



ANNUAL REPORT

December 2008 to December 2009

Municipal Separate Storm Sewer System
Federal Storm Water
National Pollutant Discharge Elimination System
Permit (IDS-028053)

SUBMITTED TO:

United States

Environmental Protection Agency

Storm Water Program

Region 10, Seattle, Washington

&

Idaho Department of Environmental Quality

Pocatello Regional Office

Pocatello, Idaho

SUBMITTED BY:

Co-permittees Pocatello Urbanized Area

City of Pocatello

City of Chubbuck

Bannock County

Idaho Transportation Department

(District 5)

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All appendices are provided as PDF documents, except for the Portneuf River Report, which is provided as several Excel spreadsheets.

Introduction

Region 10 of the U.S. Environmental Protection Agency (EPA) issued a draft National Pollutant Discharge Elimination System (NPDES) permit to the Pocatello Urbanized Area (PUA) Co-permittees Municipal Separate Storm Sewer Systems (MS4) in February 2006. Following review by the Co-permittees (City of Pocatello, City of Chubbuck, Bannock County, and District 5 of the Idaho Transportation Department), meetings with local Idaho Department of Environmental Quality (DEQ) and Region 10 EPA staff and a public hearing, a final permit was issued on December 15, 2006.

This report presents and documents the actions required by the permit and taken by the Co-permittees for the Year 3 reporting period (December 15, 2008 – December 15, 2009). Individual requirements of the permit are presented in the order of the permit outline. Additional information is provided in attached CDs. The report has been certified by the appropriate Co-permittees officials.

Information for Reviewers

This 2008-2009 Annual Pocatello Urbanized Area NPDES MS4 Annual Report is presented in two formats. This text document comprises the majority of the report and discusses each of the required reporting elements for the permit. In addition to the written materials presented in this format, several electronic attachments are included. These electronic attachments are referenced in the text and are attached within either CDs or DVDs.

General Requirements

Cooperative Agreement

Intergovernmental Agreement – As required by Part I.C.3 of the permit, the Co-permittees developed, reviewed, signed and submitted the original of an “Intergovernmental Agreement,” in March 2007. No additional action is required on this permit requirement.

Storm Water Management Program Review

The PUA’s Storm Water Management Program review for the reporting year 2008-2009 consists of activity on many of the numbered permit requirements. As required under the permit, all permit parts are discussed below in this context.

Public Education and Outreach; and Public Involvement *Part II.B.1&2*

Permit Requirements

- a) **Ongoing Public Education** Within one year of the effective date of this permit, the Co-permittees must implement an ongoing public education program to educate the community about the impacts of storm water discharges on local water bodies and the steps that citizens and businesses can take to reduce pollutants in storm water runoff. (*II.B.1*)
- b) **Informational Material Dissemination** Within one year of the effective date of this permit, Co-permittees must, at a minimum, produce informational material on each of the following activities and distribute to appropriate target audiences: an “Adopt a Storm Drain” program associated with the illicit discharge program; proper hazardous waste collection practices for the Lower Portneuf Valley residents; and the effects of erosion and runoff on water quality. Informational materials must be updated, reprinted and distributed as necessary through the duration of this permit. (*II.B.1*)
- c) **Website** Not later than one year from the effective date of this permit, the Co-permittees must create, maintain and promote an informational storm water website for Lower Portneuf Valley area residents. All annual reports, NPDES permit applications, SWMP information and meeting notices must be posted on this website, and include links to other relevant and appropriate websites. Within three years of the permit effective date, information specifically targeted to school-aged children must be included on the website. (*II.B.1*)
- d) **Speaker’s Bureau** Not later than two years from the effective date of this permit, the Co-permittees must establish and promote a speakers bureau to inform the community about storm water runoff and water quality issues. Co-permittees must conduct at least two presentations per year thereafter to local community audiences. (*II.B.1*)
- e) **Lesson Plans and Teacher Professional Development** Within three years from the effective date of this permit, Co-permittees must exercise best efforts to partner with Idaho State University to create age appropriate lesson plans regarding storm water runoff and water quality issues for school age students. The Co-permittees must participate in at least one teacher’s workshop or other forum to promote the use of such lesson plans. (*II.B.1*)
- a) **Public Notice Requirements** The Co-permittees must comply with applicable State and local public notice requirements when implementing a public involvement/participation program. (*II.B.2*)
- b) **SWMP and Annual Report Availability** The Co-permittees must make all relevant SWMP documents and all Annual Reports available to the public. Within two years of the effective date of this permit, all SWMP documentation and Annual Reports must be posted on the co-permittees’ website. (*II.B.2*)
- c) **River Cleanup** Within two years of the effective date of this permit, and annually thereafter, Co-permittees must help organize and host a community River Cleanup Day(s). (*II.B.2*)

- d) **ORV Partnership** Within four years of the effective date of this permit, Co-permittees must establish a partnership with local off-road vehicle retailers and organizations to define and promote good environmental stewardship practices for riders. *(II.B.2)*

- e) **Storm Drain Stenciling** Within one year of the effective date of this permit, Co-permittees will develop and implement a storm drain stenciling program. Within four years of the effective date of this permit, at least 120 storm drains throughout the jurisdictions will be stenciled. *(II.B.2)*

- f) **Co-permittees Meeting** Within six months of the effective date of this permit, and as appropriate thereafter, Co-permittees must convene at least one meeting with their respective city/county commissioners or governing body to discuss the SWMP and collect public comment. *(II.B.2)*

Education, Outreach, and Public Involvement Overview

During 2009, the Co-permittees made significant progress towards meeting our goal of implementing and improving the effectiveness of our Storm Water Education Program (SWEP). We conducted a storm water awareness survey of the general public and should have the data analyzed by early 2010. This information will allow us to do a better job of targeting and reaching our local audience. We will also use this information to evaluate the effectiveness of our programs.

Our 2009 SWEP included the dissemination of informational materials using a variety of media, including TV, newspapers, flyers, posters, our website http://www.pocatello.us/ScienceEnvirod/v/se_water_management.htm, a speaker's bureau, lesson plans, and workshops with K-12 teachers. Our SWEP disseminated information utilizing a variety of campaigns described below.

The Co-permittees comply with applicable State and local public notice requirements for this program, including publishing meeting notices in the local newspaper, when required. All Annual Reports and relevant SWMP documentation are available on our website.

Highlights 2009

Activities (Campaigns)

- Continued the Storm Water Awareness Campaign
- Continued the Dog Waste Campaign
- Continued the Household Hazardous Waste & Trash Management Campaign
- Implemented a new Covered Loads Campaign
- Implemented a new Yard Debris Campaign

Participation

- Yearlong storm water exhibit seen by 111,000 people.
- Exhibits at (and sponsorship of) community environmental events with ~3850 attendees.
- Website had over 650 unique visitors, with 75 unique visitors on the K-12 student pages.
- 2,146 3rd grade and 8th grade students, and 218 adults participated in Water Week.
- 15 teachers participated in 2 Professional Development workshops focusing on storm water.
- K-12 involvement with Sacajawea Park constructed storm water retention wetland

2010 Plans

Expand and improve campaigns being implemented.

Analyze formative evaluation data collected in 2009.

Appendix 1:

Pictures from storm water outreach activities

Appendix 2:

Storm water news coverage

Appendix 3:

Storm water outreach mass media and posters

Appendix 4:

Storm water survey

Appendix 5:

City Creek Master Plan

Appendix 11 and 12:

Storm Water and Portneuf River Water Quality Reports

Logic Model 2009

Situation: City storm water pipes run brown with sediment, nutrients and oil & grease. The Portneuf River is TMDL listed for these contaminants. The City’s NPDES permit requires implementation of an education and outreach program to reduce these contaminants.

Inputs	Outputs		Outcomes -- Impact		
	Activities	Participation	Awareness	Behavior	Condition
<p>Staff Program management</p> <p>Money</p> <p>Expertise Ad/Flyer design Outreach Program evaluation</p> <p>Partners K-16 schools Local government Agencies Local non-profits Local businesses</p>	<p>General Awareness Campaign</p> <p>Dog Waste Campaign</p> <p>Household Hazardous Waste Campaign</p> <p>Yard Debris Campaign</p> <p>Covered Loads Campaign</p>	<p>Mass Media & Signage Thousands of City residents reached.</p> <p>Programs 2250 school children reached. 15 teachers involved in professional development. 220 adults reached.</p> <p>Exhibits and Events 115,000 visits</p> <p>Website 800 hits</p> <p>Adopt a Storm Drain</p>	<p>Storm water Increased awareness of the connection between City streets and the Portneuf River.</p> <p>Increased awareness of local threats to water quality, including bacteria, nutrients, hazardous waste, sediment, and oil & grease.</p> <p>Increased awareness of the impacts of erosion on water quality.</p> <p>Community Standards Increased # of people report that it is wrong to place anything except water onto City streets or trails.</p>	<p>Community Standards Fewer reports of residents depositing anything except water into City streets or trails.</p> <p>Increased # of people report that they are landscaping to control erosion and runoff.</p>	<p>Storm water Decrease in amount of sediment, nutrients, E. coli, and oil & grease in City storm water.</p>

Assumptions

- Reducing sediment, *E. coli*, nutrients, and oil & grease loads saves the PUA time & money.
- Investing in changing behavior through incentives, education, barrier reduction, and peer pressure, is a cost-effective method of improving the quality of the PUA’s storm water.

General Storm Water Awareness Campaign

Activities & Participation

Exhibit display The City of Boise generously loaned us their ‘When it Rains it Drains’ Exhibit from October 2008- October 2009. This exhibit consisted of an interactive push button display along with informational material about the Portneuf Watershed, storm water, and what local residents can do to help improve our storm water quality. The exhibit was displayed for about four months each at Pocatello City Hall, Marshall Public Library, and the Portneuf District Library. Librarians reported that the exhibit was greatly appreciated by their patrons and children loved pressing the buttons while their parents engaged with the written material. *Between October 2008 and October 2009, the exhibit was viewed approximately 111,000 times.*

Community Event Participation & Sponsorship The City of Pocatello had a storm water focused booth at multiple events during 2009:

- Idaho Environmental Education Association Annual Conference *200 attendees;*
- Community Environmental Fair *3500 attendees ;*
- RiverFest *500 attendees;* and
- Bike to Work *150 parade attendees and 537 bike to work participants.*

This booth focused on increasing residents’ understanding of where storm water goes once it gets to the street. Bannock County also had a booth at RiverFest and the Environmental Fair focused on composting. Additionally, the City of Pocatello and Bannock County were major sponsors of these events, each of which provided a tremendous opportunity to change behavior for cleaner storm water. The events encouraged the use of alternative transportation, water conservation, energy conservation at home and work, and other sustainable practices which will result in an improvement in the quality of our storm water (See Appendix 1 for pictures of the storm water booth and bike to work tee-shirt). *Approximately 3850 people attended these events.*

Mass Media and Signage Our efforts to improve the quality of storm water in the area received significant media coverage during the 2009 permit year. City and County staff reached out to the public through a variety of media.

- **Three ½ hour episodes of ‘Calling City Hall’** (a panel discussion with the City of Pocatello mayor and one other participant focused on a variety of local issues). This is shown on Channel 11, the local government access TV station. These three episodes focused on:
 - 1) Erosion and sediment control, especially for contractors;
 - 2) Storm water issues in general, particularly covered loads, yard debris, and erosion and sediment control; and
 - 3) Storm water issues in general with a focus on erosion and sediment control in the City Creek drainage.
- **Coverage in local TV and newspaper news stories.** Storm water issues were covered by all three local TV news stations, and the local newspaper. There were several dozen TV stories and dozens of newspaper stories (see Appendix 2 for news coverage of storm water issues).
- **TV ad production.** The City hired Steele & Associates, a local marketing firm, to produce two 30 second PSAs about storm water. Additionally, the City’s own TV news station (Community Access Television for the Greater Pocatello Area) began working on a PSA to run in between their own shows about storm water, with a focus on covered loads and yard debris. All of these PSAs are scheduled to begin running during the 2010 permit year.

- **Mayor’s Newsletter.** Information about storm water and new storm water regulations were included in the City of Pocatello’s Mayor’s newsletter on one occasion in 2009.
 - Yard Debris and Covered Loads. June 2009 (see Appendix 3).
- **Posters and Flyers.** See Appendix 3 for copies of the flyers and posters the City of Pocatello developed to increase residents’ awareness of the new storm water regulations, how they can get involved, and how they can learn more.
- **Facebook & Email.** The City of Pocatello used its Facebook account to alert ‘fans’ about the new storm water regulations and how they could learn more or volunteer for projects such as the annual river cleanup. Additionally, information was disseminated via email to a variety of email list-serves maintained by City staff.
- **Website.**
 - City of Pocatello Storm Water Website Permittees are using one website to provide information about local storm water issues:
http://www.pocatello.us/ScienceEnvirodiv/se_water_management.htm
 - The website provides information about storm water and what homeowners, contractors, and businesses can do (and are required to do) to help the City improve the quality of storm water. The site also includes information (and links) targeted at K-12 students. *The website had 650 unique visitors during the 2009 permit year.*

Speaker’s Bureau

- **Community Groups.** Co-permittees and their partners are available to speak to the public on a variety of topics, free of charge. This includes storm water, water conservation, recycling, hazardous waste and trash management, energy efficiency, renewable energy development in the City, and other topics. *During the 2009 permit year, the Co-permittees spoke to 55 people at a variety of meetings and events, including:*
 - Master Naturalists (City staff presented information on multiple occasions about storm water issues in the City and led the group on a tour of Sacajawea Park.) *15 attendees, March- April 2009*
 - Panel on ORVs and Public Land (City staff presented on the role of UTVs and recreational management of City Creek, with an emphasis on protecting water quality in this urban watershed.) *40 attendees, November 2009*
- **Talks to Regional and National Organizations.** City of Pocatello staff has also worked to share their experiences with NPDES compliance with audiences outside of the local MS4:
 - Sanger, H. (2009, March 7). *Service Learning Panel.* Idaho Environmental Education Association Meeting, Pocatello, ID.
 - Sanger, H. (2009, November 6). *Pocatello’s Environmental Education Programs: Changing Public Behavior to Improve Stormwater.* Intermountain Conference on the Environment, Pocatello, ID (open to the public).
 - Sigler, J. (2009, November 6). *Pocatello Day Street Sacajawea Park Wetland Project.* Intermountain Conference on the Environment, Pocatello, ID (open to the public).

K-12 Partnerships

- **Curricula.** Co-permittees are working with the Portneuf Watershed Partnership and Idaho State University to identify and adapt existing watershed curricula for use by teachers in the Portneuf Watershed. Additionally, Co-permittees are working to identify storm water specific curricula that can be adapted and used by local teachers in conjunction with existing storm water outreach activities such as Water Week (see below).
- **Professional Development.** City staff partnered with staff from the Portneuf Watershed Partnership and ISU to implement a workshop focused on involving K-12 classes in using the watershed as a site for learning during fall 2009. Additionally, City staff participated in separate workshops discussing storm water issues during 2009. *In all, we reached 15 teachers at 2 workshops.*
 - PWP – 4 workshops with 5 teachers during fall 2009.
 - ISU – 1 workshop in August 2009 with 10 teachers.
- **Water Week.** The Pocatello Water Department & Bannock County Landfill’s 2009 Water Week involved 2146 3rd grade and 8th grade students and 218 adults. This program’s focus on recycling, water conservation and ground water serves to increase students’ awareness of water conservation and quality issues. Students learn about the effects of fertilizers and other potential pollutants on our water supply. This popular program complements the City’s additional storm water focused outreach efforts. The City of Chubbuck provides a handout packet to grade school children that come through its water week display.
- **Service Learning Projects.** City of Pocatello staff continued to work with New Horizons High School students on weed removal, tree thinning and seeding around the new Sacajawea Park storm water wetland.
- **Speaker’s Bureau.** Co-permittees and their partners are available to speak to K-12 students on a variety of topics, free of charge. This includes storm water, water conservation, recycling, hazardous waste and trash management, energy efficiency, renewable energy development in the city, and other topics. *During the 2009 permit year, the Co-permittees interacted with over 100 K-12 students at one school:*
 - Century High School’s two Environmental Science classes in January 2009. During 2008 City staff presented information on the Portneuf River, its concrete channel, and considerations for removing that channel (e.g. dealing with the storm water pipes that dump storm water into the river). City staff observed and commented on student presentations in 2009.

River Cleanups

The Co-permittees, in collaboration with several local organizations, have been hosting or sponsoring community river cleanup activities for many years.

- In May 2009, the ISU Stream Ecology Lab organized a river cleanup of Pocatello Creek at its mouth, with support from the City of Pocatello.
- In October 2009, the City partnered with the Portneuf Greenway Foundation, Valley Pride and the ISU Stream Ecology Lab to sponsor a river channel cleanup. Over 50 volunteers spread out along the Portneuf River removing over dozens of cubic yards of material from the river. Most of this debris was collected from just downstream of the concrete channelized portion of the river. Co-permittees plan to continue supporting and leading these community wide efforts to improve the health of the Portneuf River through regular cleanup activities.

Storm Drain Stenciling Since 2007 the Co-permittees have conducted a Storm Drain Stenciling program. This program encourages local businesses, scout groups, neighborhood groups, and others to get involved in protecting our local water quality by affixing storm drain markers to the drains. Chubbuck and Pocatello continue to mark additional storm drains with appropriate labels each year.

Municipal Government Elected Official Outreach

The Co-permittees held a joint city-county meeting on October 23, 2008. Details about this meeting were provided in the 2008 Annual Report. No joint city-county meetings on storm water were held during the 2009 permit year.

Business Outreach

- **Concrete** City staff reached out to the concrete industry in spring 2009 in conjunction with the new erosion and sediment regulations for construction sites.
- **Restaurants** Staff from the Waste Water Treatment Plant continually meets with restaurants to discuss proper grease disposal.
- **Other** Additionally, Co-permittee staff are developing plans to work with other businesses whose daily operations can impact storm water quality.

Campaign Outcomes

Storm Water Awareness and Behavior

Co-permittees have not collected enough data to define the effect of these campaigns on storm water awareness or behavior during the 2009 permit year.

- The Co-permittees are very interested in measuring the effectiveness of the storm water education and outreach campaigns. In order to get a better understanding of the effectiveness of the various campaigns and regulations, City of Pocatello staff distributed a storm water survey to residents in fall 2009 (see Appendix 4 for copy of survey). Data should be available in early 2010.

Sediment in the Street

The City of Pocatello has an aggressive street cleaning operation. City staff have been documenting the amount of material deposited through sanding operations each winter, and the amount of material collected through sweeping operations each spring- fall. In the future, City staff plan to analyze the sediment collected through sweeping operations to better understand its likely source based on particle size.

- **2008:** 3300 tons applied; 4000 tons swept up
- **2009:** 4234 tons applied; 4995 tons swept up

Water Quality

As noted in the Monitoring section of this report, the Co-permittees are actively monitoring both storm water and the Portneuf River for a variety of pollutants (see Appendix 11 and 12).

Next Steps

Co-permittees plan to continue building general awareness of storm water in the community through a myriad of outreach and public participation activities. The Co-permittees plan to put significant focus in 2010 on distributing TV PSAs, implementing K-12 outreach programs, and implementing program evaluation tools.

Dog Waste Campaign

Activities & Participation

Mutt Mitt Stations Pocatello City staff continued the social marketing campaign, the “*Mutt Mitt Campaign*,” encouraging residents to pick up after their dog(s). During 2009, the City of Pocatello continued its upkeep and maintenance of approximately 45 mutt mitt dispensers, placards, and collection containers dispersed throughout the city, adding a few more dispensers. Chubbuck installed 3 mutt mitt dispensers in 2009.

Mass Media The local media continued to publish stories about dog waste, particularly up City Creek (see Appendix 2 for media coverage).

Program Outcomes

Co-permittees have noticed a decrease in dog waste at parks and trailheads once Mutt Mitt Stations are installed.

Next Steps

Co-permittees plan to implement additional social marketing techniques to change dog waste behavior and better understand its impact on our local environment. This includes:

- 1) Working with local K-12 schools to visually demonstrate the amount of dog waste at various trailheads using flagging and GPS.
- 2) Partnering with ISU stream ecology researchers to better understand the amount of dog *E. coli* entering our local streams and its impact on stream health.
- 3) Installing additional signage at key locations for ‘point of sale’ behavior change.

Household Hazardous Waste Campaign

Activities & Participation

Household Hazardous Waste Collection Incentives

- **Free Household Hazardous Waste Days** Bannock County Landfill manages the collection of household hazardous waste, which occurs the first Saturday of the month, April through October (FREE to county residents) at the landfill.
- **Other Free Hazardous Waste Collection** The City of Pocatello accepts a variety of electronic waste at its Sanitation Department (free).

Mass Media

- **Free Household Hazardous Waste Days** Information about this program is posted on the City and County’s websites, and is publicized in the local newspaper frequently. Additionally, the County uses billboards to publicize this information. *During 2009, the program was posted on two (2) billboards in the County for seven (7) months. Additionally, seven (7) ads were run in the local newspaper and magazines (see Appendix 3 for copies Household Hazardous Waste ads).*

Websites

- **Bannock County Landfill Site** Contains information about Household Hazardous Waste Collection at the Bannock County Landfill. <http://www.co.bannock.id.us/waste/hazmat1.htm>
- **City of Pocatello Site** Contains information about Household Hazardous Waste Collection at the Bannock County Landfill and how to recycle other items in Pocatello. http://www.pocatello.us/Sanitation/sanitation_hazardous.htm

K-12 Partnerships & Speaker’s Bureau

Annually the Bannock County Landfill staff presents to a variety of community groups and K-12 students on topics related to the operation of the Bannock County Sanitary Landfill, including household hazardous waste days, groundwater and landfill operations, and recycling to reduce materials in the landfill. *During 2009, they reached 6000 community members, primarily children.*

Program Outcomes

Household Hazardous Waste Collected (gallons)

	2007	2008	2009
• Organics	240	55	0
• Used oil	2,595	2,235	2,350
• Antifreeze	700	1736	725
• Flammable liquids	935	880	615
• Flammable sludge	1,540	1595	1,008
• Pesticides/aerosols	3 boxes	165 gal +1 box	5 totes

Co-permittees have not collected enough data to define the effect of these campaigns on storm water awareness or behavior during the 2009 permit year.

Next Steps

Co-permittees plan to continue this successful program.

Yard Debris Campaign

Activities & Participation

Mass Media

- City staff discussed this campaign in news stories (TV and newspaper) (see Appendix 2).
- City staff posted flyers at garden centers and nurseries with information about the campaign (see Appendix 3 for flyers).
- City staff mailed information about the campaign to all contractors and developers in the PUA.

Business Outreach

- City staff provided information about this campaign via postcards and flyers at the January 2009 Chamber of Commerce luncheon.

One on One Education

- City staff called all landscapers in the phone book to educate them about the importance of keeping grass clippings out of the street and to let them know that it was illegal to leave any yard debris in the streets.
- City staff printed postcards with information about the campaign that were handed to violators (pre-enforcement).

Program Outcomes

Co-permittees have not collected enough data to define the effect of these campaigns on storm water awareness or behavior during the 2009 permit year.

Next Steps

The Co-permittees plan to expand this program with PSAs and more targeted outreach at local businesses that use landscapers in 2010.

Covered Loads Campaign

Activities & Participation

Mass Media

- City staff discussed this campaign in news stories (TV and newspaper) (see Appendix 2).
- City staff posted flyers at garden centers, rental companies, and nurseries with information about the campaign (see Appendix 3 for flyers).
- City staff mailed information about the campaign to all contractors and developers in the PUA.

Business Outreach

- City staff provided information about this campaign via postcards and flyers at the January 2009 Chamber of Commerce luncheon.

One on One Education

- City staff called all landscapers in the phone book to educate them about the importance of keeping grass clippings out of the street, and to let them know that it was illegal to leave any yard debris in the streets.
- City staff printed postcards with information about the campaign that were handed to violators (pre-enforcement).

Program Outcomes

Co-permittees have not collected enough data to define the effect of these campaigns on storm water awareness or behavior during the 2009 permit year.

Next Steps

The Co-permittees plan to continue this campaign with a focus on targeting the few offenders using a combination of education and enforcement techniques.

Erosion and Runoff Campaign for Homeowners

Activities & Participation

Mass Media

- City staff discussed this campaign in news stories (TV and newspaper). (see Appendix 2)

One on One Education

- City staff worked individually with landowners who called the City about erosion problems they were having.

Program Outcomes

Co-permittees have not collected enough data to define the effect of these campaigns on storm water awareness or behavior during the 2009 permit year.

Next Steps

The Co-permittees plan to expand this program with PSAs in 2010.

City Creek Campaign

Activities & Participation

Mutt Mitt Stations See Dog Waste Campaign above.

City Creek Master Plan

- City staff led an ad-hoc committee which finalized the City Creek Master Plan during 2009. It was adopted by the City Council on December 3, 2009 (see Appendix 5 for plan). Committee members included hiking, biking, ORV, and equestrian representatives.
- The plan focused on standards for trail development, erosion and sediment control, and user behavior.

User Outreach

- City staff participated in an ORV panel in December 2009 (see Speaker's Bureau above).
- As part of the City Creek Master Plan adoption process, an Open House and public hearing was held on the plan.

Mass Media

- City staff discussed this campaign in news stories (TV and newspaper). (see Appendix 2)

Program Outcomes

Co-permittees have not collected enough data to define the effect of this campaign on storm water awareness or behavior during the 2009 permit year.

Next Steps

City staff will work on implementing the suggested erosion and sediment control projects, as well as work with user groups to minimize the user behavior that is contributing to sediment loading in City Creek and other negative environmental impacts.

Illicit Discharge Detection and Elimination *Part II.B.3*

Permit Requirements

- a) Illicit Discharge Detection Program No later than two years from the effective date of this permit, the Co-permittees must develop and implement a program to detect and eliminate illicit discharges into their MS4s. The program must include procedures for detection, identification of sources, and removal of non-storm water discharges from the storm sewer system. This program must address illegal dumping into the storm sewer system, and include training for city, county and ITD staff on how to respond to reports of illicit discharges. Each Co-permittee must develop an information management system to track illicit discharges. Co-permittees must work together to provide and promote at least one telephone “hotline” for citizens to call to report problems.
- b) Ordinances 1 Not later than three years from the effective date of this permit, all Co-permittees must effectively prohibit non-storm water discharges into their system through an ordinance or other regulatory mechanism to the extent allowable under state or local law. Co-permittees must implement appropriate enforcement procedures and actions, including enforcement escalation procedures for recalcitrant or repeat offenders.
- c) Ordinances 2 Through the ordinance or other regulatory mechanism, Co-permittees must prohibit any of the excepted non-storm water flows listed in Part I.D.1.c .only if such flows are identified (by EPA or the co-permittees) as a source of pollutants to the MS4. Co-permittees must document to EPA in the Annual Report any existing local controls or conditions placed on the excepted non-storm water discharges listed in Part I.D.1.
- d) Household Hazardous Waste Program Co-permittees must support the continuation of the hazardous waste disposal program at the Bannock County landfill operated by Bannock County, and must inform the public of hazards associated with illegal discharges and improper disposal of waste.
- e) Storm Sewer Map Not later than four years from the effective date of this permit, all Co-permittees must complete a comprehensive storm sewer system map. At a minimum, each map must show jurisdictional boundaries, the location of all inlets and outfalls, names and locations of all waters that receive discharges from those outfalls, and locations of all municipally-owned and operated facilities, including any public or private snow disposal sites. The map shall be available in electronic or digital format as appropriate. A copy of the completed map must be submitted to EPA and IDEQ as part of the corresponding Annual Report.

- f) Dry Weather Field Screening Not later than three years from the effective date of this permit, Co-permittees must begin dry weather field screening for non-storm water flows from storm water outfalls. By the expiration date of the permit, at least 50% of the co-permittees' outfalls within the Pocatello Urbanized Area must be screened for dry weather flows. The screening should include field tests of selected chemical parameters as indicators of discharge sources. Screening level tests may utilize less expensive "field test kits" using test methods not approved by EPA under 40 CFR Part 136, provided the manufacturer's published detection ranges are adequate for the illicit discharge detection purposes. By the expiration date of this permit, at least 50% of the storm sewer lines must be surveyed using closed-circuit television to identify illicit connections. The Co-permittees must investigate any illicit discharge within fifteen (15) days of its detection, and must take action to eliminate the source of the discharge within forty five (45) days of its detection.
- g) Industrial Facilities Not later than three years from the effective date of this permit, the Co-permittees must submit to EPA as part of the corresponding Annual Report an inventory of industrial facilities that discharge into the copermitees' MS4 or to waters of the United States within the Pocatello Urbanized Area. The types of industrial facilities that must be inventoried are set forth in 40 CFR §122.26(b)(14)(i) through (xi). This inventory must include the location of the facility, the location of its outfall and corresponding receiving water, and the NPDES permit status for its storm water discharge.

Overview

During 2009, the Co-permittees made significant progress towards meeting our goal of eliminating illicit discharges into the MS4.

In particular, mapping of the storm sewer system is now 95% complete. Additionally, the Co-permittees began to implement programs for 1) Dry Weather Field Screening, and 2) Inventorying Industrial Facilities

During 2010, the Co-permittees will focus their efforts on improving their inventory of industrial facilities and implementing a comprehensive Dry Weather Field Screening Program.

Highlights 2009

Storm Water Hotline Dissemination

Ordinances Passed

- Bannock County
- City of Chubbuck

Storm Sewer Map 95% Complete

- 70+ miles of storm sewer pipe
- 92 outfalls
- 80 dry wells

Industrial Facilities Program Implemented

- Over 65 industrial facilities that likely require an NPDES permit with the EPA

2010 Plans

Expand Industrial Facilities Inventory

Complete Storm Sewer Map

Implement Comprehensive Dry Weather Field Screening

Implement CCTV inspection of storm sewer lines

Appendix 6:

Illicit Discharge Ordinances

Appendix 7:

Industrial Facilities List

Minimum Measures Achieved

Illicit Discharge Detection Program (IDDP) *Part IIB3a*

No later than two years from the effective date of this permit, the Co-permittees must develop and implement a program to detect and eliminate illicit discharges into their MS4s. The program must include procedures for detection, identification of sources, and removal of non-storm water discharges from the storm sewer system. This program must address illegal dumping into the storm sewer system, and include training for city, county and ITD staff on how to respond to reports of illicit discharges. Each Co-permittee must develop an information management system to track illicit discharges. Co-permittees must work together to provide and promote at least one telephone "hotline" for citizens to call to report problems.

City of Pocatello

Co-permittee Storm Water Hotline

The City has posted the Co-permittees hotline phone number (208-234-6519) on 11x17 yellow laminated cards that are posted at all construction job sites. This has increased awareness across the PUA of this hotline. The number is also posted on the City of Pocatello's website.

Training for Co-permittee Staff

The City implements annual storm water training with its own staff, including training on detecting and responding to illicit discharges, and removal of the discharge from the system. At least annually, City of Pocatello staff receive training in storm water issues. This training has been incorporated into regular staff safety training sessions. For staff whose jobs involve regularly driving on City streets, this includes training on detecting illegal dumping into the storm sewer system and where to report this information. The training also includes information on how to clean up spills and/or remove illicit discharges from the MS4. Such training proved very effective during 2009 with several City staff appropriately reporting seeing spilled oil or oil pans left on City streets. The City has provided Co-permittees with a video it uses to facilitate this training and they have used this video when appropriate, in addition to other training methods. These trainings are discussed in greater detail under the 'Good Housekeeping Minimum Measure.'

Illicit Discharge Information Management System

The City has developed an Excel spreadsheet to track illicit discharges. This spreadsheet is maintained by the City's storm water manager. The spreadsheet tracks the reporting of the illicit discharge, the City's response and action(s) taken, and final resolution of the situation. The City tracks this information for illicit discharge on ITD property within the PUA as well.

City of Chubbuck

Illicit Discharge Information Management System

The City has a code enforcement process in place whereby complaints are logged, investigated, and resolution sought.

Bannock County

Illicit Discharge Information Management System

Bannock County has a code enforcement process in place whereby complaints are logged, investigated, and resolution sought.

Ordinances Part IIB3b&c

b) Not later than three years from the effective date of this permit, all Co-permittees must effectively prohibit non-storm water discharges into their system through an ordinance or other regulatory mechanism to the extent allowable under state or local law. Co-permittees must implement appropriate enforcement procedures and actions, including enforcement escalation procedures for recalcitrant or repeat offenders. c) Through the ordinance or other regulatory mechanism, Co-permittees must prohibit any of the excepted non-storm water flows listed in Part I.D.1.c .only if such flows are identified (by EPA or the co-permittees) as a source of pollutants to the MS4. Co-permittees must document to EPA in the Annual Report any existing local controls or conditions placed on the excepted non-storm water discharges listed in Part I.D.1.

City of Pocatello**Illicit Discharge Ordinance**

Pocatello's illicit discharge ordinance prohibiting non-storm water discharges into the MS4 was passed in 2008. A copy was included in the December 2008 Annual Report.

City of Chubbuck**Illicit Discharge Ordinance**

Chubbuck's illicit discharge ordinance prohibiting non-storm water discharges into the MS4 was passed in February 2009. (See Appendix 6).

Bannock County**Illicit Discharge Ordinance**

Bannock County's illicit discharge ordinance prohibiting non-storm water discharges into the MS4 was passed in November, 2009. (See Appendix 6).

Household Hazardous Waste Program Part IIB3d

Co-permittees must support the continuation of the hazardous waste disposal program at the Bannock County landfill operated by Bannock County, and must inform the public of hazards associated with illegal discharges and improper disposal of waste.

City of Pocatello

The City of Pocatello promotes this program on its website and in its Sanitation Department brochures and exhibits.

Bannock County**Household Hazardous Waste Program**

During the 2009 permit year, the Bannock County Landfill successfully diverted over 4,600 gallons of household hazardous waste including:

- Organics 0 gallons
- Used oil 2,350 gallons
- Antifreeze 725 gallons
- Flammable liquids 615 gallons
- Flammable sludge 1,008 gallons
- Pesticides/aerosols 5 totes

Waste Oil Program

Over 2,000 gallons of waste oil were received at the Bannock County Landfill Household Hazardous Waste program during 2009. This amount was in addition to the waste oil from Pocatello and Chubbuck City departments which is collected and subsequently burned in City shops and also in addition to the waste oil collected and processed by local service providers (drop off program).

Education and Outreach

As described in detail in the Education and Outreach Minimum Measure, Bannock County Landfill staff has energetically pursued the educational aspects of the Household Hazardous Waste program at the landfill in the past year.

Storm Sewer Map *Part IIB3e*

Not later than four years from the effective date of this permit, all Co-permittees must complete a comprehensive storm sewer system map. At a minimum, each map must show jurisdictional boundaries, the location of all inlets and outfalls, names and locations of all waters that receive discharges from those outfalls, and locations of all municipally-owned and operated facilities, including any public or private snow disposal sites. The map shall be available in electronic or digital format as appropriate. A copy of the completed map must be submitted to EPA and IDEQ as part of the corresponding Annual Report.

City of Pocatello**MS4 Mapping**

Global positioning system (GPS) and geographic information system (GIS) data bases have been initiated for all aspects of the storm drain system in Pocatello. Data for approximately 95 percent of the system has been collected and integrated into the City's GIS system.

City of Chubbuck**MS4 Mapping**

Chubbuck has continued to ID stamp and GPS locate a number of street catch basins for reference and cleaning. In 2009, the City started a new more visible and identifiable tag system.

Dry Weather Field Screening *Part IIB3e*

Not later than three years from the effective date of this permit, Co-permittees must begin dry weather field screening for non-storm water flows from storm water outfalls. By the expiration date of the permit, at least 50% of the Co-permittees' outfalls within the Pocatello Urbanized Area must be screened for dry weather flows. The screening should include field tests of selected chemical parameters as indicators of discharge sources. Screening level tests may utilize less expensive "field test kits" using test methods not approved by EPA under 40 CFR Part 136, provided the manufacturer's published detection ranges are adequate for the illicit discharge detection purposes. By the expiration date of this permit, at least 50% of the storm sewer lines must be surveyed using closed-circuit television to identify illicit connections. The Co-permittees must investigate any illicit discharge within fifteen (15) days of its detection, and must take action to eliminate the source of the discharge within forty five (45) days of its detection.

City of Pocatello**Dry Season Flows**

During 2009, portions of the PUA outfall system were inspected for dry season flows. No illicit discharges were recorded, although small quantities of residential irrigation water were apparent in the system. A more aggressive program of inspections will be conducted in 2010.

Closed Circuit TV Screening

No action has been taken on this item during this time frame. The City plans to begin screening MS4 during the 2010 permit year.

Industrial Facilities. Part IIB3f

Not later than three years from the effective date of this permit, the Co-permittees must submit to EPA as part of the corresponding Annual Report an inventory of industrial facilities that discharge into the copermittees' MS4 or to waters of the United States within the Pocatello Urbanized Area. The types of industrial facilities that must be inventoried are set forth in 40 CFR §122.26(b)(14)(i) through (xi). This inventory must include the location of the facility, the location of its outfall and corresponding receiving water, and the NPDES permit status for its storm water discharge.

City of Pocatello**Industrial Facility Inspections**

City staff have created a spreadsheet of industrial facilities in the PUA that potentially meet the criteria set forth in 40 CFR §122.26(b)(14)(i) through (xi) (see Appendix 7 for spreadsheet). Facilities were identified for inclusion on the list using a combination of local knowledge and known information about local industrial facilities from the City's pre-treatment program for sanitary waste water. This spreadsheet includes information on each facility's address, contact information if known, SIC code, and known or likely location of its outfall to the MS4 system. The spreadsheet also includes information on the NPDES permit status for each facility. The spreadsheet makes no determination as to whether or not any of the listed facilities are exempt from having an NPDES industrial permit, nor if the facility is in compliance with MSGP requirements.

Construction Site Storm Water Runoff Control *Part II.B.4*

Permit Requirements

- a) Erosion and Sediment Control Program Not later than two years from the permit effective date, the Co-permittees must develop, implement, and enforce a program to reduce pollutants in storm water runoff to the MS4 from construction activities resulting in land disturbance of one acre or more. This program must include controls for pollutants in such storm water discharges from activity disturbing less than one acre, if that construction activity is part of a larger common plan of development or sale that disturbs one acre or more. Through this program, Co-permittees must provide adequate direction to representatives of proposed new development and redevelopment projects regarding the NPDES General Permit for Storm Water Discharges for Construction Activity in Idaho, #IDR10-0000 (Construction General Permit). If EPA waives the NPDES permit requirements for storm water discharges associated with a specific small construction activity (i.e., a single project) in accordance with 40 CFR §122.26(b)(15)(i)(A) or (B), the Co-permittee is not required to develop, implement, and/or enforce the program to reduce pollutant discharges from that particular site.
- b) Ordinance Not later than two years from the effective date of this permit, the Co-permittees must adopt an ordinance or other regulatory mechanism to the extent allowable under state or local law that requires construction site operators to practice appropriate erosion, sediment and waste control. This ordinance or regulatory mechanism must include sanctions to ensure compliance. The Co-permittees may evaluate any existing procedures, policies, and authorities pertaining to activities occurring on their property to assist in the development of the required regulatory mechanism.
- c) Information Dissemination Not later than two years from the effective date of this permit, the Co-permittees must publish and distribute local requirements for construction site operators to implement appropriate erosion and sediment control measures, and to control waste (such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site) that may cause adverse impacts to water quality.
- d) Site Plan Review Procedures Not later than two years from the effective date of this permit, the Co-permittees must develop procedures for reviewing all site plans for potential water quality impacts, including erosion and sediment control, control of other wastes, and any other impacts that must be examined according to the requirements of the ordinance or other enforceable mechanism previously discussed in Part II.B.4.b. These procedures must include provisions for receipt and consideration of information submitted by the public.
- e) Inspection and Enforcement Not later than two years from the effective date of this permit, the Co-permittees must develop and implement procedures for construction site inspection and enforcement of the local control measures established as required in Parts II.B.4.b and c, including enforcement escalation procedures for recalcitrant or repeat offenders. As part of these procedures, the Co-permittees shall inspect all construction sites in their jurisdictions for appropriate erosion/sediment/waste control at least once per construction season.
- f) Training Not later than three years from the effective date of this permit, Co-permittees must develop and conduct at least one training session for the local construction/design/engineering audience related to the construction ordinance and control requirements referenced in Parts II.B.4.b and c.

- g) Tracking Program Not later than three years from the effective dates of this permit, the Co-permittees must implement a program to receive, track, and consider information submitted by the public regarding construction site erosion and sediment control concerns.

- h) Public Projects and Compliance The Co-permittees must ensure all public construction projects operated by their organizations comply with the NPDES General Permit for Storm Water Discharges for Construction Activity in Idaho, #IDR10-0000 (Construction General Permit) and relevant local requirements for erosion, sediment and onsite materials control.

Overview

During 2009, the Co-permittees made significant progress with decreasing the amount of sediment leaving construction sites. We successfully implemented a multi-faceted Erosion and Sediment Control program for contractors and developers.

During 2010, we plan to continue to improve this program through targeted outreach and enforcement mechanisms. We plan to improve our tracking mechanisms as well.

Highlights 2009

Erosion and Sediment Control Program Implemented

- ESC Training and Certification (481 individuals)
- ESC Ordinances
- ESC Permits
- ESC Inspections and Enforcement

2010 Plans

Erosion and Sediment Control Program Improved

- Improve Training and Certification
- Improve process for Inspections and Enforcement

Appendix 6:

ESC ordinances passed during 2009 permit year.

Appendix 8 and 9:

ESC guidance documents provided to contractors.

Appendix 9:

Re-vegetation guide provided to contractors.

Appendix 10:

Posters and other media used to promote ESC training and regulations.

Minimum Measures Achieved

Erosion and Sediment Control Program Part IIB4a

Not later than two years from the permit effective date, the Co-permittees must develop, implement, and enforce a program to reduce pollutants in storm water runoff to the MS4 from construction activities resulting in land disturbance of one acre or more. This program must include controls for pollutants in such storm water discharges from activity disturbing less than one acre, if that construction activity is part of a larger common plan of development or sale that disturbs one acre or more. Through this program, Co-permittees must provide adequate direction to representatives of proposed new development and redevelopment projects regarding the NPDES General Permit for Storm Water Discharges for Construction Activity in Idaho, #IDR10-0000 (Construction General Permit). If EPA waives the NPDES permit requirements for storm water discharges associated with a specific small construction activity (i.e., a single project) in accordance with 40 CFR §122.26(b)(15)(i)(A) or (B), the Co-permittee is not required to develop, implement, and/or enforce the program to reduce pollutant discharges from that particular site.

City of Pocatello

Construction General Permit Requirements

During 2009, City staff implemented an Erosion and Sediment Control (ESC) program for contractors and developers, in accordance with the ESC ordinance passed in December 2008 (see next minimum measure). This program includes guidance documents for contractors on when they need a City ESC permit and when they need an EPA CGP (see Appendix 8 and 9 for a copy of these guidance documents). Contractors and developers disturbing over one acre of land (or land that is part of a larger common plan of development) must submit a copy of their NOI to the City when they apply for a City ESC permit. City staff provide advice to contractors and developers on Best Management Practices (BMPs) that will assist them in meeting the requirements of both the EPA's CGP and the City's ESC permit.

City ESC Permits

ESC permits are reviewed (site plan review) and tracked along with other construction permits. This process is outlined in the City's ESC ordinance (see 2008 Annual Report for copy). ESC permittees in the City of Pocatello receive an 11x17 laminated yellow permit card to post at their job site. This helps the City track permittees in the field and additionally provides us with an opportunity to educate the public about erosion and sediment control on construction sites. The card includes the storm water hotline number for reporting poor erosion and sediment control on the job site.

City of Chubbuck

Construction General Permit Requirements

During 2009, City staff implemented an Erosion and Sediment Control (ESC) program for contractors and developers, in accordance with the ESC ordinance passed in DATE 2009 (see next minimum measure). This program includes guidance documents for contractors on when they need a City ESC permit and when they need an EPA CGP (see Appendix 8 and 9 for a copy of these guidance documents). Contractors and developers disturbing over one acre of land (or land that is part of a larger common plan of development) must submit a copy of their NOI to the City when they apply for a City ESC permit. City staff provide advice to contractors and developers on Best Management Practices (BMPs) that will assist them in meeting the requirements of both the EPA's CGP and the City's ESC permit.

City ESC Permits

ESC permits are reviewed (site plan review) and tracked along with other construction permits. This process is outlined in the ESC ordinance (see Appendix 6 for a copy).

Bannock County**Construction General Permit Requirements**

During 2009, County staff implemented an Erosion and Sediment Control (ESC) program for contractors and developers, in accordance with the ESC ordinance passed in November 2009 (see next minimum measure). This program includes guidance documents for contractors on when they need a County ESC permit and when they need an EPA CGP (see Appendix 8 and 9 for a copy of these guidance documents). Contractors and developers disturbing over one acre of land (or land that is part of a larger common plan of development) must submit a copy of their NOI to the City when they apply for a City ESC permit. County staff provide advice to contractors and developers on Best Management Practices (BMPs) that will assist them in meeting the requirements of both the EPA's CGP and the County's ESC permit.

County ESC Permits

ESC permits are reviewed (site plan review) and tracked along with other construction permits. This process is outlined in the ESC ordinance (see Appendix 6 for a copy).

Ordinances Part IIB4b

Not later than two years from the effective date of this permit, the Co-permittees must adopt an ordinance or other regulatory mechanism to the extent allowable under state or local law that requires construction site operators to practice appropriate erosion, sediment and waste control. This ordinance or regulatory mechanism must include sanctions to ensure compliance. The Co-permittees may evaluate any existing procedures, policies, and authorities pertaining to activities occurring on their property to assist in the development of the required regulatory mechanism.

City of Pocatello**Erosion and Sediment Control Ordinance**

In December 2008, the City passed an ordinance prohibiting the discharge of sediment or other pollutant materials from construction activities onto public rights-of-way or private property not controlled by the erosion and sediment control permit holder (a copy of this ordinance was provided in the 2008 Annual Report). Permits for management of sediment and erosion control are required by the Co-permittees for all ground disturbing activities that disturb over ¼ of land or disturb more than 10 cubic yards of soil. Additionally, these permits require the applicant to submit an NOI to the EPA (and receive an NPDES permit) when their land disturbing activities take place on parcels of one acre or greater and on parcels of less than one acre if they are part of a larger common plan of development.

City of Chubbuck**Erosion and Sediment Control Ordinance**

In February 2009, the City passed an ordinance prohibiting the discharge of sediment or other pollutant materials from construction activities onto public rights-of-way or private property not controlled by the erosion and sediment control permit holder (see Appendix 6 for a copy of this ordinance). Permits for management of sediment and erosion control are required by the Co-permittees for all ground disturbing activities that disturb over ¼ of land or disturb more than 10 cubic yards of soil. Additionally, these permits require the applicant to submit an NOI to the EPA (and receive an NPDES permit) when their land disturbing activities take place on parcels of one acre or greater and on parcels of less than one acre if they are part of a larger common plan of development.

Bannock County**Erosion and Sediment Control Ordinance**

In November 2009, the County passed an ordinance prohibiting the discharge of sediment or other pollutant materials from construction activities onto public rights-of-way or private property not controlled by the erosion and sediment control permit holder (a copy of this ordinance was provided in the 2008 Annual Report). Permits for management of sediment and erosion control are required by the Co-permittees for all ground disturbing activities that disturb over ¼ of land. Additionally, these permits require the applicant to submit an NOI to the EPA (and receive an NPDES permit) when their land disturbing activities take place on parcels of one acre or greater and on parcels of less than one acre if they are part of a larger common plan of development.

Information Dissemination *Part IIB4c*

Not later than two years from the effective date of this permit, the Co-permittees must publish and distribute local requirements for construction site operators to implement appropriate erosion and sediment control measures, and to control waste (such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site) that may cause adverse impacts to water quality.

City of Pocatello**ESC Training and Certification**

During the 2009 calendar year, the City (on behalf of the Co-permittees) implemented an education and outreach program for contractors and developers which required training and certification in erosion and sediment control before homebuilding, grading, and excavating permits would be issued by the co-permittees. These permits now require the applicant (or designee) to hold an Erosion and Sediment Control Certification Card, which lasts for three years. An ESC Certification Card can be obtained by attending (and passing) a four hour class. The Co-permittees developed this program in collaboration with the City of Boise, with assistance from EPA Region 10, and the Idaho Small Business Development Center. During the required training, contractors receive the Idaho Small Business Development Center's field guide to Erosion and Sediment Control on Construction Sites.

During 2009, eleven ESC training sessions were held, and 481 individuals received their ESC certification cards. This program was heavily advertised through a variety of media including posters, emails, direct mail to registered contractors, and news coverage (see Appendix 10 for copies of media used to advertise the training). During 2010, we plan to continue to offer this certification program (which is now coordinated through Idaho State University). Additionally, we plan to continue to educate local contractors about ESC through emails, posters, news coverage, and other media as appropriate.

One on One Outreach

For many years, City staff have been educating individual homebuilders, engineers, developers, and contractors about the EPA's required storm water management practices at construction sites and forthcoming City ordinances (passed in December 2008) relating to storm water and sediment and erosion control. City staff conducts this outreach as they respond to dust and erosion complaints about a particular site, meet with developers about site design, and meet with contractors and homebuilders seeking construction permits.

Inspections and Enforcement *Part IIB4d*

Not later than two years from the effective date of this permit, the Co-permittees must develop and implement procedures for construction site inspection and enforcement of the local control measures established as required in Parts II.B.4.b and c, including enforcement escalation procedures for recalcitrant or repeat offenders. As part of these procedures, the Co-permittees shall inspect all construction sites in their jurisdictions for appropriate erosion/sediment/waste control at least once per construction season.

City of Pocatello**ESC Training and Certification**

The City has implemented a program to inspect construction sites for ESC and enforce these regulations. The enforcement mechanism (which includes escalation procedures for recalcitrant or repeat offenders) is detailed in the ESC ordinance the City passed in 2008 (a copy of the ESC ordinance was included in the 2008 Annual Report). City staff inspect job sites periodically during the construction season. Additionally, violations are reported to City staff by the general public and Co-permittee staff. Violations are tracked using an Excel spreadsheet database.

City of Chubbuck**ESC Training and Certification**

The City has implemented a program to inspect construction sites for ESC and enforce these regulations. The enforcement mechanism (which includes escalation procedures for recalcitrant or repeat offenders) is detailed in the ESC ordinance the City passed in February 2009 (see Appendix 6 for a copy of this ordinance). City staff inspect job sites periodically during the construction season. Additionally, violations are reported to City staff by the general public and Co-permittee staff. Violations are tracked using an Excel spreadsheet database.

Bannock County**ESC Training and Certification**

The County has implemented a program to inspect construction sites for ESC and enforce these regulations. The enforcement mechanism (which includes escalation procedures for recalcitrant or repeat offenders) is detailed in the ESC ordinance the City passed in November 2009 (see Appendix 6 for a copy of this ordinance). County staff inspect job sites periodically during the construction season. Additionally, violations are reported to County staff by the general public and Co-permittee staff. Violations are tracked using an Excel spreadsheet database.

Training *Part IIB4e*

Not later than three years from the effective date of this permit, Co-permittees must develop and conduct at least one training session for the local construction/design/engineering audience related to the construction ordinance and control requirements referenced in Parts II.B.4.b and c.

See information dissemination minimum measure.

Tracking Program *Part IIB4f*

Not later than three years from the effective dates of this permit, the Co-permittees must implement a program to receive, track, and consider information submitted by the public regarding construction site erosion and sediment control concerns.

See inspections and enforcement minimum measure.

Public Projects and Compliance *Part IIB4g*

The Co-permittees must ensure all public construction projects operated by their organizations comply with the NPDES General Permit for Storm Water Discharges for Construction Activity in Idaho, #IDR10-0000 (Construction General Permit) and relevant local requirements for erosion, sediment and onsite materials control.

City of Pocatello

Construction General Permit Requirements

It is City policy that all projects disturbing over 1 acre of ground must obtain an NPDES permit and comply with the permit's requirements for erosion, sediment, and onsite materials control.

City ESC Permits

Additionally, it is City policy that all projects disturbing any ground must implement BMPs for erosion and sediment control.

City of Chubbuck

Construction General Permit Requirements

It is City policy that all projects disturbing over 1 acre of ground must obtain an NPDES permit and comply with the permit's requirements for erosion, sediment, and onsite materials control.

City ESC Permits

Additionally, it is City policy that all projects disturbing any ground must implement BMPs for erosion and sediment control.

Bannock County

Construction General Permit Requirements

It is County policy that all projects disturbing over 1 acre of ground must obtain an NPDES permit and comply with the permit's requirements for erosion, sediment, and onsite materials control.

County ESC Permits

Additionally, it is County policy that all projects disturbing any ground must implement BMPs for erosion and sediment control.

ITD

Construction General Permit Requirements

It is ITD policy that all projects disturbing over 1 acre of ground must obtain an NPDES permit and comply with the permit's requirements for erosion, sediment, and onsite materials control.

Local ESC Permits

Additionally, it is ITD policy that all projects disturbing any ground must implement BMPs for erosion and sediment control.

Post-Construction Storm Water Management *Part II.B.5*

Permit Requirements

- a) Post Construction Program Implementation Not later than four years from the effective date of this permit, the Co-permittee must develop, implement, and enforce requirements to address post-construction storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, (including projects less than one acre that are part of a larger common plan of development or sale) and discharge into the MS4. The program must ensure that controls are enacted that prevent or minimize water quality impacts from newly developed or re-developed areas.
- b) Ordinance Not later than four years from the effective date of this permit, each Co-permittees must adopt an ordinance or other regulatory mechanism to the extent allowable under state or local law to address post-construction runoff from new development and redevelopment projects. If such requirements do not currently exist, adoption of a regulatory mechanism must be part of the program. The Co-permittees may evaluate existing procedures, policies, and authorities pertaining to activities occurring on their property to assist in the development of the required regulatory mechanism.
- c) Design Manual Not later than four years from the effective date of this permit, the Co-permittees must publish and distribute a design manual of practices for post-construction storm water management, that includes a list of strategies reflecting a combination of structural and/or non-structural BMPs appropriate to the MS4(s). This design manual must include, but is not limited to, requirements for the appropriate design and construction of septic systems, parking lots, and snow disposal sites.
- d) BMP Maintenance The Co-permittees must ensure proper long-term operation and maintenance of post-construction BMPs.
- e) Training Not later than four years from the effective date of this permit, the Co-permittees must develop and conduct at least one training for local developers, engineers and the public regarding the requirements of the design manual and local ordinance(s) referenced in Parts II.B.5.b., and c.
- f) Demonstration Project Prior to the expiration date of this permit, the Co-permittees must initiate and sponsor at least one independent field assessment or demonstration project to confirm the effectiveness of the local requirement(s) for post construction storm water management. Examples of field assessment or demonstration projects include, but are not limited to: comparing various alternatives to paving; demonstrating one or more techniques for increasing infiltration; verifying effectiveness of end-of-pipe treatment systems; or other appropriate actions.

Overview

During 2009, the Co-permittees continued to work at implementing programs to control post-construction storm water.

Several demonstration projects were completed.

Plans for 2010 include completing the Design Manual (and providing training opportunities for local contractors and developers), implementing post-construction ordinances, and BMP maintenance protocols for post-construction storm water controls.

Highlights 2009

Completion of 3 demonstration projects.

2010 Plans

Implement Post Construction Program

- Revise and/or implement post-construction ordinances as required.
- Finalize Design Manual and provide training.
- Implement BMP maintenance protocols.
- Provide training on Design Manual.

Minimum Measures Achieved

Post Construction Program Implementation Part IIB5a

Not later than four years from the effective date of this permit, the Co-permittee must develop, implement, and enforce requirements to address post-construction storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, (including projects less than one acre that are part of a larger common plan of development or sale) and discharge into the MS4. The program must ensure that controls are enacted that prevent or minimize water quality impacts from newly developed or re-developed areas.

City of Pocatello

Storm Water Retention Requirements

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Ordinance Part IIB5b

Not later than four years from the effective date of this permit, each Co-permittees must adopt an ordinance or other regulatory mechanism to the extent allowable under state or local law to address post-construction runoff from new development and redevelopment projects. If such requirements do not currently exist, adoption of a regulatory mechanism must be part of the program. The Co-permittees may evaluate existing procedures, policies, and authorities pertaining to activities occurring on their property to assist in the development of the required regulatory mechanism.

City of Pocatello

Post-construction ordinance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Design Manual Part IIB5c

Not later than four years from the effective date of this permit, the Co-permittees must publish and distribute a design manual of practices for post-construction storm water management, that includes a list of strategies reflecting a combination of structural and/or non-structural BMPs appropriate to the MS4(s). This design manual must include, but is not limited to, requirements for the appropriate design and construction of septic systems, parking lots, and snow disposal sites.

City of Pocatello

Design Manual Revisions

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

BMP Maintenance Part IIB5d

The Co-permittees must ensure proper long-term operation and maintenance of post-construction BMPs.

City of Pocatello

Long Term O&M

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Training Part IIB5e

Not later than four years from the effective date of this permit, the Co-permittees must develop and conduct at least one training for local developers, engineers and the public regarding the requirements of the design manual and local ordinance(s) referenced in Parts II.B.5.b., and c.

Prior to the expiration date of this permit, the Co-permittees must initiate and sponsor at least one independent field assessment or demonstration project to confirm the effectiveness of the local requirement(s) for post construction storm water management. Examples of field assessment or demonstration projects include, but are not limited to: comparing various alternatives to paving; demonstrating one or more techniques for increasing infiltration; verifying effectiveness of end-of-pipe treatment systems; or other appropriate actions.

City of Pocatello

ESC Training and Certification

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Demonstration Project *Part IIB5f*

Prior to the expiration date of this permit, the Co-permittees must initiate and sponsor at least one independent field assessment or demonstration project to confirm the effectiveness of the local requirement(s) for post construction storm water management. Examples of field assessment or demonstration projects include, but are not limited to: comparing various alternatives to paving; demonstrating one or more techniques for increasing infiltration; verifying effectiveness of end-of-pipe treatment systems; or other appropriate actions.

City of Pocatello

Demonstration Projects

In order to facilitate the implementation of innovative storm water management and xeric landscaping by developers and homeowners, the City of Pocatello has been implementing demonstration projects. In 2009, the City managed 2 demonstration projects in highly visible locations to allow residents and developers to see a variety of xeric gardens, tree plantings, and permeable paving options.

- **Lander Street Parking Lot.** This is the first public permeable paving project within Pocatello, making use of gravel paving within plastic honeycomb cells. The parking lot does not connect to the storm drain system – all water is infiltrated into the ground (infiltrators have been placed under the gravel paving to facilitate this process). The parking lot (constructed in 2008) also showcases the use of many trees and masses of xeric and mostly native perennials (installed in 2008 and 2009) within each planter strip. Interpretive signage will be installed in 2010 to help educate the general public about this innovative storm water project.
- **Tree Plantings on the Greenway.** The City planted dozens of additional trees and shrubs along a paved bicycle & pedestrian trail at the Sacajawea Park Storm Water Wetland. These plantings demonstrate the attractiveness of a variety of low water trees and shrubs that thrive in our local environment. Additionally, many of these trees have been placed to help infiltrate water that runs off the paved and impervious Greenway Trail.
- **Sacajawea Park Storm Water Wetland.** The wetland was put ‘online’ in 2008, and current design capacity is estimated at 12 acre feet of water. As the wetland continues to fill in with sediment load, the project is demonstrating how a storm water wetland can serve both a functional capacity for cleaning and infiltrating storm water, as well as be a recreational asset to the community when surrounded by paths and planted with native vegetation.

Pollution Prevention and Good Housekeeping *Part II.B.6*

Permit Requirements

- a) Municipal Operations O&M Program Not later than four years from the effective date of this permit, the Co-permittees must develop and implement an operation and maintenance program intended to prevent or reduce pollutant runoff from municipal operations. This program must address municipal activities occurring within their jurisdiction with potential for negative storm water related water quality impacts, including: grounds/park and open space maintenance operations; fleet maintenance and vehicle washing operations; building maintenance; storm water system maintenance; and snow disposal site operation and maintenance. Examples of other municipal activities which may also be evaluated as relevant to the jurisdiction include, but are not limited to: street cleaning and maintenance; solid waste transfer activities; water treatment plant operations; municipal golf course maintenance; materials storage; hazardous materials storage; used oil recycling; spill control and prevention measures for municipal refueling facilities; municipal new construction and land disturbances; and snow removal practices.
- b) Street and Catch Basin Clean Evaluation Not later than four years from the effective date of this permit, Co-permittees must evaluate existing street cleaning operations, catch basin cleaning operations, and street sanding/salt practices occurring within their jurisdiction to minimize any negative impacts to water quality. This evaluation must also examine the existing practices for the disposal of waste removed from the MS4 and MS4 operations. This evaluation must identify any actions or improvements necessary to minimize negative impacts on water quality, and timelines for incorporating such actions or improvements.
- c) Training Not later than two years from the effective date of this permit, Co-permittees must develop and conduct appropriate training for municipal personnel related to optimum maintenance practices for the protection of water quality. Two such training sessions for municipal personnel per year must be conducted thereafter.
- d) Flood Management Not later than two years from the effective date of this permit, Co-permittees must ensure that new flood management projects are assessed for impacts on water quality and must ensure that existing projects are assessed to incorporate ongoing or additional water quality protection devices or practices.

Good Housekeeping Overview

During 2009, the Co-permittees implemented a number of programs to reduce pollution from municipal activities. In particular, Co-permittee staff received training in storm water management and how to minimize polluted runoff from municipal operations. This training will be expanded during the 2010 permit year.

The Co-permittees will expand the Good Housekeeping program in the 2010 permit year to finalize and implement municipal operations' O & M manuals with respect to storm water, evaluate existing street cleaning programs, and expand the municipal training that was implemented in the 2009 permit year.

Highlights 2009

Municipal Training Program implemented.

Levee re-certification process necessitates changes in levee management that will provide environmental benefits.

2010 Plans

Finalize municipal operations O & M manuals.

Evaluate existing street and catch basin cleaning programs.

Expand municipal training.

Minimum Measures Achieved

Municipal Operations O&M Program *Part II.B.6a*

Not later than four years from the effective date of this permit, the Co-permittees must develop and implement an operation and maintenance program intended to prevent or reduce pollutant runoff from municipal operations. This program must address municipal activities occurring within their jurisdiction with potential for negative storm water related water quality impacts, including: grounds/park and open space maintenance operations; fleet maintenance and vehicle washing operations; building maintenance; storm water system maintenance; and snow disposal site operation and maintenance. Examples of other municipal activities which may also be evaluated as relevant to the jurisdiction include, but are not limited to: street cleaning and maintenance; solid waste transfer activities; water treatment plant operations; municipal golf course maintenance; materials storage; hazardous materials storage; used oil recycling; spill control and prevention measures for municipal refueling facilities; municipal new construction and land disturbances; and snow removal practices.

City of Pocatello

Parks Maintenance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Fleet Maintenance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Building Maintenance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

MS4 Maintenance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Snow Disposal

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

City of Chubbuck

Parks Maintenance

Storm water collection and filtration sites installed in parks:

- Larry Miller Park, 801 Alpine - spring 06
- Briarwood Park, 4651 Eagle Rd. - fall 06
- Hartland Park, 976 Stripes Rd.- fall 06
- Sunset West Park- 3 sites - fall 09
- Sample Park, Stuart St. - fall 09
- Park Meadows Parks addresses, 4712 Independence - fall 08
- 4765 Galena - fall 05
- 4615 Galena - fall 07
- 4776 Galena - fall 09
- 4556 Galena - fall 09
- Cambridge estates storm water collection and filtration site, 5460 Whitaker Rd. - spring 07

Parks with swales dug to code (2005-2009):

- Larry Miller Park, Rowland Park, Hartland Park, Sample Park, Park Meadows (4615, 4765), and Brookstone Estates Parks.

Fleet Maintenance

All 5 of the sand/soil separation basins in the City yard were cleaned out and serviced this year and new sump skimmers were installed.

Building Maintenance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

MS4 Maintenance

Constructed a new drain system on Noah to run the storm water from a large subdivision run through a sand/soil separator then into a large dry well (rather than into the Fort Hall waste way canal).

Snow Disposal

When the City picks up snow, it is hauled to an undeveloped lot at one park so that when it melts the water soaks into the ground. The City maintenance department has started a program of all water pumped into the street during the dewatering of a mainline water break into a sediment collection bag, keeping all sediment at the site of the break, and out of the drywell catch basin systems. City street department spent 534 hours sweeping City streets.

Bannock County

Fleet Maintenance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Building Maintenance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Snow Disposal

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

ITD

Fleet Maintenance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Building Maintenance

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Snow Disposal

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

Street and Catch Basin Clean Evaluation Part II.B.6b

Not later than four years from the effective date of this permit, Co-permittees must evaluate existing street cleaning operations, catch basin cleaning operations, and street sanding/salt practices occurring within their jurisdiction to minimize any negative impacts to water quality. This evaluation must also examine the existing practices for the disposal of waste removed from the MS4 and MS4 operations. This evaluation must identify any actions or improvements necessary to minimize negative impacts on water quality, and timelines for incorporating such actions or improvements.

City of Pocatello

Street and Catch Basin Cleaning Evaluation

No action has been taken on this permit requirement during the 2008-2009 permit reporting timeframe.

City of Chubbuck

Street and Catch Basin Cleaning Evaluation

City spent 44 hours marking catch basins and drywell inlets with the more visible and identifiable markers. City spent over 50 hours cleaning out and servicing catch basins and drywells. We improved drainage at Holly and Whitaker by installing cross drains on Whitaker at these two locations.

Training Part II.B.6c

Not later than two years from the effective date of this permit, Co-permittees must develop and conduct appropriate training for municipal personnel related to optimum maintenance practices for the protection of water quality. Two such training sessions for municipal personnel per year must be conducted thereafter.

City of Pocatello**Parks & Recreation Department Staff Training**

City staff conducted one training session in March 2009 with all Parks Department employees, using the video Storm Watch: Municipal Stormwater Pollution Prevention produced by Excal Video. Staff were alerted to their responsibility for managing lawn clippings, leaves, fertilizers, and sediment during performance of their jobs. Additionally, staff were trained in identifying illicit discharges to the MS4. Several Parks Department staff also attended ESC Certification training from the City in 2009.

Public Works Departments Staff Training (Water, Engineering, Sanitation, Streets)

Many public works City staff received training in Erosion and Sediment Control during 2009 by attending the City's four hour ESC Certification class, and/or watch the Storm Watch video.

Additionally, individual departments periodically trained their staff in BMPs for storm water during their regular monthly safety meetings.

City of Chubbuck**Public Works Departments Staff Training (Water, Engineering, Sanitation, Streets)**

Many public works City staff received training in Erosion and Sediment Control during 2009 by attending the City's four hour ESC Certification class. Additionally, individual departments periodically trained their staff in BMPs for storm water during their regular monthly safety meetings.

Bannock County**Landfill Staff Training**

The Landfill staff received training on Erosion and Sediment Control by attending the Storm Water workshops offered by the continuing education center with Idaho State University.

Other Staff Training

Many public works County staff received training in Erosion and Sediment Control during 2009 by attending the City's four hour ESC Certification class. Additionally, individual departments periodically trained their staff in BMPs for storm water during their regular monthly safety meetings.

Flood Management Part II.B.6d

Not later than two years from the effective date of this permit, Co-permittees must ensure that new flood management projects are assessed for impacts on water quality and must ensure that existing projects are assessed to incorporate ongoing or additional water quality protection devices or practices.

City of Pocatello**Levee Management**

In accordance with Army Corps of Engineers regulations regarding the 6.2 mile earthen levee system that runs through the City (of which 1.5 miles is concrete channel), the City continues to work at maintaining the hydraulic and structural integrity of the levee system. During 2009, the City worked with a local engineering firm to modify the annual maintenance requirements (as well as modify the hydraulic requirements) in order to minimize the negative impacts of the levee system to local water quality. The existing requirements mandate removal of all vegetation over 2" in diameter and that ideally the vegetation be maintained at a height of 12". The new requirements (if they are approved by FEMA) provide an opportunity for the City to keep some larger vegetation on the levees and thus maintain some riparian habitat along the levees for the TMDL listed Portneuf River.

Monitoring, Recordkeeping and Reporting Requirements

Part IV.A, B, & C

Permit Requirements

Storm Water Discharge Monitoring Report. Not later than two years from the effective date of this permit, and annually thereafter, all available storm water discharge monitoring data must be submitted as part of the Annual Report. At a minimum, this Storm Water Discharge Monitoring Report must include:

- a) Dates of sample collection and analyses
- b) Results of sample analyses
- c) Location of sample collection
- d) An overall assessment of the previous 12 months of data;
- e) A cumulative estimate of pollutant loading for each parameter at each sample location, and an overall estimate of the contribution of pollutants from all storm water emanating from the Pocatello Urban Area.

Portneuf River Water Monitoring Report. Not later than two years from the effective date of this permit, and annually thereafter, all surface water monitoring data must be submitted as part of the Annual Report. At a minimum, this Portneuf River Water Monitoring Report must include:

- a) Dates of sample collection and analyses;
- b) Results of sample analyses; and
- c) Locations of samples collection.

Quality Assurance Requirements. The Co-permittees must develop a quality assurance plan (QAP) for all monitoring required in this Part. The QAP must be developed and implemented within 270 days of the effective date of this permit. The QAP required for this permit will be developed based on “The Quality Assurance Project Plan for the Portneuf River Monitoring Project” (dated July 2004) which must be modified to meet requirements under this section. Upon completion of the QAP, the Co-permittees must notify EPA and IDEQ in writing, as indicated in Part IV.D

- a) The QAP must be designed to assist in planning for the collection and analysis of storm water discharge and receiving water samples in support of the permit and in explaining data anomalies when they occur.
- b) Throughout all sample collection and analysis activities, the Co-permittees must use the EPA-approved QA/QC and chain-of-custody procedures described in the following documents:
 - i. *EPA Requirements for Quality Assurance Project Plans EPA-QA/R-5*
 - ii. (EPA/240/B-01/003, March 2001). A copy of this document can be found electronically at: <http://www.epa.gov/quality/qs-docs/r5-final.pdf>
 - iii. *Guidance for Quality Assurance Project Plans EPA-QA/G-5*, (EPA/600/R-98/018, February, 1998). A copy of this document can be found electronically at: <http://www.epa.gov/r10earth/offices/oea/epaqag5.pdf>

The QAP must be prepared in the form which is specified in these documents.

- c) At a minimum, the QAP must include the following:
 - i. Details on the number of samples, type of sample containers, preservation of samples, holding times, analytical methods, analytical detection and quantitation limits for each target compound, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements.
 - ii. Map(s) indicating the location of each sampling point.

- iii. Qualification and training of personnel.
- iv. Name(s), address (es) and telephone number(s) of the laboratories, used by or proposed to be used by the Co-permittees.
- d) The Co-permittees must amend the QAP whenever there is a modification in sample collection, sample analysis, or other procedure addressed by the QAP.
- e) Copies of the QAP must be maintained by the Co-permittees and made available to EPA and/or IDEQ upon request.

BMP Implementation Plan A description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable water quality standards.

Enforcement and Inspections A summary of the number and nature of inspections, formal enforcement actions, and/or other similar activities performed.

Achievements

Storm Water Discharge Monitoring

During the 2009 permit year, the automatic samplers for storm water event monitoring were put online. Both the Halliday and Sacajawea outfalls were sampled by automatic samplers during 2009. Other storm water sampling locations were also sampled in accordance with permit requirements. During storm events, Portneuf River water samples were also collected throughout the city (see Appendix 11 for Storm Water Discharge Monitoring Report). Data collected in 2009 is reflective of typical storm water events in southeast Idaho. Although some sampling was successfully completed in 2009, insufficient data is available to make cumulative total pollutant load projections for the PUA.

Portneuf River Monitoring

Water quality monitoring through the use of the Portneuf Monitoring Coalition sondes was continued in 2009, as was the monthly water quality sampling on the Portneuf River sites (see Appendix 12 for Portneuf River Water Monitoring Report).

Quality Assurance Project Plan

As required by Part IV.A.6 of the permit, the Co-permittees developed, reviewed, signed, and submitted a Quality Assurance Project Plan (QAPP) for the water quality monitoring requirements of the permit (Part IV) in September 2007. A copy of the QAPP was included with the 2007 Annual Report. During the 2009 permit year, we revised the Oil & Grease standard (See Appendix 13 for addendum and letter to EPA).

Storm Water Master Plan

No progress has been made on this measure during this time period.

BMP Implementation Plan

At this point in time, the Co-permittees are working on determining what BMPs to implement to best meet water quality standards for the Portneuf River, based on monitoring results.

Enforcement and Inspections

One enforcement action was taken by the City of Pocatello in the 2008-2009 permit year for Erosion and Sediment Control on a construction site. A variety of inspections, executed in the form of education and outreach, were completed within our construction sector and other venues as appropriate.

Highlights 2009

Storm water discharge monitoring automatic samplers enabled

QAPP addendum submitted for oil & grease

Appendix 11:

Storm Water Discharge Monitoring Report

Appendix 12:

Portneuf River Monitoring Report

Appendix 13:

QAPP Addendum for Oil and Grease