



# ANNUAL REPORT

December 2017 to December 2018



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



**SUBMITTED TO:**  
**United States**  
**Environmental Protection Agency**  
Stormwater 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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## 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 12 reporting period (December 15, 2017– December 15, 2018). 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 2017-2018 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, electronic attachments are attached within CDs, and incorporated herein.

## 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.

### Stormwater Management Program Review

The PUA’s Stormwater Management Program review for the reporting year 2017-2018 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 stormwater discharges on local water bodies and the steps that citizens and businesses can take to reduce pollutants in stormwater 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 stormwater 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 stormwater 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 stormwater 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)*

## Minimum Measures Achieved

### Activities & Participation

Community Event Participation & Sponsorship The Co-permittees had stormwater focused booths at multiple events during 2018:

- Portneuf Valley Environmental Fair *5000 attendees*.
  - A City of Pocatello booth focused on increasing residents' understanding of where stormwater goes once it gets to the street.
  - Additional co-permittee booths focused on composting, ground water protection, recycling, waste water treatment, and prescription medication take back. Additionally, the City of Pocatello, City of Chubbuck, and Bannock County were major sponsors of this event, which also encouraged the use of alternative transportation, water conservation, energy conservation at home and work, and other sustainable practices – all of which will improve the quality of our stormwater.
- Water Week (see details under K-12 partnerships):
- Communiversity. August 2018. *2000 attendees*.
  - A City of Pocatello booth focused on Portneuf River Visioning, as well as distributing information about residential stormwater BMPs.

Mass Media and Signage Our efforts to improve the quality of stormwater in the area received significant media coverage during the 2018 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 the local government access TV station. One show in 2018 encouraged residents to attend the Portneuf Valley Environmental Fair and to participate in the City's curbside yard waste collection program.
- **Coverage in local TV and newspaper news stories.** Stormwater 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.
- **TV and Radio ads.** TV ads that were produced in previous years were rerun in 2018. This includes a combination of ads focused on preventing illicit discharge by residents (e.g. tossing grass clippings into the street), and an ad introducing 'Drip and Drop' Information about Free Household Hazardous Waste Days and the County's Yard Waste Composting program were also run in 2018.
- **Mayor's Newsletter.** Information about stormwater and new stormwater regulations were included in the City of Pocatello and City of Chubbuck's Mayor's newsletter on multiple occasions in 2018. Topics included the stormwater survey, yard debris, and household hazardous waste management.
- **Posters and Flyers.** The 2009, 2011 and 2012 Annual Reports included copies of flyers, posters, postcards, and comic strips that the Co-permittees developed to increase residents' awareness of the new stormwater regulations, how they can get involved, and how they can learn more. In 2018 the Co-permittees continued to disseminate these publications.
- **Facebook & Email.** The City of Pocatello used its Facebook account to alert 'fans' about the new stormwater 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.** [http://www.pocatello.us/se/se\\_stormwater.htm](http://www.pocatello.us/se/se_stormwater.htm)
  - The website provides information about stormwater and what homeowners, contractors, and businesses can do (and are required to do) to help Co-permittees improve the quality of stormwater. The site also includes information (and links) targeted at K-12 students.
  - The website contains links to all Annual Reports and available SWMP documentation.
  - Additional co-permittee websites post information about Household Hazardous Waste:
    - **Bannock County Landfill Site** Contains information about Household Hazardous Waste Collection at the Bannock County Landfill. <http://www.bannockcountylandfill.us/hazardous-waste.html>
    - **City of Chubbuck Site** Contains information about Household Hazardous Waste Collection at the Bannock County Landfill and how to recycle other items in Chubbuck. <http://www.cityofchubbuck.us/public-works/sanitation-department/>
    - **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/395/Recycling-Programs>

#### 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 stormwater, water conservation, recycling, hazardous waste and trash management, energy efficiency, renewable energy development in the City, and other topics. The Co-permittees regularly speak to the following groups:
  - **Portneuf Watershed Partnership.** Monthly meetings of Portneuf River stakeholders focused on sharing information and monitoring water quality.
  - **Portneuf River Project.** Monthly meetings of Portneuf River stakeholders focused on implementing riparian restoration projects on public and private land.
  - **Idaho State University.**
  - **Emergency Preparedness Fair**
  - **Rotary, Civitans, and similar clubs**
  - **Recycling and composting**
  - **Landfill operations and groundwater**
- **Talks to Regional and National Organizations.** Co-permittee staff has also worked to share their experiences with NPDES compliance with audiences outside of the local MS4, including sharing best practices with counterparts throughout the state and intermountain west during regional meetings and conferences.
- K-12 Partnerships (Lesson Plans and Teacher Professional Development)
  - **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 stormwater specific curricula that can be adapted and used by local teachers in conjunction with existing stormwater outreach activities such as Water Week (see below).
  - **Professional Development.** Co-permittee staff partnered Idaho State University and watershed groups to support teachers using the watershed as a site for learning during 2018.

- **Water Week.** The 2018 Water Week involved over 2831 3<sup>rd</sup> grade and 8<sup>th</sup> grade students and adults. This program's focus on recycling, water conservation, stormwater, waste water, 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 Co-permittees' additional stormwater focused outreach efforts. Pocatello, Chubbuck and Bannock County each provide handout packets to the grade school children that come to Water Week.
- **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 stormwater, water conservation, recycling, hazardous waste and trash management, energy efficiency, renewable energy development in the city, and other topics.

### Public Notice Requirements

The Co-permittees comply with applicable State and local public notice requirements during the implementation of all public involvement and participation programs, including publishing meeting notices in the local newspaper when required. During 2012 City of Pocatello staff attended a series of workshops on public participation and received a Certificate in Public Participation from the International Association for Public Participation (IAP2).

### 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 Year's Day.

### River Cleanups

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

- **2018 Portneuf River Cleanup.**
  - In September 2018, the Co-permittees partnered with the Portneuf Watershed Partnership, Valley Pride and the ISU Stream Ecology Lab to sponsor a river channel cleanup. Over 50 volunteers spread out along the Portneuf River removing over dozens of cubic yards of material from the river. Most of this debris was collected from just downstream of the concrete channelized portion of the river. Co-permittees plan to continue supporting and leading these community wide efforts to improve the health of the Portneuf River through regular cleanup activities.
  - City staff also partnered with Idaho DEQ, US Fish & Wildlife, and local businesses and volunteers to use an excavator and remove larger debris from the river over the course of a week, in line with 404 permit requirements. After this effort it was possible to float the Portneuf downstream of the City without portaging a canoe/kayak!

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. Several hundred storm drains have been marked over the years.

#### Municipal Government Elected Official Outreach

The Co-permittees have held joint City-County meetings most years of the permit to discuss the area's stormwater program and collect public comment. During 2018 elected officials were briefed individually by staff.

#### 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 stormwater quality.

### Campaign Outcomes

#### Stormwater Awareness and Behavior

Co-permittees have not collected enough data to define the effect of these campaigns on stormwater awareness or behavior during the 2018 permit year.

- The Co-permittees are very interested in measuring the effectiveness of the stormwater 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 stormwater 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). Additionally, a stormwater survey was distributed to residents in spring 2013.

#### Household Hazardous Waste Collected

Annually the County collects (on average) 2,075 gallons of used oil, 450 gallons of antifreeze 822 gallons of flammable liquids, 465 gallons of flammable sludge, and at least several totes of aerosols. Additionally, Bannock County also safely disposed of 5,350 pounds of pesticides/herbicides through the Idaho State Department of Agriculture Pesticide Disposal Program. All of these products are then incinerated or otherwise destroyed at no cost to Bannock County.

#### 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 stormwater and the Portneuf River for a variety of pollutants.

### Next Steps

Co-permittees plan to continue building general awareness of stormwater in the community through a myriad of outreach and public participation activities. The Co-permittees plan to put significant focus in continuing years on mass media outreach, implementing K-12 outreach programs, and targeting the local business community to increase their understanding and compliance with stormwater best management practices.

## 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-stormwater 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-stormwater 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-stormwater 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-stormwater 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-stormwater flows from stormwater 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 Co-permittees' 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 stormwater discharge.

## Minimum Measures Achieved

### Illicit Discharge Detection Program (IDDP) *Part IIB3a*

No later than two years from the effective date of this permit, the Co-permittees must develop and implement a program to detect and eliminate illicit discharges into their MS4s. The program must include procedures for detection, identification of sources, and removal of non-stormwater 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.

#### **Program to Detect and Eliminate Illicit Discharge**

All Co-permittees have policies and protocols in place to detect illicit discharge and remove non-stormwater discharges from the MS4. This is supported by the awareness building, training, and tracking systems described below.

#### **Training for Co-permittee Staff**

Co-permittee staff are regularly trained on detecting and responding to illicit discharges, including removal of the discharge from the system. During 2018, the following staff received training:

*Good Housekeeping & Illicit Discharge Training focused on spill response and discharges from buildings to the MS4/waters of the US.*

**Illicit Discharge and Good Housekeeping Training** Various Dates, 2018.

*Attendees:* 370 Co-permittee staff from Chubbuck, ITD, Bannock County and Pocatello (Engineering, Water, Water Pollution Control, Streets, Sanitation, Public Works, Building, Planning, Environmental, Landfill, Airport, Parks)

*Erosion and Sediment Control inspection and enforcement training.*

- **ESC Certification Class.** February 15 and March 1, 2018. 3-hour class. *Attendees:* 68 co-permittee employees were certified/re-certified. Certifications are valid for three years.
- **ESC Inspection, Enforcement, and Tracking.** One on one training in the field from April – November.

Additional co-permittee training is listed under the Good Housekeeping minimum measure.

#### **Illicit Discharge Information Management System**

All Co-permittees have code enforcement processes in place whereby complaints are logged, investigated, and resolution sought.

#### **Co-permittee Stormwater Hotline**

The Co-permittees stormwater hotline phone number (208-234-6519) is highlighted on 11x17 yellow laminated cards that are posted at all construction job sites. This has increased regional awareness across the PUA of this hotline. The number is also posted on the stormwater website and is included on the Co-permittees' stormwater brochure. The hotline compliments other heavily used avenues (e.g. web and newsletter comment forms and direct communication with Co-permittee staff via email and direct lines) for commenting on stormwater issues.

*b) Not later than three years from the effective date of this permit, all Co-permittees must effectively prohibit non-stormwater 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-stormwater 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-stormwater discharges listed in Part I.D.1.*

### **Illicit Discharge Ordinances**

Pocatello's illicit discharge ordinance prohibiting non-stormwater discharges into the MS4 was passed in 2008. Chubbuck and Bannock County passed illicit discharge ordinances prohibiting non-stormwater discharges into the MS4 in 2009. Copies of these ordinances were included in the 2008 and 2009 Annual Reports, respectively.

### **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.*

### **Household Hazardous Waste Program**

Co-permittees promote this program through avenues such as websites, the Mayor's monthly newsletter and department brochures. *Additional details on this program are included in the Education and Outreach section.*

### **Waste Oil Program**

Waste oil is collected free of charge at the Bannock County Landfill Household Hazardous Waste program. This is 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 and City of Pocatello sanitation staff have energetically pursued the educational aspects of the Household Hazardous Waste program at the landfill and at the Pocatello Water Shop during Water Week 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.*

### **MS4 Mapping**

Using GPS and GIS technology, the Co-permittees have developed digital databases and completed a stormwater map for all aspects of the storm drain system within the Pocatello Urbanized Area. The electronic map is updated frequently to reflect system additions from new and re-development (the 2012 Annual Report included an updated map).



The current MS4 map was used to create a stormwater model in 2018. LiDAR data was collected in 2016 for the entire stormwater drainage (ridgetop to ridgetop) to improve the accuracy of this model. Finally the stormwater map is being used by the City of Pocatello within its asset management system and as such is tied to work orders for inspections and cleaning of the system.

### **Dry Weather Field Screening Part IIB3e**

*Not later than three years from the effective date of this permit, Co-permittees must begin dry weather field screening for non-stormwater flows from stormwater 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.*

### **Dry Season Flows**

During 2018, 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 of Pocatello began screening the MS4 with a remote controlled camera during the 2010 permit year. In 2011 the process was improved by using GIS. As of December 1, 2018, 47.29 miles of storm sewer pipe (out of 72 miles) had been evaluated. No illicit connections have been 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 stormwater discharge.*

### **Industrial Facility Inspections**

The Co-permittees 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) (an updated version was included in the 2012 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 Stormwater 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 stormwater 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 stormwater 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 Stormwater Discharges for Construction Activity in Idaho, #IDR10-0000 (Construction General Permit). If EPA waives the NPDES permit requirements for stormwater 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 Stormwater Discharges for Construction Activity in Idaho, #IDR10-0000 (Construction General Permit) and relevant local requirements for erosion, sediment and onsite materials control.

## 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 stormwater 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 stormwater 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 Stormwater Discharges for Construction Activity in Idaho, #IDR10-0000 (Construction General Permit). If EPA waives the NPDES permit requirements for stormwater 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 and County co-permittee staff have each implemented an Erosion and Sediment Control (ESC) program for contractors and developers, in accordance with the ESC ordinances passed in 2008 and 2009. These programs include guidance documents for contractors on when they need a local ESC permit and when they need an EPA CGP (these documents were provided in the 2009 Annual Report, and are updated versions are available on the PUA's stormwater 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 local jurisdiction when they apply for an ESC permit. Co-permittees 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 local jurisdiction's ESC permit. All Co-permittees have code enforcement and tracking processes in place whereby local ESC permits are reviewed, logged, inspected, and regulations enforced.

### 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.*

#### **Materials Dissemination**

Co-permittees distribute to contractors the *Idaho Construction Site Erosion and Sediment Control Field Guide*. Additionally, Co-permittees have published and distributed handouts to assist contractors in determining if they need an NOI or a local ESC permit, and on residential homebuilding sites, what BMPs they should consider implementing.

#### **One on One Outreach**

During 2018, co-permittee staff continued to educate property owners, developers, and contractors about the EPA's stormwater 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

During 2018 the City continued to inspect and enforce construction sites for compliance with the City's ESC ordinance. Sites are inspected prior to construction, during the construction process (alongside other trade inspections), and at the end of the construction process (final inspection) before a Certificate of Occupancy is issued. Sites are also inspected following complaints. The enforcement mechanism (which includes escalation procedures for recalcitrant or repeat offenders) is detailed in the ESC ordinance that the City passed in 2008 (a copy of the ESC ordinance was included in the 2008 Annual Report). Permitting software is used to log ESC complaints, inspections and enforcement.

City of Chubbuck

The City has implemented a program to inspect construction sites for ESC and enforce their ESC 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 Copermittee staff. Permitting software is used to log ESC inspections and enforcement.

Bannock County

The County has implemented a program to inspect construction sites for ESC and enforce their ESC regulations. The enforcement mechanism (which includes escalation procedures for recalcitrant or repeat offenders) is detailed in the ESC ordinance the County 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 Copermittee staff. Permitting software is used to log ESC inspections and enforcement.

ITD

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

**ESC Training and Certification**

During the 2018 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 with exam. 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 2018, eight ESC training sessions were held, and 80 private contractors and 68 co-permittee staff received their ESC certification cards. For most of these contractors this was the fourth time they had taken the class as certification cards last three years and the first set of classes were taught in 2009. Contractors learn of this requirement through the permit application process and other mailings to contractors.

### 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.*

#### **ESC Tracking**

All Co-permittees have code enforcement and tracking processes in place whereby complaints are logged, inspected, and regulations enforced.

### 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 Stormwater 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 and City of Chubbuck

##### **Construction General Permit Requirements**

It is City policy that, in conjunction with federal NPDES requirements, all projects disturbing over one acre of ground, with the potential to discharge to the MS4 or Waters of the U.S. 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, in conjunction with federal NPDES requirements, all projects disturbing over one acre of ground, with the potential to discharge to the MS4 or Waters of the U.S. 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 1/4 acre or more of ground must implement BMPs for erosion and sediment control and all stormwater generated as a result of construction must be retained on site.

#### ITD

NPDES permits are required for ITD projects disturbing more than one acre and which have the potential to drain to Waters of the US., as per state and federal regulations. ITD includes the EPA Construction General Permit in all construction contract documents for projects that require NPDES permits. The NPDES permits require the Contractor to develop and implement of Stormwater Pollution Prevention Plans (SWPPPs) for the duration of the project. Erosion and Sediment Control Plans are specified by state contract requirements for projects that do not trigger NPDES requirements. Both SWPPPs and ESCPs include spill prevention and good housekeeping BMPs as well as erosion and sediment control BMPs.

## Post-Construction Stormwater 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 stormwater 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 stormwater 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 stormwater 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.



## 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 stormwater 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.*

#### **Program Implementation**

Since 2011 the Co-permittees have implemented and enforced a program to address post-construction runoff from new development and redevelopment projects that disturb over 5,000 sf. The program requires the treatment and detention of stormwater from pollutant generating impervious surfaces. The ordinances, manual and training associated with this program are described below.

### 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 stormwater ordinance, which requires new development to comply with the regulations outlined in the Portneuf Valley Stormwater Quality Design Manual, which outlines water quality treatment requirements for stormwater. (A copy of the ordinance was provided in the 2010 Annual Report).

#### City of Chubbuck

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

In February 2011 the City of Chubbuck adopted a post-construction stormwater ordinance, which requires new development to comply with the regulations outlined in the Portneuf Valley Stormwater Quality Design Manual, which outlines water quality treatment requirements for stormwater. (A copy of the ordinance was provided in the 2011 Annual Report).

### 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 stormwater 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.*

#### **Design Manual**

Post-construction stormwater requirements were updated in Pocatello and Chubbuck in 2015 with the adoption of The Portneuf Valley Stormwater Design Manual.

<http://www.pocatello.us/DocumentCenter/View/550>

### Septic System Design and Construction

This is regulated by the Southeast Idaho Health District. The cities of Pocatello and Chubbuck do not permit new septic systems for parcels within 300 feet of a sewer line. 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 two 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**

The Portneuf Valley Stormwater Quality Design Manual contains a section outlining maintenance criteria for post-construction BMPs, including the submittal of an O&M plan by developers.

### 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.*

#### **Design Manual Training and Certification**

During the 2011 permit year a training session was provided for local developers and engineers.

Additionally those who are interested receive one-on-one training with co-permittee staff regarding stormwater 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 stormwater 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 stormwater management and xeric landscaping by developers and homeowners, the City of Pocatello has been implementing demonstration projects, and partnering with ISU on evaluating the performance of selected facilities. This includes:

- **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 stormwater and improve the aesthetics of an area.
- **Sacajawea Park Wetland** This project demonstrates the effectiveness of an ‘end of pipe’ treatment for stormwater using a large retention facility.
  - In 2009 City staff enlarged this facility to accommodate the greater than expected volume of stormwater reaching the facility. This enlargement (which increased the capacity of the facility by 200%) should prevent stormwater from reaching the river except during exceptionally large storms. In 2011 City staff began collecting data (using automatic samplers) on the quality of the stormwater entering this facility, and measured the amount of new sediment deposited within the facility.
  - In 2011 City staff collected data on various constituents within the wetland soils.

- In 2017-2018 ISU researchers collected and analyzed data on Sacajawea Park wetland's ability to trap nutrients.
- **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 stormwater used to run off the parking area and into the City's MS4 system, the new facility retains all stormwater onsite, using an infiltration gallery under the parking lot.
- **1<sup>st</sup> Street Wetland**
  - In 2017-2018 ISU researchers collected and analyzed data on the 1<sup>st</sup> Street Wetland's ability to trap nutrients.
- **MLK Stormwater Planters** In 2010, City staff began planning work for a new demonstration project in the vicinity of Idaho State University (MLK Project). Stormwater infiltration planters were installed along MLK Ave to improve safety, aesthetics and stormwater infiltration in the area. This project was constructed in 2015.
- **Edson Fichter Nature Area** In 2015 City staff replaced and enlarged the parking lot for this Fishing Pond/Nature Area/Soccer Complex. The new stormwater features installed with this parking lot included a demonstration stormwater bio-infiltration swale.
- **N. Main Extension Stormwater Treatment** In 2015 City staff installed a series of check dams to slow down water sheet flowing off of a City street, into a swale and directly to the Portneuf.

#### City of Chubbuck

##### **Demonstration Projects**

In order to facilitate the implementation of innovative stormwater management and xeric landscaping by developers and homeowners, the City of Chubbuck has been implementing demonstration projects. This includes:

- **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.

#### ITD

##### **Demonstration Projects**

During the 2016 permit year ITD completed a new demonstration retrofit project:

- **Yellowstone Ave. / US-91 Business Loop.** In 2016 ITD repaved this section of State Highway through Pocatello. As part of the road reconstruction, ITD has installed stormwater quality BMPs including dry wells and oil & grease and sediment trap components within the MS4 system to treat stormwater prior to discharge to groundwater.

## 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 stormwater related water quality impacts, including: grounds/park and open space maintenance operations; fleet maintenance and vehicle washing operations; building maintenance; stormwater 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.

## 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 stormwater related water quality impacts, including: grounds/park and open space maintenance operations; fleet maintenance and vehicle washing operations; building maintenance; stormwater 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. All small pickups which are used to transport weeds, leaves and debris from various parks have the green public size trash containers with lids. 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 minimizes erosion much better than a weedy lot or a lot with poorly established turf.

##### **Building Maintenance**

Best management practices are implemented across all departments 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 sanitary sewer system as required by the Water Pollution Control pre-treatment program.

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 stormwater retention wetlands on S. 1st 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 pumped waste is 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 Parks Department, chemicals are stored in an approved indoor area of their shop. This area has proper markings and spill retention devices in place. Paints are stored in a fire proof cabinet. Latex paint cans are air dried when emptied and disposed of in the 3-cubic yard container. Any excess oil based paint and thinner is taken to the Hazardous Waste collection events at the Bannock County Landfill.

In 2016 the City of Pocatello replaced the salt shed's waterproof cover.

### **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.

### **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 2012 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 2017-2018 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**

2012: 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**

Oil recycled from City equipment is 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.

**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 2012 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**

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. ITD is considered by DEQ to be 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**

In 2009 ITD implemented operational practices to reduce the amount of anti-skid sand spread on roads for winter maintenance. ITD had previously used anti-skid mixed with salt at a ratio of 8 parts anti-skid to 2 parts salt. The salt was an addition to the anti-skid pile that kept it from freezing in the winter and useable. The operational change eliminated the anti-skid and went to all salt in lieu of the historical anti-skid mixed with salt for winter maintenance. This operational change did not increase the amount of salt applied during winter maintenance activities. The use of salt brine has also been implemented as a pretreatment prior to a winter storm event or use during the storm. Anti-skid material is kept on hand in the event temperatures fall below 15 degrees Fahrenheit, the bottom range of salt effectiveness and usage. Anti-skid would then be applied to provide traction on an ice surface.

**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. During 2018 the City continued to evaluate the effectiveness of its street cleaning operations, altering the frequency and route of the street sweepers to improve the effectiveness of 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.

YEAR	TONS applied	TONS swept	YEAR	YARDS applied	YARDS swept
2009	4234	4995	2011	2530	3822
2010	3960	4512	2012	1580	2466
2013	2600	3300	2014	1731	2573
2018	3049	3385	2015	1344	2859
			2016	2757	4428
			2017	4523	5142

**Street Sanding/Salting**

In 2011 the City implemented a new salt/sand snow management program, using salt brine to significantly reduce the amount of sand/salt applied to City streets, while also saving the City money and making roads safer. In 2018, the City purchased a new salt brine maker to improve efficiency and product control.

**Catch Basin Cleaning**

During 2018, 123 catch basins and 0 drywells were evaluated and cleaned. Additionally, a total of 11,085 catch basins inlets were cleaned (many inlets were cleaned multiple times), and 3.716 miles of pipe were jetted and cleaned. Overall, the City removed 36 yards of material from catch basins and stormwater pipes in 2018.

City of Chubbuck

During 2018 the City continued to evaluate the effectiveness of its street cleaning operations, altering the frequency and route of the street sweepers to improve the effectiveness of operations. 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.

**Street Cleaning**

- 2010: The City spent 425 hours on street sweeping.
- 2011: The City spent 278 hours on street sweeping.
- 2012: The City spent 355 hours on street sweeping.
- 2013: The City spent 383 hours on street sweeping.
- 2014: 30 tons applied; ~46 tons swept up (264 hours)
- 2015: The City spent 650 hours on street sweeping.
- 2016: The City of Chubbuck spent 680 hours on street sweeping, 125 hours cleaning drywells and improved 1 storm water collection facility.
- 2017: The City of Chubbuck spent 505 hours sweeping streets.
- 2018: The City of Chubbuck spent 354 hours sweeping streets.

**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.
- 2011: The City spent 150 hours on catch basin and dry well cleaning. One mile (90% of the system) of main pipe was cleaned.
- 2012: The City spent approximately 50 hours cleaning catch basins and dry wells, and approximately 30 hours cleaning drain piping and swales.
- 2013: The City spent 30 hours cleaning drywells and catch basins, and 16 hours cleaning out drain lines. Additionally, the City rebuilt the large Cole Street drywell to a higher standard and installed end of discharge bubble ups on two drain lines, to stop the erosion occurring around them.
- 2014: The City spent 62 hours cleaning drywells, catchbasins and drain lines. Additionally the City rebuilt four drywells to current standards and installed one new drywell system.

- 2015: The City spent 40 hours cleaning drywells and drain lines. Additionally, the City rebuilt and/or improved four stormwater collectors up to present standards, improved one stormwater drainfield, and improved one stormwater collection and treatment system.
- 2016: The City of Chubbuck spent 125 hours cleaning drywells and improved 1 storm water collection facility. Additionally, we installed 38 new collection and treatment structures to control surface water runoff in our Stuart Additions roadway reconstruction project.
- 2017: The City of Chubbuck spent 48 hours cleaning drywells and catch basins. The City also installed one new drywell and retention pond in the city yard. In addition, the City installed 8 new collection and treatment structures to control surface water runoff in our Country Acres roadway reconstruction project.
- 2018: The City of Chubbuck spent 40 hours cleaning drywells and catch basins. The City also installed 22 new collection and treatment structures to control surface water runoff in the Country Acres roadway reconstruction project.

### 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.
- In 2012, the County spent 699 hours sweeping county roads.
- In 2013, the County spent 993 hours sweeping county roads.
- In 2014, the County spent 922 hours sweeping county roads.
- In 2015, the County spent 679 hours sweeping county roads.
- In 2016, the County spent 764 hours sweeping county roads.
- In 2017, the County spent 1021 hours sweeping county roads.
- In 2018, the County spent 967 hours sweeping county roads.

### ITD

Street sweeping occurs in the spring of each year either on I-15/US-91 and US-30 business loops with a pick-up broom or side-cast brooming, with water being applied prior to 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** This is described in detail within Illicit Discharge Detection Program (IDDP) Part IIB3a

#### **Other Staff Training**

Individual departments periodically trained their staff on stormwater BMPs during their regular monthly safety meetings. This includes everything from proper use and disposal of chemicals to yard maintenance activities. Additionally, Street Department staff are trained on levee and stormwater maintenance periodically throughout the year. These trainings are on protecting the environment and ensuring worker safety while working in adverse and uneven surface conditions.

City of Chubbuck

**ESC Training** This is described in detail within Illicit Discharge Detection Program (IDDP) Part IIB3a

**Other Staff Training**

Individual departments periodically train their staff in BMPs for stormwater during their regular monthly safety meetings. This includes training on illicit discharge (referenced in the Illicit Discharge section of this report), as well as spill prevention.

Bannock County

**ESC Training** This is described in detail within Illicit Discharge Detection Program (IDDP) Part IIB3a

**Other Staff Training**

Individual departments periodically train their staff in BMPs for stormwater during their regular monthly safety meetings. This includes training on illicit discharge (referenced in the Illicit Discharge section of this report), as well as spill prevention.

Idaho Transportation Department

**ESC Training** This is described in detail within Illicit Discharge Detection Program (IDDP) Part IIB3a

**Other Staff Training**

This is described in detail within Illicit Discharge Detection Program (IDDP) Part IIB3a

**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.

## Monitoring, Recordkeeping and Reporting Requirements Part IV.A, B, & C

### Permit Requirements

Stormwater Discharge Monitoring Report. Not later than two years from the effective date of this permit, and annually thereafter, all available stormwater discharge monitoring data must be submitted as part of the Annual Report. At a minimum, this Stormwater 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 stormwater 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 stormwater 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 (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

### Stormwater Discharge Monitoring

In general, trend lines indicate that the constituents of concern vary significantly in amounts from year to year and at each of the outfalls. It is difficult to extrapolate much from the data given the number and range of uncontrolled variables (e.g. size of storm event during sampling, when sampling occurred during the storm event, frequency and size of previous storm events, sampling season, frequency and location of road material application and/or sweeping prior to storm event, etc) (*see Appendix 1*).

### Portneuf River Monitoring

Water quality monitoring through the use of the Portneuf Monitoring Coalition sondes was continued in 2018, as was the monthly water quality sampling on the Portneuf River sites (*see Appendix 2*).

### Quality Assurance Project Plan

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

### Stormwater Master Plan

The City of Pocatello is updating its stormwater masterplan. During 2018 work continued on modeling the MS4's stormwater system using InfoSWMM. 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.

### 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.

## Relevant Appendices

### Appendix 1: Stormwater Discharge Monitoring Report

### Appendix 2: Portneuf River Monitoring Report