.

As mentioned in previous reports, the City has fully implemented each of the program tasks associated with the current municipal NPDES permit in a timely manner. It must be presumed, therefore, that so doing has resulted in program effectiveness desired by the regional board. The municipal NPDES permit is, essentially, a process-oriented regulation. If all of the tasks are performed, it must be concluded that runoff pollution has been reduced and water quality has been improved to some extent. A more objective and reliable method of determining program effectiveness is to use monitoring data, which is expected to be available some time next year.

2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program.

Once again, in the absence of objective criteria, the City must conclude that its storm water management program is effective. It should be noted that unlike the General Industrial Activity Storm Water Permit, the municipal NPDES permit is not an iterative-oriented permit, based on a "storm water management by objectives approach (i.e., an approach that would allow permittees to determine how to achieve a particular water quality objective). It is the permit, as written by the regional board, which determines what compliance should be to meet water quality standards or objectives. In any case, based on in-stream monitoring in Reach 1 of the Los Angeles River, Coordinated Monitoring Program data for 2010-2011 revealed that the City was in compliance with dry weather WLAs for copper, lead, and zinc. These results could be interpreted to mean that the City's SQMP is effectively addressing metals.

3. A summary of the strengths and weaknesses of the City's storm water management program.

The City cannot make a determination as to whether its regional board-mandated storm water management program is strong or weak. Once again, it is program that has been developed by the regional board for implementation by permittees that can only be objectively evaluated through storm water and non-storm water monitoring data. Because the City has implemented the requisite program tasks, it must be concluded that its storm water management program is at least adequate.

4. A list of specific program highlights and accomplishments.

During the 2011-2012 permit year, Carson continued to implement Best Management Practices (BMPs) contained in its stormwater quality management plan (SQMP) in a complete and timely manner, in accordance with the current Municipal Separate Storm Sewer System (MS4) permit for Los Angeles County. In addition, Carson performed tasks associated with the several TMDLs to which it is subject. Carson is situated in three sub-watersheds: (1) Reach 2 of the Los Angeles River and its tributary, Compton

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Creek; (2) the Dominguez Channel; and (3) Machado Lake. Reach 1 of the Los Angeles River and Compton Creek are subject to the bacteria, metals, nutrients, and trash TMDL. Dominguez Channel is subject to a toxics TMDL. Machado Lake is also subject to multiple TMDLs: nutrients, toxics, and trash.

Carson, along with other permittees, is a participant in the Los Angeles River Coordinated Monitoring Program (CMP). The CMP samples the receiving water for metals (copper, lead, and zinc) during wet and dry weather. CMP dry weather in-stream monitoring revealed no exceedances for adjusted TMDL dry weather metals (copper, lead, and zinc) waste load allocations (WLAs). If the metals TMDL were based on ambient conditions Carson would be compliance with the metals TMDL based on in-stream monitoring. Carson is participating in the Reach 1 implementation plan for the metals TMDL. However, because the implementation plan is based on compliance determined in the river, which is contrary to federal stormwater regulations, and does not use "ambient" standards as numeric targets, Carson does not intend on implementing any programs or BMPs to meet wet weather waste load allocations. Instead, it will use the dry weather data, which it considers "ambient," as the numeric target for evaluating stormwater discharges monitored at the outfall. Further, Carson looks forward to performing outfall monitoring to determine to what extent its stormwater discharges are causing or contributing to an exceedance of the metals, as well as other TMDL constituents such as bacteria and nutrients. The discharges from the outfall will be sampled and analyzed to determine if metals contained in them are exceeding the ambient standard in the receiving water. If an exceedance persists, Carson intends to identify the source of the exceedance upstream of its outfall. If the source is identified, appropriate actions will be taken. If the source cannot be identified, Carson would then intensify existing BMPs or add new ones.

With regard to the Los Angeles River bacteria and nutrients TMDLs, the Carson intends to conduct outfall monitoring to determine if its discharges are causing exceedances of WLAs for these pollutants. If persistent exceedances are detected from the Carson's outfall(s), it will amend its SQMP to include bacteria and/or nutrient-specific BMPs.

Carson is included in the Dominguez Channel/Harbors Toxics TMDL. Carson intends to conduct toxicity testing in accordance with the requirements in the re-issued MS4. This TMDL allows for outfall monitoring. Federal stormwater regulations require the demonstration of compliance at the outfall, not the receiving water. Carson is anxious to begin stormwater monitoring at the outfall to determine to what extent, if any, it is exceeding the WLA for this TMDL. Whatever the result, Carson shall implement toxics-specific BMPs to attain the WLA and will rely on outfall monitoring to evaluate the effectiveness of the BMPs.

Carson is also subject to the Machado Lake toxics and nutrients TMDLs. Carson has begun outfall monitoring for compliance with dry weather WLAs in accordance with an approved monitoring program. Three consecutive sample attempts resulted in no discharges detected. Carson intends to conduct stormwater sampling from its chosen outfall monitoring location in accordance with requirements specified in the re-issued MS4 permit.

Beyond this, Carson is subject to the Machado Lake and Los Angeles River trash TMDLs. With respect to the former, there are 224 catch basins within Carson's city

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boundary limits that drain into Machado Lake (via Wilmington Drain). Initially, 38 catch basins were fitted with "Trident" non-full capture plastic curb screens based on two consecutive years of inspections. Although these screens are performing well, the County has not approved these devices and they will be replaced with approved devices in accordance with the schedule in the TMDL. In the mean time, the cities of Carson, Torrance, Lomita, Rancho Palos Verdes, Palos Verdes Estates and Rolling Hills Estates jointly applied for a Proposition 84 grant to install automatic retractable screens (ARS) and connector pipe screens (CPS) in all of the catch basins within their city's limits that are hydrologically connected to Machado Lake. If they are successful in obtaining the grant, this will put the cities ahead of the TMDL schedule requirements.

With regard to the Los Angeles River trash TMDL, Carson is nearly complete with a treatment train for all 12 of the catch basins that drain into the LA River via Compton Creek. Two years ago, "Trident" debris screens were installed in all 12 of the affected catch basins. Combined with street sweeping weekly, these screens performed well but did not hold up to continued impact from truck tires and were replaced with 11 West Coast Stormwater full capture CPS and 1 ARS. (The catch basin fitted with an ARS is too shallow for any other device). In addition, the 11 catch basins were recently fitted with Revel Environmental Manufacturing, Inc. Triton Curb Inlet Filters and Storm Web. In Fiscal Year 2012-13, West Coast Storm will install County approved unique Keep Carson Beautiful (KCB) retractable curb screens to complete the treatment train.

Carson, it should be noted, continues to implement its KCB program as an affiliate of Keep America Beautiful. One of last year's grants resulted in a demonstration rain garden and an on-going rain barrel give away program. This year's grant will fund a new adopt a median program designed to demonstrate low water use plants and runoff reduction.

This permit year, KCB also continued to team up with Adopt a Storm Drain and Goodyear for the Great American Cleanup and Heal the Bay's Coastal Cleanup Day. These cleanup events in the Dominguez Channel not only reduce the amount of trash in the channel but also serve as a public education program designed to demonstrate to Carson residents and businesses the aesthetic and environmental benefits of a debris-free community. The cleanup efforts will be even easier in the future since Carson strategically placed four floating debris booms in the Dominguez channel on August 31, 2012.

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

The City is compelled to conclude that water quality for the Los Angeles River and Machado Lake into which a portion of it drains has improved as a result of installing the aforementioned debris excluder controls. However, it is not known to what extent these controls have protected and or enhanced beneficial uses for these water bodies.

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

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The watershed management groups now being considered under the tentative MS4 permit should improve interagency coordination significantly.

7. Future plans to improve the City's storm water management program.

The City is awaiting the re-issuance of the next MS4 permit, which it believes will result in improved stormwater program management. The City expects improvements to be made to its SQMP based on stormwater outfall monitoring that will be evaluated against ambient in-stream monitoring data.

8. Suggestions to improve the effectiveness of the City's program or the County model programs.

See above response to question #7.

**B. Self Assessment**

Because the City has fully implemented all of the requirements of the Los Angeles County MS4 permit in a timely manner it must rate itself a 10.

**C. Suggestions for Improving Program Reporting and Assessment**

This task should be worked on collectively by members of WMC. However, the Principal Permittee still deserves substantial credit for developing the on-line reporting system. It has expedited tremendously completing the annual report.