

**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.

<b>!</b>	YOU MUST FILL OUT ALL THE INFORMATION REQUESTED <i>Do not leave any of the sections blank.</i>
<b>N/A</b>	If the question does not apply to your municipality, please indicate N/A in the space provided and provide a brief explanation
<b>U</b>	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 2010- 2011**

**I. Program Management**

A. Permittee Name: City of Bellflower

B. Permittee Program Supervisor: Bernardo Iniguez

Title: Environmental Services Manager

Address: 16600 Civic Center Drive

City: Bellflower

Zip Code: 90706

Phone: 562-804-1424

Fax: 562-925-8660

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.

Response: During the 2011-12 reporting year, the City continued implementing its Stormwater Management Staff Manual Policy, which establishes the Environmental Working Group (EWG). The EWG meets as necessary and is represented by staff from Public Works, Planning, Code Enforcement and Public Affairs. The inter-departmental EWG provides a coordinated forum for effectively facilitating, coordinating and communicating the municipal NPDES permit requirements for affected staff. The EWG is headed by the Assistant City Manager. Decisions and information affecting the implementation of the City's NPDES runoff control program are based on consensus and are clearly transmitted to affected City staff. The City also continued to utilize consultant services to assist the EWG in maintaining compliance with all NPDES permit requirements.

**TABLE 1 - Program Management**

<b>Storm Water Management Activity</b>	<b>Division/Department</b>	<b># of Individuals Responsible for Implementing</b>
1. Outreach & Education	Public Affairs/Administration	2
2. Industrial/Commercial Inspections	Code Enforcement/Community Development	2
3. Construction Permits/Inspections	Building Division/Community Development	2
4. IC/ID Inspections	Public Works/Community Development	2
5. Street sweeping	Public Works	2
6. Catch Basin Cleaning	Public Works	2
7. Spill Response	Public Works/Community Development	2
8. Development Planning (project/SUSMP review and approval)	Public Works/Community Development	2
9. Trash Collection	Public Works	2

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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 1. Attachment 1 contains copies of the sign in sheets for the training conducted for the reporting year. The City focused in the reporting year on increased training for Planning, Code Enforcement, Public Works and Building & Safety Staff. Training was provided for all levels of staff including counter technicians, planners, inspectors, maintenance staff, mid-managers, managers and plan checkers. Training was also provided through Environmental Working Group meetings for the reporting periods.

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.

In 2002, the City reprogrammed approximately \$314,000 of previously budgeted operating expenses and capital projects to comply with Order No. 01-182. City General Funds, Used Oil Block Grant Funds and Department of Conservation Grant Funds are used to comply with the Order.

2. Are the existing financial resources sufficient to accomplish all required activities? Yes  No

The existing funds for the City's Stormwater Management Program were derived from cuts and/or reductions to previously budgeted operating expenses and capital projects.

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. However, through its lobbyist, the City continues to seek federal discretionary funds to purchase structural controls to reduce the entry of trash into the San Gabriel River.

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TABLE 2

Program Element	Expenditures in Fiscal Year 2008-2009	Estimated Amount Needed to implement Order 01-182
1. Program management a. Administrative costs b. Capital costs	\$63,800	\$905,800
2. Public Information and Participation a. Public Outreach/Education b. Employee Training c. Corporate Outreach d. Business Assistance	\$68,900	\$379,800
3. Industrial/Commercial inspection/ site visit activities	\$3,700	\$55,700
4. Development Planning	\$30,600	\$182,900
5. Development Construction a. Construction inspections	\$9,000	\$53,600
6. Public Agency Activities a. Maintenance of structural and treatment control BMPs b. Municipal street sweeping c. Catch basin cleaning d. Trash collection/re cycling e. Capital costs f. Other	\$76,300	\$1,170,700
7. IC/ID Program a. Operations and Maintenance b. Capitol Costs	\$52,200	\$318,600
8. Monitoring		
9. Other	\$85,800	\$419,400
10. TOTAL	\$390,300	\$3,486,500

*\* Amounts listed are for estimated expenditures pertaining to the Order from FYs 2002/2003 through 2011/12*

List any supplemental dedicated budgets for the above categories:

None. The City estimates expenditures to implement Order No. 01-182 will increase for the next reporting period due to costs associated with the Los Cerritos Freshwater Channel Metals TMDL and San Gabriel River Metals TMDL implementation and monitoring plans.

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

A consultant was retained for the 2011/12 reporting year to assist the City with MS4 Permit compliance in all program areas, including enhancing Community Development Department materials and procedures, conditioning projects for SUSMP compliance, providing training to Planning, Code Enforcement, Public Works, Public Safety and Building & Safety staff on the respective SQMP programs and ensuring compliance with the new State General Construction Permit and the City's Maintenance Yard SWPPP.

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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: [N/A](#)
  - 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.

[The City has developed and implemented a Local SQMP. The Community Development and Public Works Departments have developed outreach materials to implement the Local SQMP.](#)

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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.

N/A

E. Watershed Management Committees (WMCs)

- 1. Which WMC are you in? [San Gabriel River](#)
- 2. Who is your designated representative to the WMC? [Bernie Iniguez](#)
- 3. How many WMC meetings did you participate in last year? **5**
- 4. Describe specific improvements to your storm water management program as a result of WMC meetings.

The City has identified more efficient compliance and annual reporting methods through the attendance at the WMC meetings. An example is continual discussion of the use of structural BMPs. In addition, the City has benefited from discussion of resources such as program cost recovery mechanisms and meeting the upcoming TMDL requirements.

5. Attach any comments or suggestions regarding your WMC.

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. *N/A*

**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 L.A. County Permittees as part of the 2006 Countywide ROWD. The recommendations are included in that ROWD.*

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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? 174
- b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? 174
- c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? 174

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.

N/A

- 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? 0. The City has no public access point to creeks, channels or other water bodies.

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

N/A

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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](tel:1-888-CLEANLA) in addition, the City's general phone number is [562-804-1424x2233](tel:562-804-1424x2233) will also direct the public to the correct department. The number is also on the City's website at [www.bellflower.org](http://www.bellflower.org).
- 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? **2**
- g) Describe the process used to respond to hotline calls.

Reports of illicit discharges/connections received by the hotline calls are immediately evaluated for immediate response. The call is assessed for the type of discharge being reported and response required by asking the reporting party a series of questions about the discharge such as quantity, discoloration, odor and if the discharge is in progress. If the discharge is in progress and is reported to be potentially harmful (i.e. dumping of potentially hazardous waste or toxic materials) the call is referred to the Public Works Department, who would assess the discharge and summon a private contractor or hazmat service provider, for an immediate response. If the discharge is reported to be sewage, the call is referred to the Public Works Department for immediate first response and containment with immediate follow up for clean up and further containment by L.A. County Public Works or a cleanup contractor. For discharges determined to not require an immediate emergency response (i.e. wash water) a response is scheduled by appropriate Public Works Department staff as soon as possible. City staff are trained in procedures to assess and respond based on the type of discharge being reported. In addition, the City's IC/ID program has been implemented in the City-specific SQMP.

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- 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? N/A

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)

N/A

- 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.

N/A

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

The City incorporated information distributed at these meetings into public information accessible via the City's website [www.bellflower.org](http://www.bellflower.org) and counter handouts for addressing problems with various pollutants (i.e. paints, fertilizers and other household and business pollutants).

List suggestions to increase the usefulness of quarterly meetings:

Focused information for public education regarding pollutant outreach for the San Gabriel River and Los Cerritos Channel 303(d) pollutant priority list and public awareness on receiving water quality and any TMDLs that are planned for the San Gabriel River or Los Cerritos Channel.

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

N/A

- 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 makes impressions on the general public which are reported separately.*
- d) Describe efforts your agency made to educate local schools on storm water pollution.

*For 2011/12, the City continued to educate schools on stormwater pollution prevention within its jurisdiction through notification of the Environmental Defenders Program and encouraging school administrators to take advantage of the program and the City's website [www.bellflower.org](http://www.bellflower.org). In addition, the City conducted training presentations in FY11/12 at local elementary schools.*

- 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*)?

N/A

Yes  No

If not, explain why.

N/A

- 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*).

N/A

For Permit Years 2-6, attach an assessment of the effectiveness of in-school storm water education programs. N/A

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

N/A

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

N/A

What is the status of meeting the target by the end of Year 6?

N/A

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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. *N/A*
- 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 City makes materials (ie. Community Development and Building NPDES-specific handouts and the Bellflower Citizen) available at City Hall where the general public will most likely access the information and seek information on these topics. The handouts contain development and construction requirements for development projects. The City also makes available general information at various community events. Materials are made available to schools via the Public Defenders Program. During the course of its Commercial/Industrial inspection program, the City provided business-specific pollution prevention and BMP information. General public information on pollution prevention to schools, businesses and the community are available 24/7 on the City's website at [www.bellflower.org](http://www.bellflower.org).

5. Businesses Program

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

N/A

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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*)? **N/A** Yes  No   
 If not, describe measures that will be taken to fully implement this requirement.

**N/A**

- 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.

**N/A – This is an optional program under Order 01-182, and the City has not implemented this option at this time due to lack of adequate financial resources.**

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

**The Bellflower Bulletin (printed media) through the City and the Wave, KLOS and K-Earth through the Principal Permittee.**

Who was the audience?

**General Public**

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7. Did you supplement the County's media purchase by funding additional media buys? Yes  No   
 Estimated dollar value/in-kind contribution: \$6000 (Adds placed in Bellflower Bulletin)  
 Type of media purchased: print  
 Frequency of the buys: Monthly  
 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.

N/A

9. Did you establish local community partnerships to distribute educational storm water pollution prevention material? Yes  No   
 Describe the materials that were distributed:

CR&R, Incorporated, assisted the City with the distribution of stormwater pollution prevention outreach material (flyers and brochures) at the 2012 Bellflower Compost Giveaway event.

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

General Public

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? <http://www.bellflower.org/home/index.asp?page=340>

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

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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.

The public service and outreach program implemented by the Principal Permittee in conjunction with the City's local efforts for public outreach has raised awareness in the community. One method used to evaluate increased public awareness is by the number of calls to the City requesting general information on illicit discharges.

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

The Principal Permittee needs to increase general public awareness of the 303(d) priority pollutants for the San Gabriel River and Los Cerritos Channel and their respective TMDLs by developing pollutant specific materials.

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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 used its business license database to develop and maintain the database for the 2011/12 period.

**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	0	0	0	0
TSDf	0	0	0	0
Industrial	15	0	100	15
Auto	162	0	100	162
RGO's	15	0	100	15
Restaurants	153	0	100	153

Comments/Explanation/Conclusion: The City completed all required industrial/commercial inspections in 2005/2006. The Los Angeles County Department of Health Services completed all required restaurant inspections in 2006/2007.

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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
Landfills	0	0	0	0	0	0	0	0	0	0
TSDf	0	0	0	0	0	0	0	0	0	0
Industrial	0	0	0	0	15	15	100	0	100	0
Auto	0	0	0	0	162	162	100	0	207	0
RGO's	0	0	0	0	15	15	100	0	27	0
Restaurant	0	0	0	0	153	153	100	0	295	0

Comments/Explanation/Conclusion:

The City completed all required industrial/commercial inspections in 2005/2006. The Los Angeles County Department of Health Services completed all required restaurant inspections in 2006/2007.

**4. Enforcement Activities**

Provide the reporting data as suggested in the following tables.

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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)
Verbal Warning	0	0	0	0	0	0	0
Warning Letter	0	44	0	44	0	44	60
NOV	0	49	0	49	0	49	57
City Attorney	0	0	0	0	0	0	0
District Attorney	0	0	0	0	0	0	0

Facilities by category	Number of Warning letters	Number of NOVs	Number of Referral	Number of Other
Industrial	0	0	0	0
Auto	58	0	0	0
RGO's	2	0	0	0
Restaurants	0	57	0	

**Comments/Explanation/Conclusion:**  
 After initial inspections of industrial/commercial facilities, the City issued written notices of correction. The City implemented follow-up inspections on non-compliant facilities to ensure corrections noted in the notices were implemented. For restaurant inspections, L.A. County Health Services issued written notices of violation, provided educational materials and scheduled follow-up inspections to ensure that violations were abated.

Information above is since permit adoption.

5. Program Implementation Effectiveness Assessment

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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 City met its permit obligation and conducted all required commercial/industrial inspections. The City identified facilities that were:

1. In non-compliance with the State General Industrial Permit Coverage or Permit requirements; or
2. Non-compliance with the City's Stormwater and Runoff Pollution Control Ordinance.

A number of facilities were found to have illicit discharges and these were terminated as a result of the inspections. Therefore, the Program Effectiveness can be assumed to be highly effective because deficiencies have been corrected and education has increased.

6. You must also submit a quarterly electronic submittal of your Industrial/Commercial Facilities Program activities. City performed its permit obligation and submits the results of its inspections annually.

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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's CEQA checklist was submitted with the 2003/2004 Annual Report. For CEQA projects, the City uses the standard CEQA checklist and incorporates SUSMP evaluation criteria and construction requirements for pollution prevention when developing CEQA assessments and Conditions of Approval for CEQA projects.](#)

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.

[The City has required 3 projects \(2 industrial, 1 redevelopment\) in the 2011/2012 year to implement SUSMP requirements that include storm drain infiltration devices, permeable pavers and bio-swales/rain gardens, and other proprietary devices. The City experiences primarily redevelopment infill projects typically of less than one acre.](#)

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

[Bellflower drains to a concrete lined portion of the San Gabriel River and the Los Cerritos Freshwater Channel and there are no unlined natural conveyances.](#)

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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 development/redevelopment projects are assessed for SUSMP applicability. Projects that are required to implement SUSMP requirements, priority and non priority projects, are given Conditions of Approval to meet SUSMP Requirements. These Conditions are then plan checked to ensure that compliance and SUSMP conditions are met. Building Inspections conducted for development projects include confirmation that SUSMP requirements have been constructed as conditioned.

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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  | 1 |
| b) Commercial   | 0 |
| c) Industrial   | 2 |
| d) Automotive Service Facilities  | 0 |
| e) Retail Gasoline Outlets  | 0 |
| f) Restaurants  | 0 |
| g) Parking Lots   |   |
| 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  | 3 |
8. What is the percentage of total development projects that were conditioned to meet SUSMP requirements?  
The City issued 804 building permits during the reporting year. Only 3 of these were subject to SUSMP requirements. 0.4%
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?

The City incorporated this SUSMP requirement criterion into the project assessment criteria on March 10, 2003, by adding this to the list of SUSMP project criteria used to issue Conditions of Approval for SUSMP projects. This criterion is reflected in the number of SUSMP projects reported if it was applicable to the project.

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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? 0
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?  
The Community Development Department uses the Standard CEQA Checklist, with enhanced staff training for impacted staff, to identify review procedures for CEQA project assessment for stormwater pollution runoff. During the 2011/2012 reporting period, the City scheduled a series of trainings for City staff to assist with CEQA review of projects by enhancing SUSMP requirement understanding and implementing enhanced SUSMP checklists for every project. Yes  No

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

N/A

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. N/A

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- 14. How many targeted staff were trained last year? 7
- 15. How many targeted staff are trained annually? 7
- 16. What percentage of total staff are trained annually? 100%
- 17. Has your agency developed and made available development planning guidelines? [Development planning guidelines are included in the City's SQMP.](#) Yes  No
- 18. If no, what is the expected date that guidelines will be developed and available to developers? N/A
- 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 that is still under Regional Board review.](#)

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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 requires all projects to either meet the State General Construction Permit requirements (1 acre or greater) or implement the MS4 Permit requirements for projects that do not fall under order 2009-009 DWQ. The City will not issue a grading permit without the applicant showing evidence of coverage under the Order 2009-009 DWQ with a WDID # and/or signature of the property owner/applicant acknowledging that the project has been conditioned with Minimum BMPs. All permitted construction projects are inspected by City Inspectors for compliance with project conditions and permits.

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 requires proof of coverage under the State General Construction permit. The project applicant must meet the General Permit requirements for SWPPP preparation and implementation. No Local SWPPPs are prepared.

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  
There are no ESAs or hillside areas in the City; therefore, these conditions are not applicable to the City. The City uses the General Construction Permit program to implement sites 1 acre or larger; therefore, no Local SWPPPs are prepared. SWPPPs are prepared in accordance with the State General Construction Permit Program for projects meeting this threshold.

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 City requires provision of the WDID number from the SWRCB and a signed statement from the applicant that a SWPPP shall be prepared and kept onsite for the City inspector's review at all times prior to issuing a grading permit.

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- 5. How many building/grading permits were issued to sites requiring Local SWPPPs last year? 0
- 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? 803
- 8. How many construction sites were inspected during the last wet season? 16
- 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	2	12%	2	0
Off-site discharge of other pollutants	0	0	0	0
No or inadequate SWPPP	0	0	0	0
Inadequate BMP/SWPPP implementation	1	6%	1	0

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

In 2006/2007, the City initiated the PASS program, **P**ollution **A**nd **S**torm **W**ater **B**MP's **S**creening, All projects are required to have a BMP inspection prior to the start of work. The City will implement 24-hour stop work orders for non-compliance of projects with BMP implementation. Non-compliance results in significant potential for discharge or sediment tracking. City inspectors will also issue verbal warnings for non-compliance followed by a written Notice of Violation. Continued non-compliance by a site escalates to Code Enforcement. City inspectors and Code Enforcement staff may also refer sites to the RWQCB for non-compliance.

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

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The City uses the Energov Permitting Software. The electronic database is updated daily by City staff. Inspections are logged daily by date, address and permit type electronically.

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:

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City staff respond to sewage spills immediately. Field crews trained for first response containment to sewer spills are dispatched to the reported release location and are trained to prevent the sewage from entering the MS4 system and catch basins by blocking the catch basins with sand bags and retaining the sewage in blocked retention area. After blocking the inlet and retaining the sewage, L.A. County Public Works is called for abatement and clean-up. The catch basin remains secured and blocked during the clean-up procedures.

- 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:

As a member of the Consolidated Sewer Maintenance District, the L.A. County Public Works Department maintains the City's sewer system. The City has also adopted a State-mandated Sewer System Management Plan and developed a Sewer Master Plan that details the existing capacity and condition of the sewer system. The Plan also establishes a comprehensive videotaping schedule for the system. The City plans to develop a capital improvement program for the replacement or rehabilitation of the existing system.

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:

N/A

- c) What is the total number of active public construction sites? 2  
How many were 5 acres or greater in size? 1

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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

(1) Good housekeeping practices are implemented in accordance with the City's Maintenance Yard SWPPP. The City performed annual training with Public Works Department staff and Public Safety Department staff in June 2012 to ensure that good housekeeping BMPs are properly implemented. Public Works staff employs dry clean up techniques, proper storage facilities, and proper disposal BMPs as identified in the Maintenance Yard SWPPP.

(2) Material storage control BMPs are employed in accordance with the City's Maintenance Yard SWPPP and include covered storage as required and contracting with a waste hauler for proper disposal.

(3) Vehicle leaks and spill control BMPs are employed in accordance with the City's Maintenance Yard SWPPP and include, as required, spill clean up material, and spill clean up procedures.

(4) Illicit Discharge Control BMPs are implemented through the City's Maintenance Yard SWPPP. Public Works staff were trained to identify illicit discharges and to use appropriate BMPs.

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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?

- d) How many Permittee owned and/or operated vehicle/equipment wash areas are scheduled to be redeveloped to include the BMPs listed above? ? **None, City has one wash bay and it is plumbed to the sanitary sewer.**

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:

**Public Works Staff protocol identifies the following procedures for facilities maintenance staff that may use the above materials for City landscaped areas and parks:**

1. Minimum application amounts for each material;
2. Avoid application prior to or during a rain event or if water is flowing over area of application.
3. Application to be applied to targeted area only.

- 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?

**City staff that engages in application activities are provided training to ensure that application of these materials will not take place prior to or during a storm event or if there is the potential for washing away of the materials (see above).**

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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:

- 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:

City staff that are responsible for landscape maintenance have been provided training and information to encourage planting of drought tolerant or native vegetation. City staff responsible for the listed activities have been trained in integrated pest management and application procedures to reduce the need for these materials.

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:	0
Priority C:	174

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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.

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? N/A

g) How many times were all Priority C basins cleaned last year? At least once

h) How much total waste was collected in tons from catch basin clean-outs last year? 1.11

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. **Attachment 2**

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?  
For City events Yes  No

(2) Arrange for temporary screens to be placed on catch basins?  
For City events Yes  No

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(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%

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? **N/A City does not own or operate open channels** Yes  No

Is the prioritization attached? **N/A Prioritization is unnecessary based on the City's annual observations. The City inspects annually and cleans out all debris annually. Debris collected is similar from year to year in terms of accumulation. The City uses the ID/IC and Industrial/Commercial inspection programs to effectively identify any illicit discharge.** 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?

**The City has identified that BMPs currently implemented are adequate and therefore no changes have been made in maintenance activities.**

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q) Did your agency remove trash and debris from open channel storm drains a minimum of once per year before the storm season? *N/A* Yes  No

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

The City performs maintenance and clean-out of its MS4 by hand. City staff have been trained to implement activity specific BMPs during MS4 maintenance and clean-outs. Inlet and outlet points are blocked if required or applicable to prevent material from entering the MS4. Use of these clean-out and maintenance methods did not result in the discharge of contaminants or pollutants to the MS4.

s) Where is removed material disposed of?

Material removed from MS4 clean-outs and maintenance is taken to the City Public Works Maintenance Yard and disposed of in the City's contract waste hauler's containers. Containers are then removed by the contract waste hauler and taken to the CRT materials recovery facility where over 50% of the material collected is separated and recycled. The remaining refuse is then disposed at the Puente Hills landfill.

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

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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? 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

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

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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?  
*City lots are swept weekly*  
How many?

Yes  No   
0

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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? *City does not own any facilities subject to the General Industrial Permit.* 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? *N/A no emergencies of this type occurred during the reporting period.* Yes  No
- b) Were BMPs implemented to the extent that measures did not compromise public health and safety? *N/A no emergencies of this type occurred during the reporting period.* 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? *N/A* 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? *N/A* 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.). [A copy of this program was submitted with the 2003/2004 annual report.](#)
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 completed and submitted with the 2004/2005 annual report. Illicit connections and discharges that were reported and investigated in the 2011/2012 reporting period will be plotted on GIS maps and a copy of the required GIS files will be transmitted to the Principal Permittee. The City does not permit storm drain connections.](#)

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

[The following are the City's enforcement procedures:](#)

1. [Illicit Discharges.](#) Upon receiving a report of an illicit discharge or spill, a Public Works supervisor will respond to the scene, investigate and determine the point source of the discharge and direct that Public Works staff respond to implement their plan of action for containment. The assigned Public Works supervisor will notify the Supervisor who will contact the responsible property owner, tenant and/or their agent, advising them of the situation and ordering them to take immediate steps to stop the discharge. If the responsible party fails to comply, the Supervisor will request assistance from the Sheriff's Department to enforce their order. Once the discharge is stopped the Inspector will conduct an investigation of the circumstances of the illicit discharge and determine whether a violation has occurred and whether a citation should be issued.
2. [Illicit Connections.](#) The City's policy is to initiate an investigation of a reported illicit connection as soon as possible after the report is received. The Code Enforcement Division will initiate an investigation and determine 1) the source of the connection, 2) the nature and volume of discharge through the connection, and 3) the responsible party for the connection, and determine whether the connection is illicit. Within 180-days of the determination that a connection is illicit, the Code Enforcement Division will ensure that the connection is terminated, using enforcement authority as needed.

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

All reports for ID/IC identification and follow-up are tracked on hard-copy report forms and then subsequently entered into a GIS data system for required data submittal to the Principal Permittee.

5. What is the total length of open channel that your agency owns and operates? N/A
6. What length was screened last year for illicit connections? N/A
7. What is the total length of closed storm drain that your agency owns and operates? 34,100  
LF
8. What length was screened last year for illicit connections? N/A
9. Describe the method used to screen your storm drains.

The City screens storm drains based on reports of suspected illicit connections from storm drain maintenance personnel while conducting catch basin clean outs (both regularly scheduled and unscheduled based on reports of clogged catch basins). In addition, the City used the industrial/commercial inspections as an opportunity to observe any on-site illicit connections. In December 2006, the City conducted a visual storm drain system inspection of lines 36 inches or greater.

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).

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	0	0	0	0	0	0	0
02/03	0	0	0	0	0	0	0
03/04	0	0	0	0	0	0	0
04/05	0	0	0	0	0	0	0

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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	0	0	0	0	0	0	0
09/10	0	0	0	0	0	0	0
10/11	0	0	0	0	0	0	0
11/12	0	0	0	0	0	0	0

11. Explain any *other* actions that occurred in the last year. **No other actions occurred in the reporting year.**

12. What is the average time it takes your agency to initiate an illicit connection investigation after it is reported? **City response ranges from immediate response to within 24 hours based on the determination of the type of illicit connection reported and discharges reported ( i.e. hazardous, sewage would warrant an immediate response by appropriately trained agencies and City Staff.)**

a) Were all identified connections terminated within 180 days? **N/A** Yes  No

b) If not, explain why.

**There were no identified connections**

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	# 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

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		source was identified					
01/02	0	0	0	0	0	0	0
02/03	0	0	0	0	0	0	0
03/04	0	0	0	0	0	0	0
04/05	23	18	0	0	1	1	1
05/06	6	6	1	0	0	0	1
06/07	7	7	7	0	0	0	1
07/08	8	8	2	0	0	0	0
08/09	18	16	2	0	0	0	2
09/10	34	31	10	2	1	0	1
10/11	20	20	0	0	0	0	1
11/12	21	17	7	4	0	0	2

14. What is the average response time after an illicit discharge is reported? 5-10 min

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

b) If yes, explain why.

15. Describe the your agency's spill response procedures.

The City's spill response procedures are:

1. Upon receiving a report of an illicit discharge or spill, a Public Works supervisor will respond to the scene, investigate and determine the point source of the discharge and direct that Public Works staff respond to implement their plan of action for containment. As first responders, Public Works staff will prevent material from entering the storm drain through the catch basin or channel by containment procedures( barrier etc);
2. If City does not have the resources to clean up the spill, L.A. County Public Works or a private contractor will be contacted to properly remove and dispose of the material.
3. If the discharge is sewage, L.A. County Public Works will be contacted for clean-up and removal.
4. If the discharge is a hazardous material, L.A. County Haz Mat or a private contractor will be contacted for clean-up and removal.

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

No improvements are identified at this time.

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

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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. [N/A](#)

**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: [See Attachment 3](#)
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. [The City has fully implemented all permit requirements of the Los Angeles County Municipal MS4 NPDES Permit by the required permit deadlines. Based on the full implementation of requirements by permit deadlines, the City rates a 10 for compliance with Order No.01-182.](#)
- C. List any suggestions your agency has for improving program reporting and assessment. [At this time, the City has no suggestions for improving program reporting and assessment.](#)