

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

Permittee Name: City of West Covina

Permittee Program Supervisor: Shannon A. Yauchzee

Title: Public Works Director/ City Engineer

Address: 1444 W. Garvey Avenue South

City: West Covina

Zip Code: 91790

Phone: 626-939-8425

Fax: 626-939-8600

In the space below, briefly describe how the storm water program is coordinated within your agency's departments and divisions. Include a description of any problems with coordination between departments. To facilitate this, complete the Table 1.

The City of West Covina's Public Works Department, Engineering Division, continues to manage the City's stormwater program, including all coordination among the various activities associated with the program throughout the City. Prior to, and since the adoption of the new permit on December 13, 2001 staff and activities within the City's various departments have become progressively more integrated and responsive to the requirements of the new permit. Although some of the information required by the new permit has not been historically collected, the City has made a substantial effort in implementing changes regarding the collection of data by the various City entities, and at this point the City has not encountered significant departmental coordination challenges.

TABLE 1 - Program Management

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

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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.

Training was provided by TECS Environmental to all impacted City staff, including engineering, planning, building & safety and code enforcement. See uploaded training sign-in sheet

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.

The City of West Covina NPDES Permit Program, and other storm water and urban runoff water activities, as well as the Sanitary Sewer Assessments, are funded out of the City of West Covina's General Fund.

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

3. Complete Table 2 to the extent that accurate information is available (indicate U in the spaces where the information is unavailable), and report any supplemental dedicated budgets for the same categories on the lines below the table.

4. List any additional state/federally funded projects related to storm water.

CRU (recycling) and used oil grants.

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TABLE 2

Program Element	Expenditures in Fiscal Year 2011-2012	Estimated Amount Needed to implement Order 01-182
1. Program management		
a. Administrative costs	\$45,000	\$45,000
b. Capital costs	\$0	\$0
2. Public Information and Participation		
a. Public Outreach/Education	\$3,000	\$3,000
b. Employee Training	\$4,000	\$4,000
c. Corporate Outreach	\$0	\$0
d. Business Assistance	\$0	\$0
3. Industrial/Commercial inspection/ site visit activities	\$18,000	\$18,000
4. Development Planning	\$12,000	\$12,000
5. Development Construction		
a. Construction inspections	\$15,000	\$15,000
6. Public Agency Activities		
a. Maintenance of structural and treatment control BMPs	\$35,000	\$35,000
b. Municipal street sweeping	\$571,340	\$571,340
c. Catch basin cleaning	\$10,000	\$10,000
d. Trash collection/recycling	\$120,000	\$120,000
e. Capital costs	\$65,000	\$75,000
f. Other	\$10,000	\$15,000
7. IC/ID Program		
a. Operations and Maintenance	\$22,000	\$22,000
b. Capitol Costs	\$10,000	\$10,000
8. Monitoring	\$0	\$0
9. Other	\$0	\$0
10. TOTAL	\$940,340	\$955,340

List any supplemental dedicated budgets for the above categories:

No supplemental dedicated budgets at this time.

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

1. Storm Drain Cleaning – County of Los Angeles Department of Public Works
2. Street Sweeping – Nationwide Environmental Services
3. General NPDES program compliance – TECS Environmental

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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.

The City's SQMP was completed several years ago.

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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.

The City has implemented the BMPs required under the SQMP. This includes BMPs associated with development planning, construction, illicit connection/discharge detection and elimination, and public agency programs. The City has made an effort in enforcing BMPs during the construction process with projects throughout the City.

E. Watershed Management Committees (WMCs)

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

WMC meetings continue to be helpful in communicating information that contributed to facilitating compliance with various MS4 permit programs. Additionally, these meetings presented valuable information regarding TMDLs and pollution-specific issues.

5. Attach any comments or suggestions regarding your WMC. N/A

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.

The City has adopted a storm water and urban runoff ordinance to enforce all requirements of Order 01-182.

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:

None at this time; but the City is likely not to exempt addition non-stormwater discharges because of its interest reducing dry weather low flows.

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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? **427**
- b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? **0**
- c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? **427**

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**

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? Police Department (626) 939-8500
- 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? The County has listed this number. 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.

[See attachment](#)

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

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)

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b) Did the Principal Permittee organize quarterly Public Outreach Strategy meetings that you were aware of? Yes No

How many Public Outreach Strategy meetings did your agency participate in last year? 4

Explain why your agency did not attend any or all of the organized meetings.

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

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.

List suggestions to increase the usefulness of quarterly meetings:

Focus on TMDLs.

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

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- c) Approximately how many impressions were made last year on the general public about storm water quality via print, local TV, local radio, or other media? *About 75,000 (note: Principal Permittee is responsible for this task)*
- d) Describe efforts your agency made to educate local schools on storm water pollution.

*The City also hands outs various educational materials to the local schools. It also participated in the **environmental defenders program.***

- 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.

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.

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

N/A

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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

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.
- 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.

Typically, 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.

5. Businesses Program

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

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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.

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

6. Did you encourage local radio stations and newspapers to use public service announcements? Yes No

How many media outlets were contacted? **1**

Which newspapers or radio stations ran them?

Newspaper – Discover West Covina prints a section that addresses runoff water pollution.

Who was the audience?

Various age group demographics throughout the City were targeted.

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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:
 Type of media purchased:
 Frequency of the buys:
 Did another agency help with the purchase? Yes No

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

The City continues to release a calendar each year showcasing artwork from local elementary schools depicting oil-recycling themes intended to bring awareness to the issue. This calendar is produced in coordination with the School District and local businesses. In addition, the County provided a mobile ad vehicle at various heavily visited areas throughout the City. Annually the City provides awareness information about the Clean Water Act.

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

Flyers and promotional items such as posters were made available at fairs, festivals, holiday events and various City functions throughout the year. Items varied from key chains to flyers and pamphlets on storm water pollution prevention.

Who were the key partners? City and local service clubs.
 Who was the audience (businesses, schools, etc.)?

Various audience types were targeted and reached in this reporting year, including businesses that can potentially run-off into public utilities.

10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes No
 How many events did you attend? 4

11. Does your agency have a website that provides storm water pollution prevention information? Yes No
 If so, what is the address? <http://www.westcovina.org>

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.

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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.

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

By implementing the outreach program now being considered in the tentative order being considered for adoption by the Los Angeles Regional Board.

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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

2. Inspection Program: No inspections conducted by Community Enhancement

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	N/A	0	0	0
TSDf	N/A	0	0	0
...	N/A	0	0	0

Comments/Explanation/Conclusion:

3. BMPs Implementation

Provide the reporting data as suggested in the following table.

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Category	Number of facilities inspected by category in this reporting year	Number of facilities identified as adequately implementing BMPs as specified in this reporting year	% adequately implementing out of total in this reporting year	Number of facilities required to implement or upgrade in this reporting year	Number of facilities inspected by category in this reporting cycle	Number of facilities identified as adequately implementing BMPs as specified in this reporting cycle	% adequately implementing out of total in this reporting cycle	Number of facilities required to implement or upgrade in this reporting cycle	Total Number during this permit adequately implementing	Total Number during this permit required to implement or upgrade
Landfills	N/A	0	0	0	0	0	0	0	0	0
...	N/A	0	0	0	0	0	0	0	0	0

Comments/Explanation/Conclusion:

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
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 NOVs	Number of Referral	Number of Other
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:

[See comments under "highlights."](#)

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.

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 uploaded BMP survey.](#)

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

N/A

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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.

SUSMP projects are now being reviewed by the City's NPDES consultant. To assure compliance with infiltration requirements mandated by the Regional Board, planning and engineering have been advised to "flag" suspected SUSMP projects as soon as they are introduced to the City and to forward the projects to the City's NPDES consultant for review and conditions-assignment. This process has given the project proponent ample time to propose infiltration controls before grading plans are submitted (this is because infiltration is grading dependent). For more information see uploaded SUSMP guidelines.

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7. How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- a) Residential 0
 - b) Commercial 5
 - c) Industrial 0
 - d) Automotive Service Facilities 0
 - e) Retail Gasoline Outlets 1
 - f) Restaurants 0
 - g) Parking Lots 0
 - h) Projects located in or directly adjacent to or discharging directly to an environmentally sensitive area 2
 - i) Total number of permits issued to priority projects 8
8. What is the percentage of total development projects that were conditioned to meet SUSMP requirements? <1 %
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?

This change was made in March of 2003 as required under the current Los Angeles County MS4 Permit.

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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? unknown

11. Does your agency participate in an approved regional or sub-regional storm water mitigation program to substitute in part or wholly SUSMP requirements for new development? Yes No

12. Has your agency modified its planning procedures for preparing and reviewing CEQA documents to consider potential storm water quality impacts and provide for appropriate mitigation? Yes No

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

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? 6
- 15. How many targeted staff are trained annually? varies
- 16. What percentage of total staff are trained annually? 10%
- 17. Has your agency developed and made available development planning guidelines? Yes No
- 18. If no, what is the expected date that guidelines will be developed and available to developers? 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 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 continues to fully implement 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). Additionally, the applicant is required to certify that a SWPPP has been prepared. For projects that disturb less than 1 acre of soil, grading permits are conditioned on conforming with minimum BMPs prescribed by the City.

2. Does your agency require the preparation, submittal, and implementation of a Local Storm Water Pollution Prevention Plan?
No: L-SWPPP's are no longer an MS4 permit or General Construction Stormwater Activity Permit (GCASWP) requirement.

- 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 – N/A.

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?

No grading permit is issued without the subject applicant showing evidence of having applied for GCASWP coverage (viz., a WDID number). Additionally, the applicant is required to certify that a SWPPP has been prepared.

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- 5. How many building/grading permits were issued to sites requiring Local SWPPPs last year? *The City does not require L-SWPPPs, which are no longer an MS4 permit requirement.* 0
- 6. How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? 0
- 7. How many building/grading permits were issued to construction site less than one acre in size last year? 9
- 8. How many construction sites were inspected during the last wet season? All Sites
- 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	5	100%	5	5
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

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

An instance of non-compliance with any of the development construction program triggers a verbal warning, followed with a Notice of Violation letter. If Non-compliance persists, the matter then becomes a code enforcement issue. However, the verbal warnings coupled with the threat of referring the contractor to the regional board for stronger enforcement action has been sufficient to compel compliance.

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

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Permits are issued utilizing a computerized system called (permit plus) with the capability to not only track the issuance of the grading permit, but also log data such as conditions of approval or inspection records.

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? 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:

Through various sewer maintenance and spill prevention tasks that are also requirements under the Sewer System Overflow Prevention Program that is required as waste discharge order adopted by the State Water Resources Control Board in 2006.

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

If so, describe the program:

In the event of an overflow, the City Maintenance Yard is contacted and sewer personnel are dispatched in a timely manner. The Sewer Maintenance Crew is trained to prevent and stop overflows from reaching the storm drain.

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 ? None
- b) Give an explanation for any sites greater than 5 acres that were not covered:

There were none.

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

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

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

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

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

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

- **Good housekeeping practices** are 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.

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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

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 maintenance personnel to (1) apply minimum amounts of each significant material; and (2) avoid application during storm events or impending storm events.

- 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:

Landscape maintenance staff have 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 have 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:	10
Priority B:	15
Priority C:	415
- 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.

N/A

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- e) How many times were all Priority A basins cleaned last year? Twice
- 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? Twice
- 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.
- 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?
- l) Did your agency place special conditions for events that generated substantial quantities of trash and litter including provisions that:
 - (1) Provide for the proper management of trash and litter generated from the event? Yes No
 - (2) Arrange for temporary screens to be placed on catch basins? Yes No
 - (3) Or for catch basins in that area to be cleaned out subsequent to the event and prior to any rain? Yes No
- m) Did your agency inspect the legibility of the catch basin stencil or labels? Yes No
 What percentage of stencils were legible? 100%

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

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

None. They are effective.

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?

Waste is loaded into waste container at the City yard and picked up by Athens Disposal Service for proper disposal.

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

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

7. Parking Facilities Management

- a) Did your agency ensure that Permittee-owned parking lots be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. Yes No
- b) Were any Permittee-owned parking lots cleaned less than once a month? How many? Yes No
Unknown/ Not tracked

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8. Public Industrial Activities Management

- a) Did your agency, for all municipal activity considered an industrial activity under USEPA Phase I storm water regulations, obtain separate coverage under the State of California General Industrial Activities Storm Water Discharge Permit no later than December 31, 2001? Yes No
- b) Does your agency serve a population of less than 100,000 people? Yes No

9. Emergency Procedures

- a) In case of real emergencies, did your agency repair essential public services and infrastructure in a manner to minimize environmental damage? Yes No
- b) Were BMPs implemented to the extent that measures did not compromise public health and safety? Yes No

10. Feasibility Study

- a) Did your agency cooperate with the County Sanitation Districts of Los Angeles County to prepare a study which investigates the possible diversion of dry weather flows or the use of alternative treatment control BMPs? Yes No
- b) Did your agency review its individual prioritized list and create a watershed based priority list of drains for potential diversion and submit a listing of priority diversions to the Regional Board Executive Officer? Yes No

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

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

This task was implemented by the February 3, 2003 deadline specified in the current MS4 permit. Illicit connections and discharges that were reported and investigated during the previous permit year were plotted on GIS and a copy of the required GIS files were transmitted to the principal permittee for map plotting since November of 2004.

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

Upon discovery of in-progress illicit discharges, Community Enhancement or Police, or Fire is summoned – depending on the type of materials being discharged. Community Enhancement staff will document it and record in a hardcopy and/or database format to facilitate frequent repeated inspection and review.

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

This information is recorded and logged in the Building/Engineering Department's computerized system by our Community Enhancement Officers. A citation will be issued and followed up with any additional enforcement action and documented as described in the prior box above.

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- 5. What is the total length of open channel that your agency owns and operates? 100 LF
- 6. What length was screened last year for illicit connections? 0
- 7. What is the total length of closed storm drain that your agency owns and operates? 21,120 LF
- 8. What length was screened last year for illicit connections? 0
- 9. Describe the method used to screen your storm drains.

Field inspections by City storm drain crews, which was completed prior to June of 2006.

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). **Note:** The definition of an illicit connection is any un-permitted connection (based on the County's definition). The City does not permit such connections, however. Further, its definition of an illicit connection is in keeping with the federal definition: any connection through which an illicit discharge is conveyed.

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

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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? 6 to 24 hours

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
11/12	0	0	0	0	0	0	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

b) If yes, explain why.

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

The City's Fire Dept. provides first-response services for spill incidents. In addition the City's Public Works Dept. is involved at every stage of the process. These include Community Enhancement, Engineering and Maintenance personnel.

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

The city is continuing to assess the implementation and effectiveness of the process involved in this program.

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

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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.

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.

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

The City believes it has implemented each of the program tasks associated with the current and previous municipal NPDES permit (see below "Program Highlights"). 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. As mentioned, the City has fared-well in meeting dry weather ambient waste load allocations for all 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 a 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. However, outfall monitoring data should provide a better performance measure in addressing applicable water quality standards through BMP implementation.

4. A list of specific program highlights and accomplishments.

During the 2011-2012 permit year, West Covina continued to implement BMPs contained its stormwater quality management plan (SQMP) in a complete and timely manner, in accordance with the current MS4 permit for Los Angeles County. Baldwin Park is situated in the Upper San Gabriel River sub-watershed and is subject the USEPA-adopted metals TMDL.

Unlike State-adopted TMDLs, USEPA TMDLs allow for compliance not in the receiving water but at the outfall through the implementation of BMPs (through water quality based effluent limitations). Before proposing BMPs to address metals waste load allocations (WLAs) the City intends to conduct outfall monitoring to determine if its discharges exceed any of the metals WLAs. If persistent exceedances are detected, the City will amend its stormwater quality management plan (SQMP) to include metals-specific BMPs.

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Although West Covina is not subject to a trash TMDL, it has installed debris excluders in 12 of its catch basins.

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

We know of no improvements or degradation that has occurred in the upper portion of the San Gabriel River. In-stream monitoring has not, at least to the best of the City's knowledge, provided any compelling data in this regard. The City is aware that the Natural Resources Defense Council (NRDC) has noted exceedances in the San Gabriel and Los Angeles Rivers on several occasions. The County flood control district, as principal permittee, has not notified the City of such exceedances, or the need to amend its stormwater quality management plans (SQMPs). The problem is that the exceedances were detected from monitoring stations located in the river. The City has no idea of whether it caused the exceedance because of sources of stormwater runoff enter this receiving water body, some of which, but not all, have NPDES stormwater permits. Furthermore, it is the City's understanding that compliance with water quality standards (including TMDLs) is determined by monitoring discharges from outfalls (before the discharge reaches the receiving water). It is not determined by complying with wet weather WLAs in the receiving water.

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

The City participated with the Los Angeles Stormwater Permit group to develop a new MS4 permit and watershed management program approach.

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

To conduct outfall stormwater monitoring for statutorily required and TMDL required constituents against waste load allocations established for both the Los Angeles and San Gabriel Rivers (the City is located in both). If outfall monitoring reveals persistent exceedances, the City shall revise its SQMP – in accordance with the iterative process – by either intensifying existing BMPs or adding new ones.

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

Under the next permit monitoring should be revised to place the compliance point in the discharge at the end-of-pipe (or manhole nearest to it). Data generated for such sampling will provide more meaningful information relative to (1) meeting water quality standards including TMDL waste load allocations; and (2) evaluating the performance of BMPs in meeting those standards. Unfortunately, in-stream monitoring has not been useful in these areas. In-stream monitoring should serve only to generally gauge the health of a receiving water and provide targets to strive for but not to comply with.

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

C. Suggestions for Improving Program Reporting and Assessment

As reported last year, the Principal Permittee significantly improved the annual reporting process by implementing an electronic submittal system, which has reduced preparation and submittal time, while also reducing paper-work. However, annual reporting would be made more efficient if it the requirement for reporting the number building permits was eliminated. The data really is not helpful in determining compliance with either SUSMP or development construction requirements and it requires a great deal of staff time to obtain the information. Hopefully, the next MS4 permit will contain a revised annual report form that is more streamline and does not require extraneous information.