



# ANNUAL REPORT

December 2011 to December 2012



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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**Appendix 3: Mass media advertising and posters for stormwater outreach.**

**Appendix 4: Training Reports.**

**Appendix 5: Completed stormwater maps.**

**Appendix 6: Industrial Inventory.**

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**Appendix 8: Portneuf River report.**

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

## Introduction

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

This report presents and documents the actions required by the permit and taken by the Co-permittees for the Year 6 reporting period (December 15, 2011– December 15, 2012). 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 2011-2012 Annual Pocatello Urbanized Area NPDES MS4 Annual Report is presented in two formats. This text document comprises the majority of the report and discusses each of the required reporting elements for the permit. In addition to the written materials presented in this format, several electronic attachments are included. These electronic attachments are referenced in the text and are attached within CDs.

## General Requirements

### Cooperative Agreement

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

### Stormwater Management Program Review

The PUA’s Stormwater Management Program (SWMP) review for the reporting year 2011-2012 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)*



## Education, Outreach, and Public Involvement Overview

During 2012, the Co-permittees made significant progress towards meeting our goal of implementing and improving the effectiveness of our Stormwater Education Program (SWEP). We disseminated informational materials using a variety of media, including TV, newspapers, flyers, posters, our website [http://www.pocatello.us/se/se\\_stormwater.htm](http://www.pocatello.us/se/se_stormwater.htm), a speaker's bureau, lesson plans, and workshops with K-12 teachers.

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

### Highlights 2012

#### Activities (Campaigns)

- Continued the Stormwater Awareness Campaign with a new brochure distributed.
- Continued the Dog Waste Campaign with new postcard distributed.
- Continued the Household Hazardous Waste & Trash Management Campaign.
- Continued the Covered Loads Campaign.
- Continued the Yard Debris Campaign with new material.

#### Participation

- Exhibits at (and sponsorship of) community environmental events with over 7,000 attendees.
- Website had over 400 unique visitors.
- 2,407 3<sup>rd</sup> grade and 8<sup>th</sup> grade students, and 364 adults participated in Water Week 2012.

### 2013 Plans

**Expand and improve campaigns.**

### Relevant Appendices

**Appendix 1: Pictures from stormwater outreach activities.**

**Appendix 2: Stormwater news coverage.**

**Appendix 3: Stormwater outreach mass media and posters.**

## Logic Model 2012

**Situation:** City stormwater pipes run brown with sediment, nutrients and oil & grease. The Portneuf River is 303d listed for these contaminants. The City’s NPDES permit requires implementation of an education and outreach program to reduce these contaminants.

Inputs	Outputs - Deliverables		Outcomes -- Impact		
	Activities	Participation	Awareness	Behavior	Condition
<p><b>Staff</b> Program management</p> <p><b>Money</b></p> <p><b>Expertise</b> Ad/Flyer design Outreach Program evaluation</p> <p><b>Partners</b> K-16 schools Local and State government Agencies Local non-profits Local businesses</p>	<p><b>General Awareness Campaign</b></p> <p><b>Dog Waste Campaign</b></p> <p><b>Household Hazardous Waste Campaign</b></p> <p><b>Yard Debris Campaign</b></p> <p><b>Covered Loads Campaign</b></p> <p><b>City Creek Campaign</b></p>	<p><b>Mass Media &amp; Signage</b> Most City residents reached.</p> <p><b>Programs</b> 2000 K-12 students reached. Over 200 adults (teachers, parents, mentors) reached.</p> <p><b>Exhibits and Events</b> Over 10,000 attendees</p> <p><b>Website</b> Over 400 unique visitors</p>	<p><b>Stormwater</b> Increased awareness of the connection between City streets and the Portneuf River.</p> <p>Increased awareness of local threats to water quality, including bacteria, nutrients, hazardous waste, sediment, and oil &amp; grease.</p> <p>Increased awareness of the impacts of erosion on water quality.</p> <p><b>Community Standards</b> Increased number of people report that it is wrong to place anything except water onto City streets or trails.</p>	<p><b>Community Standards</b> Fewer reports of residents depositing anything except water into City streets or trails.</p> <p>Increased number of people report that they are landscaping to control erosion and runoff.</p>	<p><b>Stormwater</b> Decrease in amount of sediment, nutrients, <i>E. coli</i>, and oil &amp; grease in City stormwater.</p>

**Logic Model Assumptions**

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

## General Stormwater Awareness Campaign

### Campaign Activities & Participation

Community Event Participation & Sponsorship The Co-permittees had stormwater focused booths at multiple events during 2012:

- **Portneuf Valley Environmental Fair** 7000 attendees.  
One 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.
- **Idaho Environmental Education Association Annual Conference** 120 attendees.
- **Water Week** (see details under K-12 partnerships) 2771 attendees.

### Mass Media and Signage

Our efforts to improve the quality of stormwater in the area received significant media coverage during the 2012 permit year. City and County staff reached out to the public through a variety of media.

- **Coverage in local TV and newspaper news stories.** All three local TV news stations and the local newspaper covered stormwater issues in 2012, which generated several dozen TV newspaper stories (see *Appendix 2* for news coverage of stormwater issues).
- **TV ad production.** TV ads that were produced in previous years were rerun in 2012. This includes one ad encouraging residents to bike to work/school and two ads focused on preventing illicit discharge by residents (e.g. tossing grass clippings into the street).
- **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 2012. Topics included the stormwater survey, yard debris, and household hazardous waste management (see *Appendix 3*).
- **Posters and Flyers.** The 2009 and 2011 Annual Reports included copies of flyers and posters 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 2012, the Co-permittees continued their work on a series of comic strips and created yard waste and dog waste postcards (see *Appendix 3*).
- **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.
- **Stormwater Website.** During 2012 the Co-permittees' stormwater website was overhauled to make it more user friendly for all users, including residents, contractors/developers, K-12 teachers and students, business owners, and Co-permittee staff. The website is available at: [http://www.pocatello.us/se/se\\_stormwater.htm](http://www.pocatello.us/se/se_stormwater.htm) and
  - Provides information about stormwater and what homeowners, contractors, and businesses can do/are required to do to improve the quality of stormwater.

- Includes stormwater-related information and links targeted at K-12 students.
- Contains links to all Annual Reports and available SWMP documentation.
- Had over 400 unique visitors during the 2012 permit year.

#### Speaker's Bureau

- **Community Groups.** Co-permittees and their partners are available to speak to the public on a variety of topics, free of charge. This includes stormwater, water conservation, recycling, hazardous waste and trash management, energy efficiency, renewable energy development in the City, and other topics. During 2012, the Co-permittees spoke on the following topics:
  - **Water Quality:** Science Café. February 1, 2012.
  - **Water Quality and Environmental Management:** Pi Alpha Alpha Induction Ceremony. April 29, 2012
- **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:
  - No formal talks were given in 2012, however Co-permittees shared 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.** City staff partnered with staff from the Portneuf Watershed Partnership and ISU to support teachers using the watershed as a site for learning during 2012. This collaboration grew out of workshops held in 2009. During 2012 Co-permittees partnered with Project WET and Project Learning Tree to offer two teacher workshops focused on supporting teachers who wanted to engage their students in studying stormwater and other local water issues. Over 15 area teachers participated in these multi-day workshops.
- **Water Week.** The 2012 Water Week involved 2407 3<sup>rd</sup> grade and 8<sup>th</sup> grade students and 364 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).

#### River Cleanups

The Co-permittees, in collaboration with several local organizations, have been hosting or sponsoring community river cleanup activities since the 1990s.

- **2012 Portneuf River Cleanup.** In September 2012, the Co-permittees partnered with the Portneuf Watershed Partnership, Valley Pride and the ISU Stream Ecology Lab to sponsor a river channel cleanup. Over 30 volunteers spread out along the Portneuf River removing over dozens of cubic yards of material from the river. Most of this debris was collected from just downstream of the concrete channelized portion of the river. Co-permittees plan to continue supporting and leading these community wide efforts to improve the health of the Portneuf River through regular cleanup activities.
- **Roosevelt Academy Cleanup.** A second River Cleanup took place in October 2012, sponsored by the Co-permittees and the Roosevelt Academy (a local K-8 Charter School). Six students from the Academy participated in this cleanup.

#### Storm Drain Stenciling

The Co-permittees have conducted a Storm Drain Stenciling program since 2007. This program encourages local businesses, scout groups, neighborhood groups, and others to get involved in protecting our local water quality by affixing “Dump No Waste – Drains to River/Groundwater” markers to area stormdrains. Chubbuck and Pocatello continue to mark additional storm drains with appropriate labels each year. Several hundred storm drains have been marked since the program started.

#### Municipal Government Elected Official Outreach

The Co-permittees have held joint City-County meetings almost every year of the permit to discuss the area’s stormwater program and collect public comment. During 2012 elected officials were briefed individually by staff in lieu of a joint City- County meeting.

#### 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 2012 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).

#### Sediment in the Street

The cities of Pocatello and Chubbuck have aggressive street cleaning operations. These are described 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.

## Dog Waste Campaign

### Activities & Participation

#### Mutt Mitt Stations

Pocatello City staff continued the social marketing campaign, the “*Mutt Mitt Campaign*,” encouraging residents to pick up after their dog(s). During 2012, the City of Pocatello continued its upkeep and maintenance of approximately 45 Mutt Mitt dispensers, placards, and collection containers dispersed throughout the city, adding one more dispenser at the City’s new dog park. Additionally, a new dog waste postcard was printed and distributed at local public events and municipal offices. Chubbuck installed two Mutt Mitt dispensers in 2012, and continued to maintain its existing dispensers and collection containers.

#### Mass Media

In 2012 the local media continued to publish stories about dog waste, particularly up City Creek (see *Appendix 2* for media coverage).

### Program Outcomes

Based on observations by Parks & Recreation staff and comments from residents, Co-permittees have realized a decrease in uncollected dog waste at parks and trailheads once Mutt Mitt Stations are installed.

### Next Steps

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

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

## Household Hazardous Waste Campaign

### Activities & Participation

#### Household Hazardous Waste Collection Incentives

- **Free Household Hazardous Waste Days** Bannock County Landfill manages the collection of household hazardous waste, which occurs the first Saturday of the month, April through October (FREE to county residents) at the landfill. The County accepts household electronic waste at the landfill.
- **Other Free Hazardous Waste Collection** The City of Pocatello accepts a variety of household electronic waste at its Sanitation Department (free).
- **Household Cooking Oil Recycling: Cease the Holiday Grease** The City of Pocatello promotes recycling of waste cooking oils through a partnership with Golden K Recycling (a waste cooking oil recycler). Oil recycling barrels are placed at three locations throughout the City from Thanksgiving through New Year's Day.

#### Mass Media

- **Free Household Hazardous Waste Days** Information about this program is posted on the City and County's websites. Additionally, the County uses billboards to publicize this information. During 2012, the program was advertised through one billboard in the County for six months, advertising board on the side of a Pocatello Transit bus for six months, one ad in "Inside Pocatello," 122 TV PSAs on Channels 6 & 8, and 292 radio ads on Star 98.5 and KZBQ (copies of these ads were provided in the 2011 Annual Report).

#### Websites

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

#### K-12 Partnerships & Speaker's Bureau

Annually the Bannock County Landfill staff presents to a variety of community groups and K-12 students on topics related to the operation of the Bannock County Sanitary Landfill, including household hazardous waste days, groundwater and landfill operations, and recycling to reduce materials in the landfill. *During 2012, they reached over 3500 community members, primarily children.*



## Program Outcomes

### Household Hazardous Waste Collected (gallons)

	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
<b>Organics</b>	55	0	0	0	0
<b>Used oil</b>	2,235	2,350	2276	2275	2245
<b>Antifreeze</b>	1736	725	455	527	488
<b>Flammable liquids</b>	880	615	753	965	1245
<b>Flammable sludge</b>	1595	1,008	925	1085`	840
<b>Pesticides/aerosols</b>	165 gal +1 box	5 totes	1 tote	7 totes	5 totes

In addition to the items listed above, Bannock County also safely disposed of 1,600 pounds of pesticides/herbicides through the Idaho State Department of Agriculture Pesticide Disposal Program. All of these products were then incinerated or otherwise destroyed at no cost to Bannock County.

Co-permittees have not collected enough data to define the effect of these campaigns on stormwater awareness or behavior during the 2013 permit year.

## Next Steps

Co-permittees plan to continue this successful program.

## Yard Debris Campaign

### **Activities & Participation**

#### Mass Media

- City staff discussed this campaign in news stories on TV, in the newspaper, and in newsletters (see Appendix 2).
- A yard debris post card was created and distributed (*see Appendix 3*).

#### Business Outreach

- No specific business outreach was conducted in 2012.

#### One on One Education

- Postcards with information about the campaign that were handed to violators (pre-enforcement).

### **Program Outcomes**

Co-permittees have not collected enough data to define the effect of these campaigns on stormwater awareness or behavior during the 2012 permit year.

### **Next Steps**

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

## Covered Loads Campaign

### **Activities & Participation**

#### Mass Media

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

#### Business Outreach

- No specific business outreach was conducted in 2012.

#### One on One Education

- City staff printed postcards with information about the campaign that were handed to violators (pre-enforcement).

### **Program Outcomes**

Co-permittees have not collected enough data to define the effect of these campaigns on stormwater awareness or behavior during the 2012 permit year.

### **Next Steps**

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

## Erosion and Runoff Campaign for Homeowners

### Activities & Participation

#### Mass Media

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

#### One on One Education

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

### Program Outcomes

Co-permittees have not collected enough data to define the effect of these campaigns on stormwater awareness or behavior during the 2012 permit year.

### Next Steps

The Co-permittees plan to expand this program with additional PSAs in coming years.

## City Creek Campaign

### Activities & Participation

Mutt Mitt Stations See Dog Waste Campaign above.

#### User Outreach & Participation

- **Grant Collaboration.** City staff partnered with user groups and Idaho State University to write a second grant to support trail restoration and monitoring projects (funded).
- **User Group Involvement.** City staff worked with user groups (primarily bicyclists and ORV users) on implementing trail and riparian restoration projects.
- **City Creek road maintenance.** City staff continued ongoing efforts to maintain the City Creek road for erosion and sediment control.

#### Mass Media

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

### Program Outcomes

Co-permittees have not collected enough data to define the effect of this campaign on stormwater awareness or behavior during the 2012 permit year.

### Next Steps

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

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

### Permit Requirements

- a) Illicit Discharge Detection Program No later than two years from the effective date of this permit, the Co-permittees must develop and implement a program to detect and eliminate illicit discharges into their MS4s. The program must include procedures for detection, identification of sources, and removal of non-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 copermittees' MS4 or to waters of the United States within the Pocatello Urbanized Area. The types of industrial facilities that must be inventoried are set forth in 40 CFR §122.26(b)(14)(i) through (xi). This inventory must include the location of the facility, the location of its outfall and corresponding receiving water, and the NPDES permit status for its stormwater discharge.

## Overview

During 2012, the Co-permittees made significant progress towards meeting our goal of eliminating illicit discharges into the MS4.

In particular, mapping of the known storm sewer system is now complete, although work continues to refine the mapping. Additionally, the Co-permittees continued to implement programs for 1) Dry Weather Field Screening and 2) Inventorying Industrial Facilities

During 2013, the Co-permittees will continue to inspect and monitor the storm sewer system and map system additions.

### Highlights 2012

#### **Stormwater Hotline Dissemination.**

#### **Storm Sewer Map – Completed.**

- 77.7 miles of storm sewer pipe mapped.
- 93 outfalls mapped.
- 92 dry wells mapped.

#### **CCTV – 36.46 miles completed.**

### 2013 Plans

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

### Relevant Appendices

**Appendix 4: Training Reports.**

**Appendix 5: Storm Sewer Maps.**

**Appendix 6: Industrial Inventory.**



## 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 2012 the following staff received training:

- City of Pocatello *Illicit Discharge Detection and Elimination training focused on spill response and discharges from buildings to the MS4/waters of the US.*
  - **Storm Watch and Illicit Discharge.** August 23, 2012 or October 22- 26, 2012. *Attendees:* 47 Street Department, Development Engineering, Engineering, and Science and Environment staff members: (see *Appendix 4* for sign-in sheets).
- City of Pocatello *Erosion and Sediment Control inspection and enforcement training.*
  - **ESC Certification Class.** February 14 or February 29<sup>th</sup> 8:30 a.m. – 12: 30 p.m. *Attendees:* All 9 Science and Environment, Building and Development Engineering staff members (see *Appendix 4* for sign-in sheets).
  - **ESC Inspection, Enforcement, and Tracking.** September 19<sup>th</sup>, 2012. *Attendees:* All Building Department staff members (see *Appendix 4* for sign-in sheets). Included follow-up one on one training in the field from September – November.
  - **ESC Inspection, Enforcement, and Tracking.** Monthly meetings. *Attendees:* All Development Engineering and Science & Environment staff members (see *Appendix 4* for sign-in sheets). Included follow-up one on one training in the field.
- Bannock County: *Illicit Discharge Detection and Elimination training focused on spill response and discharges from buildings to the MS4/waters of the US.*
  - **Storm Watch and Illicit Discharge.** August 23, 2012. *Attendees:* 62 Public Works staff members (see *Appendix 4* for sign-in sheets).
- Bannock County: *Erosion and Sediment Control inspection and enforcement training.*
  - **ESC Certification Class.** February 29<sup>th</sup> 8:30 a.m. – 12: 30 p.m. *Attendees:* Three Building, Planning and Engineering Department staff members (see *Appendix 4* for sign-in sheets).
  - **ESC Inspection, Enforcement, and Tracking: One on one training,** November 15 2012. *Attendees:* Two Building Department staff members (see *Appendix 4* for sign-in sheets).

- **US EPA Workshop 2012 Construction General Permit.** November 15, 2012. *Attendees:* Two Engineering and Building Department staff members (see *Appendix 4* for sign-in sheets).
- **Chubbuck:** *Illicit Discharge Detection and Elimination training focused on spill response and discharges from buildings to the MS4/waters of the US.*
  - **Storm Watch and Illicit Discharge.** October 25/November 8/November 13/November 14, 2012. *Attendees:* 29 Public Works staff members (see *Appendix 4* for sign-in sheets).
- **Chubbuck:** *Erosion and Sediment Control inspection and enforcement training.*
  - **ESC Certification Class.** February 29<sup>th</sup> 8:30 a.m. – 12: 30 p.m. *Attendees:* Three Building Department staff members (see *Appendix 4* for sign-in sheets).
  - **ESC Inspection, Enforcement, and Tracking,** November 9, 2012. *Attendees:* Two Building Department staff members (see *Appendix 4* for sign-in sheets).
- **ITD:** *Illicit Discharge Detection and Elimination training focused on spill response and discharges from buildings to the MS4/waters of the US.*
  - **Storm Watch and Illicit Discharge.** November 13, 2012. *Attendees:* 9 Environmental and Maintenance Department staff members (see *Appendix 4* for sign-in sheets).
- **ITD:** *Erosion and Sediment Control inspection and enforcement training.*
  - **NPDES Stormwater for Inspectors Refresher** This course is intended as a refresher to update and maintain the NPDES / Storm-water inspector qualification status as required by the EPA Construction General Permit. Upon completion of this course the participant will be able to:
    - Effectively use the Erosion and Sediment Control Manual and Other ITD Manuals for information concerning erosion and sediment control;
    - Use ITD flow charts to determine if a NPDES and a SWPPP permit are necessary;
    - Select the proper Best Management Practices (BMP) technique to fit the project needs;
    - Recognize BMPs used for Construction Site Management;
    - Recognize BMPs used for Temporary measures;
    - Recognize BMPs used for Permanent measures;
    - Recognize Specifications used for Seedbed Preparation and Seeding;
    - Develop and document an effective Storm Water Pollution Prevention
  - **NPDES Stormwater for Inspectors Refresher.** October 10, 2012. *Attendees:* 26 Environmental, Construction and Maintenance Department staff members (see *Appendix 4* for sign-in sheets)

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 supplements other heavily used avenues (e.g. web and newsletter comment forms; direct communication with Co-permittee staff via email and direct lines) for commenting on stormwater issues.

### Ordinances Part IIB3b&c

*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

The City of Pocatello enacted an illicit discharge ordinance prohibiting non-stormwater discharges into the MS4 in 2008. The City of Chubbuck and Bannock County enacted 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

Over 2,245 gallons of waste oil were received at the Bannock County Landfill Household Hazardous Waste program during 2012. This amount was in addition to municipal departmental waste oil which is collected and subsequently burned in City of Pocatello and City of Chubbuck shops and 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 2012.

### 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 (see

*Appendix 6 for the most updated version of the MS4 map). During 2012 5.03 miles of storm pipe, 60 catch basins, 3 dry wells, 2 head gates and 1 outfall to the river were added to the storm sewer map.*

### **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 2012, 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. 36.46 miles (50% of the system) have been screened as of December 1, 2012. No illicit connections were discovered.

### **Industrial Facilities. Part IIB3f**

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

### **Industrial Facility Inspections**

The Co-permittees have created a spreadsheet that lists the 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 of this spreadsheet is provided in *Appendix 6*).

Facilities were identified for inclusion on the list using a combination of local knowledge and records on local industrial facilities from the City's pre-treatment program for sanitary waste water. This spreadsheet includes each facility's address, SIC code, known or likely location of its outfall to the MS4 system, and 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, or 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.

## Overview

During 2012, the Co-permittees continued to implement a multi-faceted Erosion and Sediment Control program for contractors and developers.

During 2013, we plan to continue to improve this program through targeted outreach and enforcement mechanisms.

### Highlights 2012

#### Erosion and Sediment Control Program Improved

- ESC Training and Certification (159 private contractors).
- ESC Inspections and Enforcement improved.
- Improved process for inspections and enforcement.
- 2012 Construction General Permit training (three private contractors).

### 2013 Plans

#### Erosion and Sediment Control Program Improved

- Continue to improve Training and Certification.
- Continue to improve process for Inspections and Enforcement.



## 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 common plan of development larger than one acre.

#### 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 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 common plan of development larger than one acre.

### 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 common plan of development larger than one acre.

#### **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 both the EPA's *Developing Your SWPPP: A Guide for Construction Sites and 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 2012, 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 2012 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 Co-permittee 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 City passed in 2009 (a copy of the ESC ordinance was included in the 2009 Annual Report). County staff inspect job sites periodically during the construction season. Additionally, violations are reported to County staff by the general public and Co-permittee staff. An excel database is used to log ESC inspections and enforcement.

ITD

ITD environmental inspectors must complete state certification training in stormwater management. ITD inspects ALL construction sites; frequency of inspections is established in ESC plans or SWPPs. Projects with NPDES permits are inspected every 7, 14 or 30 days, depending on sensitivity of the site and stage of construction activity. ITD has standard reporting procedures in place, including routine inspection reports, avoid verbal orders (warnings) and notice of potential violation protocols.

### Training *Part IIB4e*

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

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

During the 2012 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 2012, six ESC training sessions were held, and 159 private contractors received their ESC certification cards. For most of these contractors this was the second 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. During 2013, the Co-permittees plan to continue to offer this certification program, coordinated through Idaho State University. Additionally, the Co-permittees plan to continue to educate local contractors about ESC through emails, posters, news coverage, and other media as appropriate.

During June 2012 the Co-permittees also held two training sessions on the 2012 Construction General Permit, based on a similar workshop held in Boise in May 2012. Three private contractors attended these sessions.

### 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

##### **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.

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 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.

**County ESC Permits**

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

ITD

ITD includes the Construction General Permit in all construction contract documents. ESC Plans are required for projects that do not trigger NPDES requirements, and NPDES permits are required for projects disturbing more than one acre, as per state and federal regulations. Both of these documents include spill prevention and good housekeeping BMPs as well as erosion and sediment control BMPs.

## Post-Construction 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.

## Overview

During 2012, the Co-permittees continued to implement programs to control post-construction stormwater.

An Operations and Maintenance Manual for private stormwater facilities (as required by the stormwater quality manual) was created and disseminated to local developers.

Plans for 2013 include providing training opportunities for local contractors and developers, implementing the post-construction ordinance, and BMP maintenance protocols for post-construction stormwater controls.

### Highlights 2012

**Revised BMP maintenance protocols and storm water manual.**

### 2013 Plans

**Continue to implement and revise post construction program**

## 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**

The Portneuf Valley Stormwater Quality Design Manual outlines water quality treatment requirements for stormwater. A copy was provided in the 2011 Annual Report. During the 2012 permit year, this manual was revised.



### 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.*

### 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 by the City of Pocatello 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.

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

- **Lander Street Permeable Paving** This project demonstrates the effectiveness of using gravel permeable paving to infiltrate water from parking lots into infiltration galleries.
- **Greenway Tree Plantings at Sacajawea Park** This project demonstrates the effectiveness of using local trees to infiltrate 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.

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

- **1<sup>st</sup> Street Parking Lot** A compacted earthen parking lot was converted to a paved parking lot by City staff in 2010. Whereas 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.
- **MLK Stormwater Planters** In 2010, City staff began planning work for a new demonstration project in the vicinity of Idaho State University (MLK Project). Current plans call for installing stormwater infiltration planters along MLK Street to improve safety, aesthetics and stormwater infiltration in the area. While this project is years away from construction, the design process will provide significant opportunities for educating City staff, Idaho State University staff and many others about Green Infrastructure/Low Impact Development.

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

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

During the 2012 permit year the City continued to work on implementing demonstration projects.

- **Complete Streets Policy Development** In 2012, the City received an EPA Building Blocks grant to develop a Complete Streets policy. The grant included one day of training and resulted in City staff receiving Council approval to move forward on developing a Complete Streets Design Manual. Eighteen City of Pocatello staff attended, as well as 20 additional participants from local Engineering, Landscape Architecture and government organizations, and five participants from the Boise area.

### 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.

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

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

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

### Permit Requirements

- a) Municipal Operations O&M Program Not later than four years from the effective date of this permit, the Co-permittees must develop and implement an operation and maintenance program intended to prevent or reduce pollutant runoff from municipal operations. This program must address municipal activities occurring within their jurisdiction with potential for negative 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.

## Good Housekeeping Overview

During 2012, the Co-permittees continued a number of programs to reduce pollution from municipal activities. In particular, Co-permittee staff received training in stormwater management and how to minimize polluted runoff from municipal operations. This training will be expanded during the 2013 permit year.

### Highlights 2012

**Municipal Training Program continued.**

### 2013 Plans

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

**Expand municipal training.**

**Continue to improve municipal operations protocols with respect to stormwater.**

### Relevant Appendices

**Appendix 4: Training Reports**

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

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

##### **Building Maintenance**

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 sewer system.

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

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

### **Used Oil Recycling**

At the City Sanitation and Street Departments, waste oil is collected and burned to heat the main shop. Oil filters are drained before being discarded. 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 handled. 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.

### **MS4 Maintenance**

*See next minimum measure for details.*

### **Snow Disposal**

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

### **Street Cleaning and Maintenance**

*See next minimum measure*

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

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

**Track-on Reduction**

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

City of Chubbuck**Parks Maintenance**

No action has been taken on this permit requirement during the 2011-2012 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**

Best management practices are implemented across all departments including proper storage and disposal of chemicals, use of ground cloths when painting, etc.

**Used Oil Recycling**

2012: 1000 gallons of recycled oil (from City equipment) burned for heating in the City shop. The fleet maintenance shop recycles all waste oil and burns it in a space heating furnace in another city building.

**Materials and Hazardous Materials Storage**

All materials are stored in areas that do not drain to the MS4 system. Paints and solvents are stored in fire proof storage lockers. Water based paints are utilized as much as possible. Only cleaning solvents/materials that are needed are kept on hand. The inventory is periodically reviewed. The Bannock County Household Hazardous Waste collections events are utilized for disposal. All paints, solvents, etc. that are collected from illegal dumping are similarly handled. 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 City 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 discharged.

**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 processed for disposal. Site drainage goes into an oil sand separator before being allowed to infiltrate 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**

Best management practices are implemented across all departments 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 began the installation of a tire wash at the Bannock County Landfill to eliminate the ongoing problem of track on of mud from the facility onto County roads.



ITD**Fleet Maintenance**

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

**Building Maintenance**

Best management practices are implemented across all departments including proper storage and disposal of chemicals, use of ground cloths when painting, etc.

**Snow Disposal**

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

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

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

City of Pocatello**Street Cleaning**

The streets are swept quarterly. Catch basin cleaning began in spring 2011. During 2012 the City continued to evaluate the effectiveness of its street cleaning operations. This resulted in altering the frequency and route of the street sweepers to improve the effectiveness of their operations. Since 2010 the spring street sweeping program has been coordinated with the hydrant flushing operation to better ensure that hydrants are flushed *after* streets are swept.

City staff have been documenting the amount of material deposited through salt/sand operations each winter, and the amount of material collected through sweeping operations each spring- fall. In the future, City staff plan to analyze the sediment collected through sweeping operations to better understand its likely source based on particle size.

- **2008:** 3300 tons applied; 4000 tons collected
- **2009:** 4234 tons applied; 4995 tons collected
- **2010:** 3960 tons applied; 4512 tons collected
- **2011:** 2530 yards applied; 3822 yards collected
- **2012:** 1580 yards applied; 2466 yards collected

**Street Sanding/Salting**

In 2010 the City implemented a new salt/sand snow management program. This program significantly reduced the amount of sand/salt applied to City streets, while also saving the City money and making

roads safer. The new program calls for use of a ‘pre-treatment’ salt/sugar beet brine solution as the primary snow management technique. The salt brine has reduced all sand/salt applications by 50%.

### **Catch Basin Cleaning**

During 2011 the Street Operations department implemented an MS4 maintenance program. Using GIS, they identified the stormwater catch basins and manhole covers that are not serviceable and have instituted a program to renovate them so that they can be inspected, serviced and CCTV’d using a remote camera. As of December 1, 2012, 36.46 miles of storm sewer pipe (50%) had been evaluated. Several lines that were identified in 2011 with a silt problem were targeted for extensive cleaning. During 2013 cleaning efforts will be focused on 15 of the 77 pipes identified for extensive cleaning. During 2012 263 catch basins were evaluated and cleaned.

### City of Chubbuck

#### **Street Cleaning**

2011: The City spent 425 hours on street cleaning.

2012: The City spent 278 hours on street cleaning.

2013: The City spent 355 hours on street cleaning.

#### **Catch Basin Cleaning**

2009: The City spent 44 hours marking catch basins and drywell inlets with the more visible and identifiable markers. City spent over 50 hours cleaning out and servicing catch basins and drywells. We improved drainage at Holly and Whitaker by installing cross drains on Whitaker.

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

### Bannock County

#### **Street Cleaning**

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

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

In 2012, the County spent 699 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 water being applied prior to side cast brooming operations to minimize dust.

**Training Part II.B.6c**

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

City of Pocatello

**ESC Training** All City staff who are responsible for erosion and sediment control on the job site must attend a four hour local ESC training every three years. This includes personnel from Streets, Water, Engineering, and Parks. Training is offered every year.

- ESC Certification Class. February 14 and February 29<sup>th</sup> 8:30 a.m. – 12: 30 p.m. Attendees: 28 Street, Public Works, Engineering, Planning, Building, Environmental, Development Engineering and Parks staff members (see *Appendix 4* for sign-in sheets).

**Other Staff Training**

Individual departments periodically trained their staff in BMPs for stormwater during their regular monthly safety meetings.

- Street Department staff are trained on levee and stormwater maintenance the first Tuesday of every month (12 trainings). These trainings are on protecting the environment and ensuring worker safety while working in adverse and uneven surface conditions. Some training is on the use of tools that require oil like chain saws and mowers around open water. One very effective training has been on how to work around storm drains and not deposit construction materials in the openings. Other trainings have been on how to properly seal off a storm drain during pavement management projects and how to identify an illicit discharge and what to do about it when you see it.

City of Chubbuck

**ESC Training** All City staff who are responsible for erosion and sediment control on the job site must attend a four hour local ESC training every three years. This includes personnel from Public Works and Engineering. Training is offered every year.

- ESC Certification Class. February 14 and February 29<sup>th</sup> 8:30 a.m – 12: 30 p.m. Attendees: 12 Public Works staff members. (see *Appendix 4* for sign-in sheets).

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** All County staff who are responsible for erosion and sediment control on the job site must attend a four hour local ESC training every three years. This includes personnel from Public Works. Training is offered every year.

- ESC Certification Class. February 14 and February 29<sup>th</sup> 8:30 a.m – 12: 30 p.m. Attendees: Seven Landfill, Engineering and Building Department staff members (see *Appendix 4* for sign-in sheets).

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

**Materials Management Training** These sessions provide participants an awareness of maintenance practices as well as new technologies and their implementation. Topics covered: wetlands, permits, BMP use in highway maintenance, cultural resources.

- Maintenance Academy Level II. July 17, 2012. Attendees: Two maintenance staff members (see *Appendix 4* for sign-in sheets).
- Maintenance Academy I. April 26, 2012. Attendees: Two maintenance staff members (see *Appendix 4* for sign-in sheets).

**Flood Management *Part II.B.6d***

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

City of Pocatello**Levee Management**

In accordance with Army Corps of Engineers regulations regarding the 6.2 mile earthen levee system that runs through the City (of which 1.5 miles is concrete channel), the City continues to work at maintaining the hydraulic and structural integrity of the levee system. During 2012 the City continued to work with a local engineering firm to modify the annual maintenance requirements (as well as modify the hydraulic requirements) in order to minimize the negative impacts of the levee system to local water quality. The existing requirements mandate removal of all vegetation over 2" in diameter and that ideally the vegetation be maintained at a height of 12". The new requirements (if they are approved by FEMA) provide an opportunity for the City to keep some larger vegetation on the levees and thus maintain some riparian habitat along the levees within the Portneuf River.

## 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

During the 2012 permit year, one stormwater discharge event was monitored in accordance with permit requirements. In general, trend lines indicate a reduction in the level of each of the constituents of concern, except for nutrients which went up in 2012 at several storm water outfall locations. 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 7* for Stormwater Discharge Monitoring Report).

### Portneuf River Monitoring

Water quality monitoring through the use of the Portneuf Monitoring Coalition sondes was continued in 2012, as was the monthly water quality sampling on the Portneuf River sites (see *Appendix 8* for Portneuf River Water Monitoring Report).

### Quality Assurance Project Plan

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

### Stormwater Master Plan

The City has begun revising its stormwater master plan. During 2012 work continued on modeling the 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. Consistency with the new “Portneuf Valley Stormwater Quality Design Manual” is a major goal of the revision process.

### BMP Implementation Plan

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

### Enforcement and Inspections

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

## Relevant Appendices

**Appendix 7: Stormwater Discharge Monitoring Report**

**Appendix 8: Portneuf River Monitoring Report**