



# ANNUAL REPORT

December 2010 to December 2011

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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**Appendix 1: Pictures from storm water outreach activities**

**Appendix 2: News coverage of storm water program.**

**Appendix 3: Mass media advertising and posters for storm water outreach**

**Appendix 4: Completed storm water map for Pocatello.**

**Appendix 5: Storm Water ordinances passed during 2011**

**Appendix 6: Storm water report**

**Appendix 7: Portneuf River report**

All appendices are provided as PDF documents, except for the Storm Water and Portneuf River Reports.

## 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 5 reporting period (December 15, 2010– December 15, 2011). 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 2010-2011 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 CDs.

## 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 2010-2011 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 2011, the Co-permittees made significant progress towards meeting our goal of implementing and improving the effectiveness of our Storm Water Education Program (SWEP). We disseminated informational materials using a variety of media, including TV, newspapers, flyers, posters, our website [http://www.pocatello.us/se/se\\_storm\\_water.htm](http://www.pocatello.us/se/se_storm_water.htm), a speaker's bureau, lesson plans, and workshops with K-12 teachers.

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 2011

#### Activities (Campaigns)

- Continued the Storm Water Awareness Campaign
- Continued the Dog Waste Campaign
- Continued the Household Hazardous Waste & Trash Management Campaign
- Continued the Covered Loads Campaign
- Continued the Yard Debris Campaign
- Revamped material for the Storm Drain Marking Campaign

#### Participation

- Exhibits at (and sponsorship of) community environmental events with over 7,000 attendees.
- Website had over 300 unique visitors, with over 45 unique visitors on the K-12 student pages.
- 1,991 3<sup>rd</sup> grade and 8<sup>th</sup> grade students, and 280 adults participated in Water Week 2011.

### 2012 Plans

**Expand and improve campaigns being implemented.**

### Relevant Appendices

Appendix 1: **Pictures from storm water outreach activities**

Appendix 2: **Storm water news coverage**

Appendix 3: **Storm water outreach mass media and posters**

Appendix 6 & 7: **Storm Water and Portneuf River Water Quality Reports**

Logic Model 2011

**Situation:** City storm water pipes run brown with sediment, nutrients and oil & grease. The Portneuf River is TMDL listed for these contaminants.

Inputs	Outputs		Outcomes -- Impact		
	Activities	Participation	Awareness	Behavior	Condition
<p><b>Staff</b> Program management</p> <p><b>Money</b></p> <p><b>Expertise</b> Ad/Flyer design Outreach Program evaluation</p> <p><b>Partners</b> K-16 schools Local government Agencies Local non-profits Local businesses</p>	<p><b>General Awareness Campaign</b></p> <p><b>Dog Waste Campaign</b></p> <p><b>Household Hazardous Waste Campaign</b></p> <p><b>Yard Debris Campaign</b></p> <p><b>Covered Loads Campaign</b></p> <p><b>City Creek Campaign</b></p>	<p><b>Mass Media &amp; Signage</b> Most City residents reached.</p> <p><b>Programs</b> 2000 K-12 students reached. Over 200 adults (teachers, parents, mentors) reached.</p> <p><b>Exhibits and Events</b> Over 7,000 attendees</p> <p><b>Website</b> Over 300 hits</p>	<p><b>Storm water</b> 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 &amp; grease.</p> <p>Increased awareness of the impacts of erosion on water quality.</p> <p><b>Community Standards</b> Increased # of people report that it is wrong to place anything except water onto City streets or trails.</p>	<p><b>Community Standards</b> 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><b>Storm water</b> Decrease in amount of sediment, nutrients, E. coli, and oil &amp; grease in City storm water.</p>

The City's NPDES permit requires implementation of an education and outreach program to reduce these contaminants.

<p><b>Assumptions</b></p> <ul style="list-style-type: none"> <li>• Reducing sediment, <i>E. coli</i>, nutrients, and oil &amp; grease loads saves the PUA time &amp; money.</li> <li>• 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.</li> </ul>
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## General Storm Water Awareness Campaign

### Activities & Participation

Exhibit display No storm water exhibit was on display in 2011.

Community Event Participation & Sponsorship The City of Pocatello had a storm water focused booth at multiple events during 2011:

- Portneuf Valley Environmental Fair *7000 attendees*;
- RiverFest *500 attendees*; and

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). *Over 7,000 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 2011 permit year. City and County staff reached out to the public through a variety of media.

- **'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. *No episodes with a storm water focus occurred in 2011.*
- **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.** No TV ads were produced in 2011.
- **Mayor's Newsletter.** Information about storm water and new storm water regulations were included in the City of Pocatello and City of Chubbuck's Mayor's newsletter on multiple occasions in 2011. Topics included the storm water survey, yard debris, and household hazardous waste management (see Appendix 3).
- **Posters and Flyers.** The 2009 Annual report included 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. In 2011 the City produced a new storm water flyer for residents and began working on a series of comic strips (see Appendix 3).
- **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. During 2011 the City worked to overhaul this website. The new and improved website will be posted early into the 2012 permit year.
    - [http://www.pocatello.us/ScienceEnvirodiv/se\\_water\\_management.htm](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 over 310 unique visitors during the 2011 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 2011, the co-permittees spoke on the following topics
  - **Water Quality:** Global Water Dance performance. June 25, 2011
  - **Water Quality:** Peace Village. March 23, 2011
- **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:
  - Ghezzi R (2011, April 12) *Good Housekeeping and Street Maintenance*. Stormwater Technical Conference, Boise, ID.
- 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 support teachers using the watershed as a site for learning during 2011. This individual one on one work grew out of workshops held in 2009.
  - **Water Week.** The Pocatello Water Department & Bannock County Landfill's 2011 Water Week involved 1991 3<sup>rd</sup> grade and 8<sup>th</sup> grade students and 280 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.
  - **Speaker's Bureau.** Co-permittees and their partners are available to speak to K-12 students and community groups 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.

#### River Cleanups

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

- In September 2011, the City partnered with the Portneuf Watershed Partnership, Valley Pride and the ISU Stream Ecology Lab to sponsor a river channel cleanup. Over 30 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. In 2011 several individuals participated in marking over 25 new drains.

#### Municipal Government Elected Official Outreach

The Co-permittees have held joint city-county meetings on storm water each year of the permit. During 2011 the joint meeting focused on ground water contamination.

#### Business Outreach

- **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 2011 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 (a copy of the survey was provided in the 2009 Annual Report; survey results were provided in the 2010 Annual Report).

#### Sediment in the Street

The cities of Pocatello and Chubbuck have aggressive street cleaning operations. These are described in greater detail in the Pollution Prevention and Good Housekeeping section.

#### 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 6 and 7).

### 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 2012 on mass media outreach, implementing K-12 outreach programs, and targeting the local business community to increase their understanding and compliance with storm water best management practices.

## 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 2011, 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 2 mutt mitt dispensers in 2011, and continued to maintain its existing dispensers and collection containers.

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. The County accepts household electronic waste at the landfill.
- **Other Free Hazardous Waste Collection** The City of Pocatello accepts a variety of household electronic waste at its Sanitation Department (free).
- **Household Cooking Oil Recycling: Cease the Holiday Grease** The City of Pocatello promotes recycling of waste cooking oils through a partnership with Golden K Recycling (a waste cooking oil recycler). Oil recycling barrels are placed at three (3) locations throughout the City from Thanksgiving through New Years.

#### 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 2011, the program was advertised through one (1) billboard in the County for six (6) months, one (1) ad in "Inside Pocatello," 122 TV PSAs on Channels 6 & 8, and 292 radio ads on Star 98.5 and KZBQ (see Appendix 3).
- **Cease the Holiday Grease** Information about this program was posted on the City of Pocatello's website, through posters that were distributed throughout the City, and through an ad that was run in the Idaho State Journal, and on a variety of TV and radio stations.

#### 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](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 2011, they reached over 3000 community members, primarily children.*

**Program Outcomes**

Household Hazardous Waste Collected (gallons)

	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>
• <b>Organics</b>	240	55	0	0	0
• <b>Used oil</b>	2,595	2,235	2,350	2276	2275
• <b>Antifreeze</b>	700	1736	725	455	527
• <b>Flammable liquids</b>	935	880	615	753	965
• <b>Flammable sludge</b>	1,540	1595	1,008	925	1085
• <b>Pesticides/aerosols</b>	3 boxes	165 gal +1 box	5 totes	1 tote	7 totes

In addition to the items listed above, Bannock County also safely disposed of 1,000 pounds of pesticides/herbicides through the Idaho State Department of Agriculture Pesticide Disposal Program. All of these products were then incinerated or otherwise destroyed at no cost to Bannock County.

Co-permittees have not collected enough data to define the effect of these campaigns on storm water awareness or behavior during the 2011 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).

#### Business Outreach

- *No specific business outreach was conducted in 2011*

#### One on One Education

- 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 2011 permit year.

### Next Steps

The Co-permittees plan to expand this program with more targeted outreach at local businesses that use landscapers in 2012.

## Covered Loads Campaign

### Activities & Participation

#### Mass Media

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

#### Business Outreach

- *No specific business outreach was conducted in 2011*

#### One on One Education

- 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 2011 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 2011 permit year.

### **Next Steps**

The Co-permittees plan to expand this program with PSAs in 2012.

## City Creek Campaign

### Activities & Participation

Mutt Mitt Stations See Dog Waste Campaign above.

#### User Outreach & Participation

- City staff engaged users (including ORV users) in installing fencing to reduce off-trail traffic and the resulting erosion and other negative impacts. Several hundred feet of buck and rail fence were installed.
- City staff partnered with user groups and Idaho State University to write a grant to support trail restoration and monitoring projects (funded). City staff began working with user groups (primarily bicyclists and ORV users) on implementing trail and riparian restoration projects with user groups.
- City staff partnered with user groups, the BLM and USFS to implement a major motorized trail restoration project on the North Fork Trail, which had been one of the largest sediment sources to City Creek. Additionally, City staff continued ongoing efforts to maintain the City Creek road for erosion and sediment control.

#### 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 2011 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 2011, 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 99% complete. Additionally, the Co-permittees continued to implement programs for 1) Dry Weather Field Screening, and 2) Inventorying Industrial Facilities

During 2012, the Co-permittees will focus their efforts on improving their inventory of industrial facilities and implementing a comprehensive Dry Weather Field Screening Program.

## Highlights 2011

### Storm Water Hotline Dissemination

### Storm Sewer Map 99% Complete

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

## 2012 Plans

- **Expand Industrial Facilities Inventory**
- **Continue mapping additions to the storm sewer system**
- **Continue Comprehensive Dry Weather Field Screening**
- **Continue CCTV inspection of storm sewer lines**

## Relevant Appendices

## Minimum Measures Achieved

### **Illicit Discharge Detection Program (IDDP) Part II.B.3a**

*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 2011 with several City staff appropriately reporting seeing spilled oil or oil pans left on City streets, as well as handing out information post cards to violators about yard debris and covered loads. 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. A copy was included in the December 2009 Annual Report.

Bannock County**Illicit Discharge Ordinance**

Bannock County's illicit discharge ordinance prohibiting non-storm water discharges into the MS4 was passed in November, 2009. A copy was included in the December 2009 Annual Report.

**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.

City of Chubbuck

The City of Pocatello promotes this program through the Mayor's monthly newsletter.

Bannock County**Household Hazardous Waste Program**

*See Education and Outreach section for details on this program*

**Waste Oil Program**

Over 2,300 gallons of waste oil were received at the Bannock County Landfill Household Hazardous Waste program during 2011. 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 completed for all aspects of the storm drain system in Pocatello (see Appendix 4).

City of Chubbuck

**MS4 Mapping**

Chubbuck has continued to ID stamp and GPS locate a number of street catch basins for reference and cleaning.

**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 2011, portions of the PUA outfall system, in conjunction with the closed circuit TV screening, were inspected for dry season flows. No illicit discharges were recorded, although small quantities of residential irrigation water were apparent in the system.

**Closed Circuit TV Screening**

The City began screening the MS4 during the 2010 permit year. 30 miles (53% of the system) have been screened as of December 1, 2011. No illicit connections were discovered.

**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 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.*

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) (a copy was included in the December 2009 Annual Report.). 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 2011, the Co-permittees made significant progress with decreasing the amount of sediment leaving construction sites. We continued to implement a multi-faceted Erosion and Sediment Control program for contractors and developers.

During 2012, we plan to continue to improve this program through targeted outreach and enforcement mechanisms. We plan to improve our tracking mechanisms as well.

### Highlights 2011

#### **Erosion and Sediment Control Program Improved**

- ESC Training and Certification (23 individuals)
- ESC Inspections and Enforcement improved
- New ESC permit tracking software implemented

### 2012 Plans

#### **Erosion and Sediment Control Program Improved**

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

### Relevant Appendices

## 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 2011, City staff implemented an Erosion and Sediment Control (ESC) program for contractors and developers, in accordance with the ESC ordinance passed in 2008. This program includes guidance documents for contractors on when they need a City ESC permit and when they need an EPA CGP (a copy of these documents was provided in the 2009 Annual Report, and is available on the City's website). 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 2009 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. These permits and their resulting inspections were tracked using the City's new permits database. During the 2012 permit year the software will be modified to enable reporting on the number of ESC permits issued, as well as the number and outcomes of resulting inspections.

#### 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 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 (a copy of these documents was provided in the 2009 Annual Report). 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. During 2011

Chubbuck issued 26 ESC permits. Inspection of these permits resulted in one inspection requiring follow-up due to blowing trash.

### **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 2009 Annual Report 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 2009. This program includes guidance documents for contractors on when they need a County ESC permit and when they need an EPA CGP (a copy of these documents was provided in the 2009 Annual Report). 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 (a copy was provided in the 2009 Annual Report).

### **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 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 acre 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 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 (a copy of this ordinance was provided in the 2009 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.

### Bannock County

#### **Erosion and Sediment Control Ordinance**

In 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 2009 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 acre 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.*

#### All Co-permittees

#### **ESC Training and Certification**

During the 2011 calendar year, the Co-permittees continued their ESC education and outreach program for contractors and developers. Training and certification in erosion and sediment control is required before homebuilding, grading, and excavating permits are issued by the Co-permittees. These permits 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 2011, three ESC training sessions were held, and 23 individuals received their ESC certification cards. Contractors learn of this requirement through the permit application process. Most existing contractors in town (who move dirt) are certified until 2012. During 2012, the Co-permittees plan to continue to offer this certification program, coordinated through Idaho State University. Additionally, the Co-permittees plan to continue to educate local contractors about ESC through emails, posters, news coverage, and other media as appropriate.

### City of Pocatello

#### **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 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.

Bannock County

**ESC Training and Certification**

During 2011, county staff continued to educate property owners, developers, and contractors about the EPA’s storm water requirements, county ordinances, and best management practices at construction sites as part of the construction permit application process and as they responded to inquiries and complaints.

**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. During 2011 the City implemented the use of new permit tracking software. All ESC permits, inspections (including inspection reports), and violations are tracked through this software.

During 2011, by the mayor’s directive, the Building Department was enlisted to inspect residential sites for Erosion and Sediment Control. Development Engineering and the Science and Environment Division continued to inspect commercial and subdivision sites.

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 2009 (a copy of the ESC ordinance was included in the 2009 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.

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 2009 (a copy of the ESC ordinance was included in the 2009 Annual Report). 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.

ITD

ITD environmental inspectors must complete state certification training in stormwater management. ITD inspects ALL construction sites; frequency of inspections is established in ESC plans or SWPPs.

Projects with NPDES permits are inspected every 7, 14 or 30 days, depending on sensitivity of the site and stage of construction activity. ITD has standard reporting procedures in place, including routine inspection reports, avoid verbal orders (warnings) and notice of potential violation protocols.

**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 one 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 one 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 one 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

ITD includes the Construction General Permit in all construction contract documents. ESC Plans are required for projects disturbing less than 1 acre, and NPDES permits are required for projects disturbing more than 1 acre, as per state and federal regulations. Both of these documents include spill prevention and good housekeeping BMPs as well as erosion and sediment control BMPs.

## 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 2011, the Co-permittees continued to work at implementing programs to control post-construction storm water.

An Operations and Maintenance Manual for private storm water facilities (as required by the storm water quality manual) was created.

Plans for 2012 include providing training opportunities for local contractors and developers, implementing the post-construction ordinance, and BMP maintenance protocols for post-construction storm water controls.

## Highlights 2011

**Training was provided to developers and engineers on the Storm Water Quality Design Manual**

**Post-construction storm water ordinance passed by Chubbuck City Council**

## 2012 Plans

### **Implement Post Construction Program**

- Implement BMP maintenance protocols.

## Relevant Appendices

Appendix 5: Post-construction ordinance

## 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

#### **Program Implementation**

During 2011 the City of Pocatello implemented training for PUA engineers and developers on using the storm water quality design manual (see next two minimum measures). Additionally, an Operations and Maintenance Manual for private facilities was developed. This manual provides maintenance and inspection requirements for these private facilities.

### 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**

In December 2010 the City of Pocatello adopted a post-construction storm water ordinance, which requires new development to comply with the regulations outlined in the Portneuf Valley Storm Water Quality Design Manual, which outlines water quality treatment requirements for storm water. (A copy was provided in the 2010 Annual Report).

City of Chubbuck

#### **Post-construction ordinance**

In February 2011 the City of Chubbuck adopted a post-construction storm water ordinance, which requires new development to comply with the regulations outlined in the Portneuf Valley Storm Water Quality Design Manual, which outlines water quality treatment requirements for storm water. (see Appendix 5).

### 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**

In December 2010 the City of Pocatello adopted the Portneuf Valley Storm Water Quality Design Manual, which outlines water quality treatment requirements for storm water. (A copy was provided in the 2010 Annual Report).

During the 2011 permit year, the City of Chubbuck participated in the Bannock County led effort to improve protections for the Lower Portneuf Valley Aquifer.

**Septic System Design and Construction**

This is regulated by the Southeast Idaho Health District. The City of Pocatello does not permit new septic systems for parcels within 300 feet of a sewer line.

City of Chubbuck

**Design Manual**

In February 2011 the City of Chubbuck adopted the Portneuf Valley Storm Water Quality Design Manual, which outlines water quality treatment requirements for storm water. (A copy was provided in the 2010 Annual Report).

During the 2011 permit year, the City of Chubbuck participated in the Bannock County led effort to improve protections for the Lower Portneuf Valley Aquifer.

**Septic System Design and Construction**

This is regulated by the Southeast Idaho Health District. The City of Chubbuck does not permit new septic systems for parcels within 300 feet of a sewer line.

Bannock County

**Design Manual**

During the 2011 permit year, Bannock County led an effort to improve protections for the Lower Portneuf Valley Aquifer.

**Septic System Design and Construction**

This is regulated by the Southeast Idaho Health District. Within the Chubbuck Area of City Impact (ACI), Bannock County does not permit new septic systems for parcels within 300 feet of a sewer line. Additionally, within the Chubbuck ACI, Bannock County does not permit new septic systems on subdivisions over 2 parcels.

**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**

In 2010 the City of Pocatello adopted the Portneuf Valley Storm Water Quality Design Manual (a copy of which was provided in the 2010 Annual Report), which contains a section outlining maintenance criteria for post-construction BMPs.



**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.*

City of Pocatello**Design Manual Training and Certification**

During the 2011 permit year a training session was provided for local developers and engineers. Additionally those who were interested received one-on-one training with City staff regarding storm water quality requirements.

City of Chubbuck**Design Manual Training and Certification**

During the 2011 permit year a training session was provided for local developers and engineers. Additionally those who were interested received one-on-one training with City staff regarding storm water quality requirements.

**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 completed three demonstration projects in highly visible locations to allow residents and developers to see a variety of xeric gardens, tree plantings, and permeable paving options. These projects are described in more detail in the 2009 Annual Report:

- **Lander Street Permeable Paving** This project demonstrates the effectiveness of using gravel permeable paving to infiltrate water from parking lots into infiltration galleries.
- **Greenway Tree Plantings at Sacajawea Park** This project demonstrates the effectiveness of using local trees to infiltrate storm water and improve the aesthetics of an area.
- **Sacajawea Park Wetland** This project demonstrates the effectiveness of an ‘end of pipe’ treatment for storm water using a large retention facility.
  - In 2009 City staff enlarged this facility to accommodate the greater than expected volume of storm water reaching the facility. This enlargement (which increased the capacity of the facility by 200%) should prevent storm water from reaching the river except during exceptionally large storms. In 2010 City staff began collecting data (using automatic samplers) on the quality of the storm water entering this facility, and measured the amount of new sediment deposited within the facility.

During the 2010 permit year, the City completed one demonstration project (1<sup>st</sup> Street Parking Lot) and began work on a second project (MLK)

- **1<sup>st</sup> Street Parking Lot** A compacted earthen parking lot was converted to a paved parking lot by City staff in 2010. Whereas storm water used to run off the parking area and into the City’s MS4

system, the new facility retains all storm water onsite, using an infiltration gallery under the parking lot.

- **MLK Storm Water Planters** In 2010, City staff began planning work for a new demonstration project in the vicinity of Idaho State University (MLK Project). Current plans call for installing stormwater infiltration planters along MLK Street to improve safety, aesthetics and stormwater infiltration in the area. While this project is years away from construction, the design process will provide significant opportunities for educating City staff, Idaho State University staff and many others about Green Infrastructure/Low Impact Development.

During the 2011 permit year the City continued to evaluate Sacajawea Park

- **Sacajawea Park Wetland** In 2011 City staff collected data on various constituents within the wetland soils.

#### City of Chubbuck

##### **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.

During the 2010 permit year, the City completed one demonstration project (City Hall Sidewalk)

- **City Hall Sidewalk** In 2010 the City replaced concrete sidewalk at the city offices with permeable concrete paver sidewalk with an integral drainage layer beneath.

## 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 2011, the Co-permittees continued 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 2012 permit year.

The Co-permittees will expand the Good Housekeeping program in the 2012 permit year to finalize and implement municipal operations' protocols with respect to storm water, evaluate existing street cleaning programs, and expand the municipal training that was implemented in the 2009 permit year.

### Highlights 2011

**Municipal Training Program continued.**

### 2012 Plans

**Continue to evaluate existing street and catch basin cleaning programs.**

**Expand municipal training.**

**Continue to improve municipal operations protocols with respect to storm water.**

### Relevant Appendices

## 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**

All dump trucks and flatbeds have been equipped with covers to minimize the materials being hauled access to the roads. All small pickups which are used to transport weeds, leaves and debris from various parks have the green public size trash containers with lids to minimize any materials escaping. On large construction projects the Park's Department uses appropriate BMPs, such as installing silt fences where needed.

**Fertilizer Use:** The Parks Department uses a slow release polymer coated urea fertilizer, which is applied in the late fall. This slow release fertilizer does not move off target. It is not applied to impervious areas such as sidewalks and driveways. A person with a blower is sent with the tractor to blow any fertilizer that might accidentally get onto sidewalks and is blow back onto the grass. This fertilizer promotes a healthy turf (which controls sediment and minimize erosion much better than a weedy lot or a lot with poorly established turf).

##### **Building Maintenance**

Across departments best management practices are implemented including: proper storage and disposal of chemicals, use of ground cloths when painting, etc.

##### **Fleet Maintenance and Vehicle Washing**

At the City Street Department, all fleet maintenance is performed in the shop. Any steam cleaning goes thru an oil water separator and then in the sewer system.

At the City Sanitation Department, the vehicle lot drains to either the landscape areas surrounding the property, one of two on-site retention ponds or the wetlands on S. 1<sup>st</sup> Avenue. All vehicle/ container/ cart/ etc. washing is completed inside. All water is collected and goes through one of two sand/grease traps before being discharged to the sanitary sewer. The traps are cleaned as required by the Street Operations Department. The pumpings are dewatered prior to being disposed of at the Fort Hall Mine Landfill.

At the Parks Department the vehicle washing occurs on the Shop parking lot with drainage to the grass area behind the shop. During the winter vehicles are washed in the Shop, which has a dirt and oil separator installed in-line with the floor drain.

### **Used Oil Recycling**

At the City Sanitation and Street Departments, waste oil is collected and burned to heat the main shop. Oil filters are drained before being disposed of. The outside containment tank is double-walled and protected by bollards. The inside tank is located in a containment enclosure.

At the Parks Department waste oil is collected and put into recycling containers that are installed in an approved storage area at the shop. The waste oil is collected by Tri-State oil recycling. The oil filters are also put into a recycling container and removed by Tri-State oil recycling.

### **Materials and Hazardous Materials Storage**

At the City Street Department, all materials are stored in areas that do not drain to the MS4 system.

At the City Sanitation Department, paints and solvents are stored in one of two fire proof storage lockers. Water based paints are utilized as much as possible. Only cleaning solvents/materials that are needed are kept on hand. The inventory is periodically reviewed. The Bannock County Household Hazardous Waste collections events are utilized for disposal. All paints, solvents, etc. that are collected from illegal dumping are similarly disposed of. All oil/antifreeze/soap drums are located on spill containment pallets. Collections trucks have spill kits. Any spills are reported to a supervisor. The supervisor notifies the shop who in turn immediately responds to the scene with floor dry, containment socks etc.

At the Park's Department chemicals are stored in an approved area in the box car at the end of Ross Park. This area has proper markings and spill retention devices in place. Paints are stored in a fire proof cabinet at Ross Park Shop. Latex paint cans are air dried when emptied and disposed of in the 3 yard container at the shop. Any excess oil based paint and thinner is taken to the Hazardous Waste collection events at the Bannock County Landfill.

### **MS4 Maintenance**

*See next minimum measure for details.*

### **Snow Disposal**

Snow disposal is minimal within the City. Snow can only be disposed of at one location (Philbin Gravel Pit), which is disconnected from the City's MS4 and in an area of town with a significant distance to ground water.

### **Street Cleaning and Maintenance**

*See next minimum measure*

### **Spill Control Prevention Measures for Municipal Refueling Facilities**

Spill control measures are in place at the fuel island with a barrel of sand and containment boom.

**Track-on Reduction**

In 2011 the City of Pocatello installed cattle guards at the two municipal facilities (Pocatello zoo sanitation facility and the Water and Street Department sand/gravel/dirt storage facility) where track on of mud onto City streets has been an ongoing problem.

City of Chubbuck**Parks Maintenance**

No action has been taken on this permit requirement during the 2010-2011 permit reporting timeframe.

**Fertilizer Use:** The Parks Department uses a slow release polymer coated urea fertilizer, which is applied in the late fall. This slow release fertilizer does not move off target. It is not applied to impervious areas such as sidewalks and driveways. A person with a blower is sent with the tractor to blow any fertilizer that might accidentally get onto sidewalks and is blow back onto the grass. This fertilizer promotes a healthy turf (which controls sediment and minimize erosion much better than a weedy lot or a lot with poorly established turf).

**Fleet Maintenance**

2011: A pretreatment sump was installed outside of the new maintenance building for washing City vehicles. The pretreatment sump catches wash water before it enters a dirt oil separator.

2009: Permanent tarps were installed on six City dump trucks for materials coverage during transportation.

**Building Maintenance**

Across departments best management practices are implemented including: proper storage and disposal of chemicals, use of ground cloths when painting, etc.

**Used Oil Recycling**

2011: 1000 gallons of recycled oil (from city equipment) burned for heating in the City shop. The fleet maintenance shop recycles all waste oil and burns it in a space heating furnace in another City building.

**Materials and Hazardous Materials Storage**

All materials are stored in areas that do not drain to the MS4 system. Paints and solvents are stored in fire proof storage lockers. Water based paints are utilized as much as possible. Only cleaning solvents/materials that are needed are kept on hand. The inventory is periodically reviewed. The Bannock County Household Hazardous Waste collections events are utilized for disposal. All paints, solvents, etc. that are collected from illegal dumping are similarly disposed of. All oil/antifreeze/soap drums are located on spill containment pallets. Collections trucks have spill kits. Any spills are reported to a supervisor. The supervisor notifies the shop who in turn immediately responds to the scene with floor dry, containment socks etc.

**MS4 Maintenance**

*See next minimum measure.*

**Street Cleaning and Maintenance**

*See next minimum measure*

**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 and does not drain to a water course. The City maintenance department collects 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.

**Fleet Maintenance**

The county maintenance shop uses absorbent mat dispensers to capture any fluids that may drip or leak off hard-to-reach surfaces from vehicles and equipment.

When oil changes are performed, the oil is contained in a proper storage container. All waste oil is burned on site for heat in a storage building

**Vehicle Washing**

The fleet maintenance shop washing facility runs all its waste water to a sand and oil separator before it is disposed of.

**Building Maintenance**

Across departments best management practices are implemented including: proper storage and disposal of chemicals, use of ground cloths when painting, etc.

**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 collects 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.

**Spill Control Prevention Measures for Municipal Refueling Facilities**

The City uses above-ground, double wall fuel tanks that are filled through a special bulk unloading spill containment box. Nozzle spills are cleaned with absorbent material and properly disposed. Site drainage goes into an oil sand separator before being allowed to percolate underground.

Bannock County**Fleet Maintenance**

The county maintenance shop uses absorbent mat dispensers to capture any fluids that may drip or leak off hard-to-reach surfaces from vehicles and equipment.

When oil changes are performed, the oil is contained in a proper storage container. Periodically a local vendor picks up the oil for recycling purposes.

**Building Maintenance**

Across departments best management practices are implemented including: proper storage and disposal of chemicals, use of ground cloths when painting, etc.

**Street Cleaning and Maintenance**

*See next minimum measure*



**Snow Disposal**

Bannock County does not have a policy to pick up snow. It is plowed from all county roads to the side of the road. If necessary, a large snow blower is used to clear the snow from the side of the road where it is left to melt when the weather warms up.

**Track-on Reduction**

In 2011 Bannock County installed cattle guards at the Bannock County Landfill to eliminate the ongoing problem of track on of mud from the facility onto County roads.

ITD**Fleet Maintenance**

On site swales and ponds were reinforced at the Pocatello facility, to ensure no wash water or runoff leaves the ITD site. In addition, all used oil and chemicals are recycled, and ITD is considered by DEQ as a small quantity generator. All shop bay drain sumps are equipped with oil and grit separators.

**Building Maintenance**

Across departments best management practices are implemented including: proper storage and disposal of chemicals use of ground cloths when painting, etc.

**Snow Disposal**

ITD has switched its maintenance operational practices to eliminate sand. ITD does not have a policy to pick up snow. It is plowed from all highways to the side of the road where it melts. Operational practices to minimize anti-skid are in place.

**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 Cleaning**

The streets are swept quarterly. Catch basin cleaning began in spring 2011. This has had a direct impact on water quality. During 2011 the City continued to evaluate the effectiveness of its street cleaning operations. This resulted in altering the frequency and route of the street sweepers to improve the effectiveness of their operations. Since 2010 the spring street sweeping program has been coordinated with the hydrant flushing operation to better ensure that hydrants are flushed *after* streets are swept.

City staff have been documenting the amount of material deposited through salt/sand 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

- **2010:** 3960 tons applied; 4512 tons swept up
- **2011:** 2530 yards applied (2208 yds sand; 330 yds salt); 3822 yards swept up

### **Street Sanding/Salting**

In 2010 the City implemented a new salt/sand snow management program. This program significantly reduced the amount of sand/salt applied to City streets, while also saving the City money and making roads safer. The new program calls for use of a 'pre-treatment' salt/sugar beet brine solution as the primary snow management technique. The salt brine has reduced all sand salt applications by 50%, which directly impacts water quality.

### **Catch Basin Cleaning**

During 2010 the Street Operations department implemented an MS4 maintenance program. Using GIS, they identified the storm water catch basins and manhole covers that are not serviceable and have instituted a program to renovate them so that they can be inspected, serviced and CCTV'd. As of December 2011, 30 miles have been CCTV'd (53% of the total storm sewer). City staff found 77 silted or obstructed pipes, 60 of which have been cleaned. During 2011, 1240 of the 2291 catch basins were evaluated. 186 of those still need cleaning.

## City of Chubbuck

### **Street Cleaning**

2010: The City spent 425 hours on street cleaning.

2011: The City spent 278 hours on street cleaning.

### **Catch Basin Cleaning**

2009: The 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.

2010: The City spent 150 hours on catch basin and dry well cleaning. One mile (90% of the system) of main pipe was cleaned.

2011: The City spent approximately 50 hours cleaning catch basins and dry wells, and approximately 30 hours cleaning drain piping and swales

## Bannock County

### **Street Cleaning**

In 2010, the county spent 838 hours sweeping the county roads.

In 2011, the county spent 896 hours sweeping county roads.

## ITD

Street sweeping occurs in the spring of each year either with a pick-up broom or water being applied prior to side cast brooming operations to minimize dust.

**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

**ESC Training**

New Engineering and building department staff attended the City's ESC Certification training.

**Other Staff Training**

Additionally, individual departments periodically trained their staff in BMPs for storm water during their regular monthly safety meetings. Street Department staff are trained on levee and storm water maintenance the first Tuesday of every month.

City of Chubbuck

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

Four public works City staff (Sean, Rob, Ray, & Ron) received training in Erosion and Sediment Control during 2011 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

**Staff Training**

Two employees with Public Works received training in Erosion and Sediment Control during 2011 by attending the City's four-hour ESC Certification Class. Also, individual departments periodically trained their staff in BMPs for storm water during their regular monthly safety meetings.

Idaho Transportation Department

The following training sessions occurred in 2011:

**3.09 Best Management Practices NPDES/Storm water**

Location: District 5 - D5 Headquarters Building – EOC; Date(s): 03/02/2011;

Time: 08:00 AM-05:00 PM; Day(s): Wed; Instructor: NEWMAN, GARTH

Attendees: Allen, George; Dial, Bruce; Hayward, James ; Holmes, Richard; Muir, Brian; Richards, Randy; Tamasco, Joseph; Tracy, Oscar; Wells, Trent; Wubker, Alan

**3.07 Best Management Practices NPDES/Storm water**

Location: District 4; Date(s): 05/17/2011-05/19/2011;

Time: 08:00 AM-05:00 PM; Day(s): Tue-Thurs; Instructor: NEWMAN, GARTH

Attendees: Cardona, Jay; Crockett, Gene; Kidd, Jeffrey; Miller, Richard; Salmore, Alissa; Wright, Gil; Wright, Greydon

**3.08 Storm water for Designers**

Location: TBD; Date(s): 05/10/2011-05/12/2011 Workdays

Time: 08:00 AM-05:00 PM; Day(s): Tue-Thurs; Instructor: Burgos, Steve

Attendees: Barrus, Jesse

**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 2011, the City continued to work 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 2011 permit year, the automatic samplers for storm water event monitoring were online. Neither the Halliday nor the Sacajawea outfalls were sampled by automatic samplers during 2011. No storm water sampling locations were also sampled in accordance with permit requirements (see Appendix 6 for Storm Water Discharge Monitoring Report). 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 2011, as was the monthly water quality sampling on the Portneuf River sites (see Appendix 7 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 2010 permit year, we revised the Oil & Grease standard (A copy was included in the December 2009 Annual Report.).

### Storm Water Master Plan

The City has begun revising its storm water masterplan. During 2011 work began to model the storm water system. Plan revisions will be in accordance with requirements of the NPDES MS4 permit, current EPA guidance and the conscripts of the 2009 “Urban Stormwater Management in the United States” report of the National Research Council. Consistency with the new “Portneuf Valley Storm Water Quality Design Manual” is a major goal of the revision process.

### 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

A variety of inspections, executed in the forms of education and enforcement, were completed within our construction sector and other venues as appropriate.

## Highlights 2011

The City of Pocatello began updating its storm water masterplan by 1) collecting survey grade data of its storm water system and 2) importing this data into INFOSWMM, a storm water modeling program.

## Relevant Appendices

Appendix 6: **Storm Water Discharge Monitoring Report**

Appendix 7: **Portneuf River Monitoring Report**